

THE BPA FINANCIAL GROUP

PRIVACY CODE

FOR ALL BPA EMPLOYEES



JANUARY 1, 2010



The BPA Financial Group Privacy Code

The companies in the BPA Financial Group (“BPA”) are a Third Party Administrators specializing in the administration of Trusteed multi-employer benefit plans.

Purpose of the Policy

Respecting the confidentiality of personal information entrusted to us is a primary concern. Personal information belongs to the individual and he or she has control over the information and may access or change the information by contacting us in writing or by telephone. Personal information may only be used with the individuals consent unless required by law.

What is Personal Information?

- Individuals provide us with their Name, Social Insurance Number, Address, Telephone Number, Date of Birth, Marital Status and such health information as required to determine eligibility for benefits.
- Employers provide us with earnings and work history.

Who Collects this Personal Information?

- BPA collects Personal Information on behalf of the Board of Trustees.
- Any personal information entrusted to BPA will be kept in the strictest confidence and used only for the purposes intended.
- Members grant consent for the collection and use of personal information when they complete enrolment cards and claim forms.
- The Employer and Local Unions may also provide additional personal information to the Trust Fund.
- Personal Information may be provided via mail, e-mail, telephone, fax or other electronic media.

How is Personal Information Recorded?

- BPA maintains both paper and electronic files containing Personal Information.
- All paper files maintained by BPA are kept in locked filing cabinets and/or storage rooms.
- All electronic files containing personal information are maintained in “state of the art” mainframe and network computers, which are “password protected”.
- Internet access to BPA’s electronic files containing personal information is “firewall protected” and all data is “encrypted”.
- Access to BPA’s offices is restricted to authorized personnel during regular business hours.

Who has Access to Personal Information?

- BPA, as an Agent of the Board of Trustees, has access to personal information.
- The Trustees have access to such personal information as required to permit them to carry out their fiduciary duties.
- Access to personal information maintained by BPA is on a “need to know” basis.
- The staff of BPA only has access to the particular personal information needed to determine the benefit entitlements payable under the terms of the Plan.
- In order for BPA to authorize the payment of benefits from the Plan it may be necessary to share personal information with insurance carriers or trust companies that make the actual payments.
- Personal information is disclosed either in person, via telephone, fax, letter, or other electronic means.
- The information provided to these parties and to Trust Fund auditors or actuaries is also on a “need to know” basis.
- These insurance carriers, trust companies, auditors and actuaries must support the principles of PIPEDA.
- Should BPA use the expertise of an outside company to do work involving personal information we will select only those companies whose Privacy Code is comparable to our own.

How long is Personal Information Retained?

- Personal information is kept only as long as required to establish entitlement to benefits under the Trust Fund.
- Once personal information is no longer required paper files are shredded and electronic files are purged from our systems.

In this Policy “BPA” and “Company” mean any of the following BPA Financial Group companies: Benefit Plan Administrators Limited, Benefit Plan Administrators (Atlantic) Limited and BPA Consulting Group Limited.

Questions Regarding the BPA Financial Group Privacy Code

Our staff is trained to promptly address any questions or concerns from individuals regarding the use of personal information.

If an individual requires further clarification of our Privacy Code they may contact our Privacy Officer at the following addresses, as applicable:

In Ontario:

**Attention: Privacy Officer
Benefit Plan Administrators Limited
90 Burnhamthorpe Road West, Suite 300
Mississauga, Ontario
L5B 3C3
Telephone: (905) 275-6466
Fax: (905) 275-6462
E-Mail: lbartram@bpagroup.com**

Or

In Atlantic Canada:

**Attention: Privacy Officer
Benefit Plan Administrators (Atlantic) Limited
7001 Mumford Road, Suite 216
Halifax, Nova Scotia
B3L 4N9
Telephone: (902) 455-7111
Fax: (902) 454-5936
E-Mail: jfredericks@bpagroup.com**