



PRIVACY POLICY

Privacy Statement

We, the Trustees of the Public Education Benefits Trust Fund (the "Trustees"), recognize the importance of privacy and the sensitivity of personal information. We are committed to protecting the privacy of the Members of the Public Education Benefits Trust Fund (the "Plan") and the confidentiality, accuracy, and security of their personal information, in a manner that complies with relevant privacy legislation.

Scope

This Privacy Policy (the "Policy") outlines how and when personal information is collected, used, disclosed, retained and protected by the Trustees and any third party when they are providing services to the Trustees related to the administration of the Plan.

Definition

Personal information is information about an individual or information that allows an individual to be identified. It may include, but is not limited to, name, address, telephone number, social insurance number, age, marital status, date of marriage or cohabitation, dependents, occupation, employment status, income and education. It also includes health information including, but not limited to:

- information about physical or mental health including treatments, test results, prognosis and functional capacity assessments,
- information about the nature of a disability,
- dental records, and
- information about health services provided or information collected while a health service was being provided.

Personal information does not include information that is available in the public domain.

Consent

The Plan, Trustees, and third party service providers will obtain consent to collect, use or disclose personal information except when authorized or required by law to do so without consent.

Consent can be expressed, implied or given through an authorized representative or substitute decision-maker of an individual, such as a legal guardian or a person with power of attorney. It can also be given verbally, in writing, electronically, through inaction or otherwise.

A Member may withdraw consent at any time (subject to legal, contractual, and other restrictions) if reasonable notice is provided. After such notice is received, the Member will be informed of the likely consequences of withdrawing consent, which may include discontinuation of coverage or benefits.

Members have the right to access their personal information at any time and can do so by contacting the Privacy Officer identified in this Privacy Policy.

Purpose

The Plan, Trustees, and third party service providers may collect, use, and disclose personal information for the following purposes:

- Authenticating the Member and their identity,
- Determining eligibility for enrolment in the Plan,
- Providing and administering requested coverage,
- Processing and collecting payments and debt owed to the Plan,
- Processing and administering claims and benefits,
- Analyzing and reconciling claims and financial valuations,
- Administering appeals and complaints,
- Auditing claims and entitlement to benefits,
- Protecting the Plan from fraud and error,
- Determining whether carriers are adjudicating claims properly,
- Managing or transferring the Plan's assets or liabilities, and
- Complying with legal requirements and acting pursuant to legal authorizations.

Trustees and third party service providers may use personal information for other purposes and will obtain prior consent to do so, unless the use is authorized or required by law.

Accuracy

It is important that the personal information held by the Plan be accurate and up to date. If any personal information changes, Members must advise the Trustees, appropriate service providers or the Privacy Officer, so that the Plan's records can be adjusted. When necessary, Members will be contacted to verify their personal information.

Safeguarding Personal Information

The Plan protects the personal information in its custody or control by making reasonable security arrangements to prevent unauthorized access, collection, use, disclosure, copying, modification, disposal or similar risks.

The Plan will take reasonable steps, through contractual or other reasonable means, to ensure that a comparable level of personal information protection is implemented by its third-party service providers and agents who assist with the overall management of the Plan.

Note that confidentiality and security are not assured when information is transmitted through e-mail or wireless communication. Therefore, the Plan, Trustees and third-party service providers will not send personal information via email or wireless communication whenever possible.

Complaints

Any inquiries, complaints or questions regarding the Policy or compliance with privacy legislation should be directed in writing to the Plan's privacy officer, Alison Coelho, Trust Secretary.

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