pension

PRIVACY POLICY

Purpose

Nova Scotia Pension Services Corporation is committed to taking all reasonable steps and precautions to protect the privacy of all members, pensioners, and beneficiaries whose Personal Information is under the administration, possession, and control of NS Pension. NS Pension will adhere to the privacy protection provisions of applicable legislation relating to the collection, use, disposal, storage, and disclosure of Personal Information. NS Pension utilizes as a guideline the principles established within the Canadian Standards Association Model Code for the Protection of Personal Information supported by the Personal Information Protection and Electronic Documents Act ("PIPEDA"). In addition to NS Pension's dedication to the protection of Personal Information, NS Pension recognizes the obligation to protect confidential non-Personal Information of NS Pension and of the Plans and Funds. These obligations, as well as reference to this Policy, are included within NS Pension's Code of Business Ethics and Conduct for Employees, which is agreed to by all Employees on an annual basis. This Policy does not apply to the Personal Information of Employees, in respect of their employee relationships with NS Pension, as such Employees are covered by other policies.

Definitions

Board	Board of Directors of NS Pension
CEO	Chief Executive Officer and President of NS Pension
CIO	Chief Investment Officer of NS Pension
Code	Code of Business Ethics and Conduct for Employees
Confidentiality Agreement	Appendix C of the Code of Business Ethics and Conduct for Employees, requiring all Employees to read and agree to on an annual basis
CPO	Chief Pensions Officer of NS Pension
Employee	An individual in the employ of or under personal service contract with NS Pension (e.g. temporary workers, and interns who have access to Records)
External Parties	Includes (i) individual(s) and/or corporation(s) or other entities that are not a member, pensioner, beneficiary of any of the Plans (ii) individual(s) and/or corporation(s) or other entities that are not an employer of current or previous members

	(iii) individual(s) and/or corporation(s) or other entities that are not Service Providers currently contracted with NS Pension
Funds	Nova Scotia Teachers' Pension Fund and the Public Service Superannuation Fund
NS Pension	Nova Scotia Pension Services Corporation
Personal Information	Includes information about an identifiable individual, for example, date of birth, social insurance number, income, home address, marital status, contributions, salary, eligible pensionable service, and medical information, but does not include (i) the position name or title, business address, business telephone number, business fax number, or business e-mail address of a member, pensioner, or beneficiary of one of the Plans when such business contact information is used for the purpose of communicating or facilitating communication with a member, pensioner, or beneficiary in relation to their employment. (ii) information that is publicly accessible
Plans	Nova Scotia Teachers' Pension Plan, the Public Service Superannuation Plan, the three former Sydney Steel plans, and the Members' Retiring Allowance (MLA) plan
Policy	Nova Scotia Pension Services Corporation Privacy Policy
Privacy Breach	Unauthorized collection, access, use, disclosure, alteration, or disposal of Personal Information.
Privacy Officer	Responsible, along with the CEO, for NS Pension's compliance with this Policy
PSSPTI	Public Service Superannuation Plan Trustee Inc.
Record	As defined in PIPEDA, includes any correspondence, memorandum, book, plan, map, drawing, diagram, pictorial or graphic work, photograph, film, microform, sound recording, videotape, machine-readable record, and any other documentary material, regardless of physical form or characteristics, and any copy of any of those things
Senior Management	Includes the CEO, CIO, CPO, Director of Technology & Infrastructure Services, Director of Finance, Director of Human Resources, and Director of Enterprise Risk & Compliance
Service Providers	Means any individual(s) and/or corporation(s) currently contracted under a service agreement with NS Pension
TPPTI	Teachers' Pension Plan Trustee Inc.
Trustees	TPPTI and PSSPTI

Application

This Policy applies to:

- all Employees
- all Personal Information in the custody and control of NS Pension

Objectives

This Policy is designed to ensure that NS Pension meets its obligations in its management and protection of Personal Information throughout the information's life cycle. This includes ensuring the protection of Personal Information by making reasonable security arrangements against such risks as unauthorized access, collection, use, disclosure, or disposition.

Principles

1. Accountability
   - NS Pension is accountable for all information under the control of NS Pension including information disclosed to Service Providers for processing.
   - The Privacy Officer and the CEO are accountable for compliance with this Policy.
   - External Parties requesting non-public Plan or Fund information will be directed to the CEO who will evaluate the request, respond directly, or consult with the Board and/or the respective Trustee on an appropriate response.

2. Identifying Purposes of Collection
   - NS Pension will identify, where reasonable, the purposes for which Personal Information is collected at or before the time the information is collected.
   - The purposes for which NS Pension collects Personal Information will be those that would be considered reasonable given the responsibilities of NS Pension. Such purposes include, but are not limited to, the administration of the Plans, Funds, pensions and benefits of members, pensioners, and their beneficiaries, and communication of information to said parties.

3. Obtaining Consent
   - NS Pension will obtain consent of the respective member, pensioner, or beneficiary as required or permitted by law for the collection, use, or disclosure of Personal Information related to that individual, except where inappropriate and in the best interests of the individual (e.g. individual is seriously ill or incapacitated), prohibited by law, or as set out in section five (5), Limiting Use, Disclosure, and Retention, below.
   - The form of the consent may vary depending on the circumstances and the type of Personal Information.
   - Consent is only valid if it is reasonable to expect that the member, pensioner, or beneficiary, to whom NS Pension's activities are directed, understands the nature, purpose, and consequences of the collection, use, or disclosure of the individual's Personal Information. For example, a member, pensioner, or beneficiary's consent is implied in situations where reasonable expectations are applicable such as enrolment in one of the Plans.

4. Limiting Collection
   - The collection of Personal Information will be limited to that which is necessary for the purposes identified by NS Pension.
   - Information will be collected by fair and lawful means.

5. Limiting Use, Disclosure, and Retention
   - Personal Information of members, pensioners, and beneficiaries is confidential and will not be used or disclosed (electronically, verbally, etc.) for purposes other than those for which it was collected, except when:
     - the consent of the same member, pensioner, or beneficiary is received
     - required or permitted by law
     - required by a government institution or the member, pensioner, or beneficiary's next of kin or authorized representative if there are reasonable grounds to believe that the member, pensioner, or beneficiary is suspected of, has been the victim of, or is suspected of having been the victim of financial abuse or fraud and where it is reasonable to expect that obtaining the consent from the member, pensioner, or beneficiary for the disclosure would compromise the ability to prevent or investigate the abuse or fraud
     - required by a Service Provider while acting under a duty of confidentiality (e.g. Auditors) or
     - requested by the member or pensioner's current and/or previous employer and under any of the following circumstances:
       - the employer would reasonably have or have had such information on file for the member as part of the employer/employee relationship
       - the requested information was originally provided to NS Pension by the requesting employer as part of NS Pension's regular administration of such employer's pension plan
       - the requested information does not contain pension-specific information (e.g. selected survivor option) provided by the member or pensioner directly to NS Pension in confidence that can be connected directly to an individual member or pensioner, or
       - the requested information does not contain Personal Information of pensioners

6. Accuracy of Personal Information
   - NS Pension will keep Personal Information as accurate, complete, and up to date as is reasonably possible for the purposes for which it is to be used and for which the Personal Information is under the control of NS Pension.
   - It is expected that members, employers, pensioners, and beneficiaries will make all reasonable efforts to provide accurate, complete, and up-to-date Personal Information.

7. Safeguards
   - Senior Management will ensure there are current policies and procedures in place concerning the administration of Personal Information and other confidential information that is collected, stored, accessed, processed, or disposed of within its custody and control. The safeguarding measures include physical and technological controls as well as audit and educational measures.

8. Openness
   - NS Pension will be open about its Personal Information policies, process, and practices.

- This Policy will be made readily available and will be posted on NS Pension's website.

9. Providing Access to Personal Information
   - Upon request and with appropriate verification of identity, NS Pension will provide a member, pensioner, or beneficiary access to their own Personal Information, except where NS Pension is required or permitted by law not to do so, and in conjunction with section five (5), Limiting Use, Disclosure, and Retention, above, or when the Personal Information also contains Personal Information of other individuals.
   - Requests for access to a member, pensioner, or beneficiary's own Personal Information will be managed by the respective NS Pension manager and/or their designated representative. NS Pension staff may require a reasonable amount of time to process requests for access as staff are required to perform a diligent review prior to providing access to Personal Information.

10. Questions of Corporate Compliance
    - Individuals may contact NS Pension's Privacy Officer with questions or concerns surrounding NS Pension's compliance with this Policy at the following address: privacyofficer@nspension.ca.
    - NS Pension has adopted a Privacy Breach Procedure intended to assist Employees in their response to the discovery of a Privacy Breach and/or a complaint from an individual about a perceived Privacy Breach.

Procedures and Stipulations

1. The Director of Human Resources will ensure that all new Employees receive a copy of this Policy in an orientation package.

2. NS Pension managers will be responsible for incorporating the objectives of this Policy during the training of new Employees as well as delivering on-going reminders and examples to staff, supporting the principles and guidelines of this Policy.

3. Access to NS Pension's premises must be controlled at all times to prevent unauthorized access to Personal Information and other confidential information.

4. Computers must be locked while Employees are temporarily away from their office or workstation.

5. All files must be secured after business hours. As a minimum, offices should be locked if confidential files must 'stay out' overnight. All files containing Personal Information of members, pensioners, and beneficiaries or other confidential information, should be located within the central filing room; otherwise, the exact location of such files should be accounted for and such files 'locked away' overnight.

6. Files containing Personal Information must not be removed from the premises of NS Pension, and disposal of both transitory and master Records will only be carried out by an authorized records management professional in accordance with the established disposition policy and procedures.

7. NS Pension will perform a diligent review when providing information to an individual so as not to include Personal Information belonging to another member, pensioner, and/or beneficiary.

8. Any uncertainty regarding a response to an employer's request for member information will be brought to the attention of the Manager of Employer Services, Senior Manager of Client Services, or the CPO for further review.

9. NS Pension will impose the same standards and controls with any of its Service Providers that are or may be in possession of Personal Information and any other confidential information, through the execution of a non-disclosure agreement and within any executed contracts or service agreements undertaken with said Service Provider. Specifically, such contracts and/or agreements will include details on how Personal Information, and any other confidential information, under the administration of NS Pension, is delivered, stored, and destroyed by the applicable Service Provider, with the ability of such controls to be inspected by NS Pension and/or its Trustees, upon request, or will include such other measures or representations as are satisfactory to NS Pension in its discretion.

10. An internal system security audit will be undertaken quarterly and then verified by the Director, Enterprise Risk & Compliance as per the NS Pension Compliance Monitoring & Internal Audit Manual.

Accountability

- The CEO and the Privacy Officer assume responsibility for ensuring NS Pension meets the obligations depicted in the Policy.
- Each employee is responsible for complying with the Policy. Employees must immediately report any actual/suspected violation of the Policy to their manager, the CEO and/or the Privacy Officer.

Monitoring and Review

The Privacy Officer is responsible for monitoring the implementation of and adherence to this Policy.

Enquiries

Any questions of uncertainty pertaining to the meaning or application of this Policy should be referred to the CEO, the Privacy Officer, or their respective delegates.

References

- Canadian Standards Association Model Code 10 Principles
- Digital Privacy Act
- Nova Scotia Public Service Superannuation Act and Regulations, and Collective Agreements
- Nova Scotia Teachers' Pension Act and Regulations, including the 2005 Joint Trust Agreement
- NS Pension Code of Business Ethics and Conduct
- NS Pension Communications and Disclosure Policy
- NS Pension Compliance Monitoring & Internal Audit Manual
- Personal Information Protection and Electronic Documents Act

Approved By:	Doug Moodie, Chief Executive Officer and President
Document Owners:	Privacy Officer
Effective Date:	November 1, 2025
Next Review Date:	October 31, 2027