



POLICY

Employee Benefit Plans Board of Trustees Privacy Policy and Statement for Plan Members

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1 Purpose

The purpose of this document is to describe how 3sHealth, as the administrator of the Employee Benefit Plans, will collect, use, disclose, and protect the personal information and personal health information of plan members. This policy specifically addresses the handling of the personal information (PI) and personal health information (PHI) pertaining to the plan members and it is intended to supplement 3sHealth's overarching privacy policy.

3sHealth uses vendors to provide information management and technology services, as well as supporting business services to operate and maintain the systems used to administer benefits effectively.

It is 3sHealth's policy and intent to protect and respect the privacy of personal information and personal health information in accordance with applicable privacy laws. This policy explains the specific privacy and security practices governing personal information and personal health information.

For ease of reference, the term personal information will be referred to as "**PI**" and personal health information will be referred to as "**PHI**."

2 Why is PI/PHI collected for plan members?

The PI/PHI is collected for the following purposes:

- To manage and administer benefit payments;
- To provide payroll services, including disclosures to Canada Revenue Agency as required by law;
- To provide consulting services, on behalf of 3sHealth, with third-party companies;
- To administer, plan, and manage the relationship between 3sHealth and plan members;
- To comply with applicable legal and regulatory requirements or to protect the legal rights and property of 3sHealth; and
- To plan, manage or evaluate the effectiveness or efficiency of the services being delivered by 3sHealth.

(Collectively, the "**Authorized Purposes**").

The type of information that may generally be collected from plan members includes, for example, name, address, contact information, social insurance number, and benefits information including health information. Financial information to support direct deposit or tax reporting is also collected.

PI/PHI is not collected for any other purposes, and where necessary, the express consent of the plan member to whom the information relates will be required.

3 How is PI/PHI collected for plan members?

The PI/PHI about a plan member is only collected with the individual's knowledge and consent except where authorized by law. Generally, this means that the PI/PHI is collected directly from the plan member or their authorized representative, via channels such as the plan member's application, e-mail, telephone, fax, or in person. PI/PHI may be collected from third-parties, but only with the knowledge and consent of the plan member or where otherwise authorized by applicable laws.

4 When is PI/PHI used or disclosed for plan members?

The PI/PHI is used and disclosed as reasonably required to facilitate the **Authorized Purposes** listed above. There will be times when 3sHealth must share information about your restrictions and limitations with your employer(s) to support accommodations or return-to-work planning. Otherwise, PI/PHI is not used or disclosed without the plan member's consent unless required by law.

The PI/PHI will be used for the purpose of completing analytics and analysis. This PI/PHI will be de-identified and kept anonymous before being disclosed outside of Employee Benefits.

***** The PI/PHI is not rented, sold, or traded. *****

5 Consent – is there a choice?

The collection, use, and disclosure of a plan member's PI/PHI, as described in this policy, is authorized under applicable law. It is the only way for 3sHealth to efficiently and effectively deliver service and support to plan members.

Express consent will be obtained from the plan member where PI/PHI is being disclosed to a third party where the disclosure is not authorized or required by law.

Plan members can revoke or withdraw their consent to the collection, use, and disclosure of their PI/PHI at any time upon reasonable notice. If consent is revoked or withdrawn, the plan member's benefit application will be limited or terminated. Anytime a plan member chooses to revoke or withdraw their consent it must be made to 3sHealth in writing.

6 How is the security of PI/PHI for employees protected?

There are reasonable policies, procedures, and safeguards (including physical, technological, and organizational measures) in place designed to protect the security and confidentiality of PI/PHI. 3sHealth is responsible for complying with such policies, procedures, and safeguards, as well as any others that may be introduced and approved by 3sHealth from time to time. The written agreements in place with service providers include reasonable data protection schedules and other reasonable provisions with respect to the protection of PI/PHI.

- The protection of PI/PHI is of paramount concern to the functionality of the systems 3sHealth uses, and the Privacy Officer is prepared to take appropriate and timely steps in the event of any incidents involving PI/PHI in accordance with applicable privacy laws.
- Every reasonable effort is taken to ensure the accuracy and completeness of PI/PHI.. This may involve reaching out to plan members for further details or updates. 3sHealth relies on plan members to notify us if there is any changes to their PI/PHI that may affect the administration of services provided.
- PI/PHI included in 3sHealth's systems is retained in accordance with applicable laws.
- PI/PHI included in 3sHealth's systems is disposed of or destroyed in a secure manner in accordance with applicable laws. 3sHealth, will follow secure practices when disposing of or destroying PI/PHI.

7 Is access to PI/PHI provided?

In accordance with applicable laws, 3sHealth will provide plan members with access to their PI/PHI upon written request by the plan member or designate.

As a general rule, 3sHealth does not charge plan members for accessing their own PI/PHI. However, 3sHealth reserves the right to charge any reasonable costs relating to such requests for access to PI/PHI. to the plan member making the request where 3sHealth believes that the plan member's request is unreasonable or in bad faith.

If a request for access to PI/PHI is refused, the plan member will be informed in writing of the refusal and the grounds for the refusal.

PI/PHI will be corrected or amended where it can be proven that the information is inaccurate or incomplete. For these types of corrections and amendments 3sHealth is subject to any applicable exceptions or exemptions outlined in applicable laws.

Decisions on the access request or amendment of PI/PHI will be made by 3sHealth, depending on the original source of the PI/PHI. This will also be in consultation with the Privacy Officer.

8 Storage and processing

PI/PHI is securely stored in-house on a restricted cloud computing environment with reasonable safeguards to ensure the PI/PHI is stored in Canadian **data centres**.. Every effort is made to ensure PI/PHI is processed and stored in Canada; however, service providers may access and store PI/PHI outside of Canada (including in the United States of America) temporarily to provide maintenance and support services. When information is temporarily accessed or stored outside of Canada, it may be subject to their applicable laws.. 3sHealth has taken reasonable and appropriate technical, organizational, and legal steps (including appropriate contractual provisions) to secure this information, ensure it is stored within Canada, and encrypt the information.

9 Challenging compliance and further information

For further information about the privacy practices applicable to the employee benefit plans administered by 3sHealth, to make a request for access to information request, or to exercise any other rights outlined above, please contact the privacy officer at 3sHealth.

3sHealth

600-1919 Saskatchewan
Drive Regina, SK, S4P 4H2

Telephone:

306-347-5532

Fax:

306-525-1960

Email:

PrivacyOfficer@3sHealth.ca

If your concern is not resolved by contacting 3sHealth privacy officer, you can contact the Office of the Saskatchewan Information and Privacy Commissioner at:

Telephone:

306-787-8350

Toll-Free Telephone (within Saskatchewan):

1-877-748-2298

Fax:

306-798-1603

Email:

webmaster@oipc.sk.ca

10 Reserved Rights

Notwithstanding any of the foregoing, nothing in this Policy will negate or affect the rights and obligations of 3sHealth, under applicable laws, or the rights of individual employees under applicable laws.

The foregoing policy is effective as of December 7, 2022. 3sHealth Privacy Officer reserves the right to change this policy at any time in accordance with applicable laws – please check 3sHealth’s website for updates to this policy.

11 List of Authorized Third Parties

- Canada Life
- Canada Pension Plan (CPP)
- Medical Consultants
- WCB
- Treatment Provider, Physicians, and/or other health practitioners
- SGI
- Medaca
- Arcas