

# HEB Manitoba Privacy Notice

HEB Manitoba is committed to protecting the confidentiality, accuracy, and security of the personal information that we collect and maintain. This *Privacy Notice* describes how we collect, use, and disclose your personal information when we do business with you. We may change it from time to time.

We are committed to addressing all privacy questions and concerns of individuals and to providing them with information related to HEB Manitoba's privacy practices.

Our Privacy & Policy Office oversees our privacy programs and compliance with the privacy laws that apply to HEB Manitoba. Please [contact the Privacy & Policy Office](#) if you have any questions or concerns about privacy at HEB Manitoba.

[Contact our Member Services team](#) if you have questions about a HEB Manitoba Plan or a Plan benefit.

## What personal information does HEB Manitoba collect?

The personal information we may collect about you can vary depending your relationship with us (e.g., a member, an authorized representative, a spouse, a beneficiary) and the Plan and benefit involved. It can include:

- Demographic information such as name, contact information, birth date, age, gender, family status, marital status, cohabitation date, marriage date, and relationship breakdown dates.
- Information about an individual's union, professional memberships, and education.
- Information about employment with participating employers, such as payroll details, occupation, hire date, termination date, retirement date, rate of pay, and full-time equivalent (FTE) status.
- Banking information.
- Identifying numbers, such as the Social Insurance Number (SIN).
- Information about other pension and benefits coverage or disability insurance benefits. For example, Workers Compensation Board, Manitoba Public Insurance, Canada Pension Plan benefits or other private insurance coverage.
- Other earnings, payments, or income (if you've applied for or are receiving Disability & Rehabilitation (D&R) Plan benefits).
- Previous insurance coverage and claims experience.
- Information about an individual's death.

Additionally, we may also collect information about your health if you've applied for or are receiving D&R Plan benefits. This can include:

- Health services you've received
- Medical appointments dates
- Medical examination findings, medical opinions and diagnoses, and lab test results
- Details about treatment plans
- Medications you are taking
- Information about your lifestyle and activities.

We also use video surveillance in our office spaces for the safety of our members, employees, and other visitors and to protect against unauthorized access, theft, and property damage. If you do not want to

have your image recorded, there are other options for doing business with us - members can use our online self-service portal and we can be contacted by phone, email and in writing.

### **Why does HEB Manitoba collect, use, and disclose personal information?**

We collect, use and disclose personal information to administer the HEB Manitoba Pension and Benefit Plans and as required by the laws that apply to the Plans. This includes:

- Identifying and enrolling members
- Communicating with members and participating employers
- Determining eligibility and entitlement to benefits
- Providing members with pension estimates
- Assessing and adjudicating claims
- Processing and paying Plan benefits
- Addressing pension and benefit issues arising from relationship breakdowns
- Managing the Plans
- Monitoring service providers
- Auditing claims
- Regulatory reporting.

See our [website](#) to learn more about our Plans.

### **Why does HEB Collect Social Insurance Numbers?**

We use Social Insurance Numbers for identification purposes and for reporting to the Canada Revenue Agency (CRA).

We use members' Social Insurance Numbers for identification purposes because they are the only reliable identifier common to both HEB Manitoba and participating employers that we can use to accurately:

- Process member enrolments and applications
- Confirm and record employment information
- Process pension contributions and benefit premiums
- Administer a member's Plan participation and benefits when the member has more than one eligible position or period of employment.

We also include Social Insurance Numbers when we forward life insurance claim information to Canada Life.

Additionally, we are required to include Social Insurance Numbers on the income tax slips we issue to recipients of pension and D&R benefit payments and when we report these payments and Past Service Pension Adjustments to CRA.

### **How does HEB Manitoba collect personal information?**

We collect personal information primarily from you and your employer. We may also collect information from other sources in some situations.

## From You

We collect personal information directly from you by phone, from your self-service online member portal account, on HEB Manitoba forms, and other documents and communication channels.

## From Participating Employers

When you start a new employment with a participating employer, your employer provides us with information about your employment so we can set up your Plan accounts. This information includes your address, Social Insurance Number, birth date, occupation, hire date, and pay information. Once you become a member, your employer regularly provides us with information about your salary, pension contributions, service, and employment events like new positions, leaves of absence, and terminations.

## Other Sources

We may collect personal information about you from other sources in some situations. Please see **Personal Information Exchanges with Service Providers for Plan Administration Purposes** and **Personal Information Sharing and Disclosures** below for more information.

## Personal Information Exchanges with Service Providers for Plan Administration Purposes

We sometimes exchange personal information with service providers who support our administration of the Plans. We use contracts and other measures to ensure the personal information we provide to a service provider is protected in a manner consistent with our *Privacy Notice* and is used or disclosed only for authorized purposes.

These exchanges can include the following:

- We provide our actuaries with the information they need to perform actuarial valuations of the Plans.
- We may provide personal information to our lawyers when we consult with them about administration of the Plans.
- If you are receiving D&R Plan Benefits, we may consult with healthcare and vocational rehabilitation professionals to:
  - Assist in the administration of your benefits
  - Develop treatment plans for you
  - Independently review your claim file
  - Facilitate your vocational rehabilitation
  - Help us adjudicate your claim and claim appeals.

As these consultations often involve discussions about your health, we will always obtain your written consent to exchange information about your health before consulting about your claim (in most cases we obtain this consent during the D&R claim application process).

- We exchange personal information with Manitoba Blue Cross to administer the Group Healthcare and Dental Plans. This does not include information about health.
- We provide personal information to Canada Life when we are advised about a claim for Group Life Insurance Plan benefits. This can include member and beneficiary Social Insurance Numbers which Canada Life uses for tax reporting and identification purposes.

## **Cross Border Transfers of Personal Information for Processing**

At times we may use service providers that are located outside of Canada. As a result, personal information we've collected may be accessible to government authorities, courts, and law enforcement officials outside of Canada.

## **Personal Information Sharing Between the HEB Manitoba Plans**

Management of the Pension, Healthcare, Dental, Life Insurance, and D&R Plans is centralized at HEB Manitoba and personal information is sometimes shared between the Plans for administration purposes. For example:

- We use your contact information to confirm your identity and to communicate with you about your benefits. Contact information changes you provide to us will be used by all the Plans you are enrolled in.
- Changes in marital or family status you submit to us will be reviewed by all the Plans you are enrolled in to ensure your benefits are appropriately administered.
- Information in your HEB Manitoba file that can affect a premium-free benefits coverage and pension accrual claim or a pension offset may be reviewed by all the Plans you are enrolled in to assess the claim or offset and their effect on other benefits. This may include non-medical information about a disability claim such as your claim status and monthly benefit.
- Power of Attorney appointment information is available to all employees who work on member files to ensure they are aware if someone has been appointed to act on a member's behalf.

## **Personal Information Sharing and Disclosures**

We may also exchange your personal information with a government agency or another organization when an exchange is needed to administer the Plans. Examples include:

- Member information is sometimes exchanged with government agencies and other insurers to coordinate the administration of a member's benefits. These agencies and insurers include the Workers Compensation Board of Manitoba, Manitoba Public Insurance, Manitoba Employment and Income Assistance, Employment Insurance, the Canada Pension Plan, and other private insurers and benefit plans.
- We may provide personal information to representatives of estates of deceased members or to the Public Guardian & Trustee to administer a member's benefits.
- We confirm information about a member's enrolment, employment information, pension contributions, benefit premiums and entitlement to benefits with their participating employers. This may include a participating employer who is the custodian of the employment records of your former employer and your Social Insurance Number may be included in communications for identification purposes.
- We may exchange information with your union that is similar to the payroll information we would normally collect from your employer if there is a labour disruption at your workplace. This information would be needed to continue your Plan enrollment and benefits during the disruption and may include Social Insurance Numbers.
- We may exchange information about your health with a healthcare or vocational rehabilitation provider you have been referred to or have already seen to help us assess and manage your D&R Plan claim. As this information is often very sensitive, we will always obtain your written consent

before exchanging information about your health with your healthcare or vocational rehabilitation provider (we most often obtain this consent during the D&R claim application process).

- We may exchange information related to career planning and employment searches with a career counsellor you have seen to help us manage your D&R Plan claim.
- We will provide information about your HEB Manitoba pension to your financial planner or financial institution at your request.

There are also situations where information disclosures are permitted or required by law. For example:

- Personal information may be provided to public bodies, government departments, and government agencies in response to official requests for information and to meet regulatory reporting requirements. These include:
  - Requests for information from the Maintenance Enforcement Program that are authorized by *The Family Maintenance Act*.
  - Requests for information from the Manitoba Pension Commission that are authorized by *The Pension Benefits Act*.
  - Tax filings with the Canada Revenue Agency as required by the *Income Tax Act*.
- We may need to disclose personal information if we are involved in judicial, administrative or regulatory proceedings, or other similar processes (e.g., enforcing our rights or collecting on a debt).
- We may release personal information in response to a search warrant, court order or other valid demand or inquiry.
- It may be necessary to disclose information to prevent, detect or suppress financial abuse, fraud, or criminal activity or because of an emergency that threatens someone's life, health or security.

### **Withholding, Withdrawing and Limiting Your Consent**

You may withhold, withdraw or limit your consent at any time by advising us of your consent preferences in writing and with reasonable notice. If you withhold, withdraw or limit your consent, we will evaluate options for providing benefits and services to you while maintaining your privacy. However, withholding, withdrawing or limiting consent may interfere with the administration of benefits or services. This includes determining if you are entitled to receive benefits or services and may result in benefits or services being denied.

Please note you cannot withhold, withdraw or limit your consent when:

- Collection, use or disclosure of your personal information is required by law or to meet contractual requirements.
- Your personal information is needed for Plan administration purposes and Plan participation is a condition of your employment or is required by law.

For example, if you waive or defer enrolment in a Plan, we still need to collect some of your personal information to record the waiver or deferral.

### **Accessing Your Personal Information**

You have the right to know what personal information we hold about you and how we have used and disclosed that information. Please [contact our Privacy & Policy Office](#) for more information about submitting an access request.

Please note access to some information may be limited. For example, in some cases the information may contain details about other individuals, or there may be legal, security, or commercial reasons why information is withheld.

Please [contact our Privacy & Policy Office](#) if you believe there are inaccuracies in the information provided in response to an access request, and we will update our files as appropriate or will note your opinion in the file if we are not able to update information as requested.

### **Keeping your information accurate**

Having accurate information about you enables us to provide you with better service and reduces the chance of us using out-of-date information to make a decision that affects you or to send information to you.

We have procedures and systems in place to maintain personal information related to your employment with participating employers, and you can help by keeping us informed of changes that are not related to your employment, such as when your contact information or family status changes.

Please see our [website](#) for more information about keeping your information up to date.

Date: May 2023