

# 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 is intended to supplement the privacy policy used by 3sHealth. It is only intended to deal with personal information and personal health information of plan members.

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.

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 privacy and security practices concerning 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 is only collected with the individual's knowledge and consent unless otherwise authorized by law. Generally, this means that the PI/PHI is collected directly from the plan member or designate to whom it relates, whether via the plan member's application, e-mail, telephone, fax, or in person. PI/PHI may be collected from third-party sources, 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 has to 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 anonymized 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 that PI/PHI is accurate and complete. This may involve requesting further information or updates from plan members. 3sHealth relies on plan members to notify us if there is a change to their PI/PHI that may affect the administration of services through.
- 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.

First Approved: December 7, 2022

Last Amended: December 7, 2022

Last Reviewed: August 24, 2023

## 7 Is access to pi/phi provided?

In accordance with applicable laws, 3sHealth will provide plan members with access to their PI/PHI. All requests submitted by a plan member for access to PI/PHI must be made in writing.

It is the general policy of 3sHealth not to charge plan members for access to their own PI/PHI. However, 3sHealth reserves the right to charge any reasonable costs relating to a request 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 shown that the information is inaccurate or incomplete, subject to any applicable exceptions or exemptions under applicable laws.

Decisions on the access to or amendment of PI/PHI will be made by 3sHealth, depending on who is the source of the PI/PHI, in consultation with the Privacy Officer.

## 8 Storage and processing

PI/PHI will be stored in-house on a restricted cloud computing environment with reasonable safeguards to ensure the PI/PHI will remain stored in **data centres located in Canada**. 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 the laws of and be accessible by legal authorities in such other jurisdictions. 3sHealth has taken reasonable and appropriate technical, organizational, and legal steps (including appropriate contractual provisions) to secure this information, to ensure it is stored in Canada, and to 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 PI/PHI, or to exercise any other rights outlined above, please contact the privacy officer at 3sHealth.

### **3sHealth**

700 – 2002 Victoria Avenue  
Regina, SK, S4P 0R7

Telephone:

306-347-5500

Fax:

306-525-1960

Email:

[PrivacyOfficer@3sHealth.ca](mailto: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:

First Approved: December 7, 2022

Last Amended: December 7, 2022

Last Reviewed: August 24, 2023



**Saskatchewan Information and Privacy Commissioner**

503 – 1801 Hamilton Street  
Regina, SK, S4P 4B4

Telephone:	306-787-8350
Toll-Free Telephone (within Saskatchewan):	1-877-748-2298
Fax:	306-798-1603
Email:	<a href="mailto:webmaster@oipc.sk.ca">webmaster@oipc.sk.ca</a>

## 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
- CBI and/or other health practitioners
- SGI
- Vista
- Medaca