

# Canada Pension Plan Investment Board Privacy Policy (External)

April 2020



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## 1. Purpose

This Privacy Policy (External) (the “**Policy**”) has been prepared by the Canada Pension Plan Investment Board (“**CPP Investments**”) and sets out the manner in which CPP Investments collects, uses, discloses and otherwise manages personal information, including through our website located at <http://www.cppib.com> (“**Website**”) and through other interactions with individuals. For more information regarding the manner in which we treat personal information of individuals applying for a job with CPP Investments, or a CPP Investments Board of Director appointment, please see the [CPP Investments Applicant Privacy Policy](#).

## 2. Definitions

“**Personal information**” means information about an identified or identifiable individual, including name, address, email address, signature, an opinion, and other information relating to an individual. Depending on the jurisdiction in which you are located, certain business contact information may be excluded from the meaning of personal information.

## 3. Collection and Use of Personal Information

We may collect personal information from individuals in the following circumstances:

- When you visit our Website;
- When you visit our facilities;
- When you sign-up to receive communications from CPP Investments;
- In the course of managing our investments and undertaking due diligence;
- In connection with discussion forums, meetings, conferences or other activities sponsored by CPP Investments;
- In connection with public consultations, opinion surveys, focus groups or feedback;  
or
- When you contact us with a comment or question or otherwise provide us with personal information.

Our collection and use of personal information is required for us to deliver the services and perform the functions described below, and without which we would not be able to undertake certain tasks.

### Visiting our Website

Please see the section below titled “Cookies and Additional Information about our Website” for details about the Website’s collection, use and disclosure of personal information.

### Visiting our Facilities

In accordance with applicable laws, CCTV cameras are installed by CPP Investments to ensure the security and safety of our premises. For more information about our use of CCTV, please refer to CPP Investments' CCTV Standard which is available upon request from [privacy@cppib.com](mailto:privacy@cppib.com).

### Signing Up for CPP Investments Communications

We may provide you with an opportunity to sign-up to receive CPP Investments communications by email or mail, such as news and updates. If you choose to sign-up to receive CPP Investments communications, we may collect contact information such as your email and postal address. You can opt-out of receiving these communications at any time by clicking on the unsubscribe link included in our email communications or by contacting us as set out under Contact Us below. Please note that if you unsubscribe, you may continue to receive certain non-marketing electronic communications from us.

### Managing Investment Activities

In the course of CPP Investments' investment activities, we may collect personal information about individuals with whom CPP Investments works or invests (such as investment advisors or fund managers), or about members of the Boards of Directors (or similar) or management, clients or suppliers of companies or entities in which CPP Investments is considering an investment. The information we collect may include information obtained through background verifications. We collect and use this information in order to conduct due diligence regarding potential investments, investment advisors or fund managers, to manage our investments, to track attendance at board meetings and as required by applicable law. For individuals located in the European Economic Area (EEA) or the United Kingdom (UK), we use personal information for these purposes (i) in reliance on our legitimate interest under applicable EEA or UK law in operating and improving our business, or (ii) because we are required to do so by applicable law.

### Forums, Meetings, Conferences and Other Activities

From time to time, CPP Investments may sponsor forums for discussion, conferences or other similar activities. In the course of these activities, we may collect personal information of registrants such as name, email address, contact information and payment information in order to administer registration for the forum, conference or other activity. For example, CPP Investments may collect the name, municipality or township and province of residence of individuals who attend the CPP Investments Bi-Annual Public Meeting in Canada. This information is used for security and reporting purposes. For individuals located in the EEA

or in the UK, we use personal information for these purposes in reliance on our legitimate interest under applicable EEA or UK law in administering these events.

#### Public Consultations, Opinion Surveys, Focus Groups or Feedback

CPP Investments or its authorized survey, polling or other service providers may conduct public consultations, opinion surveys, focus groups or solicit public feedback in which individuals participate to support the fulfillment of our mandate. In the course of these activities, CPP Investments may obtain consent from participants to collect and use personal information such as first and last name, email address, telephone number, and mailing address for the purpose of conducting research and/or public engagement. Reports generated from such public consultation will be provided to CPP Investments in aggregate form and in a manner that does not identify any individual participant.

#### Call Recording

Subject to applicable law, CPP Investments may monitor and record audio and video conversations with the CPP Investments securities trading desk or with other CPP Investments personnel to ensure accuracy and for record-keeping purposes. For individuals located in the EEA or in the UK, we use personal information obtained from these conversations in reliance on our legitimate interest under applicable EEA or UK law in ensuring accuracy and maintaining records related to our business.

#### Social Media

We may offer you the opportunity to engage with CPP Investments or its content on or through third-party social networking websites, plug-ins and applications. When you engage with us on or through third-party social networking websites, plug-ins and applications, you may allow us to have access to certain information associated with your social media account (e.g., name, username, email address, profile picture) to deliver content or as part of the operation of the website, plug-in or application. For individuals located in the EEA or in the UK, we use this information in reliance on our legitimate interest under applicable EEA or UK law to do so (including to deliver content or as part of the operation of the website, plug-in or application).

#### Questions, Comments and Complaints

If you contact us with a comment, question or complaint, you may be asked for information that identifies you (such as your name, email address, address and a phone number) along with additional information we need to help us promptly answer your question or respond to your comment or complaint. We may also retain this information to assist you in the

future. For individuals located in the EEA or in the UK, we use this information in reliance on our legitimate interest under applicable EEA or UK law in communicating with individuals who contact us.

#### 4. Sharing of Personal Information

We will not disclose, trade, rent, sell or otherwise transfer personal information, without your consent, except as set out herein.

##### Service Providers

We may transfer (or otherwise make available) your personal information to third parties who provide services on our behalf. For example, we may use service providers to send our emails, host our website and operate certain of its features. Our service providers are given the information they need to perform their designated functions, and we do not authorize them to use or disclose personal information for their own marketing or other purposes.

Your personal information may be maintained and processed by CPP Investments or its third party service providers in the US, Canada, Hong Kong and India. If you are located in the EEA, Switzerland or in the UK, we comply with applicable legal requirements providing adequate protection for the transfer of personal information to recipients in countries outside the EEA, Switzerland or the UK which have not been recognized as providing for an adequate level of protection for personal data. In all such cases, we will only transfer your personal information if we have put in place appropriate safeguards in respect of the transfer, for example, EU Standard Contractual Clauses. You may obtain a copy of the safeguards we use in respect of such transfers by contacting us as indicated below.

##### Legal Requirements

CPP Investments and our Canadian, US and other service providers may provide your personal information in response to a search warrant or other legally valid inquiry or order (which may include lawful access by Canadian, US or other foreign governmental or investigative authorities, courts or law enforcement agencies), to an organization in the case of a breach of an agreement or contravention of law, to detect, suppress or prevent fraud, or as otherwise required or permitted by applicable Canadian, US or other law. We may also disclose personal information where necessary for the establishment, exercise or defence of legal claims or disputes, and to investigate or prevent actual or suspected loss or harm to persons or property.

## 5. Safeguards & Retention

We retain personal data as long as we need it: (i) to fulfil our mandate, (ii) in connection with litigation, investigations or proceedings, and (iii) as required or permitted by applicable law. We have implemented reasonable administrative, technical and physical safeguards in an effort to protect against unauthorized access, use, modification and disclosure of personal information in our custody and control. These measures include locked filing cabinets and restricted access to offices, restricting access to personal information on a “need to know” basis, and the use of passwords, encryption and firewalls.

## 6. Individual Rights

Subject to applicable privacy legislation, you may access, update and correct inaccuracies in your personal information in our custody or control at any time. You can request access, corrections or updates to all personal information by contacting us as set out in the Contact Us section below. Subject to applicable data protection law, you may also object to the processing and request that we erase or restrict our processing of your personal information. We may request certain personal information for the purposes of verifying the identity of the individual seeking access to their personal information records.

If you are not satisfied with CPP Investments’ response, you may have a right to file a complaint with the privacy commissioner’s office in your jurisdictions pursuant to applicable privacy legislation.

## 7. For EEA and UK Individuals

For the purposes of applicable data protection law, if you are a resident of Luxembourg, the primary data controllers of your personal information are Canada Pension Plan Investment Board; Canada Pension Plan Investment Board, Luxembourg Branch; CPPIB Credit Investments Inc., Luxembourg Branch; CPPIB Credit Europe S.à r.l.; CPP Investment Board Europe S.à r.l.; Canada Pension Plan Investment Board, UK Branch; CPPIB Credit Investment Inc., UK Branch; CPPIB Equity Investment Inc., UK Branch; and if you are a resident of the UK, the primary data controllers of your personal information are Canada Pension Plan Investment Board; Canada Pension Plan Investment Board, UK Branch; CPPIB Credit Investment Inc., UK Branch; and CPPIB Equity Investment Inc., UK Branch. These entities can all be contacted by sending an email to [privacy@cppib.com](mailto:privacy@cppib.com).

## 8. Links to Other Websites

Our Website may contain links to other websites that operate independently from CPP Investments. We provide links to third party websites as a convenience to the user. These links are not intended as an endorsement of or referral to the linked websites. The linked websites have separate and independent privacy statements, notices and terms of use, which we recommend you read carefully. We do not have any control over such websites, and therefore we have no responsibility or liability for the manner in which the organizations that operate such linked websites may collect, use or disclose, secure and otherwise treat your personal information.

## 9. Changes to Our Privacy Policy

This Privacy Policy may be updated periodically to reflect changes to our personal information practices or applicable law. The revised Privacy Policy will be posted on the Website and in certain circumstances we may notify you of any changes to our policy by email. We encourage you to refer to this Privacy Policy often for the latest information about our personal information practices.

## 10. Contact Us

Please contact us if:

- you have any questions or comments about this Privacy Policy,
- you wish to access, update and/or correct inaccuracies in your personal information or otherwise exercise your data protection rights, or
- you otherwise have a question or complaint about the manner in which we or our service providers treat your personal information.

You may contact us by email at [privacy@cppib.com](mailto:privacy@cppib.com) or by mail at the following address:

Canada Pension Plan Investment Board  
Attn: General Counsel  
One Queen Street East, Suite 2500  
Toronto, ON, Canada, M5C 2W5

## 11. Cookies and Additional Information about our Website

When you visit our Website, we collect your IP (Internet protocol) address and other related information such as page requests, browser type, operating system and average time spent on our Website. We collect these types of personal information using automated means, including cookies.

Cookies are small files that are downloaded to the device you use to visit a website. They are generally used to help improve visitors' experiences on the site, by, for instance, remembering preferences, log in information, or otherwise recognizing that they have visited the site previously (or are the same user during a single visit). They are also used by website owners to make improvements to the site based on visitor behaviour. In some cases they are used to collect and store information about specific users.

### Cookies on this Website

The cookies used on this site are primarily for analytics purposes: to better understand how individuals are moving through the site, what pages they visit, how long they remain on pages, and so on. We use this information to make improvements to how the site works and to ensure it meets the information needs of our visitors.

Some of the cookies we use on our Website are persistent cookies which remain on your computer or other Internet-connected device for a certain period of time after you end your browsing session, unless you delete them. Others are session cookies and are deleted when you end your browsing session.

In total, there are five, third-party applications that have cookies that may be downloaded to your device when you visit CPPIB.com:

#### **Siteimprove** ([www.siteimprove.com](http://www.siteimprove.com))

Siteimprove is an application that provides us with analytics about traffic to the site. It uses a cookie called "nmstat" that is persistent. The cookie contains a randomly generated ID used to recognise the browser when you read a page. It does not collect personal information from you.

Siteimprove also uses a session cookie (one that is stored in temporary memory and is erased when you close your web browser). This cookie is called "siteimproveses" and is used

to track the sequence of pages you view during a visit to the site. For more information about Siteimprove's cookies practices, please visit their website.

**WebTrends** ([www.webtrends.com](http://www.webtrends.com))

Webtrends is an analytics application that collects and reports on traffic to web sites and mobile applications. On our site it uses cookies to collect information about your preferences and activity while on the site. For more information about WebTrends' cookies practices, please visit their website.

**Google Analytics** ([www.google.com/analytics/](http://www.google.com/analytics/))

Google Analytics is also an analytics solution that provides information on how visitors interact with the site. Its cookies track things such as how long you spend on the site, which pages you go to, how you get to the site, and which geographic areas you are from.

Google Analytics uses four cookies: The cookie called "utma" is a persistent cookie that tracks first visits and returning visits. The "utmb" and "utmc" cookies are session cookies that work together to identify how long visitors spend on the site. The "utmz" cookie is a persistent cookie that identifies from where traffic to the site originates. And the persistent "utmv" cookie provides information about visitor behaviour on the site and site performance. You can learn more about Google Analytics cookies [here](#). You can also [choose to opt out](#) of being tracked by Google Analytics.

**YouTube** ([www.youtube.com](http://www.youtube.com))

We use YouTube to house videos that we display on the site. YouTube cookies are set by YouTube to track visitors' use of its services. These cookies are installed only once when you press play.

The persistent "PREF" cookie stores your preferences and other information, including how many search results you wish to be shown on your page. The "VISITOR\_INFO1\_LIVE" cookie measures your bandwidth to determine which player will be used to show the video. The session cookie "use\_hitbox" is used to add to the views counter on YouTube. And the session "YSC" cookie is set by the YouTube video service on pages with embedded YouTube video.

You can learn more about cookies that Google uses through its YouTube platform [here](#).

**Zmags** ([www.zmags.com](http://www.zmags.com))

We use this application to deliver a more interactive, online version of our annual report. Zmags cookies are both session-based and persistent. You can learn more about Zmags cookies [here](#).

### Disabling Cookies

You can choose to prevent cookies from being downloaded to your device by blocking some or all of them. However please note that if you do this you may not be able to use the full functionality of the site. You can also delete cookies that have already been downloaded.

If you do wish to restrict or block cookies you can do this through the settings of whatever browser you are using. To find out how click on the appropriate link:

[Deleting cookies using Internet Explorer](#)

[Deleting cookies using Firefox](#)

[Deleting cookies using Chrome](#)

[Deleting cookies using Safari and iOS devices](#)