

MUNICIPAL PENSION FUND PRIVACY POLICY

The Pittsburgh Municipal Pension Fund (“Fund”) is committed to maintaining the accuracy, confidentiality and security of personal information collected, used and retained for the administration of the Pension Plan. To guide decision-making, the Fund has adopted provisions of the *Personal Information Protection and Electronic Documents Act (PIPEDA)*

The Fund limits the use of personal information to the stated purposes for which it was collected and retain personal information only for as long as required for those purposes, or as long as is required to fulfill the Fund’s legal obligations.

This Privacy Policy is a formal statement of principles and management guidelines for the protection of personal information collected, used and retained by the Fund. In addition, the Policy outlines the responsibilities and obligations of the Fund and its employees with regard to disclosing and maintaining the security of personal information.

Summary of principles

Accountability – The Fund is responsible for personal information under its control and has designated the Executive Secretary as the Privacy Officer with overall accountability for compliance with the following principles. However, each employee of the Fund is responsible for following the Privacy Policy and assisting in complying with applicable laws.

Limited Collection of Personal Information – The Fund only collects personal information that is necessary to achieve the purposes set forth in applicable pension law, including the Pension Act of 1975 and its associated Ordinances.

Limited Use, Disclosure and Retention of Personal Information - The fact that the Fund has personal information of a member does not mean that the personal information can be used for any purpose, disclosed for any purpose or retained indefinitely. Personal information, including a member’s employment data and pension calculation, shall not be disclosed without consent unless required by law. Personal information shall not be retained for longer than is necessary to fulfill the purposes of the Fund and to comply with statutory requirements for the retention of records.

Accuracy of Personal Information – Fund employees shall take care to keep personal information that they are responsible for maintaining as accurate, complete and up-to-date as is necessary for the purposes for which it is to be used.

Security Safeguards - The Fund uses administrative procedures, technical controls and physical security safeguards to protect personal information. Fund employees must never circumvent or attempt to circumvent these safeguards. If a Fund employee believes that there is a security breach or that safeguards are not being complied with, that employee must report the issue to the Privacy Officer.

Member and Employee Access to Personal Information - Upon request, the Fund will inform a member or employee of the existence, use and disclosure of his or her personal information and shall give the individual access to that information. A Fund member or employee shall be able to challenge the accuracy and completeness of the information and to have it amended as appropriate. Any such challenge shall be directed to the Privacy Officer.