



Privacy Notice

PSP Investments

Prepared by the Access to Information and Privacy (“ATIP”) Office

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1. Purpose and Scope

Public Sector Pension Investment Board is a Canadian federal Crown Corporation with offices in Montréal, Québec and Ottawa, Ontario, as well as international offices operated by our wholly-owned subsidiaries in London (UK), New York (USA) and Hong Kong (Special Administrative Region [SAR]) (collectively, “PSP Investments,” “us,” or “we”).

This Privacy Notice (the “Notice”) applies to those who visit our website located at <https://www.investpsp.com> (“Website”), to those who interact with us online or in person, to our investment partners and managers, and in the context of our due diligence activities for our investment operations (collectively, “you” and “your”). The purpose of this Notice is to provide you details on how we process your personal information and inform you about your rights in relation to your personal information.

PSP Investments is committed to respecting your privacy and processing your personal information in accordance with applicable privacy laws and regulations. At PSP Investments, we determine how and why we process your personal information. This means that we are what is called a “data controller” under some privacy laws. As a data controller, we are responsible to ensure that your personal information is processed in accordance with the applicable laws and your privacy rights are respected. From time to time, depending on your relationship with PSP Investments, we may provide you with additional terms and/or commitments that also govern how we process your personal information.

For the purposes of this Notice, “personal information” means any information about an identified or identifiable individual, and “process/processing” means collectively any operations performed on personal information, including collection, use, disclosure, storage, transfer, access, or destruction.

2. Collection of Personal Information

The types of personal information that we collect will depend on the nature of our relationship with you, and may include the following categories:

- **Identification Information:** Full name, title, gender, marital status, date and place of birth.
- **Contact Information:** Personal contact information (home address, telephone number, email address).
- **Professional Information:** Position/job title, business contact information (address, telephone number, email address).
- **Profile Information:** Username and password for our online platforms that you have access to.
- **Communication Data:** Your interactions with us including emails, letters and other communications sent to us, as well as your attendance in events and meetings (virtual or in-person) and to the extent permitted by law and where applicable, recordings of such events and meetings.
- **Physical Access Records:** Records of visits to our premises, access card logs, CCTV recordings.
- **Device Information:** Information relating to your use of and interaction with our Website and/or online platforms, including, your IP address, device ID, browser type, browser version, browser language and operating system.
- **Background Verification Information:** Unique identifiers (such as passport or driver’s license numbers, social insurance, or social security numbers, etc.), media or social media verifications, reference checks, credit checks and background information including criminal convictions and offenses.

Please note that the types of personal information that PSP Investments processes are set out in our [Info Source Chapter](#), which describes our purposes for the collection and use of personal information, as well as possible consistent uses, and the retention and disposal standards for such information. Please refer to our [Info Source Chapter](#) for additional details on how PSP Investments processes your personal information.

Any personal information we request from you is necessary for us to fulfill the purpose for which it is being collected, unless we inform you that it is optional. If you do not provide certain information when we request it, we will inform you of the consequences.

If you provide us with the personal information of others (such as family members), you must obtain their explicit consent prior to providing us with such information.

3. How We Collect Personal Information

We collect your personal information in several ways, including:

- Directly from you:
 - When you directly provide us personal information throughout our relationship.
 - When you visit our Website, contact or otherwise interact with us, including through our social media accounts or participating in our events or meetings.
- From other sources:
 - When we collect personal information about you from various third parties, such as from companies that provide background verification services, or from publicly available sources, including media and social media outlets and platforms.

4. Purposes for Processing Personal Information

Your local law may require us to identify the legal grounds on which we rely to process your personal information. In most cases, our legal basis will be one of the following:

- **Contract:** Where processing your personal information is necessary in order to enter into a contract with you or to fulfil our contractual obligations towards you.
- **Legal Obligation:** Where processing your personal information is necessary to comply with a legal or regulatory obligation.
- **Legitimate Interests:** Where processing your personal information is necessary to achieve our (or a third party's) legitimate interests and where such interests are not overridden by your interests or fundamental rights and freedoms.
- **Consent:** Where we request your consent for processing your personal information and you give your explicit consent for us to carry out such processing. Where the processing is based on your consent, you may contact us anytime to withdraw your consent, however, please note that the withdrawal of your consent will not affect the lawfulness of any processing previously carried out.

In the table below, we describe what personal information we may process about you, why we process it and the legal basis under which we process it.

Please note that depending on the nature of your relationship with PSP Investments, some processing activities listed below may not be applicable for you.

Purposes for processing your personal information	Type of personal information	Legal basis for processing
To communicate with you through your preferred contact method.	<ul style="list-style-type: none"> • Contact Information • Professional Information • Communication Data 	<ul style="list-style-type: none"> • Consent • Legitimate Interests
To organize and host meetings, events, and training sessions.	<ul style="list-style-type: none"> • Professional Information • Contact Information • Communication Data • Device Information 	<ul style="list-style-type: none"> • Legitimate Interests: to administer the meeting, event, or session, to facilitate your attendance, and where relevant, to record such meetings, events, or sessions.
To conduct analytics on our Website.	<ul style="list-style-type: none"> • Device Information 	<ul style="list-style-type: none"> • Legitimate Interests: to improve our Website.
To ensure the security of our digital assets, infrastructure, systems, and data.	<ul style="list-style-type: none"> • Communication Data • Device Information 	<ul style="list-style-type: none"> • Legitimate Interests: to protect our infrastructure and information assets.
To ensure the physical security of our offices and other facilities.	<ul style="list-style-type: none"> • Identification Information • Contact Information • Professional Information • Physical Access Records 	<ul style="list-style-type: none"> • Legitimate Interests: to ensure the physical security of our facilities as well as our personnel.
To create and administer external access to PSP Investments' systems.	<ul style="list-style-type: none"> • Profile Information • Identification Information • Contact Information • Professional Information • Device Information 	<ul style="list-style-type: none"> • Consent • Legitimate Interests: to provision system access and monitor system usage.
To conduct reputational due diligence in the context of our investment activities	<ul style="list-style-type: none"> • Identification Information • Contact Information • Professional Information • Communication Data • Background Verification Information 	<ul style="list-style-type: none"> • Consent • Legitimate Interests: To conduct reputational due diligence on individuals in the context of our investment activities using publicly available information or databases. In these limited circumstances, informing or obtaining the consent from the specific individual would defeat the purpose or be prejudicial to the use for which information is being collected and/or would not be possible or appropriate given the particular circumstances of the potential transaction or business relationship (for instance, public merger and acquisition transactions, minority or passive investments, credit investments, highly competitive private transactions conducted by auction or similar circumstances).

<p>To assess existing and potential suppliers and manage the supplier relationship.</p>	<ul style="list-style-type: none"> • Identification Information • Contact Information • Professional Information • Background Verification Information 	<ul style="list-style-type: none"> • Consent • Legitimate interests: to mitigate operational risk and maintain our supplier relationships.
<p>To stay informed about industry trends, peers, public perceptions about PSP Investments, and relevant news articles.</p>	<ul style="list-style-type: none"> • Identification Information • Professional Information 	<ul style="list-style-type: none"> • Legitimate interests: to mitigate reputational risk.

Please note that any personal information identified above may be used for the purposes of internal and/or external investigations, audits or to comply with legal obligations, as applicable.

5. Disclosure of Personal Information

We may disclose your personal information in connection with the purposes outlined in section 4 to the following parties:

- Wholly-owned subsidiaries of Public Sector Pension Investment Board.
- Third parties, such as external consultants and service providers who are performing certain services on our behalf.
- Any person or body to whom disclosure is allowed or required by applicable law, regulation, or any other applicable instrument.

When we disclose your personal information to an external consultant, service provider or other third-party, we ensure that appropriate contractual controls are put in place, where required, to protect your personal information.

6. International Transfers of Personal Information

We are a global organization operating across multiple jurisdictions. Therefore, personal information may be transferred to, accessed from and stored globally as necessary for the purposes stated above in this Notice.

As a result, we may transfer personal information to a third-party in a different jurisdiction which may not have equivalent laws and regulations for the protection of your personal information. We apply the same level of technical and organizational measures to the processing of your personal information wherever it is processed, and we implement safeguards to require that any such third parties also process your personal information accordingly. Such safeguards include implementing appropriate contractual measures and data transfer mechanisms, where required, with our third parties.

If you are in the European Economic Area (EEA), Switzerland or the United Kingdom (UK), PSP Investments may transfer data collected from you to third party processors located in other countries. PSP Investments will comply with the requirements of your local law for the international transfer of your personal information by ensuring that proper transfer mechanisms are in place.

7. Accuracy of Personal Information

We will take all reasonable steps to ensure that the personal information we process is as accurate and complete as possible. If any information about you changes or you have any concerns regarding the accuracy of the information we hold about you, you can exercise your rights as described in section 10.

8. Retention of Personal Information

We retain personal information for as long as we need it: (i) to fulfill our mandate, (ii) for the purposes outlined in this Notice, (iii) in connection with litigation, investigations, or proceedings, and (iv) as required or permitted by applicable law.

We dispose of personal information under our control securely and in accordance with applicable laws. As a Canadian federal crown corporation, PSP Investments will also consider the provisions of the *Library and Archives of Canada Act* when disposing of records containing personal information.

9. Security of Personal Information

We have implemented appropriate technical and organisational measures to ensure a level of security for the personal information in our custody or control that is appropriate to the sensitivity of the information. These measures are designed to protect personal information against loss or theft, as well as unauthorized access, disclosure, use or modification.

We have established plans and procedures to respond to suspected and confirmed security and privacy incidents in a timely fashion. In the event of a confirmed privacy breach, we will notify the applicable regulator and you, where we are legally required to do so.

Please note that emails and other electronic methods used to communicate with PSP Investments may not be secure and PSP Investments cannot guarantee the confidentiality of communications initiated by email or via a social media platform. Therefore, it is recommended that you do not send us sensitive personal information, such as any government issued identification numbers or your date of birth by email or via a social media platform.

10. Your Rights

You may have certain rights under your local law in relation to the personal information we hold about you, as described below. However, please note that these rights are not absolute, and they may be subject to certain exceptions and conditions.

Access: You have the right to request to find out whether information related to you is being processed, and if so, you have the right to access such personal information, subject to certain exceptions.

Correction: If we hold personal information about you that is inaccurate, you have the right to request that information to be corrected.

EU/UK/Switzerland residents: In addition to the rights of Access and Correction, if you are located in the European Union, United Kingdom or Switzerland, you have the following additional rights in connection with your personal information:

Erasure: You have the right to ask for the deletion of your personal information, subject to certain conditions and exceptions.

Restriction: You have the right to request us to limit the processing of your personal information, subject to certain conditions and exceptions.

Object: You have the right to object to the processing of your personal information, under certain conditions.

Portability: You have the right to request a copy of your personal information that you have provided to us in a commonly used electronic format, or request that we share such information with another party, under certain conditions.

Automated decision making: You have the right not to be subject to a decision based solely on automated processing that may produce outcomes that significantly impact you. Please note that PSP Investments does not make decisions based solely on automated processing that may impact you.

California residents: In addition to the rights of Access and Correction, if you are located in California, you have the following additional rights in connection with your personal information:

Right to Know: You have the right to receive additional information on how and why it is collected, processed, used, sold, and disclosed including the list of third parties to whom it was disclosed or collected from.

Deletion: You have the right to ask for the deletion of your personal information, subject to certain exceptions.

Opt-Out: You have the right to request that we not to “sell” your personal information or “share” your personal information with third parties for the purpose of targeted advertising or cross-context behavioral advertising. Please note that PSP Investments does not sell personal information or share personal information for the purposes of targeted advertising or cross-context behavioral advertising.

Limit: You have the right to request that we limit the use and disclosure of sensitive personal information we have collected. To the extent we collect your sensitive personal information (as defined by the *California Consumer Privacy Act*), we will not use or disclose such information for purposes other than (i) to perform services and/or provide goods that you reasonably expect from us; (ii) to prevent, detect and investigate security incidents; (iii) to resist illegal actions directed at the business and prosecute/defend our rights; (iv) to ensure the physical safety of others; (v) for short-term, transient use; (vi) to perform services necessary for the business; (vii) to verify and maintain the quality and safety of our product or services; and (viii) generally for purposes that do not infer characteristics about you. As such, any sensitive personal information that we collect does not come within this right to limit use.

Exercising your rights: You may exercise your rights at any time by completing the applicable form below and sending it to the coordinates detailed in the “Contact Us” section.

- Residents of the European Union, Switzerland and the United Kingdom may submit a request by completing the [Privacy Rights Request Form \(EU/SWISS/UK\)](#).
- Residents of all other jurisdictions may submit a request by completing the [Privacy Rights Request Form](#). Alternatively, requests for access to personal information can also be submitted through the

[ATIP Online Request Service](#), and requests for correction of personal information can also be submitted by completing the [Record Correction Request Form](#).

We may need to request additional information from you to help us confirm your identity prior to processing your request. This is an important step to ensure the security and privacy of your information and to ensure that your personal information is not disclosed to anyone who does not have the authority to receive it. We may also request further information in relation to your request to help us to locate your personal information subject to the request, including, for example, the nature of your relationship with us. Any personal information you share with us to confirm your identity and the scope of your request will only be used for these purposes.

We will respond to all legitimate requests in line with the time limits set out in applicable law. You will never be discriminated against or penalized for exercising your rights in relation to your personal information.

If you have concerns with how we handle your personal information, you have the right to contact the privacy or data protection regulator in the country you live or work, or in the country where you believe there is an issue about the processing of your personal information.

- In Canada, you can contact the [Office of the Privacy Commission of Canada](#).
- In the United Kingdom, you can contact the [Information Commissioner's Office](#).
- In Hong Kong, you can contact the [Office of the Privacy Commissioner for Personal Data](#).
- In California, you can contact the [California Attorney General](#).
- In the European Economic Area, you can contact your [local data protection authority](#).
- In Switzerland, you can contact the [Federal Data Protection and Information Commissioner](#).

11. Cookies Used on our Website

For information about the use of cookies on our Website, please read our [Cookie Notice](#).

12. Updates to this Notice

This Notice may be updated periodically to reflect changes to our personal information practices or applicable law. The revised Notice will be posted on our Website. We encourage you to refer to this Notice often for the latest information about our personal information practices.

13. Contact Us

You can exercise your rights, direct questions, comments, concerns or complaints you may have about how we process your personal information by contacting our Access to Information and Privacy Office:

Access to Information and Privacy (ATIP) Office
1250 René-Lévesque Boulevard West, Suite 1400
Montréal, Québec, Canada, H3B 5E9
ATIP@investpsp.ca

European Union residents may also contact our EU GDPR Representative to exercise their rights under the EU GDPR:

Bredin Prat SAS
Attn: PSP Investments EU GDPR Representative
53 Quai d'Orsay, Paris, 75007 France
RGPD@bredinprat.com

United Kingdom residents may also contact our UK entity to exercise their rights under the UK GDPR and UK Data Protection Act:

PSP Investments Holding Europe Ltd
10 Bressenden Place, 8th floor, London, United Kingdom, SW1E 5DH
UK-GDPR@investpsp.ca