



PRIVACY IMPACT ASSESSMENT (“PIA”) SUMMARY – GROUP INSURANCE MANAGEMENT SERVICES

Section 1 - PIA Overview:

1. Name of program or activity:

Group Insurance Management Services– Benefits Provider

2. Completion date of the PIA:

November 15, 2018

3. Institution responsible for delivering the program or activity:

Public Sector Pension Investment Board (“PSP Investments”)

4. Government official responsible for the privacy impact assessment:

Tammy Marer, ATIP Coordinator and Senior Director, Legal Affairs

5. Head of institution/delegate:

Neil Cunningham, CEO

6. Description of program or activity:

PSP Investments has engaged a third-party service provider to administer its group insurance and benefits program. The Service Provider will oversee the administration of all benefits such as life insurance; disability insurance including accidental death & dismemberment or long-term disability; out-of province/out-of-Canada coverage; extended health care; dental coverage; critical illness; and as such. Due to the nature of the services that will be provided, the service provider will have access to Canadian employees’ personal and confidential information.

7. Description of the class of record associated with the program or activity:

PRN 941 – Compensation and Benefits

8. Personal information bank:

PSE 904 – Pay and Benefits

9. Legal authority for the program or activity:

The legal authority for the collection of personal information for the benefits plan is undertaken under PSP’s general authority to operate. No special authority is required.

General authority:

Public Sector Pension Investment Board Act:

5(1) The Board has the capacity and, subject to this Act, the rights, powers and privileges of a natural person.

Section 2 - PIA Risk Area Identification and Categorization

The following section contains risks identified in the PIA for the new or modified program. A risk scale has been included for each risk area lettered "a – f". The numbered risk scale is presented in ascending order: the first level represents the lowest level of potential risk for the risk area; the fourth level (4) represents the highest level of potential risk for the given risk area. Please refer to "Appendix C" of the [TBS Directive on PIAs](#) to learn more about the risk scale.

a. Type of program or activity

- **Risk Scale - 2:** Administration of program or activity and services

b. Type of Personal Information Involved and Context

- **Risk Scale – 3:** Social Insurance Number, medical, financial or other sensitive personal information and/or the context surrounding the personal information is sensitive. Personal information of minors or involving a representative acting on behalf of the individual. For example: Detailed PSP employee personnel information, complaints that are of a sensitive nature.

c. Program or Activity Partners and Private Sector Involvement

- **Risk Scale – 4:** Private sector organizations or international organizations or foreign governments

d. Duration of the Program or Activity

- **Risk Scale – 3:** Long-term program

e. Program Population

- **Risk Scale – 2:** The program affects all individuals for internal administrative purposes.

f. Technology and Privacy

Does the new or substantially modified program or activity involve implementation of a new electronic system or the use of a new application or software, including collaborative software (or groupware), to support the program or activity in terms of the creation, collection or handling of personal information?

Yes	No
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Does the new or substantially modified program or activity require any modifications to information technology (IT) legacy systems?

Yes	No
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Does the new or modified program or activity involve the implementation of one or more of the following technologies:

- Enhanced identification methods?
- Use of Surveillance?
- Use of automated personal information analysis, personal information matching and knowledge discovery techniques?

Yes	No
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g. Personal Information Transmission

- **Risk Scale – 2:** The personal information is used in a system that has connections to at least one other system

h. Risk Impact to the Institution:

- **Risk Scale – 4:** High

i. Risk Impact to the Individual or Employee

- **Risk Scale – 4:** High