



PRIVACY POLICY

Native Benefits Plan and its affiliated entities

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RBA

RÉGIME DES BÉNÉFICES AUTOCHTONE
NATIVE BENEFITS PLAN

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PREAMBLE

The Native Benefits Plan and its affiliated entities (hereinafter collectively referred to as “RBA”) recognize the importance of privacy and are committed to protecting the personal information they collect and process in the course of their operations. For clarity, RBA includes the following organizations:

- RBA Financial Group;
- RBA Foundation;
- Native Benefits Plan;
- First Nations Public Security Pension Plan;
- Defined Contribution Pension Plan;
- 15577764 Canada inc.

The term “the Plans” will be used to refer to both the Native Benefits Plan and the First Nations Public Security Pension Plan.



SECTION 1 – OBJECTIVES

This Privacy Policy (hereafter “Policy”) describes the practices implemented by RBA regarding the protection of personal information. The Policy aims to:

- Protect personal information throughout its lifecycle, from collection, use, disclosure and retention to destruction or anonymization, in compliance with applicable laws;
- Establish guiding principles to ensure effective protection of personal information;
- Ensure compliance with applicable legal and regulatory requirements, including the Act respecting the protection of personal information in the private sector.

SECTION 2 – SCOPE

This Policy applies to all employees and third parties (consultants, subcontractors, or service providers) acting on behalf of RBA.

It applies to all information, data, and documents held by RBA or by third parties acting on its behalf, whether stored electronically (servers or cloud) or on paper, in any format (text, image, audio, or video), whether on-site or off-site.



SECTION 3 – DEFINITIONS

Client: The client is the company or individual who retains the services of RBA Financial Group and to whom RBA Financial Group undertakes to provide a service in exchange for remuneration.

Information owner: With respect to personal information, RBA Financial Group owns the information when it acts as an employer or in the course of its own business activities. When RBA Financial Group acts as a service provider or on behalf of companies, the information owner is the company in question.

Personal information: Any information about an identifiable individual.

Examples: address, phone number, email, bank account number.

Sensitive personal information: Information with a high expectation of privacy due to potential harm.

Examples: financial data, medical data, social insurance number.



SECTION 4 – ROLES AND RESPONSIBILITIES

The roles and responsibilities of the stakeholders responsible for ensuring compliance with and implementation of the Policy are described in the following table:

Business Function	Responsibilities
Pension Committees and Boards of Directors	<ul style="list-style-type: none"> - Approve this Policy and any amendments thereto.
General Management	<ul style="list-style-type: none"> - Ensure communication, implementation, and compliance with the Policy.
Chief Privacy Officer	<ul style="list-style-type: none"> - Contribute to the implementation of this Policy; - Ensure compliance with the Privacy Policy; - Oversee the storage and disposal of personal information in collaboration with the IT team; - Oversee the disclosure of personal information to third parties and transfers outside Quebec; - Collaborate with Human Resources to ensure compliance with the privacy training plan for staff members; - Manage privacy complaints and incidents, process requests to exercise individuals' rights (e.g., right of access, rectification, etc.), and communicate with the Commission d'accès à l'information, as applicable; - Oversee the management of privacy impact assessments.
Information Technology Department	<ul style="list-style-type: none"> - Ensure the adequacy of controls and security measures applicable to personal information; - Operationalize the destruction and anonymization, where applicable, of personal information; - Support the completion of privacy impact assessments.
Human Resources	<ul style="list-style-type: none"> - Coordinate training on privacy protection;



	<ul style="list-style-type: none">- Ensure that staff members' personal information is processed based on legitimate business objectives and the necessary legal basis.
Staff Members	<p><i>*Responsibilities common to all operational departments</i></p> <ul style="list-style-type: none">- Obtain consent from the individuals concerned regarding the personal information collection activities for which they are responsible;- Report confidentiality incidents within their respective department to the Chief Privacy Officer;- Support privacy protection deployments and ensure compliance with privacy protection processes.



SECTION 5 – PERSONAL INFORMATION COLLECTED

5.1 Responsibility

RBA is responsible for the processing of the personal information it holds, including information shared with third parties. RBA has appointed a Chief Privacy Officer, whose contact details are provided in section 12, who ensures the application of this Policy and that RBA complies with laws and regulations relating to personal information.

5.2 Identifying the Purposes

RBA must first determine the reasons why it wants to collect, use, disclose, and/or retain personal information. RBA ensures that it collects only the personal information necessary to fulfill the predetermined purposes. The purposes for which RBA collects your personal information are specified at the time of collection. You may also be informed of these purposes upon request.

As of the date of adoption of this Policy, the purposes for which personal information is used are:

Category of individuals concerned	Purposes of data collection
Participants in the Plans	<ul style="list-style-type: none">- To confirm your identity, verify the accuracy of your personal information, and update it as necessary;- To process your file as a member, which includes, but is not limited to:<ul style="list-style-type: none">- Calculating contributions;- Paying retirement pensions;- Paying any other benefits due from the Plans.- Performing overall Plan management (e.g., actuarial valuation, asset and liability analysis, etc.);- Providing support and assistance;- Improving the services offered to you by conducting customer service surveys;- Managing complaints;- Analyzing data and generating statistics;



	<ul style="list-style-type: none"> - Sending communications for marketing and advertising purposes; - Communicating with you; - Detecting and preventing fraud or other illegal activity; - Managing risks, security, and regulatory compliance; - Meeting legal and regulatory obligations; - Respond to inquiries.
Job applicants	<ul style="list-style-type: none"> - To evaluate your application; - To retain the results of your application evaluation for 3 years for future reference; - To communicate with you; - To comply with our legal and regulatory obligations.
Any other person	<ul style="list-style-type: none"> - To respond to your requests submitted by phone, email, or mail; - To make courtesy calls.

5.3 Collection of Personal Information

RBA collects personal information directly from the individual concerned unless it has obtained their consent for their personal information to be collected from third parties or unless the law authorizes it to collect it otherwise.

Directly from you: the personal information we collect directly from you is that which you provide to us when you communicate with us (by phone, email, etc.).

For participants in the Plans

Your employer provides us with most of your personal information. When you enroll in the Plans, they provide us with information such as your name, address, date of birth, etc. Subsequently, they regularly provide us with information such as your salary, periods of absence (e.g., unpaid leave, maternity or paternity leave, periods of disability, etc.), and your termination date. This information is transmitted to the Plan through our secure website.

Other information comes directly from you, either by telephone, email, through your RBAccess account, or through other documents or forms that you send us.



Finally, certain details are determined by the pension plans, such as the amount of your pension calculated at the time of your retirement or the date on which you will be eligible to receive your pension without reduction.

For RBA Financial Group

In cases where RBA Financial Group does not have control over the personal information submitted or processed by its clients, RBA Financial Group cannot be held responsible for any failure to fulfill this obligation. However, RBA Financial Group ensures that the personal information transmitted through its systems is adequately protected.



SECTION 6 – CONSENT

Unless otherwise provided by law, RBA ensures that it obtains the consent of the person concerned by informing them beforehand of the following:

- The purposes for which their personal information is collected;
- The means by which it will be collected;
- Their right to access and correct their personal information;
- The categories of third parties to whom it may be disclosed;
- The possibility that their personal information may be disclosed outside Quebec, if applicable;
- Their right to withdraw their consent to the use and disclosure of their personal information, subject to legal restrictions.

RBA obtains appropriate consent depending on the nature of the personal information collected and the purposes of the collection. Generally, consent must be explicit. It must be expressly given in the following cases:

- If the sensitive personal information that has been collected is to be used for a purpose other than that for which it was initially collected, subject to the exceptions provided for by law;
- If the collection is carried out using a technological solution, including any solution that includes functionalities allowing the identification, location, or profiling of an individual.

RBA restricts the use of personal information to the purposes for which it was collected and for which the individual concerned has given consent, subject to exceptions provided by law or obtaining new consent.

We may occasionally use your contact information to send you advertisements that align with our values. For example, at the request of a foundation or organization, we might send you an advertisement about them. Your personal information will never be disclosed to these third parties. RBA will directly send you the advertisements that these third parties wish to send you.

RBA discloses your personal information only if it has obtained your consent in accordance with applicable requirements, or without your consent in certain cases provided for by law, such as in the context of a criminal prosecution.

Any request to withdraw consent must be communicated to the office of the Chief Privacy Officer, whose contact details can be found in section 12 of the Policy.

For participants in the Plans

In accordance with the requirements of the Supplemental Pension Plans Act and considering that the personal information collected by the Plans is used to



determine eligibility for the pension plan and the benefits it provides, a member or beneficiary cannot arbitrarily withdraw their consent to the use of their personal information for these purposes. If a member or beneficiary refuses to provide the Plans with the required personal information, the Plans may be unable to pay a benefit, establish an entitlement, or provide a requested service.

For RBA Financial Group

As a service provider to a client, RBA Financial Group is generally not responsible for obtaining consent from the individuals concerned who are employees of that company. This responsibility lies with the client, as the owner of the information.

When consent is obtained by RBA Financial Group, it is retained until the file is destroyed.

SECTION 7 – ACCESS TO AND DISCLOSURE OF PERSONAL INFORMATION

Your personal information is accessible only to RBA staff members who require access to it in the course of their duties. The principle of least privilege is followed in granting access to personal information, based on the role and responsibilities of each staff member. This principle means that each staff member receives only the access necessary to perform their job, thereby reducing the risk of unauthorized access to personal information.

RBA is committed to not disclosing personal information to other third parties except in the following cases:

- Required by law;
- Disclosure of personal information to a third party is required for any legal proceedings;
- Disclosure of personal information to a third party is necessary to establish or protect legal rights;
- Disclosure of personal information to a third party is necessary for RBA to fulfill its mission.

The categories of third parties to whom RBA may disclose your personal information are as follows:

- A person acting on your behalf with your consent;
- A service provider, including technology solution providers;
- Criminal and penal prosecuting authorities, if we hold personal information about a person who has committed an offence and whose personal information is necessary to prosecute them;
- The Commission d'accès à l'information (the regulatory authority for personal information) and all persons authorized to obtain it, as required by law.

The Plans may also disclose your personal information to public bodies for the purposes described above or to public authorities as required by law. Here are some examples of third parties to whom we may disclose your information:

- Actuarial firm (actuarial valuation and various analyses);
- Canada Revenue Agency and Revenu Québec (reporting of retirement income and benefit payments on tax slips);
- Survey firm;
- Another pension plan (when a member transfers or redeems a membership from another plan, or vice versa);
- Legal guardian of a child to whom we pay a benefit;



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- Mandated representative of a member (for example, in the event of incapacity);
 - Locator firm (to update the contact information of a member who cannot be found).

SECTION 8 – RETENTION OF PERSONAL INFORMATION

RBA uses facilities and service providers to ensure the secure storage of your personal information and maintain its confidentiality.

RBA ensures the accuracy of the personal information it collects and stores in the course of its operations. The principle of accuracy aims to minimize the possibility that inappropriate information will be used to make a decision about an individual. Individuals whose personal information is collected by RBA have the right to have it corrected, if necessary.

Your personal information is generally stored in Quebec. However, it is possible that the disclosure of personal information to certain technology solution providers may result in its transfer outside of Canada. In such cases, RBA will:

- Conduct the necessary privacy risk analysis;
- Validate in advance the privacy laws and practices applicable in the jurisdiction concerned and ensure adequate protection of your personal information;
- Inform you of this, at the latest, at the time your personal information is collected.

RBA retains your personal information for as long as necessary to fulfill the purposes for which it was collected and to comply with its legal obligations, which may sometimes justify longer retention periods.

When the personal information collected is no longer needed for the purposes for which it was collected, RBA destroys or anonymizes it.

RBA has implemented a retention schedule. This schedule guides us on how long we must retain each type of personal information, depending on the context. We destroy personal information once the retention period has expired. This period depends, in particular, on our legal and regulatory obligations, and the time required to protect our rights in the event of legal action.

For participants in the Plans

The Plans retain your personal information only for as long as necessary to administer the Plans. This means that if you have benefits under the Plans, if we pay you a pension, or if we pay a pension to your surviving spouse or beneficiary, we retain your data. We also retain the data of members who withdraw their benefits after termination of employment, as this information may be required should the member later rejoin the Plan and wish to redeem their refunded



contribution. However, the Plans retain the data of members who have left until they reach the statutory retirement age, which is December 1 of the year they turn 71.

SECTION 9 – MEASURES FOR THE PROTECTION OF PERSONAL INFORMATION

RBA implements security measures that are proportionate to the sensitivity of your personal information and that protect it against loss or theft, and against any unauthorized access, disclosure, copying, use, or modification, in accordance with applicable law. The security measures implemented by RBA include:

- Regular monitoring of evolving security threats to your personal information;
- Physical measures, such as restricting access to sites hosting RBA services and to the premises where staff members involved in the proper functioning of RBA work;
- Technical measures, such as the implementation of passwords or two-factor authentication mechanisms to access RBA's systems and internet networks, restricting access to your personal information by applying the "need-to-know" principle (i.e., limiting access only to those who need it to perform their duties), implementing alerts in the event of suspicious activity, and securely encrypting communications;
- The deployment of a training and awareness program for all RBA staff members on information security and PRP, which includes mandatory annual training.

Furthermore, all RBA staff members, upon assuming their duties, committed to respecting the confidentiality of the information to which they have access by signing a confidentiality agreement.

While RBA implements a multitude of security measures to adequately protect your personal information and minimize the risk of breaches, a risk always remains, and we cannot guarantee 100% that your personal information will not be subject to a breach of confidentiality or integrity in the event of a breach of our physical, technical, or administrative security measures. If you have reason to believe that personal information has been compromised, please contact the Chief Privacy Officer, whose contact information can be found in section 12.

Use of the RBA Website and Cookies

RBA may use cookies, which are placed on the hard drives of visitors' computers. These cookies are used for website administration and to personalize your browsing experience. You can disable cookies in your browser settings; however, if you do so, some website features may be unavailable.



SECTION 10 – YOUR RIGHTS REGARDING YOUR PERSONAL INFORMATION

RBA respects your legal rights regarding your personal information and therefore applies procedures to process the following requests.

10.1 Accessing and Correcting Your Personal Information

You can access the personal information RBA has collected about you, verify its accuracy, and request its modification, subject to exceptions provided by law. Your request for access or rectification must be sent to the Chief Privacy Officer using the contact information provided in section 12 and will be processed no later than thirty (30) days after RBA receives your written request and confirms its admissibility.

We strive to obtain and maintain high-quality data. Therefore, we rely on your cooperation to keep your data up to date and inform us of any necessary changes. You can make changes through your RBAccess account, by phone, email, or in person.

10.2 Withdrawal of Your Consent

Under certain circumstances, you may withdraw your consent to the processing of your personal information. Any request to withdraw consent must be submitted in writing to the Chief Privacy Officer, whose contact information is provided in section 12.

For participants in the Plans

Once you have given your consent to the collection, use, and disclosure of your personal information, you cannot withdraw that consent. Your pension plan is part of your terms of employment and is therefore binding.

If we have fulfilled the purposes for which we collected your personal information, we will destroy it. However, we may retain it to comply with our legal and regulatory obligations and to protect ourselves in the event of legal action.



10.3 Automated Processing

RBA does not conduct decision-making processes based solely on automated processing (without human intervention) of your personal information.

If RBA were to implement a decision-making process based solely on automated processing (without human intervention) of your personal information, you will be informed that you are subject to such a process, the decision that has been made, and your right to submit comments on that decision. You may also be informed, upon request, of the following:

- The personal information used to make the decision;
- The reasons for the decision;
- Your right to have the personal information used to make the decision corrected.

10.4 Complaints

If you believe that your rights regarding PRP have not been respected by RBA, you can file a complaint with the Manager whose contact details can be found in section 12.

10.5 Portability

You may, upon request, obtain a copy of the personal information that has been collected about you. If this personal information is stored electronically, you may request that it be provided to you in a structured and commonly used technological format.



SECTION 11 – WHAT IF I HAVE A QUESTION ABOUT MY PERSONAL INFORMATION?

Any questions regarding your personal information should be directed to the Chief Privacy Officer, whose contact details can be found in section 12, for processing and follow-up.

SECTION 12 – CHIEF PRIVACY OFFICER

The person responsible for the protection of personal information is responsible for ensuring compliance with and implementation of the Act respecting the protection of personal information in the private sector and, as such, is also responsible for compliance with this Policy.

The contact information for the Chief Privacy Officer is as follows:

Patrick Lessard

Email: rp@rbagroupefinancier.com

Phone Number: 418 847-1840

Toll free: 1 888 242-0277

In order to properly fulfill his responsibilities and functions, the Manager may be assisted by a team.



SECTION 13 – UPDATES AND NOTICES OF AMENDMENTS

This Policy has been adopted by the pension committees and boards of directors of the various organizations. The Chief Privacy Officer is responsible for this Policy and its review. This Policy may be amended to reflect changes in applicable requirements or RBA practices.

COMPLIANCE WITH THE POLICY

Failure to comply with this Policy may constitute a breach of RBA's legal obligations and may result in administrative or criminal penalties and disciplinary action against the individuals to whom the Policy applies. RBA may terminate any agreement with a third party or subcontractor that fails to comply with this Policy.

IMPLEMENTATION, MONITORING AND REVIEW

This Policy comes into effect on the date of adoption indicated. It will be reviewed every three years, or sooner if changes to the legal framework affect its application.

DOCUMENT HISTORY

Version	Effective	Description	Chief Privacy Officer
1.0		New policy	Patrick Lessard

