

Canada Pension Plan Investment Board

Applicant Privacy Policy

October 2022



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1. Purpose

This Applicant Privacy Policy (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 of individuals who apply for a job or board of director appointments, including through the Careers section of our website located at www.cppib.com (“**Website**”). For more information regarding the manner in which we treat personal information, please see the CPP Investments [Privacy Policy \(External\)](#).

2. Definitions

“**Personal information**” means information about an identified or identifiable individual, including name, address, email address, signature, an opinion regarding the data subject, and other information relating to an individual, including sensitive personal information. 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 who apply for a job or board of director appointments in the following circumstances:

- When you visit our Website;
- When you create an account through the Website;
- When you apply for employment with CPP Investments or a Board of Directors appointment, or otherwise provide us with a copy of your resume or other job- related information; and
- When you sign-up to receive communications from CPP Investments, such as job alerts or other updates.

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 be unable to perform certain tasks. For applicants located in the European Economic Area (EEA) or in United Kingdom (UK), we process your personal information for the purposes set out below in reliance on our legitimate interest to do so under applicable EEA or UK law or with your consent.

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. 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 website, or (ii) based on your consent.

Creating an Account on the Website

In order to access certain features on the Website and to apply for a job through the Careers portal, you may be required to create an online account. When you create an account, we collect personal information such as your full name, email address, a password you choose, mailing address, and phone number. We use this information to provide and otherwise administer your online account. For individuals located in the EEA or the UK we use personal information for these purposes in reliance on our legitimate interest in operating our website.

Applying for a Job at CPP Investments or Board of Directors Appointment

In connection with a job application or application for a Board of Directors appointment, you may provide us with certain personal information about yourself (such as that contained in a resume, cover letter, transcript, or similar employment-related materials). When you apply for a job through the Careers section of the Website, we may also collect your responses to questions relating to your eligibility to work in your chosen jurisdiction, availability, educational background (including your educational institution, degree, field of study, and, for certain job opportunities, GPA). We may also obtain employment-related information that you publicly post to social media websites such as LinkedIn. We use this information to evaluate your qualifications and suitability for the desired position and to process and respond to your application. We may also keep this information on file to consider you for future job opportunities (unless you choose to opt out) or to otherwise meet legal or business requirements. We may also collect optional demographic information, which we use on an aggregated basis for the purpose of supporting our employment equity and diversity initiatives and better understanding our applicants. For individuals located in the EEA or the UK we use personal information for these purposes in reliance on our legitimate interest in assessing your suitability for the desired position and informing you of relevant positions in the future, and we use sensitive personal information (for example, information about your racial or ethnic origin) based on your consent.

Background Verifications

Subject to applicable law, we may obtain your consent to collect additional personal information in the course of reference check and background verifications processes.

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 conduct background verifications, send our emails, to perform analytics and reporting, 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 or other jurisdictions (including the jurisdictions in which CPP Investments has offices) for the purposes set out above. 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 and 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 its transfer, for example, EU Standard Contractual Clauses. You can obtain a copy of the relevant data transfer mechanism we have put in place to protect personal information by contacting us as described 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, and to investigate or prevent actual or suspected loss or harm to persons or property.

CPP Investments Board of Directors Appointments

As set out above, if you apply for a CPP Investments Board of Directors appointment, your information may be shared with search firms, the Privy Council Office, the Federal Cabinet and the CPP Investments External Nominating Committee as part of the statutory consultation and appointment process. The CPP Investments nominating committee is comprised of representatives of all participating governments in the Canada Pension Plan, and may include one or more third parties.

5. Safeguards & Retention

We retain personal data as long as we need it: (i) for the processing purposes described above, (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, the use of passwords, encryption and firewalls. Your online access to certain of your personal information may be protected with a password you select. We strongly recommend that you do not disclose your password to anyone. We will never ask you for your password in any unsolicited communication (such as letters, phone calls or email messages).

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 access and correct certain personal information by logging-in to your online account.

To request access, corrections or updates to all other personal information contact 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 jurisdiction pursuant to applicable privacy legislation.

7. For EEA and UK Residents

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. To the extent necessary, CPP Investments entities in other jurisdictions may occasionally also be data controllers in respect of your personal information. These entities can all be contacted by sending an email to privacy@cppib.com.

8. Cookies and Additional Information about our Website

Visiting our Website

In general, you can visit our Website without telling us who you are or submitting any personal information. However, we collect the IP (Internet protocol) addresses of all visitors to our Website and other related information such as page requests, browser type, operating system and average time spent on our Website. We use this information to help us understand our Website activity, and to monitor and improve our Website.

Cookies

Please see our Cookie Policy contained within our [Privacy Policy \(External\)](#) for information on how we use cookies on our website.

9. 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.

10. Changes to Our Privacy Policy

This Policy may be updated periodically to reflect changes to our personal information practices or applicable law. The revised 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 Policy often for the latest information about our personal information practices.

11. Contact Us

Please contact us if:

- you have any questions or comments about this 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 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