

## Indian Boarding Homes Class Action

### Data Use and Disposition Protocol

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#### Introduction

The Claims Administrator will collect, process, and retain data throughout the claims process. The content, communications, and information provided by Class Members may contain personal and sensitive information. The Claims Administrator understands the importance of maintaining privacy and commits to the confidential management and destruction of the information upon its end of use.

The information collected and used by the Claims Administrator is subject to the following disposition protocol.

#### Summary of Collected Data

Information collected and processed throughout the Settlement will include the following:

- **Information provided within the forms** – This includes information, both required and optional, requested to evaluate Category 1 and Category 2 compensation. This includes requests for missing information and reconsideration requests. This information may be retained in a hard copy or digital format.
- **Information provided throughout the claims process** – This includes queries, communications, and feedback provided throughout the claims process, that may not be contained in the claims forms. This information may be retained in a hard copy or digital format.
- **Information about the content provided** – This information may include data about the content submitted physically and digitally (i.e., metadata). Examples can include the date(s) of submission, or the file name of a digital file uploaded as part of a claim.

## Use of Collected Data

The Claims Administrator will limit its collection of information to what is necessary to perform the assigned responsibilities specified in the Settlement Agreement. These tasks include:

- Identification of the Class Member and/or their representative(s)
- Determining the potential Class Member's eligibility
- Communication and socialization of the Settlement within relevant communities
- Communications to provide guidance on the location, navigation, and completion of claim forms
- Evaluation of Class Member Category 1 and Category 2 claims
- Prevention of fraud
- Improving the services and technology used to manage the claims process

## Data Disposition Protocol

1. The information collected during the claims process, including all digital and hard copies, will be retained by the Claims Administrator for the duration of the process. The retention period will conclude two years following the completion of all individual payments (both initial and those issued following reconsiderations).
2. Following the retention period, the Claims Administrator will destroy all information and documentation in its possession that was received or collected during the Settlement process.
3. The destruction of information will include all physical and digital copies of information, as per ISO 27001 and ISO 27701 data sanitization standards. The standards are summarized as follows:
  - a. Physical documents maintained on paper will be shredded in such a way that the data cannot be read or retrieved.
  - b. Digital media including information on servers will be disposed of in such a way that identification or the re-identification of sensitive data will not be possible.

4. Certification of destruction will be provided to class counsel and Canada following the destruction of information and documentation by the Claims Administrator.
5. The Claims Administrator will not provide Claimant information or documentation back to the Class Member or their Representative(s), unless Claimants specifically request that their information and documentation be returned to them.

All other information in the Claims Administrator's possession will be destroyed in accordance with the above protocols. The Claims Administrator will provide notice on claim forms and supplementary materials, that information submitted will not be returned nor copies made available.

6. An exemption to the above data destruction protocols is information and documentation created by the Claims Administrator with respect to administrative reports. These reports will be retained in strict confidence and can only be used in a legal proceeding or in the settlement process where relevant.