Canada Growth Fund Investment Management (CGFIM) A subsidiary of PSP Investments

# Annual Report on the Privacy Act

For the period April 1, 2023, to March 31, 2024

# Canada Growth Fund Investment Management Inc.

(a wholly-owned subsidiary of the **Public Sector Pension Investment Board**)

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## I. Introduction

## I.1 Background Information

In Budget 2022, the Government of Canada announced the government's intention to create the Canada Growth Fund ("CGF"). CGF's mandate is to build a portfolio of investments that catalyze substantial private sector investment in Canadian businesses and projects to help transform and grow Canada's economy at speed and scale on the path to net-zero.

In December 2022, CGF was incorporated as a subsidiary of the Canada Development Investment Corporation ("CDEV"). In Budget 2023, the Government of Canada announced that the Public Sector Pension Investment Board ("PSP Investments") would act as the independent and exclusive investment manager of CGF. In June 2023, the *Public Sector Pension Investment Board Act* was amended to allow a subsidiary of PSP Investments to act as the investment manager of CGF. Shortly after, PSP Investments incorporated Canada Growth Fund Investment Management Inc. ("CGFIM") as its wholly owned subsidiary for that purpose, and CGFIM has been providing investment management services to CGF pursuant to an Investment Management Agreement ("IMA")<sup>1</sup>. CGFIM does not have any non-operational ("paper") subsidiaries operating during this reporting period.

# I.2 Presentation of the Report

The *Privacy Act* was proclaimed into force on July 1, 1983. This report is prepared and tabled in accordance with the following:

Section 3.01 of the *Privacy Act*, which states that PSP Investments is a parent Crown corporation for the purposes of the Act, and that any provision of the Act that applies to a government institution that is a parent Crown corporation

Gestion d'actifs Fonds de croissance du Canada (GAFCC) Canada Growth Fund Investment Management (CGFIM)

<sup>&</sup>lt;sup>1</sup> On June 5th, 2023, PSP Investments, CGF and CDEV entered into an agreement pursuant to which PSP Investments agreed to provide, through a secondment arrangement, employees that would deliver a full suite of services to CGF (the "Framework Agreement") prior to entering into the IMA. The IMA was entered into between PSP Investments, CGFIM, CDEV and CGF on March 11th, 2024 and became effective as of that date. For more information about CGF, please see: https://www.cgf-fcc.ca/

- applies to any of its wholly-owned subsidiaries within the meaning of section 83 of the *Financial Administration Act*.<sup>2</sup>
- Section 72 of the *Privacy Act*, which requires every head of a federal government institution to submit a report to Parliament on the administration of the Act during the fiscal year.
- Treasury Board of Canada Secretariat ("TBS") content requirements for annual reports 2023-24.3

Section 73.1 of the *Privacy Act* allows government institutions to provide Access to Information and Privacy ("ATIP") services to another government institution chaired by the same minister. As noted above, PSP Investments is a parent Crown corporation for the purposes of the *Privacy Act* and, as such, provides ATIP services on behalf of almost all of its wholly-owned subsidiaries subject to the *Privacy Act*.

In addition, in accordance with TBS content requirements for the 2023-24 annual reports,<sup>4</sup> please note that CGFIMis **not** subject to the *Service Fees Act* <sup>5</sup>

This report is submitted and tabled to Parliament.

# I.3 Purpose of the Privacy Act and TBS Privacy Requirements

The *Privacy Act* provides individuals with the right of access to and correction of personal information about themselves that is under the control of a government institution. It also provides the legal framework for the collection, retention, use, disclosure, disposition, and accuracy of personal information in the administration of programs and activities by government institutions subject to the Act.

# II. Organizational Structure

PSP Investments Legal Services - Access to Information and Privacy office ("PSP ATIP office" or "PSP ATIP") is part of the Legal Affairs Department found within the Legal Affairs, Compliance, Taxation and Human Resources Branch of PSP Investments. The PSP ATIP

<sup>&</sup>lt;sup>2</sup> https://laws.justice.gc.ca/PDF/F-11.pdf.

<sup>&</sup>lt;sup>3</sup> January 9, 2024.

<sup>&</sup>lt;sup>4</sup> January 9, 2024.

<sup>&</sup>lt;sup>5</sup> https://laws-lois.justice.gc.ca/PDF/S-8.4.pdf.

Coordinator has delegated authority and is responsible for the implementation and management of programs and services related to CGFIM and PSP Investments' administration of, among other things, the *Privacy Act*, and the *Access to Information Act*.

#### II.1 PSP ATIP Office

The PSP ATIP office is the central coordinating body for privacy matters. As of March 31, 2024, for the application of the *Privacy Act*, the PSP ATIP Coordinator is supported by 2 employees and 3 consultants who collectively share responsibility for intake, operations, policies, and procedures.

# **II.2 Privacy Governance Specifics**

The ATIP Coordinator oversees privacy governance, risk monitoring, and decision-making. She also leads the stewardship and management of personal information and privacy across PSP, including CGFIM. Among others, the ATIP Coordinator supports the integration of data management, privacy, and cyber security; provides oversight of risk management processes with respect to personal information; and promotes a culture that recognizes that the protection of privacy is a core organizational value.

# **II.3 Service Agreements**

During the reporting period, CGFIM was not party to any service agreements under section 73.1 of the *Privacy Act*.

# III. Delegation Order

As of March 31, 2024, in accordance with section 73 of the *Privacy Act*, the President, in his capacity as Head of CGFIM, has delegated all powers, duties and functions related to the application of the *Privacy Act* to the PSP ATIP Coordinator.

The delegation order in effect during the reporting period was signed on August 24, 2023, and a copy can be found in **Appendix A**.

### IV. Performance in Fiscal Year 2023-24

CGFIM is committed to transparency and accountability under the *Privacy Act* and continues to work to maintain its performance to deliver the highest standards of service for access and protection of personal information.

### **IV.1 Statistical Report**

Statistical reports prepared by government institutions provide aggregate data on the application of the *Privacy Act* and the *Access to Information Act*. This information is made public each year in a statistical report that accompanies the annual reports on access to information and privacy tabled in Parliament by each institution. The 2023-24 CGFIM Statistical Report on the *Privacy Act*, at **Appendix B**, consists of data submitted by CGFIM as part of TBS annual collection of ATIP-related statistics.

In addition, TBS has asked institutions to report on other ancillary performance data. As a result, CGFIM presents the 2023-24 Supplemental Statistical Report on the Access to Information Act and Privacy Act in **Appendix C**.

The following sections highlight CGFIM's performance in fiscal 2023-24 in relation to its obligations under the *Privacy Act*.

# **IV.2 Requests Received and Carried Forward**

During fiscal year 2023-24, CGFIM did not receive any requests under the *Privacy Act*. No requests were carried forward, and no requests were carried over.

# **IV.3 Details of Requests Processed**

### **Disposition of Requests Completed and Pages Processed**

There is no data to report for fiscal year 2023-24, as CGFIM has not received any privacy requests. Accordingly, no documents were processed. In addition, there were no requests abandoned by applicants. Moreover, no requests were transferred, none were all

exempted, or excluded, and no records were disclosed (in whole or in part).

#### **Exemptions**

The *Privacy Act* allows, and in some cases requires, that certain information be exempted from release. For fiscal 2023-24, CGFIM has not claimed any exemptions.

#### **Exclusions**

The *Privacy Act* does not apply to or excludes information that is already publicly available, such as library material preserved solely for public reference or exhibition purposes. In fiscal year 2023-24, CGFIM has not claimed any exclusions.

#### Format of requests

There is no data to report for fiscal year 2023-24, as CGFIM has not received any privacy requests.

# **IV.4 Complaints**

In fiscal year 2023-24, CGFIM was not notified of any complaints received by the Office of the Privacy Commissioner of Canada (OPC). In addition, there were no outstanding complaints from previous reporting periods.

# **IV.5 Completion Times**

There is no data to report for fiscal year 2023-24, as CGFIM has not received any privacy requests.

#### IV.6 Extensions

The legislation sets timelines for responding to privacy requests and allows for extensions when the response requires the review of a large amount of information; consultations with other organizations; or extra time for documents to be translated. In fiscal year 2023-24, CGFIM did not seek extensions.

#### **IV.7 Consultations**

CGFIM may receive consultation requests from other federal institutions regarding privacy requests for records or matters concerning CGFIM. During fiscal 2023-24, CGFIM did not receive any consultation requests. There were no outstanding consultation requests from the previous reporting period.

# **IV.8 Informal Requests**

As part of its objective to provide Canadians with relevant information in an informal and timely manner, and in the spirit of transparency and open government, CGFIM handles informal privacy requests for information. These requests are not subject to the *Privacy Act*. During fiscal year 2023-24, CGFIM did not received any informal privacy requests.

# V. Training and Awareness

In fiscal 2023-24, PSP Investments offered training sessions to all new staff through the On-boarding program (e-learning). In addition, informal information sessions were provided throughout the reporting period.

To mark Data Privacy Day held on January 28, 2024, PSP Investments promoted the importance of sound privacy management practices and shared responsibility for protecting personal information in day-to-day activities through various awareness-raising activities.

For its *Privacy Awareness Week 2024*, PSP Investments' campaign focused on "everything you always wanted to know about privacy but were afraid to ask." Staff had the opportunity to complete a survey and visit the PSP ATIP office "Privacy pop-up" stand. PSP Investments' campaign also included an online component. In addition to email communication about the event and information about PSP Investments' privacy education resources, an article was published that included a link to a contest. This article was accompanied by a launch email. This was followed by an article inviting staff to visit the redesigned intranet site to find additional resources and special

education bulletins on how define personal information, who to contact for privacy issues, how to handle a privacy breach, and more.

# VI. Policies, Guidelines, and Procedures

CGFIM supports a robust privacy program for the protection and judicious use of personal information by CGFIM. Supplementing TBS policies, directives and standards, these procedures codify the requirements for the management and protection of personal information, articulate clear and universal privacy principles, and specify roles and responsibilities for the management of personal information, including discrete functional responsibilities and accountabilities for privacy. The procedures set out CGFIM's privacy management framework establish CGFIM's privacy governance mechanisms.

# VI.1 New or Revised Policies, Guidelines, and Procedures

There were no "new or revised" institution-specific policies, guidelines, and procedures related to privacy that were implemented during the reporting period (2023-24).

# VI.2 New Collection or New Consistent Use of Social Insurance Number

In 2023-24, CGFIM did not undertake any new collection or consistent use of Social Insurance Numbers.

# VII. Initiatives and Projects to Improve Privacy

Below is a short list of initiatives and projects currently under review.

### **Algorithmic Impact Assessment Tool**

Since June 9, 2023, the Algorithmic Impact Assessment is a risk assessment tool<sup>6</sup> intended to support the TBS *Directive on* 

<sup>&</sup>lt;sup>6</sup> <a href="https://www.canada.ca/en/government/system/digital-government/digital-government-innovations/responsible-use-ai/algorithmic-impact-assessment.html">https://www.canada.ca/en/government/system/digital-government/digital-government/digital-government/digital-government-innovations/responsible-use-ai/algorithmic-impact-assessment.html</a>.

Automated Decision-Making. <sup>7</sup> The tool is a questionnaire that determines the impact level of an automated decision-system. It is composed of 51 risk and 34 mitigation questions. Assessment scores are based on many factors, including the system's design, algorithm, decision type, impact, and data. Where applicable, CGFIM will align any internal initiatives with those set out in this risk assessment tool.

#### **De-identification**

The TBS *Privacy Implementation Notice 2023-01: De-identification* was published on March 17, 2023.8 This TBS privacy implementation notice provides information and guidance to CGFIM on the use of de-identification as a privacy-preserving technique to bolster the privacy protections around the personal information under its control in support of its obligations under section 3.1.3 of the TBS *Policy on Privacy Protection*. Where necessary, CGFIM will align any internal initiatives with those set out in TBS *Privacy Implementation Notice 2023-01*.

#### **Digital Advertising**

On January 18, 2024, TBS published its *Privacy Implementation Notice 2024-01: Digital Advertising*.<sup>9</sup> This TBS privacy implementation notice provides guidance to federal institutions on how to protect the privacy of individuals when purchasing advertising for placement on digital platforms. Where applicable, CGFIM will align any internal initiatives with those set out in TBS Privacy Implementation Notice 2024-01.

# **Digital Privacy Playbook**

TBS *Digital Privacy Playbook* was published on March 27, 2023.<sup>10</sup> The Playbook summarizes important and timely privacy

<sup>&</sup>lt;sup>7</sup> https://www.tbs-sct.canada.ca/pol/doc-eng.aspx?id=32592.

<sup>8</sup> https://www.canada.ca/en/treasury-board-secretariat/services/access-information-privacy/access-information-privacy-notices/2023-01-de-identification.html.

https://www.canada.ca/en/treasury-board-secretariat/services/access-information-privacy/access-information-privacy-notices/privacy-implementation-notice-2024-01.html.

<sup>&</sup>lt;sup>10</sup> <u>https://www.canada.ca/en/government/system/digital-government/digital-privacy-playbook.html</u>.

advice. Where necessary, CGFIM will align any internal initiatives with those set out in TBS *Digital Privacy Playbook*.

#### **Generative Artificial Intelligence**

On September 28, 2023, TBS published its *Guide on the use of generative artificial intelligence*. <sup>11</sup> The TBS Guide provides high-level considerations of generative artificial intelligence, including related privacy advice. The Guide is intended to support the TBS *Directive on Automated Decision-Making*. Where applicable, CGFIM will align any internal initiatives with those set out in this guide.

#### **Information Sharing Agreements**

TBS Guidance on Preparing Information Sharing Agreements Involving Personal Information<sup>12</sup> was published on August 3, 2023. TBS guidance is designed to assist parties in completing the Information Sharing Agreement template as well as its supporting annexes when sharing personal information among federal institutions. Where necessary, CGFIM will align any internal initiatives with those set out in this guidance.

#### **Personal Information Publicly Available Online**

On August 1, 2023, TBS published "Privacy Implementation Notice 2023-03: Guidance pertaining to the collection, use, retention and disclosure of personal information that is publicly available online." This TBS privacy implementation notice provides guidance in accordance with the requirements of the Privacy Act and related policy instruments on the collection, use, disclosure, and retention of personal information that is publicly available online. Where necessary, CGFIM will align any internal initiatives with those set out in this document.

# **Privacy Act: Plain Language Guide to Exemptions and Exclusions**

https://www.canada.ca/en/government/system/digital-government/digital-government-innovations/responsible-use-ai/guide-use-generative-ai.html.

https://www.canada.ca/en/treasury-board-secretariat/services/access-information-privacy/guidance-preparing-information-sharing-agreements-involving-personal-information.html.

https://www.canada.ca/en/treasury-board-secretariat/services/access-information-privacy/access-information-privacy-notices/privacy-implementation-notice-2023-03.html.

On October 4, 2023, TBS published its guide entitled: "Privacy Act: Plain Language Guide to Exemptions and Exclusions". The publication of this guide fulfills a commitment made by the Minister in her "National Action Plan on Open Government". The guide provides clear language on the context, rationale, and details for each exemption or exclusion applied under the Privacy Act. With this publication, the Minister aims to provide transparency to requesters on why information has been redacted in their access requests. To support the TBS Minister, CGFIM and PSP ATIP office will align its response letters, issued under the Privacy Act, to include a reference to the guide.

### **Privacy Breaches**

On March 1, 2024, the TBS Minister updated Appendix B of TBS Directive on Privacy Practices. With this update, the Minister established revised mandatory procedures to contain any potential or confirmed privacy breaches. These revised mandatory procedures for privacy breaches were updated to include new required information to be provided to TBS and the OPC when reporting material privacy breaches. It also prescribes the Privacy Act Material Breach Reporting form to be used. 15 By using the form, CGFIM will ensure that it meets its material breach reporting requirements. The TBS/OPC privacy breach form is accompanied by an update to the TBS Privacy Breach Management Toolkit. 16 The TBS toolkit provides guidance on managing privacy breaches and is meant to provide guidance to employees working in programs across federal institutions as well as ATIP officials. The toolkit includes downloadable tools to assist in assessing and communicating breaches. Where appropriate, CGFIM will align any internal initiatives with those set out in the updated TBS Directive on Privacy Practices and the TBS Privacy Breach Management Toolkit.

https://www.canada.ca/en/treasury-board-secretariat/services/access-information-privacy/pa-plain-language-guide.html#toc-1.

https://www.canada.ca/en/treasury-board-secretariat/corporate/forms.html (TBS Form entitled: "Privacy Act Material Breach Report Form"); or at <a href="https://www.priv.gc.ca/en/report-a-concern/report-a-privacy-breach-at-your-organization/report-a-privacy-breach-at-your-federal-institution/">https://www.priv.gc.ca/en/treasury-board-secretariat/corporate/forms.html (TBS Form entitled: "Privacy Act Material Breach Report Form"); or at <a href="https://www.priv.gc.ca/en/report-a-concern/report-a-privacy-breach-at-your-federal-institution/">https://www.priv.gc.ca/en/treasury-board-secretariat/corporate/forms.html (TBS Form entitled: "Privacy Act Material Breach Report Form"); or at <a href="https://www.priv.gc.ca/en/report-a-concern/report-a-privacy-breach-at-your-organization/report-a-privacy-breach-at-your-federal-institution/">https://www.priv.gc.ca/en/report-a-concern/report-a-privacy-breach-at-your-organization/report-a-privacy-breach-at-your-federal-institution/</a> (OPC Form entitled: "Report a privacy breach at your federal institution").

https://www.canada.ca/en/treasury-board-secretariat/services/access-information-privacy/privacy/privacy-policies-guidance/breach-management.html.

Concurrently, by updating Appendix I of TBS *Directive on Security Management*,<sup>17</sup> the TBS Minister has implemented the TBS *Standard on Security Event Reporting*.<sup>18</sup> This standard came into effect on March 1, 2024. Where appropriate, CGFIM will align its internal initiatives with those set out in this standard.

#### **Privacy Impact Assessments**

Since March 19, 2024, the OPC has established a new online PIA submission form. 19 CGFIM will align its internal procedures to include a reference to the OPC new online PIA submission form.

#### **Program Monitoring**

On July 24, 2023, TBS published *Privacy Implementation Notice* 2023-02: Personal information for program monitoring, evaluation and reporting purposes.<sup>20</sup> The TBS privacy implementation notice serves to assist CGFIM in collecting, using, retaining, and disclosing personal information for program monitoring, evaluation and reporting purposes, including for Gender-based Analysis Plus, and provides guidance regarding the management of personal information for such non-administrative uses. Where necessary, CGFIM will align any internal initiatives with those set out in Privacy Implementation Notice 2023-02.

# VIII. Summary of Key Issues and Actions Taken on Complaints and Court Cases

Applicants have the right to register a complaint with the OPC regarding any matter relating to the processing of a request.

<sup>&</sup>lt;sup>17</sup> https://www.tbs-sct.canada.ca/pol/doc-eng.aspx?id=32611.

<sup>&</sup>lt;sup>18</sup> https://www.tbs-sct.canada.ca/pol/doc-eng.aspx?id=32613.

<sup>&</sup>lt;sup>19</sup> https://www.priv.gc.ca/en/privacy-topics/privacy-impact-assessments/submit-pia/.

<sup>&</sup>lt;sup>20</sup> https://www.canada.ca/en/treasury-board-secretariat/services/access-information-privacy/access-information-privacy-notices/2023-02-evaluation.html .

Table 1: Complaints received, by type, 2023-24					
Type of complaint	Numbers of complaints				
Time limits	0				
Delay: deemed refusal	0				
Refusal: exemptions	0				
Refusal: exclusion	0				
Refusal: missing records	0				
Miscellaneous	0				
Total	0				

Table 2: Complaints closed by the OPC in 2023-24							
Disposition of complaint	Type of complaint						
Not well-founded	0	N/A					
Discontinued	0	N/A					
Well-founded	0	N/A					
Total	0						

In fiscal 2023-24, no complaints were filed with the OPC against CGFIM, and the OPC issued no findings.

#### **Court Cases**

With respect to the *Privacy Act*, no court cases have been brought against CGFIM.

# IX. Material Privacy Breaches

In fiscal year 2023-24, CGFIM did not experience any material privacy breaches.

# X. Privacy Impact Assessments and Privacy Reviews

#### **Privacy Impact Assessments**

As noted above, in accordance with the TBS *Directive on Privacy Impact Assessment*, CGFIM is required to conduct PIAs prior to establishing any new or substantially modified program or activity involving the administrative use of personal information. PIAs are used to identify and assess privacy risks as well as to develop plans to reduce or eliminate those risks. During the 2023-24 fiscal year, no PIAs were initiated.

#### XI. Public Interest Disclosures

Paragraphs 8(2)(e), (f), (g), and (m) of the *Privacy Act* permit the disclosure of personal information to various investigative/regulatory bodies or to Members of Parliament, or if disclosure is in the public interest. No disclosures under subsection 8(2), including under paragraph 8(2)(m), were made in fiscal year 2023-24.

# XII. Monitoring Compliance

CGFIM and PSP ATIP staff monitor the time it takes to process privacy requests.<sup>21</sup> Compliance is ensured on an on-going basis through the use of a privacy request tracking system.

As warranted, CGFIM and the PSP ATIP office will produce a series of regular and ad hoc reports to monitor CGFIM's compliance with the *Privacy Act*, and the *Access to Information Act*, through quarterly reviews of key performance indicators.

# XIII. Corrections

Paragraph 12(2)(a) of the *Privacy Act* gives individuals a right to request a correction of personal information about them held by CGFIM. No corrections were requested or made in fiscal year 2023-24.

<sup>&</sup>lt;sup>21</sup> CGFIM fully adheres to the implementation guidelines issued by TBS which specify that inter-institutional consultations on privacy requests should only take place where necessary, and to restrict the scope of such consultations.

# **Appendix A: Delegation Order**

Canada Growth Fund Investment Management Inc. ("CGFIM")

Delegation Order ("Order")

(section 95(1), Access to Information Act, R.S.C. 1985, c. A-1, as amended and section 73, Privacy Act, R.S.C. 1985, c. P-21, as amended)

- This Order may be cited as the "CGFIM Head of Institution Delegation Order pursuant to the Access to Information Act and Privacy Act".
- 2. Pursuant to Section 95(1) of the Access to Information Act and Section 73 of the Privacy Act, the undersigned, acting in his capacity of head of CGFIM hereby designates the person holding the position set out below, or the person occupying on an acting basis that position, to exercise their powers, duties and functions, under the provisions of the Acts and related regulations set out in the schedule opposite each position.

Position/Title	Access to Information Act and Regulations	Privacy Act and Regulations		
Access to Information Co- Ordinator	Full Authority	Full Authority		

This Delegation Order has been made in Montreal and is effective starting on the 24th day of August, 2023.

Patrick Charbonneau
President

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# **Appendix B: Statistical Report**

Government of Canada du Canada

#### Statistical Report on the Privacy Act

Name of institution: Canada Growth Fund Investment Management Inc., a v

Reporting period: 2023-04-01 to 2024-03-31

#### Section 1: Requests Under the Privacy Act

#### 1.1 Number of requests received

		Number of Requests
Received during reporting period	0	
Outstanding from previous reporting periods	0	
Outstanding from previous reporting period	0	
Outstanding from more than one reporting period	0	
Total		0
Closed during reporting period		0
Carried over to next reporting period	0.00	0
Carried over within legislated timeline	0	
Carried over beyond legislated timeline	0	1

#### 1.2 Channels of requests

Source	Number of Requests
Online	0
E-mail	0
Mail	0
In person	0
Phone	0
Fax	0
Total	0

#### Section 2: Informal requests

#### 2.1 Number of informal requests

		Number of Requests
Received during reporting period	0	
Outstanding from previous reporting periods		0
Outstanding from previous reporting period	0	
Outstanding from more than one reporting period	0	
Total	0	
Closed during reporting period	0	
Carried over to next reporting period		0

#### 2.2 Channels of informal requests

Source	Number of Requests
Online	0
E-mail	0
Mail	0
In person	0
Phone	0
Fax	0
Total	0

#### 2.3 Completion time of informal requests

			Comple	tion Time			
0 to 15 Days	16 to 30 Days	31 to 60 Days	61 to 120 Days	121 to 180 Days	181 to 365 Days	More Than 365 Days	Total
0	0	0	0	0	0	0	0

#### 2.4 Pages released informally

						1001-5000 Pages Released			eleased
						Requests			
0	0	0	0	0	0	0	0	0	0

#### Section 3: Requests Closed During the Reporting Period

#### 3.1 Disposition and completion time

	Completion Time							55
Disposition of Requests	0 to 15 Days	16 to 30 Days	31 to 60 Days	61 to 120 Days	121 to 180 Days	181 to 365 Days	More Than 365 Days	Total
All disclosed	0	0	0	0	0	0	0	0
Disclosed in part	0	0	0	0	0	0	0	0
All exempted	0	0	0	0	0	0	0	0
All excluded	0	0	0	0	0	0	0	0
No records exist	0	0	0	0	0	0	0	0
Request abandoned	0	0	0	0	0	0	0	0
Neither confirmed nor denied	0	0	0	0	0	0	0	0
Total	0	0	0	0	0	0	0	0

#### 3.2 Exemptions

Section	Number of Requests	Section	Number of Requests	Section	Number of Requests
18(2)	0	22(1)(a)(i)	0	23(a)	0
19(1)(a)	0	22(1)(a)(ii)	0	23(b)	0
19(1)(b)	0	22(1)(a)(iii)	0	24(a)	0
19(1)(c)	0	22(1)(b)	0	24(b)	0
19(1)(d)	0	22(1)(c)	0	25	0
19(1)(e)	0	22(2)	0	26	0
19(1)(f)	0	22.1	0	27	0
20	0	22.2	0	27,1	0
21	0	22,3	0	28	0
	•	22,4	0		

#### 3.3 Exclusions

Section	Number of Requests	Section	Number of Requests	Section	Number of Requests
69(1)(a)	0	70(1)	0	70(1)(d)	0
69(1)(b)	0	70(1)(a)	0	70(1)(e)	0
69.1	0	70(1)(b)	0	70(1)(f)	0
	th.	70(1)(c)	0	70.1	0

#### 3.4 Format of information released

Paper	E-record	Data set	Video	Audio	Other
0	0	0	0	0	0

#### 3.5 Complexity

3.5.1 Relevant pages processed and disclosed for paper, e-record and dataset formats

Number of Pages Processed	Number of Pages Disclosed	Number of Requests
0	0	0

# 3.5.2 Relevant pages processed per request disposition for paper, e-record and dataset formats by size of requests

	Less Than 100 Pages Processed			100-500 Pages Processed		501-1000 Pages Processed		1001-5000 Pages Processed		More Than 5000 Pages Processed	
Disposition	Number of Requests	Pages Processed	Number of Requests	Pages Processed	Number of Requests	Pages Processed	Number of Requests	Pages Processed	Number of Requests	Pages Processed	
All disclosed	0	0	0	0	0	0	0	0	0	0	
Disclosed in part	0	0	0	0	0	0	0	0	0	0	
All exempted	0	0	0	0	0	0	0	0	0	0	
All excluded	0	0	0	0	0	0	0	0	0	0	
Request abandoned	0	0	0	0	0	0	0	0	0	0	
Neither confirmed nor denied	0	0	0	0	0	0	0	0	0	0	
Total	0	0	0	0	0	0	0	0	0	0	

#### 3.5.3 Relevant minutes processed and disclosed for $\underline{\text{audio}}$ formats

Number of Minutes Processed	Number of Minutes Disclosed	Number of Requests
0	0	0

#### 3.5.4 Relevant minutes processed per request disposition for <u>audio</u> formats by size of requests

	Less than 60 Minutes processed		60-120 Minutes	processed	More than 120 Minutes processed	
Disposition	Number of requests	Minutes Processed	Number of requests	Minutes Processed	Number of requests	Minutes Processed
All disclosed	0	0	0	0	0	0
Disclosed in part	0	0	0	0	0	0
All exempted	0	0	0	0	0	0
All excluded	0	0	0	0	0	0
Request abandoned	0	0	0	0	0	0
Neither confirmed nor denied	0	0	0	0	0	0
Total	0	0	0	0	0	0

#### 3.5.5 Relevant minutes processed and disclosed for video formats

Number of Minutes Processed	Number of Minutes Disclosed	Number of Requests
0	0	0

#### $3.5.6 \ \text{Relevant minutes processed per request disposition for } \underline{\text{video}} \ \text{formats by size of requests}$

Disposition	Less than 60 Minutes processed		60-120 Minutes processed		More than 120 Minutes processed	
	Number of requests	Minutes Processed	Number of requests	Minutes Processed	Number of requests	Minutes Processed
All disclosed	0	0	0	0	0	0
Disclosed in part	0	0	0	0	0	0
All exempted	0	0	0	0	0	0
All excluded	0	0	0	0	0	0
Request abandoned	0	0	0	0	0	0
Neither confirmed nor denied	0	0	0	0	0	0
Total	0	0	0	0	0	0

#### 3.5.7 Other complexities

Disposition	Consultation Required	Legal Advice Sought	Interwoven Information	Other	Total
All disclosed	0	0	0	0	0
Disclosed in part	0	0	0	0	0
All exempted	0	0	0	0	0
All excluded	0	0	0	0	0
Request abandoned	0	0	0	0	0
Neither confirmed nor denied	0	0	0	0	0
Total	0	0	0	0	0

#### 3.6 Closed requests

#### 3.6.1 Number of requests closed within legislated timelines

Number of requests closed within legislated timelines	0
Percentage of requests closed within legislated timelines (%)	0

#### 3.7 Deemed refusals

#### 3.7.1 Reasons for not meeting legislated timelines

	Principal Reason					
Number of requests closed past the legislated timelines	Interference with operations / Workload	External Consultation	Internal Consultation	Other		
0	0	0	0	0		

#### 3.7.2 Request closed beyond legislated timelines (including any extension taken)

Number of days past legislated timelines	Number of requests past legislated timeline where no extension was taken	Number of requests past legislated timeline where an extension was taken	Total
1 to 15 days	0	0	0
16 to 30 days	0	0	0
31 to 60 days	0	0	0
61 to 120 days	0	0	0
121 to 180 days	0	0	0
181 to 365 days	0	0	0
More than 365 days	0	0	0
Total	0	0	0

#### 3.8 Requests for translation

Translation Requests Accepted		Refused	Total
English to French	0	0	0
French to English	0	0	0
Total			0

#### Section 4: Disclosures Under Subsections 8(2) and 8(5)

Paragraph 8(2)(e)	Paragraph 8(2)(m)	Subsection 8(5)	Total
0	0	0	0

Section 5: Requests for Correction of Personal Information and Notations				
Disposition for Correction Requests Received	Number			
Notations attached	0			
Requests for correction accepted	0			
Total	0			

#### Section 6: Extensions

#### 6.1 Reasons for extensions

		15(a)(i) Interference	e with operations		15 (a)(	ii) Consultat	tion	
Number of extensions taken	Further review required to determine exemptions	Large volume of pages	Large volume of requests	Documents are difficult to obtain	Cabinet Confidence Section (Section 70)	External	Internal	15(b) Translation purposes or conversion
0	0	0	0	0	0	0	0	0

#### 6.2 Length of extensions

	15(a)(i) Interference with operations 15 (a)(ii) Consultation						on	
Length of Extensions	Further review required to determine exemptions	Large volume of pages	Large volume of requests	Documents are difficult to obtain	Cabinet ConfidenceSection (Section 70)	External	Internal	15(b) Translation purposes or conversion
1 to 15 days	0	0	0	0	0	0	0	0
16 to 30 days	0	0	0	0	0	0	0	0
31 days or greater								0
Total	0	0	0	0	0	0	0	0

#### Section 7: Consultations Received From Other Institutions and Organizations

#### 7.1 Consultations received from other Government of Canada institutions and other organizations

Consultations	Other Government of Canada Institutions	Number of Pages to Review	Other Organizations	Number of Pages to Review
Received during the reporting period	0	0	0	0
Outstanding from the previous reporting period	0	0	0	0
Total	0	0	0	0
Closed during the reporting period	0	0	0	0
Carried over within negotiated timelines	0	0	0	0
Carried over beyond negotiated timelines	0	0	0	0

#### 7.2 Recommendations and completion time for consultations received from other Government of Canada institutions

	N N	Number of Days Required to Complete Consultation Requests								
Recommendation	0 to 15 Days	16 to 30 Days	31 to 60 Days	61 to 120 Days	121 to 180 Days	181 to 365 Days	More Than 365 Days	Total		
Disclose entirely	0	0	0	0	0	0	0	0		
Disclose in part	0	0	0	0	0	0	0	0		
Exempt entirely	0	0	0	0	0	0	0	0		
Exclude entirely	0	0	0	0	0	0	0	0		
Consult other institution	0	0	0	0	0	0	0	0		
Other	0	0	0	0	0	0	0	0		
Total	0	0	0	0	0	0	0	0		

7.3 Recommendations and completion time for consultations received from other organizations outside the Government of Canada

		Number of days required to complete consultation requests									
Recommendation	0 to 15 Days	16 to 30 Days	31 to 60 Days	61 to 120 Days	121 to 180 Days	181 to 365 Days	More Than 365 Days	Total			
Disclose entirely	0	0	0	0	0	0	0	0			
Disclose in part	0	0	0	0	0	0	0	0			
Exempt entirely	0	0	0	0	0	0	0	0			
Exclude entirely	0	0	0	0	0	0	0	0			
Consult other institution	0	0	0	0	0	0	0	0			
Other	0	0	0	0	0	0	0	0			
Total	0	0	0	0	0	0	0	0			

#### Section 8: Completion Time of Consultations on Cabinet Confidences

#### 8.1 Requests with Legal Services

	Fewer T Pages Pr			100-500 Pages Processed		501-1000 Pages Processed		1001-5000 Pages Processed		More than 5000 Pages Processed	
Number of Days	Number of Requests	Pages Disclosed	Number of Requests	Pages Disclosed	Number of Requests	Pages Disclosed	Number of Requests	Pages Disclosed	Number of Requests	Pages Disclosed	
1 to 15	0	0	0	0	0	0	0	0	0	0	
16 to 30	0	0	0	0	0	0	0	0	0	0	
31 to 60	0	0	0	0	0	0	0	0	0	0	
61 to 120	0	0	0	0	0	0	0	0	0	0	
121 to 180	0	0	0	0	0	0	0	0	0	0	
181 to 365	0	0	0	0	0	0	0	0	0	0	
More than 365	0	0	0	0	0	0	0	0	0	0	
Total	0	0	0	0	0	0	0	0	0	0	

#### 8.2 Requests with Privy Council Office

		han 100 ocessed		0 Pages essed	501- Pages Pr			-5000 rocessed		nan 5000 rocessed
Number of Days	Requests	Disclosed	Requests	Disclosed	Requests	Disclosed	Requests	Disclosed	Requests	Disclosed
1 to 15	0	0	0	0	0	0	0	0	0	0
16 to 30	0	0	0	0	0	0	0	0	0	0
31 to 60	0	0	0	0	0	0	0	0	0	0
61 to 120	0	0	0	0	0	0	0	0	0	0
121 to 180	0	0	0	0	0	0	0	0	0	0
181 to 365	0	0	0	0	0	0	0	0	0	0
More than 365	0	0	0	0	0	0	0	0	0	0
Total	0	0	0	0	0	0	0	0	0	0

#### Section 9: Complaints and Investigations Notices Received

Section 31	Section 33	Section 35	Court action	Total
0	0	0	0	0

#### Section 10: Privacy Impact Assessments (PIAs) and Personal Information Banks (PIBs)

#### 10.1 Privacy Impact Assessments

Number of PIAs completed	0
Number of PIAs modified	0

#### 10.2 Institution-specific and Central Personal Information Banks

Personal Information Banks	Active	Created	Terminated	Modified
Institution-specific	0	0	0	0
Central	0	0	0	0
Total	0	0	0	0

# 11.1 Material Privacy Breaches 11.1 Material Privacy Breaches reported Number of material privacy breaches reported to OPC 11.2 Non-Material Privacy Breaches Number of non-material privacy breaches Number of non-material privacy breaches

#### Section 12: Resources Related to the Privacy Act

#### 12.1 Allocated Costs

Expenditures		Amount	
Salaries		\$0	
Overtime		\$0	
Goods and Services		\$0	
Professional services contracts	\$0		
Other	\$0		
Total		\$0	

#### 12.2 Human Resources

Resources	Person Years Dedicated to Privacy Activities
Full-time employees	0,000
Part-time and casual employees	0,000
Regional staff	0,000
Consultants and agency personnel	0,000
Students	0,000
Total	0,000

Note: Enter values to three decimal places.

# **Appendix C: Supplemental Statistical Report**



1.2 Enter the number of open complaints with the Information Commissioner of Canada that are outstanding from previous reporting periods.

Flocal Year Open Complaints Were Received by institution	Number of Oper Complaints
Received in 2023-24	0
Received in 2022-23	0
Received in 2021-22	0
Received in 2025-21	0
Received in 2019-20	0
Received in 2018-19	0
Received in 2017-16	0
Received in 2015-17	0
Received in 2015-16	0
Received in 2014-15 or earter	a
Total	0



Complaints Were Received by Institution	Number of Open Complaints
Received in 2023-24	0
Received in 2022-23	0
Received in 2021-22	0
Received in 2020-21	0
Received in 2019-20	0
Received in 2018-19	0
Received in 2017-16	0
Received in 2016-17	0

Received in 2015-16 Received in 2014-15 or

Execution 2: Boold Ensurance Number

Has your institution begun a new collection or a new consistent use of the SIN in
2023-247

Execution 4: University Access under the Technology Act

How many requests were received from foreign nationals outside of Canada in 2023247

1.1 of the 2023-24 Statistical Report on the Privacy Act

Canada

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