



# Privacy Impact Assessment Summary

## Public Sector Pension Investment Board (“PSP Investments”)

### Title

Provide the title of the program or activity:

Office Attendance Monitoring

### Description

Provide a brief, plain language description of the program or activity:

The program aims to confirm compliance with PSP Investments' hybrid work policy that requires personnel to work from the office certain number of days per week. The program will require the processing of the access card logs of PSP Investments' personnel, as well as their names and employee identification numbers. Compliance will be monitored by verifying that personnel have swiped their access card at least once per day at any card reader to confirm their physical presence in the office for the day. The program does not aim to track where (i.e., at which card reader) or when swipes are done, it only looks to confirm that one swipe was done for the day. Weekly aggregated individual numbers will be reviewed on a quarterly basis to ensure adherence to the hybrid work policy requirements. Confirmed non-compliance with PSP Investments' hybrid work policy may lead to investigations and disciplinary proceedings.

### Why a privacy impact assessment was completed

Provide an outline of the reason for completing the PIA:

A Privacy Impact Assessment (PIA) was completed due to the nature of the program, which requires the collection and use of personal information of PSP Investments' personnel. This information will be used by PSP Investments to confirm in-office attendance of its personnel. The PIA was completed to ensure that this program is implemented in a manner that respects individuals' privacy and ensures compliance with the *Privacy Act*.

### Additional information

List any risks identified and the date any corresponding mitigation measures were implemented:

- 1) Risk: It must be ensured that individuals are given an opportunity to challenge the accuracy of any data processed about them prior to any administrative decisions being taken. Mitigation: An internal process has been documented and all individuals involved have been informed of the process and steps that need to be taken (January 5, 2026).
- 2) Risk: If personal information is not properly anonymized or aggregated prior to being used for reporting purposes, it may create a privacy risk. Mitigation: It should be ensured that personal information is anonymized first prior to being used for reporting purposes. This is documented in the internal procedure (January 5, 2026).
- 3) Risk: The scope of the program should be clearly defined internally to avoid any additional monitoring beyond the purpose. Mitigation: An internal process has been documented and all individuals involved have been informed of the process and steps that need to be taken (January 5, 2026).

4) Risk: Retention schedule should include the retention periods for the personal information created and used for this program. Mitigation: Applicable retention periods have been determined for the update of the retention schedule (December 15, 2025).

5) Risk: Manual deletion process is subject to human error. Mitigation: An internal procedure has been documented by the Human Resources department including specific instructions around the proper deletion of personal information in accordance with the retention periods established. It has been made available to all stakeholders involved (January 5, 2026).

6) Risk: There may be accuracy challenges if personnel forget their access card, fail to scan their card for one day or due to other absences. Mitigation: Due to these concerns, no decisions will be made solely based on the data. Appropriate steps have been established in the process to first review other absences. Testing has been done to confirm that temporary cards do not cause any accuracy issues (December 15, 2025).

## Related personal information banks

Provide the name and bank number of any relevant personal information banks or classes or record:

Class of Records: PSPIB HWP 001  
Personal Information Bank: PSPIB PPE 002

## For more information about this privacy impact assessment

Provide the contact information of the person to reach out to for more information:

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