PSP Investments

Annual Report on the *Privacy Act*

For the period from April 1, 2021, to March 31, 2022

Public Sector Pension Investment Board and its Wholly-Owned Subsidiaries

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Introduction

The Public Sector Pension Investment Board and its Wholly-Owned Subsidiaries (collectively "PSP") is pleased to present to Parliament its annual report on the administration of the *Privacy Act* for fiscal year 2021–22 (April 1, 2021, to March 31, 2022).

The Public Sector Pension Investment Board ("PSP") is a Canadian federal Crown Corporation with offices in Montréal, Québec and Ottawa, Ontario, as well as international offices operated by its wholly-owned subsidiaries in London (UK), New York (USA) and Hong Kong (Special Administrative Region). A copy of PSP relevant wholly-owned subsidiaries (as of March 31, 2022) can be found in **Appendix D.**

This report is prepared and tabled in accordance with the following:

- section 72 of the *Privacy Act*, which requires that the head of every federal institution prepare and submit an annual report to Parliament on the administration of the act in the institution during the fiscal year.
- section 3.01 of the *Privacy Act*, which enunciates that PSP is a parent Crown corporation for the purposes of the Act.

Purpose of the Privacy Act

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.

Under the *Privacy Act*, personal information is defined as "*information about an identifiable individual that is recorded in any form*." Examples include information relating to the national or ethnic origin, colour, religion, age, or marital status of an individual; the education or the medical, criminal, financial or employment history of an individual; the address, fingerprints, or blood type of an individual; and any identifying number, symbol or other identifier assigned to an individual.

As noted above, PSP is a Crown corporation that operates in multiple jurisdictions. Personal information is collected under the authority of the *Public Sector Pension Investment Board Act*.[1] Consistent with the purposes of the *Privacy Act*, and Treasury Board of Canada Secretariat's (TBS) privacy policies and directives,[2] PSP has

[1] https://laws-lois.justice.gc.ca/PDF/P-31.7.pdf, at section 5.
[2] TBS *Policy on Privacy Protection (https://www.tbs-sct.canada.ca/pol/doc-eng.aspx?id=12510)*, TBS *Directive on Personal Information Requests and Correction of Personal Information* (https://www.tbs-sct.canada.ca/pol/doc-eng.aspx?id=32590), TBS *Directive on Privacy Practices* (https://www.tbs-sct.canada.ca/pol/doc-

developed comprehensive internal privacy procedures.[3] These procedures include applying the *European Union General Data Protection Regulation* ("EU GDPR"),[4] the *UK Data Protection Act* ("UK DPA"),[5] the *New York Stop Hacks and Improve Electronic Data Security ("SHIELD") Act*,[6] and the *Hong Kong Personal Data (Privacy)(Amendment) Ordinance 2021*.[7]

This report presents an overview of privacy-law activities carried out within PSP in Canada during the reporting period from April 1, 2021, to March 31, 2022. Activities carried out within PSP under the EU GDPR, the UK DPA, the *SHIELD Act*, and the *Hong Kong Personal Data (Privacy)(Amendment) Ordinance 2021* are not described in this report.

Mandate of the Public Sector Pension Investments Board

PSP manages the amounts transferred to it by the Government of Canada for the funding of benefits earned from April 1, 2000, by members of the public sector pension plans of the federal Public Service, the Canadian Forces, the Royal Canadian Mounted Police and, since March 1, 2007, the Reserve Force (the "Plans"). In accordance with the Public Sector Pension Investment Board Act, PSP Investments' statutory mandate is to:

- Manage amounts that are transferred to it in the best interests of the contributors and beneficiaries under the acts related to the Plans.
- Invest its assets with a view to achieving a maximum rate of return, without undue risk of loss, having regard to the funding, policies and requirements of the Plans and the ability of the Plans to meet their financial obligations.

Delegation order

Pursuant to subsection 73(1) of the *Privacy Act*, the President and CEO of the PSP, acting in his capacity of head of PSP, has delegated the full powers, duties, and functions for the administration of the *Privacy Act* to the following PSP officials: the

eng.aspx?id=18309), and TBS *Guidance Document: Taking Privacy into Account Before Making Contracting decisions* (https://www.canada.ca/en/treasury-board-secretariat/services/access-information-privacy/privacy/guidance-document-taking-privacy-into-account-before-making-contracting-decisions.html).

[3] PSP *Privacy Act Procedure (Comm-2)*, PSP *Human Resources Procedure HR12 (Privacy – Compliance with the law)*, and the *Privacy Notice* posted at https://www.investpsp.com/en/privacy/ .

[4] https://gdpr-info.eu/ .

[5] https://www.legislation.gov.uk/ukpga/2018/12/contents?view=plain Please note that Chapter 2 of the UK DPA is entitled: "*The UK GDPR*". The *UK GDPR* is part of the UK Data Protection Act. Please see: https://www.legislation.gov.uk/ukpga/2018/12/2022-06-06 .

[6] https://www.nysenate.gov/legislation/bills/2017/s6933 .

[7] https://www.gld.gov.hk/egazette/pdf/20212540/es12021254032.pdf .

Senior Vice-President and Chief Legal Officer, the Access to Information and Privacy Coordinator, and the Access to Information and Privacy Analyst(s).

The delegation order was signed on June 21, 2019, and a copy can be found in **Appendix C.**

Organizational structure

The Access to Information and Privacy (ATIP) office is under the responsibility of the Legal Affairs Department.

The ATIP office is responsible for implementing and managing programs and services relating to PSP's administration of the *Access to Information Act* and the *Privacy Act*, as well as for providing advice to PSP employees as they fulfill their obligations under both acts.

The ATIP office is led by a Senior Director, who is supported by 3 employees who collectively share the responsibilities for the Intake, Operations, Policies and Procedures.

Team members work together closely to:

- process access to information and privacy requests.
- support sector officials on privacy-related matters.
- support proactive publication of information.
- develop training materials.

Section 73.1 of the *Privacy Act* allows government institutions to provide services related to privacy to another government institution that is presided over by the same minister. In 2021–22, the PSP ATIP office did not provide any such services.

Part 1: Performance in Fiscal Year 2021–22

Statistical reports prepared by government institutions provide aggregate data on the application of the *Access to Information Act* and *Privacy Act* legislation. This information is made public annually in a Statistical Report that is included with the annual reports on access to information and privacy tabled in Parliament by each institution. PSP's statistical report on the *Privacy Act* for 2021–22 is in **Appendix A.**

This year, institutions were asked to report on how the COVID-19 pandemic affected their capacity to receive requests and process records. The 2021–22 Supplemental Statistical Report on the *Access to Information Act* and *Privacy Act* is in **Appendix B.**

The following sections contain highlights on PSP's performance in fiscal year 2021–22 in relation to its obligations under the *Privacy Act* and analyses of the notable statistical data for this year compared with previous years.

Requests received and carried forward

In fiscal year 2021–22, PSP received a total of 7 new requests under the *Privacy Act*. This represents a 29% increase from the 2020–21 total of 5. No privacy requests were carried forward in 2020–21 or in 2021–22. Figure 1 shows how many privacy requests PSP received each year and how many were completed for 2018–19 to 2021–22.

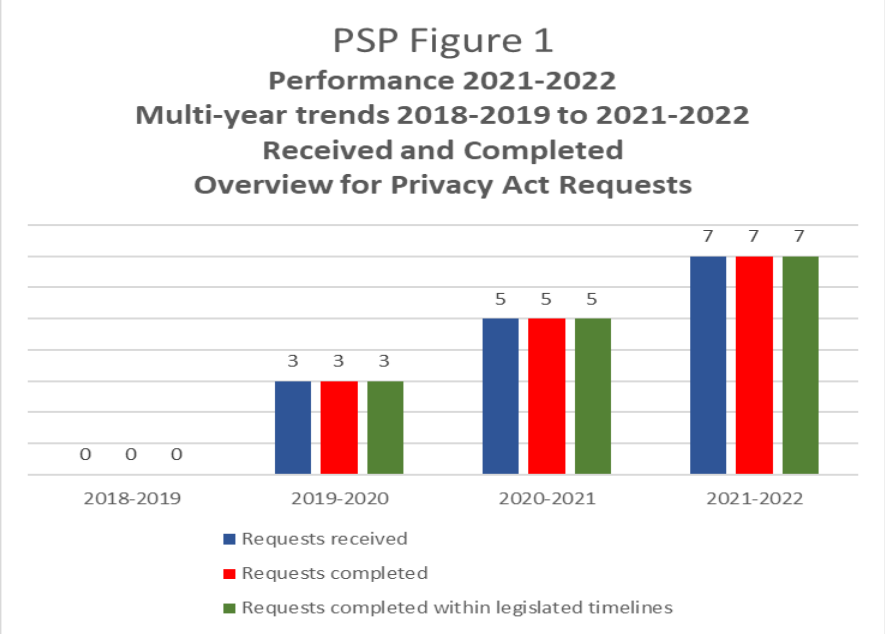
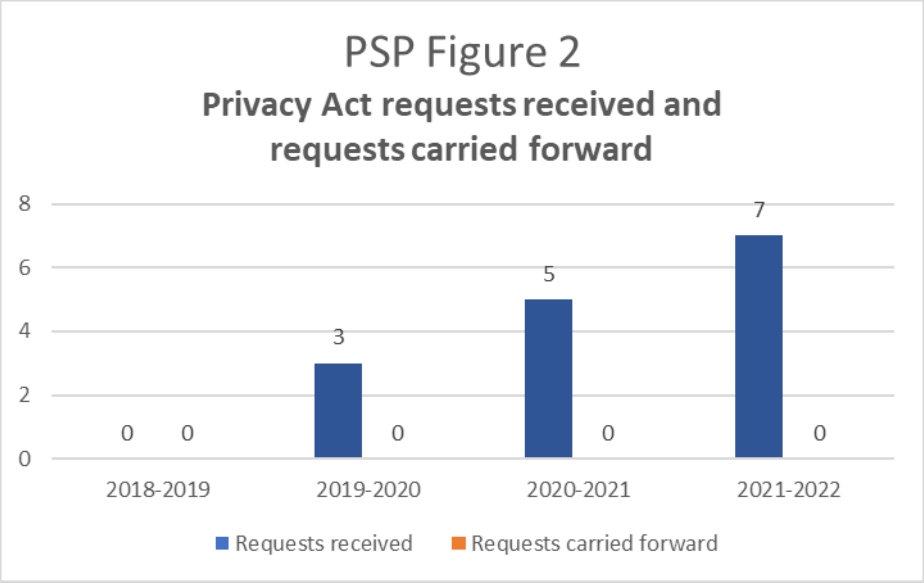
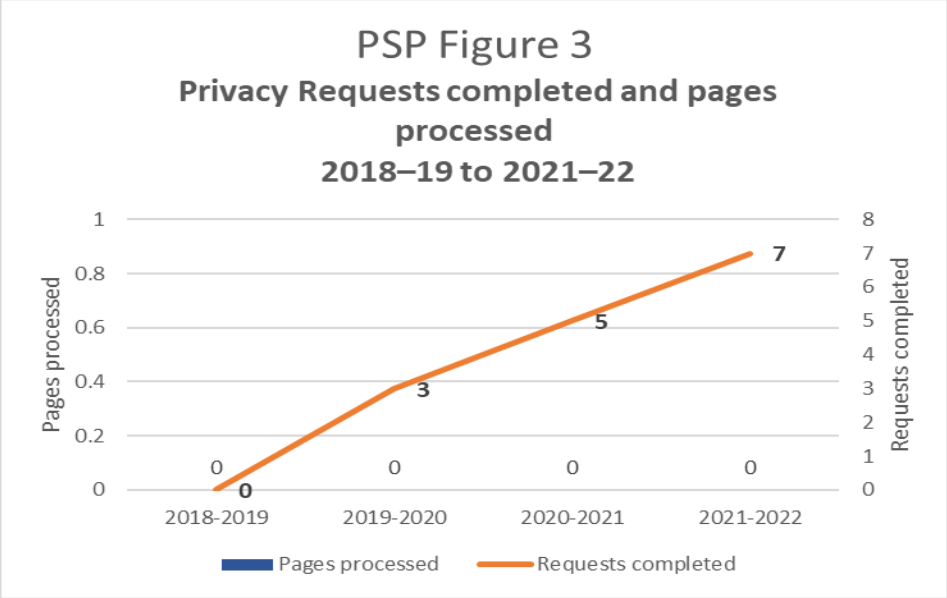


Figure 2 shows how many privacy requests PSP received each year and how many were carried forward for 2018–19 to 2021–22.



Requests completed and pages processed

PSP completed 7 requests in fiscal year 2021–22. As in previous years, no records were processed. Figure 3 shows, for 2018–19 to 2021–22, the number of privacy requests PSP completed each year and the number of pages it processed for those requests.



Disposition of requests, exemptions and exclusions applied to records

Of the 7 requests completed, for 5 them, no relevant records were found; for 2 them, the request was abandoned.

Exemptions

The *Privacy Act* allows, and in certain instances, requires that some personal information, such as information about other individuals, or information that is subject to solicitor-client privilege, be exempt from release. No records were subject to exemptions in fiscal year 2021–22.

Exclusions

The *Privacy Act* does not apply to or excludes information that is already publicly available, such as government publications and material in libraries and museums. No records were subject to exclusions in fiscal year 2021–22.

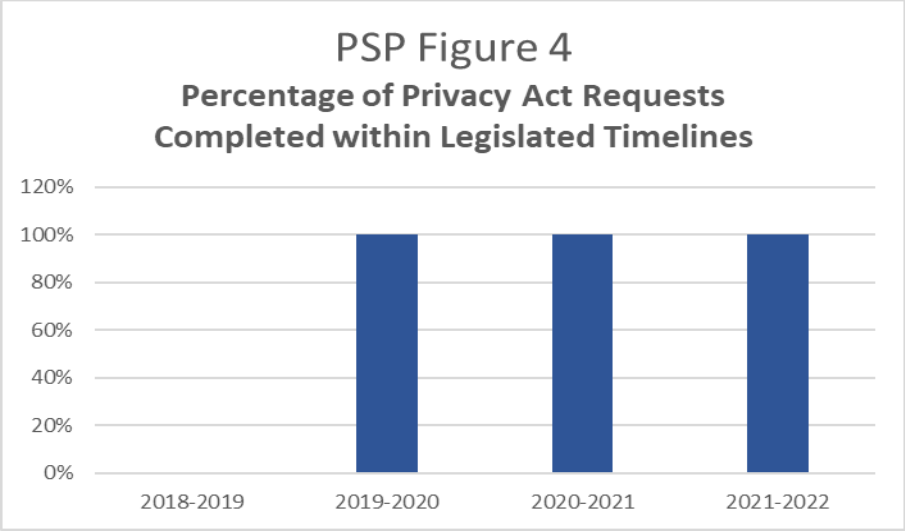
Format of requests

All requests were received electronically, and all responses were provided in this format.

On-time compliance rate, completion times and extensions

On-time compliance rate

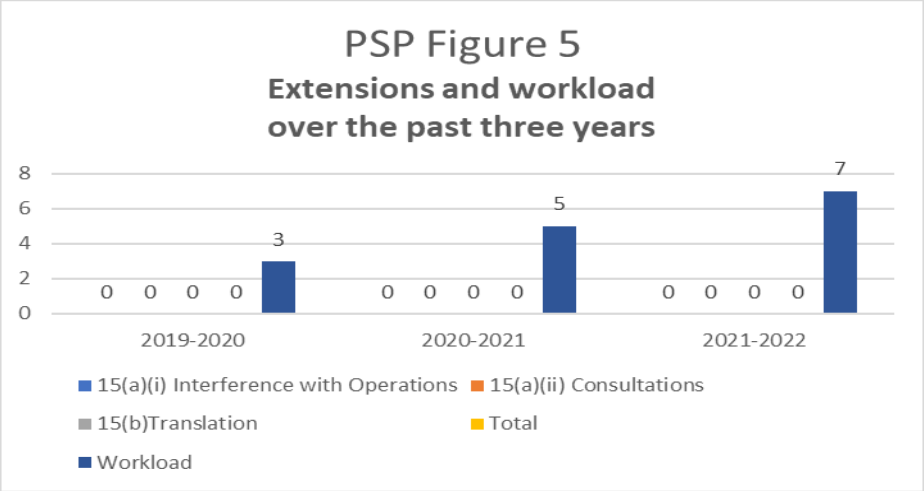
The on-time compliance rate is the percentage of requests responded to within their legislative timelines, including requests for which the institution invoked legislative extensions. In fiscal year 2021–22, PSP's ATIP office achieved an 100% on-time compliance rate, despite the significant challenges associated with the COVID-19 pandemic. Several factors contributed to this rate, including the quick resumption of the office's operations after adapting to the shift to teleworking, the issuing of weekly statistical reports on performance, strong case file management, and regular information sessions with PSP officials. Figure 4 shows the percentage of requests completed within legislated timelines, 2018-19 to 2021-22.



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 2021–22, PSP did not seek extensions.

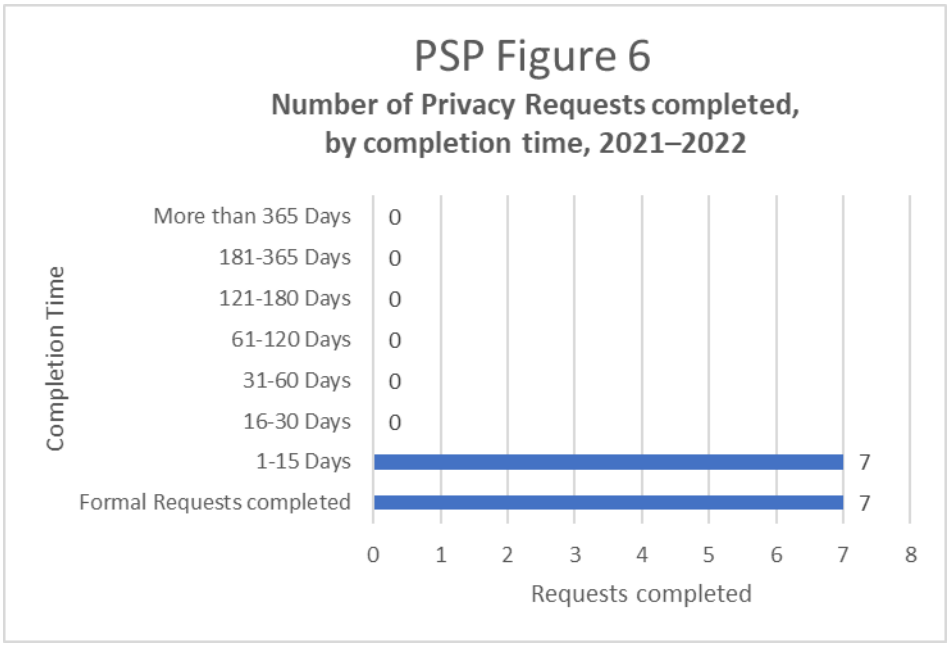
Figure 5 shows the average number of pages processed per completed request, percentage of completed requests that required an extension, and the on-time compliance rate, for fiscal years 2019-20 to 2021-22.



Completion times

During the fiscal year 2021-22, all responses were issued within 15 days of receipt of requests.

Figure 6 shows the number of requests completed within each completion time.



Corrections

Paragraph 12(2)(a) of the *Privacy Act* gives individuals a right to request a correction of personal information about them held by the PSP.

No corrections were requested or made in fiscal year 2021–22.

Disclosure under Subsection 8(2)

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 2021–22.

Consultations

In fiscal year 2021-22, PSP did not receive any consultation requests from other federal institutions relating to *Privacy* requests involving PSP records or issues.

PSP's ATIP office also receives enquiries from the public about how to obtain information under the *Access to Information Act* or the *Privacy Act*, and about where to send their requests. PSP redirects some of these enquiries to other federal government institutions, and occasionally, to provincial Freedom of Information and Privacy offices. They are not counted as requests for the purposes of this report.

Training and awareness

In fiscal year 2021–22, the PSP ATIP office continued to expand its outreach activities and provided training sessions to all new PSP employees through the PSP on-boarding program.

In addition, to mark Data Privacy Day, the PSP ATIP office promoted the importance of sound privacy management practices and the shared responsibility for safeguarding personal information in day-to-day activities. The PSP ATIP office published a PSP video which outlined the importance of sound privacy practices.

Impact of COVID-19 pandemic on ATIP office operations

In response to the measures implemented to minimize the effects of the COVID-19 pandemic (for example, having all employees work from home), PSP activated its business continuity plan (BCP) on March 16, 2020. Under the BCP, all employees were granted access to PSP's virtual private network (VPN).

From April 1, 2021, to March 31, 2022, legislated ATIP services were provided through PSP VPN access, under the BCP. Since all PSP ATIP employees had full access to the VPN, normal ATIP activities were conducted. Further, some PSP colleagues have also been going to the office regularly to perform certain tasks needed to ensure program continuity (for example, to pick up regular mail).

The PSP ATIP office had to update its procedures to reflect the realities of a new digital environment while at the same time continuing its operations despite the challenges of the pandemic. It modernized its processes to ensure that requests were processed efficiently and within legislative deadlines.

The PSP ATIP office fully complied with the COVID-19 ATIP Implementation notice issued by the Treasury Board of Canada Secretariat's (TBS) Information and Privacy Policy Division.

Policies, guidelines, procedures, and reporting

Digital processes

With most PSP employees working from home because of the COVID-19 pandemic, the PSP ATIP office developed alternate procedures and guidelines to make it easier for employees to retrieve documents digitally in response to ATIP requests.

Monitoring Compliance

The PSP ATIP office produces a variety of regular and ad hoc reports to monitor PSP's compliance with the *Access to Information Act* and *Privacy Act* through the quarterly review of key performance indicators.

Data sharing activities

PSP did not undertake any new internal or external data sharing activities in fiscal year 2021–22.

Exempt banks

PSP has no exempt banks under the *Privacy Act*.

Privacy Impact Assessments

The ATIP office provides PSP program officials with support and guidance on the Privacy Impact Assessment (PIA) process. In accordance with the *TBS Directive on Privacy Impact Assessment*, a PIA must be initiated for a program or activity in the following circumstances:

- when personal information is used for or is intended to be used as part of a decision-making process that directly affects the individual.
- upon substantial modifications to existing programs or activities where personal information is used or intended to be used for an administrative purpose.
- when the contracting out or the transfer of a program or activity to another level of government or to the private sector results in substantial modifications to the program or activities.

PIA is a risk management process that helps institutions ensure they meet legislative requirements and identify the impacts of their programs and activities will have on individuals' privacy. To fulfill its mandate, some of PSP's responsibilities require the collection, use and disclosure of personal information. As a trusted custodian of this information, the PSP uses PIAs as a means of ensuring compliance with the legal requirements set out in the *Privacy Act* as well as adherence to TBS policies and directives. A PIA may not eliminate such risks altogether but should help to identify and manage them. There is often more than one way of designing a project. A PIA can help identify the least privacy intrusive way of achieving a legitimate aim.

PSP continually assesses its current level of privacy exposure through rigorous legal privacy assessments. Through a streamlined process, PSP ensures that unique areas of concern or atypical data handling practices are assessed, privacy issues identified and resolved. In fiscal year 2021-22, in Canada, PSP conducted 48 privacy assessments. However, no PIA that would satisfy the TBS *Privacy Impact Assessment Directive* (at Appendix "C") has been completed and approved under Section 10 of the *Privacy Act*.

Material privacy breaches

In fiscal year 2021-22, PSP had no material privacy breaches.

Privacy Protocol for non-administrative purposes

Under TBS *Directive on Privacy Practices*, a non-administrative purpose is the use of personal information for a purpose that is not related to any decision-making process that directly affects the individual. In accordance with TBS *Policy on Privacy Protection*, PSP must establish privacy protocols for the collection, use or disclosure of personal

information for non-administrative purposes, including research, statistical, audit and evaluation purposes.

In fiscal year 2021-22, PSP did not establish any protocols.

Complaints, investigations and appeals

Applicants have the right to register a complaint with the Office of the Privacy Commissioner of Canada (OPC) regarding any matter relating to the processing of a request.

Complaints received

In fiscal year 2021–22, PSP was not notified of any complaints received by the OPC.

Complaints closed

In fiscal year 2021–22, the OPC issued no findings against PSP.

Application/appeals to the Federal Court or Federal Court of Appeal

There have been no court cases against PSP in relation to the *Privacy Act* since 2004.

Information about programs and information holdings

The Public Sector Pension Investment Board publishes an inventory of its information holdings, as well as relevant details about personal information under its control.

The primary purpose of this inventory is to assist individuals in exercising their rights under the *Access to Information Act* and the *Privacy Act*. It also supports the federal government's commitment to facilitate access to information on its activities, since it is available to the public on the Internet, free of charge.

A description of PSP's functions, programs, activities, and related information holdings can be found on PSP's website (https://www.investpsp.com/en/)

In addition to completing the annual update of its inventory of information holdings, PSP is realigning all content in the publication to bring it into line with the fiscal year 2021–22 Annual Report which enunciates its Results Framework.

Costs

In fiscal year 2021–22, PSP's total cost for administering the *Privacy Act* was $419,131. The PSP ATIP office incurred $148,314 in salary costs and $270,817 in professional services contracts costs.

These costs do not include resources expended by PSP's program areas to meet the requirements of the Act.

Appendix A: Statistical Report on the *Privacy Act*

Government of Canada / Gouvernement du Canada

Statistical Report on the *Privacy Act*

Name of institution: PSPIB and its Wholly-Owned Subsidiaries

Reporting period: 4/1/2021 to 3/31/2022

Section 1: Requests Under the *Privacy Act*

1.1 Number of requests received

		Number of Requests
Received during reporting period		7
Outstanding from previous reporting periods		0
• Outstanding from previous reporting period	0	
• Outstanding from more than one reporting period	0	
Total		7
Closed during reporting period		7
Carried over to next reporting period		0
• Carried over within legislated timeline	0	
• Carried over beyond legislated timeline	0	

1.2 Channels of requests

Source	Number of Requests
Online	6
E-mail	1
Mail	0
In person	0
Phone	0
Fax	0
Total	7

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

2.4 Pages released informally

Less Than 100 Pages Released		100-500 Pages Released		501-1000 Pages Released		1001-5000 Pages Released		More Than 5000 Pages Released	
Number of Requests	Pages Released	Number of Requests	Pages Released	Number of Requests	Pages Released	Number of Requests	Pages Released	Number of Requests	Pages Released
0	0	0	0	0	0	0	0	0	0

Section 3: Requests Closed During the Reporting Period

3.1 Disposition and completion time

Disposition of Requests	Completion Time							
	1 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	5	0	0	0	0	0	0	5
Request abandoned	2	0	0	0	0	0	0	2
Neither confirmed nor denied	0	0	0	0	0	0	0	0
Total	7	0	0	0	0	0	0	7

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
		70(1)(c)	0	70.1	0

3.4 Format of information released

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

3.5 Complexity

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

Number of Pages Processed	Number of Pages Disclosed	Number of Requests
0	0	2

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

Disposition	Less Than 100 Pages Processed		100-500 Pages Processed		501-1000 Pages Processed		1001-5000 Pages Processed		More Than 5000 Pages Processed	
	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	2	0	0	0	0	0	0	0	0	0
Neither confirmed nor denied	0	0	0	0	0	0	0	0	0	0
Total	2	0	0	0	0	0	0	0	0	0

3.5.3 Relevant minutes processed and disclosed for 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 audio 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

3.5.5 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 Relevant minutes processed per request disposition for video 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	7
Percentage of requests closed within legislated timelines (%)	100

3.7 Deemed refusals

3.7.1 Reasons for not meeting legislated timelines

Number of requests closed past the legislated timelines	Principal Reason			
	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	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	0	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 with operations				15 (a)(ii) Consultation			
Number of requests where an extension was taken	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
0	0	0	0	0	0	0	0	0

6.2 Length of extensions

	15(a)(i) Interference with operations				15 (a)(ii) Consultation			
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

Recommendation	Number of Days Required to Complete Consultation Requests							
	1 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

Recommendation	Number of days required to complete consultation requests							
	1 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

Number of Days	Fewer Than 100 Pages Processed		100-500 Pages Processed		501-1000 Pages Processed		1001-5000 Pages Processed		More than 5000 Pages Processed	
	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

Number of Days	Fewer Than 100 Pages Processed		100–500 Pages Processed		501-1000 Pages Processed		1001-5000 Pages Processed		More than 5000 Pages Processed	
	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**

Section 11: Privacy Breaches

11.1 Material Privacy Breaches reported

Number of material privacy breaches reported to TBS	0
Number of material privacy breaches reported to OPC	0

11.2 Non-Material Privacy Breaches

Number of non-material privacy breaches	0

Section 12: Resources Related to the Privacy Act

12.1 Allocated Costs

Expenditures		Amount
Salaries		$148,314
Overtime		$0
Goods and Services		$270,817
• Professional services contracts	$270,817	
• Other	$0	
Total		**$419,131**

12.2 Human Resources

Resources	Person Years Dedicated to Privacy Activities
Full-time employees	1.623
Part-time and casual employees	0.000
Regional staff	0.000
Consultants and agency personnel	0.624
Students	0.000
Total	2.247

Note: Enter values to three decimal places.

Appendix B: Supplemental Statistical Report on the *Access to Information Act* and *Privacy Act*

In addition to completing the forms for the statistical reports on the *Access to Information Act* and the *Privacy Act* for 2021 to 2022, institutions were asked to complete this supplemental report regarding capacity to receive requests and capacity to process records.

Name of institution: Public Sector Pension Investment Board and its wholly-owned subsidiaries
Reporting period: 2021-04-01 to 2022-03-31

Section 1: Capacity to Receive Requests

	Number of Weeks
Able to receive requests by mail	52
Able to receive requests by email	52
Able to receive requests through the digital request service	52

Section 2: Capacity to Process Records

	No Capacity	Partial Capacity	Full Capacity	Total
Unclassified Paper Records	0	52	0	52
Protected B Paper Records	52	0	0	0
Secret and Top-Secret Paper Records	52	0	0	0

	No Capacity	Partial Capacity	Full Capacity	Total
Unclassified Electronic Records	0	0	52	52
Protected B Electronic Records	52	0	0	0
Secret and Top-Secret Electronic Records	52	0	0	0

Appendix C: Delegation Order

Public Sector Pension Investment Board
("PSPIB")

and its Wholly-Owned Subsidiaries

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)

1. This Order may be cited as the "PSPIB and wholly-owned subsidiaries of PSPIB 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 PSPIB, its Wholly-Owned Subsidiaries in existence as of the date of this Order as well as those which may hereafter be established, PSP Investments USA LLC, PSP Investments Holding Europe Ltd and PSP Investments Asia Limited (the "**Government Institutions**"), hereby designate the persons holding the positions set out in the schedule set forth in the attached Section 4 below, or the persons occupying on an acting basis those positions, to exercise his powers, duties and functions, under the provisions of the Acts and related regulations set out in the schedule opposite each position. This Delegation Order replaces all previous delegation orders for the Government Institutions.

3. For the purposes of this Order, "**Wholly-Owned Subsidiaries**" shall include all Canadian wholly-owned subsidiaries of PSPIB which are corporations, with the exception of those subsidiaries with their own heads.

This Delegation Order has been made in Montreal and is effective starting on the 21st day of June 2019.

DocuSigned by:
[signature]
3E0B8A4AA7D34A3...

Neil Cunningham
President and CEO

PSP-Legal 3823946-4

4. Schedule

PSPIB
Delegation of Authority
Under the *Access to Information Act and the Privacy Act*

Position/Title	*Access to Information Act* and Regulations	*Privacy Act* and Regulations
Senior Vice-President and Chief Legal Officer	Full authority	Full authority
Access to Information and Privacy Coordinator	Full authority	Full authority
Access to Information and Privacy Analyst(s)	Full authority	Full authority

Appendix D: List of Relevant Wholly-Owned Subsidiaries

	Name of Subsidiary	French Version in Corporate Name	French Business Name
1	3Net Indy Holdings Inc.	N/A	Gestion 3Net Indy
2	3Net Indy Investments Inc.	N/A	Investissements 3Net Indy
3	7986386 CANADA INC.	N/A	N/A
4	8599963 Canada Inc.	N/A	N/A
5	Argentia Private Investments Inc.	N/A	Argentia Investissements Privés
6	AviAlliance Canada Inc.	N/A	N/A
7	Belle Bay Private Investments Inc.	N/A	Investissements Privés Belle Bay
8	Blue & Gold Private Investments Inc.	N/A	Blue & Gold Investissements Privés
9	Datura Private Investments Inc.	N/A	Datura Investissements Privés
10	Downsview Metro Devco Inc.	N/A	Gestion Downsview Métro Devco
11	Galvaude Private Investments Inc.	N/A	Investissements Privés Galvaude
12	Indo-Infra Inc.	N/A	Gestion Indo-Infra
13	Infra H2O GP Partners Inc.	N/A	Infra H2O GP Partenaires
14	Infra H2O LP Partners Inc.	N/A	Infra H2O LP Partenaires
15	Infra TM Investments Inc.	N/A	Investissements Infra TM
16	Infra-PSP Canada Inc.	N/A	N/A
17	Infra-PSP Credit Inc.	N/A	Infra-PSP Crédit
18	Infra-PSP ECEF Inc.	N/A	N/A
19	Infra-PSP Partners Inc.	N/A	Infra-PSP Associés
20	Ivory Private Investments Inc.	N/A	Ivory Investissements Privés
21	Kings Island Private Investments Inc.	N/A	Kings Island Investissements Privés
22	Northern Fjord Holdings Inc.	N/A	Gestion Northern Fjord
23	Port-aux-Choix Private Investments Inc.	N/A	Port-aux-Choix Investissements Privés

24	Potton Holdings Inc.	N/A	Gestion Potton
25	PSP Capital Inc.	N/A	N/A
26	PSP FINCO Inc.	N/A	N/A
27	PSP FINCO LATAM INC.	N/A	Gestion PSP Finco Latam
28	PSP H2O FL GP INC.	N/A	Commandité PSP H2O FL
29	PSP Investments Asia Limited	N/A	N/A
30	PSP Investments Canada Inc./Investissements PSP Canada Inc.	Investissements PSP Canada Inc.	N/A
31	PSP Investments Holding Europe Ltd	N/A	N/A
32	PSP Investments USA LLC	N/A	N/A
33	PSP Public Credit I Inc.	N/A	PSP Crédit Public I
34	PSP Public Credit Opportunities Inc.	N/A	Opportunités de Crédit Public PSP
35	PSP Public Markets Inc.	N/A	PSP Marchés Publics
36	PSPIB Bromont Investments Inc.	N/A	Investissements PSPIB Bromont
37	PSPIB CLUSTER INVESTMENTS INC.	N/A	Investissements PSPIB Cluster
38	PSPIB Deep South Inc.	N/A	Gestion PSPIB Deep South
39	PSPIB DevCol Inc.	N/A	Gestion PSPIB DevCol
40	PSPIB Emerald Inc.	N/A	Gestion PSPIB Emerald
41	PSPIB G.P. Finance Inc.	N/A	PSPIB Commandité Finance
42	PSPIB G.P. Inc.	N/A	PSPIB Commandité
43	PSPIB G.P. Partners Inc.	N/A	PSPIB Commandité Associés
44	PSPIB GIPP D1 Inc.	N/A	N/A
45	PSPIB Golden Range Cattle II Inc.	N/A	Gestion PSPIB Golden Range Cattle II
46	PSPIB Golden Range Cattle Inc.	N/A	Gestion PSPIB Golden Range Cattle
47	PSPIB Homes Inc.	N/A	Gestion PSPIB Homes
48	PSPIB LUNAR INVESTMENTS INC.	N/A	Investissements PSPIB Lunar
49	PSPIB MEXICO GP INC.	N/A	Commandité PSPIB Mexico
50	PSPIB Michigan G.P. Inc.	N/A	PSPIB Michigan Commandité
51	PSPIB Orchid Inc.	N/A	Gestion PSPIB Orchid
52	PSPIB Paisas Inc.	N/A	Gestion PSPIB Paisas
53	PSPIB Pennsylvania Investments	N/A	Investissements PSPIB

	Inc.		Pennsylvania
54	PSPIB Realty International Inc. / PSPIB Immobilier International Inc.	PSPIB Immobilier International Inc.	N/A
55	PSPIB Stanley Investments Inc.	N/A	N/A
56	PSPIB Steam Investments Inc.	N/A	Investissements PSPIB Steam
57	PSPIB THOR INVESTMENTS INC.	N/A	Investissements PSPIB Thor
58	PSPIB Unitas Investments II Inc.	N/A	N/A
59	PSPIB Unitas Investments Inc.	N/A	N/A
60	PSPIB WEXFORD INVESTMENTS INC.	N/A	Investissements PSPIB Wexford
61	PSPIB-AI Investments Inc.	N/A	Investissements PSPIB-AI
62	PSPIB-Andes Inc.	N/A	Gestion PSPIB-Andes
63	PSPIB-ARE CANADA INC.	N/A	Gestion PSPIB-ARE CANADA
64	PSPIB-ARE SERVICES INC.	N/A	SERVICES PSPIB-ARE
65	PSPIB-Condor Inc.	N/A	N/A
66	PSPIB-Eldorado Inc.	N/A	Gestion PSPIB-Eldorado
67	PSPIB-ILS INVESTMENTS INC.	N/A	Investissements PSPIB-ILS
68	PSPIB-LSF Inc.	N/A	N/A
69	PSPIB-RE FINANCE II INC.	N/A	Gestions PSPIB-RE Finance II
70	PSPIB-RE Finance Inc.	N/A	N/A
71	PSPIB-RE Finance Partners II Inc.	N/A	PSPIB-RE Finance Associés II
72	PSPIB-RE Finance Partners Inc.	N/A	PSPIB-RE Finance Associés
73	PSPIB-RE MANCHESTER INC.	N/A	Gestion PSPIB-RE Manchester
74	PSPIB-RE Partners II Inc.	N/A	PSPIB-RE Associés II
75	PSPIB-RE Partners Inc.	N/A	PSPIB-RE Associés
76	PSPIB-RE UK Inc.	N/A	Gestion PSPIB-RE UK
77	PSPIB-SDL Inc.	N/A	N/A
78	PSPIB-Star Inc.	N/A	PSPIB-Étoile
79	Red Isle Private Investments Inc.	N/A	Red Isle Investissements Privés
80	Revera Inc.	N/A	N/A
81	Sooke Investments Inc.	N/A	Investissements Sooke

82	Trinity Bay Private Investments Inc.	N/A	Placements Privés Trinity Bay
83	Vertuous Energy Canada Inc.	N/A	Énergie Vertuous Canada
84	VOP Investments Inc.	N/A	Investissements VOP

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