PSP Investissements
Investments

Annual Report on the *Privacy Act*

For the period from April 1, 2022, to March 31, 2023

Public Sector Pension Investment Board and its Wholly-Owned Subsidiaries

Table of Contents

I. Privacy Year in Review 3
I.1 Privacy and the PSP operating context 3
I.2 Privacy by Design at the PSP 3
I.3 Highlights and results for 2022-23 4
II. Introduction 4
II.1 Presentation of the Report 4
II.2 Mandate of the PSP 5
III. PSP's Privacy Regime 5
III.1 Purpose of the Privacy Act and Related Legal Framework 5
III.1.1 Canada: TBS and OPC Requirements 7
III.1.2 UK DPA/EU GDPR Requirements 8
III.1.3 Other Jurisdictions Requirements 9
III.2 Privacy Act Delegation Order 10
III.3 PSP Privacy Management Framework 10
IV. Organizational Structure 11
IV.1 Access to Information and Privacy Team 11
IV.2 Privacy Governance Specifics 11
V. Performance in Fiscal Year 2022–23 12
V.1 Requests Received and Carried Forward 12
V.2 Requests Completed and Pages Processed 13
V.3 Disposition of Requests, Exemptions and Exclusions 14
V.4 Informal Requests 14
V.5 Monitoring Compliance 14
V.5.1 On-Time Compliance Rate and Completion Times 15
V.5.2 Extensions 16
V.5.3 Data Sharing Activities 16
V.5.4 Exempt Banks 17
V.5.5 Material Privacy Breaches 17
V.5.6 Privacy Protocol for Non-Administrative Purposes 17
V.5.7 Critical Vendors with High Residual Privacy Risks 17
VI. Consultations 17
VII. Complaints and Court Cases 17
VII.1 Complaints Received and Closed 17
VII.2 Court Cases 18
VIII. Corrections 18
IX. Disclosures under Subsection 8(2) of the Privacy Act 18
X. Training and Awareness 19
XI. Privacy Management Procedures and Initiatives 19
XI.1 Privacy Impact Assessments and Privacy Reviews 20
XI.2 2022-23 Initiatives 21
XI.3 Revised Policies, Guidelines, and Procedures 22
XI.4 2023-24 Upcoming Initiatives 22
XII. Information About Programs and Information Holdings 24
XIII. Personal Information Banks 24
XIV. Other Factors which Affected the Activities of the PSP ATIP Office 24

XIV.1 Impact of COVID-19 Pandemic on the PSP ATIP Office Operations 24
XIV.2 Impact of Parliamentary Committee Activities on the PSP ATIP Office 24
XV. Costs 25
Appendix A: List of Relevant Wholly-Owned Subsidiaries 26
Appendix B: Delegation Order 30
Appendix C: Statistical Report 32
Appendix D: Supplemental Statistical Report 38

I. Privacy Year in Review

As federal Crown corporations, the Public Sector Pension Investment Board ("PSPIB") and its Wholly-Owned Subsidiaries (collectively "PSP") are subject to the *Privacy Act*,[1] and are pleased to present this report in accordance with various requirements.

PSP maintains global personal information holdings and protecting it is a top priority. Some PSP programs require the collection, use and disclosure of detailed and sensitive personal information.

Further, to fulfil its mandate and in the context of its international operations, PSP makes information available to partners, service providers and other stakeholders, including other federal departments and provincial, and international governments. There are many reasons for these disclosures including, without limitation: to enable program delivery; to determine eligibility for federal and provincial programs and benefits; to pay and provide benefits to its employees, for authentication and identity management; integrity operations; legal obligations and legal proceedings.

As custodians of this information, PSP is proud to ensure that personal information is protected in compliance with applicable privacy laws worldwide.

I.1 Privacy and the PSP operating context

There were two primary influences on PSP's privacy management during the reporting period:

- PSP's footprint is global in scale.
- Digital transformation continued to change how personal information is managed across all sectors, including within the Government of Canada. As a result, PSP continued to focus on transformation efforts.

I.2 Privacy by Design at the PSP

PSP aims to manage a robust privacy program through practices that complement the President of the Treasury Board of Canada Secretariat's ("TBS") requirements and Office of the Privacy Commissioner's ("OPC") expectations. A key element of PSP's "*privacy by design*" approach is the integration of privacy considerations into all of its program activities.

To this end, PSP's privacy assessment process begins with an early check to establish, at an initial stage in the project lifecycle, the type of privacy review that is required. PSP has developed a tailored assessment process to ensure the right level of attention is committed to each program initiative depending on the sensitivity of the information

[1] https://laws-lois.justice.gc.ca/PDF/P-21.pdf, at sections 3 (under "*government institutions*"), and 3.01.

involved. As a result, privacy risks are identified at an early stage so that appropriate recommendations can be made to mitigate them.

Further, PSP actively tracks and reports, if required, privacy breach incidents. Moreover, the link between privacy and cybersecurity is being closely monitored in order to be ready to face current and future threats.

I.3 Highlights and results for 2022-23

- PSP received **ten** *Privacy Act* (Canada) requests, up from the previous year's total of seven. The 2022-23 reporting period saw **+30%** increase in *Privacy Act* requests. The compliance rate remained at **100%**.
- **Thirty-nine** privacy reviews were completed in 2022-23.

This report describes how PSP proactively supports the judicious use and protection of personal information in one of the most complex privacy environments in government. All the facts, figures and information provided in this report demonstrate the responsibility, diligence and effort PSP employees make every day.

II. Introduction

II.1 Presentation of the Report

PSP is pleased to present to Parliament its annual report on the administration of the *Privacy Act* for fiscal year 2022–23 (April 1, 2022, to March 31, 2023).

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

- Section 3.01 of the *Privacy Act*, which states that PSPIB is a parent Crown corporation for the purposes of the Act.
- Section 72 of the *Privacy Act,* which requires the Head of the PSPIB to prepare and submit to Parliament an annual report on the administration of the Act within the institution during the fiscal year.
- TBS content requirements for the 2022-23 annual reports.[2]

PSP operates from its offices in Montréal (Québec) and Ottawa (Ontario), as well as from international offices operated by its Wholly-Owned Subsidiaries in London (United Kingdom), New York (United States) and Hong Kong (Special Administrative Region [SAR]).

Section 73.1 of the *Privacy Act* allows government institutions to provide ATIP services to another government institution chaired by the same minister. As noted above, the PSPIB 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

[2] April 28, 2023.

to the *Privacy Act*, the only exception being Revera Inc. A list of PSPIB's Wholly-Owned Subsidiaries (as of March 31, 2023), to which the *Privacy Act* applies, is included in **Appendix A** (Wholly-Owned Subsidiaries)**.**[3]

II.2 Mandate of the PSP

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.

In accordance with the *Public Sector Pension Investment Board Act*, PSP's 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.[4]

III. PSP's Privacy Regime

III.1 Purpose of the Privacy Act and Related Legal Framework

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 Ac*t, 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.

[3] In accordance with TBS content requirements for the 2022-23 annual reports, this list shows all Subsidiaries, subject to the *Privacy Act*, wholly-owned or managed by PSPIB, including those that were dissolved or created during the reporting period. In addition, the reporting requirements of an active subsidiary are met through separate reports, prepared by the ATIP coordinator responsible for the subsidiary's ATIP activities.

[4] https://laws-lois.justice.gc.ca/PDF/P-31.7.pdf, at section 4.

As noted in the Introduction, PSP operates globally and has employees located in multiple countries. PSP operates within one of the most complex privacy regimes at the Canadian federal level. Its legal obligations are set out in the *Privacy Act*[5] and in various legislation. Hence, PSP has the authority to collect personal information (including Social Insurance Numbers) under the *Public Sector Pension Investment Board Act*, [6] the *Employment Equity Act*,[7] the *Canadian Human Rights Act*,[8] the *Income Tax Act*,[9] the *Employment Insurance Act*[10] and Regulations,[11] and the *Canada Pension Plan Act*.[12] [13]

Consistent with the purposes of the *Privacy Act* and related TBS policies and directives,[14] PSP internal procedures[15] [16] include applying, among others, the *European Union General Data Protection Regulation* ("EU GDPR"),[17] the *United Kingdom Data Protection Act* ("UK DPA"),[18] the *New York Stop Hacks and Improve Electronic Data*

[5] The *Privacy Act* is the federal legislation that protects the personal information of Canadians, permanent residents, and individuals present in Canada that is held by federal public sector institutions. Extending from the *Charter of Rights and Freedoms* (Canada), it is a key foundation piece for preserving the privacy interests of individuals in Canada. The *Privacy Act* contains a set of rules for the Government's management of personal information by providing a framework on how federal institutions can collect, use, retain, and disclose personal information.

[6] *Public Sector Pension Investment Board Act*, at section 5.

[7] *Employment Equity Act* (https://laws-lois.justice.gc.ca/PDF/E-5.401.pdf), at paragraph 4(1)(d).

[8] *Canadian Human Rights Act* (https://laws-lois.justice.gc.ca/PDF/H-6.pdf), at section 16.

[9] *Income Tax Act* (https://laws-lois.justice.gc.ca/PDF/I-3.3.pdf), among others at section 237.

[10] *Employment Insurance Act* (https://laws-lois.justice.gc.ca/PDF/E-5.6.pdf), among others, at section 87.

[11] *Employment Insurance Regulations* (https://laws-lois.justice.gc.ca/PDF/SOR-96-332.pdf), among others, at section 19.

[12] *Canada Pension Plan Act* (https://laws-lois.justice.gc.ca/PDF/C-8.pdf), among others, at section 9.

[13] During the reporting period, PSP did not initiate any new collections or new consistent uses of Social Insurance Numbers.

[14] TBS *Policy on Privacy Protection* (https://www.tbs-sct.canada.ca/pol/doc-eng.aspx?id=12510), among others at section 2.1; TBS *Directive on Personal Information Requests and Correction of Personal Information* (https://www.tbs-sct.canada.ca/pol/doc-eng.aspx?id=32590), among others at section 2.1; TBS *Directive on Privacy Practices* (https://www.tbs-sct.canada.ca/pol/doc-eng.aspx?id=18309), among others at section 2.1; 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), among others at section 2, under: "*Who should use the document?*"

[15] PSP Privacy Act Procedure (Comm-2), PSP Human Resources Procedure HR12 (Privacy – Compliance with the law), PSP Information Management Procedure (CORP-17), PSP Privacy Breach Response Plan, and PSP Privacy Notice (https://www.investpsp.com/en/privacy/).

[16] The collection and use of personal information by PSP are based on lawful authority or legal authorization. PSP can only collect or use personal information with a sufficiently direct connection to legally authorized programs and activities.

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

[18] https://www.legislation.gov.uk/ukpga/2018/12/contents?view=plain. The UK DPA is the UK's implementation of the EU GDPR. (https://www.gov.uk/data-protection#:~:text=The%20Data%20Protection%20Act%202018%20is%20the%20UK's%20implementation%20of,used%20fairly%2C%20lawfully%20and%20transparently). Chapter 2 of the UK DPA is entitled: "*The UK GDPR*". Through UK Regulation titled: "*Data Protection, Privacy and Electronic Communications (Amendments etc) (EU Exit) Regulations 2019*" (https://www.legislation.gov.uk/uksi/2019/419/regulation/1/made), in section 2, "*the UK GDPR*" means

Security Act,[19] the Hong Kong *Personal Data (Privacy) Ordinance*,[20] and the *Code of Fair Information Practices* found in sections 4 to 8 of the *Privacy Act*.[21] Consequently, particular attention is paid to the applicable related legislation throughout any review, as the requirements of the EU GDPR and UK DPA and related regulations are more stringent than those imposed on PSP by the *Privacy Act*[22] and related TBS requirements.[23] [24] [25] As described below in section III.1.3, other privacy legislation may also have an impact on PSP privacy reviews.

Moreover, with the numerous collaborative efforts with which PSP is involved to deliver its programs and services, legal interoperability with Government of Canada institutions, the provinces, as well as with various international bodies and private sector organizations, is always an important requirement.

III.1.1 Canada: TBS and OPC Requirements

Under section 3.3 of the TBS *Directive on Privacy Impact Assessment* ("PIA"),[26] in Canada, PSP must ensure that privacy implications are properly identified, assessed, and resolved before a new or substantially modified program or activity involving personal information is implemented.[27]

"*Regulation (EU) 2016/679 of the European Parliament and of the Council of 27th April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data (General Data Protection Regulation) as it forms part of the law of England and Wales, Scotland and Northern Ireland by virtue of section 3 of the European Union (Withdrawal) Act 2018*." Chapter 2 of the UK DPA provides the UK specific limits and definitions for applying the EU GDPR.

[19] Usually described as the "*SHIELD Act*." https://www.nysenate.gov/legislation/bills/2019/S5575.

[20] https://www.elegislation.gov.hk/hk/cap486!en-zh-Hant-HK.pdf?FROMCAPINDEX=Y.

[21] *Privacy Act*, at sections 4 to 8.

[22] The *Privacy Act* also created the OPC, an independent agent of Parliament that oversees compliance with its implementation. The Privacy Commissioner has powers to receive and investigate complaints, including in cases where an individual's request for access to their personal information has been refused.

[23] The administration of the *Privacy Act* by federal institutions, including PSP, is supplemented by policies and directives issued by the President of the TBS or an authorized delegate. Pursuant to section 2 ("*Minister*") and paragraph 3.1(2) of the *Public Sector Pension Investment Board Act*, the President of the TBS holds all PSPIB shares on behalf of His Majesty in right of Canada.

[24] As indicated above, PSP is active in the European Union through one of its Wholly-Owned Subsidiaries (*PSP Investments Holding Europe Ltd*). Under the UK DPA, as a Controller, PSP processes personal information because it is necessary for PSP's legitimate interests, which are to ensure that all data is centralized for consumption for end users, making such data easily available, to ensure it is properly archived and to ease the analytical journey of data.

[25] Personal information under the control of PSP cannot be disclosed without the consent of the individual, except in specific circumstances. These include uses that are consistent with the purpose of the original collection; when authorized by legislation; to comply with legal instruments, such as subpoenas and court orders; in circumstances where there is a clear benefit to the individual; and where there is a public interest that outweighs the invasion of privacy. Importantly, the *Privacy Act* gives individuals the right to request access to their own personal information held by a federal institution and the right to request a correction to their information if it is inaccurate.

[26] https://www.tbs-sct.canada.ca/pol/doc-eng.aspx?id=18308 .

[27] This directive is to be read in conjunction with the *Privacy Act*, the *Privacy Regulations* (https://laws-lois.justice.gc.ca/PDF/SOR-83-508.pdf), the TBS *Policy on Privacy Protection*, TBS *Directive on Privacy Practices* and TBS *Directive on Privacy Requests and Correction of Personal Information* (https://www.tbs-

According to TBS, in Canada, a PIA must be initiated for a program or activity under the following circumstances:

- when the personal information is used for or is intended to be used as part of a decision-making process that directly affects the individual.
- when making substantial modifications to existing programs or activities where personal information is used or intended to be used for administrative purposes (i.e., as part of a decision-making process that directly affects the individual).
- when contracting out or transferring a program or activities to another level of government or the private sector results in substantial modifications to the program or activities.[28] [29]

III.1.2 UK DPA/EU GDPR Requirements

Controllers must carry out a Data Protection Impact Assessment ("DPIA") only if the processing "*is likely to result in a high risk to the rights and freedoms of natural persons*." In addition, the European Union "*Guidelines of the Working Party on the Protection of Individuals about the Processing of Personal Data*" (abbreviated "WP29") [30] [31] point in the same direction.[32]

---

sct.canada.ca/pol/doc-eng.aspx?id=32590&section=html) and the TBS *Directive on Social Insurance Number* (https://www.tbs-sct.canada.ca/pol/doc-eng.aspx?id=13342).

[28] TBS *Directive on Privacy Impact Assessment*, at section 6.3.1.

[29] "*Expectations: OPC's Guide to the Privacy Impact Assessment Process*," under: "*When a PIA is required?*" See: https://www.priv.gc.ca/en/privacy-topics/privacy-impact-assessments/gd_exp_202003/ .

[30] WP29, Guidelines on DPIA and determining whether processing is "*likely to result in a high risk*" for the purposes of Regulation 2016/679, 4 October 2017, pp. 12-13.

[31] Art. 35(3) of the EU GDPR provides a list of "*inherently*" risky processing operations which always require a DPIA. This is the case, when processing involves: (a) a systematic and extensive evaluation of personal aspects relating to natural persons which is based on *automated processing, including profiling*, and on which decisions are based that produce legal effects concerning the natural person or similarly significantly affect the natural person; (b) processing *on a large scale of special categories* of data referred to in Art. 9(1) (e.g., *personal data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, and the processing of genetic data, biometric data for the purpose of uniquely identifying a natural person, data concerning health or data concerning a natural person's sex life or sexual orientation*), or of personal data relating *to criminal convictions and offences* referred to in Art. 10; or (c) a systematic *monitoring of a publicly accessible area on a large scale*. The above-mentioned circumstances, however, do not constitute an exclusive list. It follows that a DPIA may be required also for diverse types of processing which are not mentioned in the list.

[32] WP29 considers that a DPIA is not required when: (a) the processing is *not "likely to result in a high risk to the rights and freedoms of natural persons*"; (b) the nature, scope, context and purposes of the processing *are very similar to the processing for which DPIA have been carried out*; (e.g., in such cases, the controller may use the *results of a DPIA already carried out for similar processing* [Art. 35(1), last sentence EU GDPR]); (c) the processing operations *have been checked by a supervisory authority before May 2018* in specific conditions that have not changed (Commission decisions adopted and authorizations by supervisory authorities based on Directive 95/46/EC remain in force until amended, replaced or repealed" [Recital 171]); (d) a processing operation, pursuant to point (c) or (e) of Art. 6(1), has a legal basis in EU or Member State law, where the law regulates the specific processing operation and *where a DPIA has already been carried out* as part of the establishment of that legal basis (Art. 35(10) EU GDPR; e.g., Except if Member state law states it to be necessary to carry out a DPIA prior processing activities); (e) the

III.1.3 Other Jurisdictions Requirements

In other jurisdictions where PSP currently operates (Hong Kong and New York), or where PSP is subject to other privacy laws due to its international operations and the extra-territorial reach of such laws (i.e., California, Brazil), PSP is not currently legally required to conduct a PIA or a DPIA. However, this is not the case for PSP's activities in China. Below is a very brief overview of some of the requirements that apply to PSP.

Brazil

Brazil's General Data Protection Law[33] ("BGDPL") apply to PSP with regard to personal information from this jurisdiction (e.g., applicants, investment partners, etc.) and investment due diligence activities. In this context, the application of the BGDPL is limited compared to other privacy laws.

China

China's Personal Information Protection Law[34] ("PIPL") apply to PSP with regard to personal information from this jurisdiction (e.g., applicants, investment partners, etc.) and investment due diligence activities. Article 55 of the PIPL[35] requests PSP to carry out DPIAs when "*processing sensitive personal information; making automatic decision-making for the use of personal information; entrusting other parties to process the personal information; and providing personal information to overseas parties*". Article 56[36] further specifies the DPIA requirements, which should include assessing the purpose of personal information processing; the impact it may have on personal rights and interests; and whether the protection measures currently in place are adequate.

Hong Kong (SAR)

The Hong Kong *Personal Data (Privacy)Ordinance* does not require nor impose to a Controller to perform a PIA. However, the *Privacy Commissioner for Personal Data* advises/encourages controllers to perform PIAs "*before the launch of any new business initiative or project that might have significant impact on personal data privacy*."[37]

---

processing is included on the optional list (established by the supervisory authority) of processing operations for which no DPIA is required (Art. 35(5) EU GDPR; e.g., such a list may contain processing activities that comply with the conditions specified by this authority, in particular through guidelines, specific decisions or authorizations, compliance rules, etc. [e.g., in France, authorizations, exemptions, simplified rules, compliance packs, etc.]. In such cases, and subject to re-assessment by the competent supervisory authority, a DPIA is not required, but only if the processing falls strictly within the scope of the relevant procedure mentioned in the list and continues to comply fully with all the relevant requirements of the EU GDPR.

[33] The "*Lei Geral de Proteção de Dados*" is a legal framework to regulate the collection and use of personal data. It came into effect in Brazil on August 16, 2020. The English translation is: "*Brazilian General Data Protection Law."* https://iapp.org/media/pdf/resource_center/Brazilian_General_Data_Protection_Law.pdf .

[34] https://www.bmj.com/content/379/bmj-2022-072619.full .

[35] https://personalinformationprotectionlaw.com/PIPL/article-55/ .

[36] https://personalinformationprotectionlaw.com/PIPL/article-56/ .

[37] The *Privacy Commissioner for Personal Data's* recommendation above is aimed at initiatives and/or projects, which is a fairly similar approach to the Canada OPC and TBS requirements for PIAs for programs and activities. Moreover, as stated, this is a recommendation and not a legal obligation.

United States – State of California

The *California Consumer Privacy Act*[38] ("CCPA"*)* imposes an assessment requirement for businesses to conduct *annual cybersecurity audits* and "*regular*" risk assessments if the business' "*processing of consumers' personal information presents significant risk to consumers' privacy or security*." In determining whether the processing "*may result in significant risk to the security of personal information*," the California Privacy Protection Agency identifies two factors to be considered: (1) the size and complexity of the business; and (2) the nature and scope of processing activities.[39]

United States – State of New York

The *New York Stop Hacks and Improve Electronic Data Security Act* does not require a business to conduct a PIA, as the law is intended to regulate security breaches only. It should be noted that the "*New York Privacy Act"* is in the works and if enacted this positioning may change.[40]

III.2 Privacy Act Delegation Order

In accordance with section 73 of the *Privacy Act*, the President and CEO, acting in her capacity as Head of PSP, has delegated all powers, duties and functions related to the application of the Act.[41] The delegation order was signed on September 1, 2022, and a copy can be found in **Appendix B.**

III.3 PSP Privacy Management Framework

PSP's privacy management framework promotes a proactive approach for the management of personal information by fostering the integration of privacy practices into program, system, and business process design. The framework, which is currently in the process of being enhanced, consists of the following elements:

- Governance and accountability: Roles and responsibilities for privacy are defined.
- Stewardship of personal information: Privacy protections are implemented to manage personal information properly throughout its life cycle.

[38] The personal information of external contacts is processed by PSP. See: https://oag.ca.gov/privacy/ccpa . Also: https://oag.ca.gov/privacy/ccpa ; https://cppa.ca.gov/regulations/pdf/cppa_act.pdf and https://leginfo.legislature.ca.gov/faces/codes_displayText.xhtml?division=3.&part=4.&lawCode=CIV&title=1.81.5 .

[39] What constitutes a "*significant risk*" and other details regarding this requirement is subject to *CCPA Regulations*. The CCPA Regulations became effective on 2023-03-29. See: https://cppa.ca.gov/regulations/pdf/cppa_regs.pdf .

[40] https://nyassembly.gov/leg/?default_fld=&leg_video=&bn=S02390&term=2023&Summary=Y&Text=Y and https://www.nysenate.gov/legislation/bills/2021/A680 .

[41] The delegation order provides for the delegation to individuals in the following positions: Senior Vice President and Chief Legal Officer (the delegate holds the position of Senior Vice President and Chief Legal and People Officer; Legal Affairs, Compliance, Taxation and Human Resources); Senior Director, Legal Affairs and ATIP Coordinator; Advisor/Senior Advisor/Counsel or equivalent, Privacy; Administrative Analyst or equivalent, Legal Affairs. Only those positions currently filled are identified.

- Assurance of compliance: Processes and practices are in place to ensure adherence to applicable privacy laws.
- Effective risk management: Risk identification and assessments are conducted to limit the probability and impact of negative events.
- Culture, training, and awareness: Privacy training and awareness activities that promote the protection and stewardship of personal information.

The framework is a clear and succinct foundational element in establishing and operating a comprehensive privacy program at PSP.

IV. Organizational Structure

The Access to Information and Privacy ("ATIP") office reports to the Legal Affairs department.

The ATIP office is responsible for providing privacy awareness within the organization, ensuring that PSP is compliant with its obligations in relation to the processing and the administration of personal information in compliance with the related privacy laws, regulations policies, directives, and procedures.

IV.1 Access to Information and Privacy Team

During fiscal 2022-23, the ATIP office was headed by a Senior Director, Legal Affairs and ATIP Coordinator, who is supported by two employees and consultants (on an ad-hoc basis) who collectively shared responsibility for the privacy management framework, intake, operations, policies, and procedures. During fiscal 2022-23, ATIP was provided by PSP offices in Montréal, and Ottawa.

Team members work together closely to:

- Execute the privacy management framework.
- Process ATIP requests.
- Support internal corporate functions.
- Develop training materials, policies, procedures, and initiatives.

IV.2 Privacy Governance Specifics

PSP's Senior Director, Legal Affairs and Access to Information and Privacy Coordinator oversees privacy governance, risk monitoring, and decision-making. The Senior Director also leads the stewardship and management of personal information and privacy across PSP. Among others, the Senior Director supports the integration of data management, privacy, and cyber security; provides oversight of PSP's risk management processes with respect to personal information; and promotes a culture that recognizes that the protection of privacy is a core organizational value.

Moreover, during the reporting period, PSP was not party to any service agreements under section 73.1 of the *Privacy Act*.

V. Performance in Fiscal Year 2022–23

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 privacy and access to information tabled in Parliament by each institution. The PSP 2022-23 Statistical Report on the *Privacy Act* can be found in **Appendix C.**

In addition, TBS has asked institutions to report on how COVID-19 related measures have affected their ability to carry out their responsibilities, receive requests and process records, as well as other ancillary performance data. As a result, PSP presents the 2022-23 Supplemental Statistical Report on the *Access to Information Act* and *Privacy Act* in **Appendix D.**

The following sections highlight PSP's performance in fiscal 2022–23 in relation to its obligations under the *Privacy Act*, as well as analyses of notable statistical data for this year compared with previous years.

V.1 Requests Received and Carried Forward

In fiscal year 2022–23, PSP received a total of ten new requests under the *Privacy Act*. This represents a **30%** increase from the 2021–22 total of seven.

The number of requests carried forward increased from zero in 2021–22 to two in 2022–23. The requests were carried over as a result of the date they were received (March 2023).

Figure 1 shows how many privacy requests PSP received each year and how many were completed for 2018–19 to 2022–23.

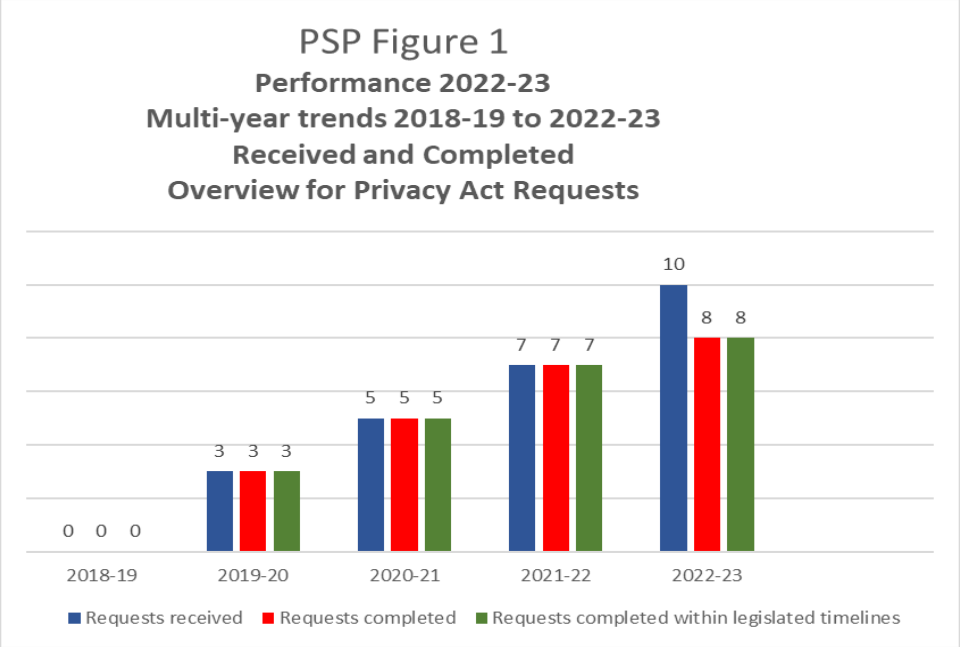
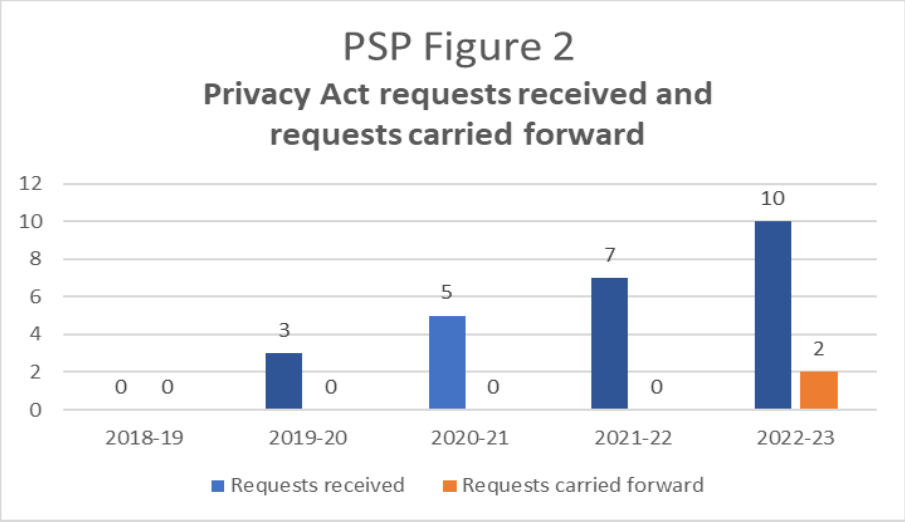


Figure 2 shows how many privacy requests PSP received each year and how many were carried forward for 2018–19 to 2022–23.

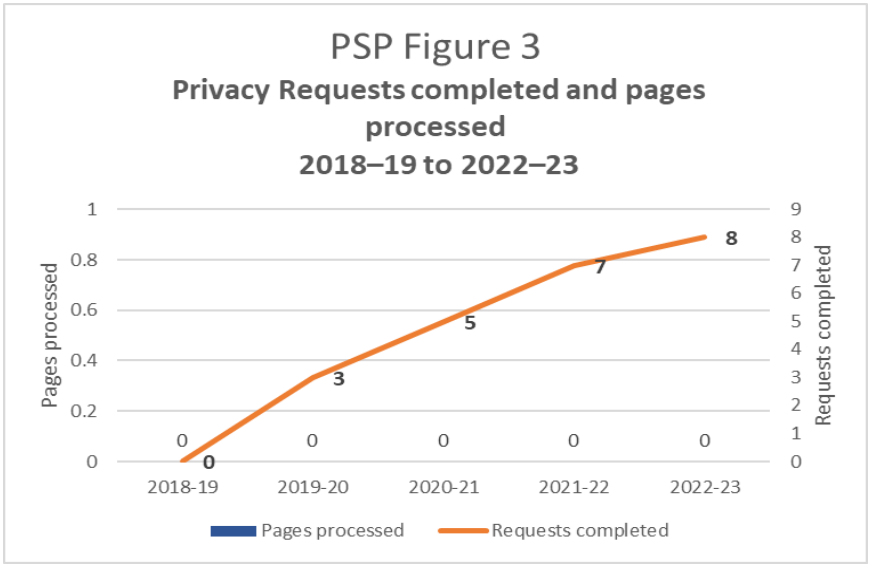


All requests carried forward (2) were received in fiscal year 2022-23. At the time of completion of this report, all of them were already closed.

V.2 Requests Completed and Pages Processed

PSP completed eight privacy requests in 2022–23. This is an increase of **+12%** compared with the previous year.

Figure 3 shows, for 2018–19 to 2022–23, the number of privacy requests PSP processed each year.



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

V.3 Disposition of Requests, Exemptions and Exclusions

Disposition of Requests

Of the eight requests completed, for five of them, no relevant records were found; three of them were abandoned.

Exemptions

The *Privacy Act* allows, and in some cases requires, that certain personal information (such as information about other individuals, or information that is subject to solicitor-client privilege) be exempted from release. No records were subject to exemptions in fiscal year 2022–23.

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. No records were subject to exclusions in fiscal year 2022–23.

Format of requests

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

V.4 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, PSP handles informal requests for information. These requests are not subject to the *Privacy Act*. During fiscal year 2022–23, the ATIP office did not received any informal privacy requests.

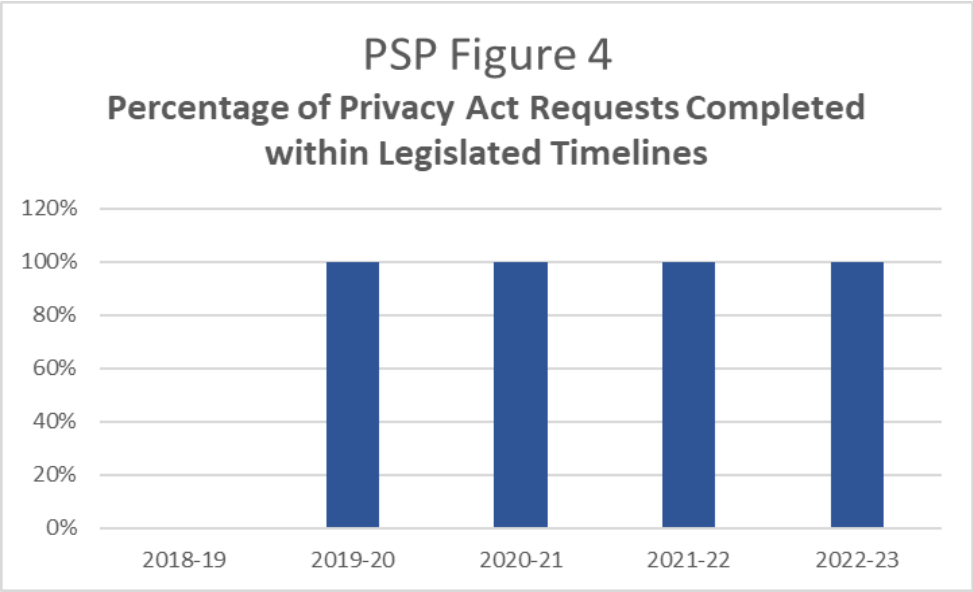
V.5 Monitoring Compliance

As evidenced by our **100%** on-time performance year after year, PSP's ATIP office closely monitors *the time it takes to process* privacy requests.[42] Compliance is ensured on an on-going basis through the use of a privacy request tracking system.

[42] PSP 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.

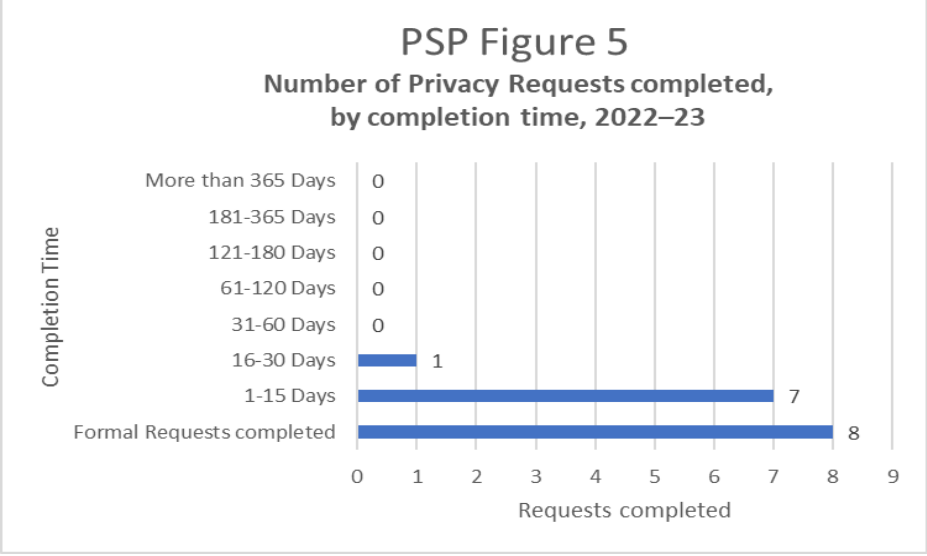
V.5.1 On-Time Compliance Rate and Completion Times

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 2022–23, the PSP ATIP office achieved **100%** on-time compliance rate. Figure 4 shows the percentage of requests completed within legislated timelines, 2018-19 to 2022-23.



During the fiscal year 2022-23, **87.5%** of all responses were issued within 15 days of receipt of requests, and the remaining within the initial 30 days of receipt of requests.

Figure 5 shows the number of requests completed within each completion time.



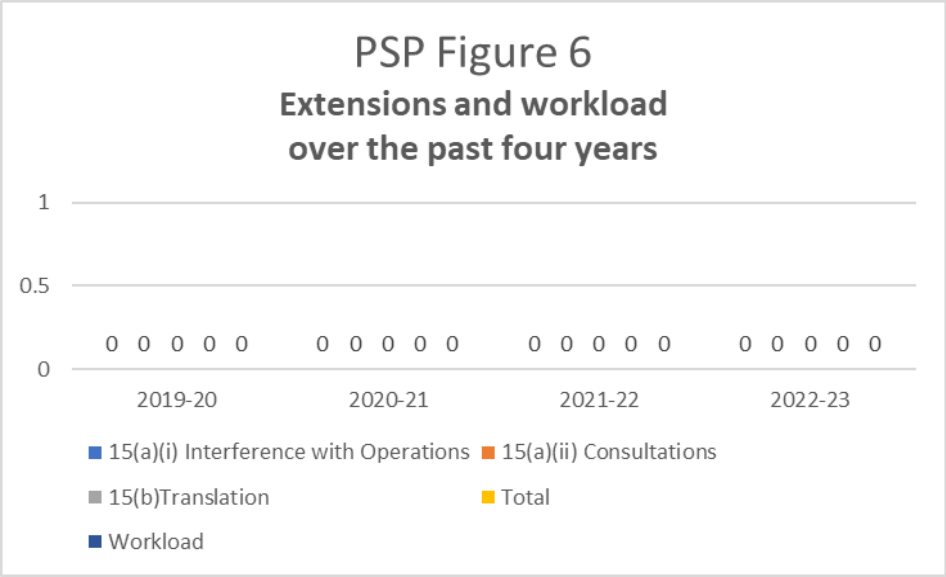
When required, follow-up is conducted on an on-going basis, and reminders of unassigned tasks are sent via the PSP privacy request tracking system. The same applies to informal privacy requests, where PSP *reviews requested types of information and assesses the feasibility* of making this information available by other means.

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

V.5.2 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 2022–23, PSP did not seek extensions.

Figure 6 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 2022-23.



V.5.3 Data Sharing Activities

PSP did not undertake any new internal or external data sharing activities in fiscal year 2022–23.

V.5.4 Exempt Banks

PSP has no exempt banks under the *Privacy Act*.[43]

V.5.5 Material Privacy Breaches

In fiscal year 2022-23, PSP had no material privacy breaches and no breaches that occurred during this period were required to be reported to data protection authorities.[44] The PSP ATIP office continues to provide awareness regarding privacy risks, breach avoidance and breach responses.

V.5.6 Privacy Protocol for Non-Administrative Purposes

Under TBS *Policy on Privacy Protection*, 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 this policy, 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 2022-23, PSP did not establish any protocols.

V.5.7 Critical Vendors with High Residual Privacy Risks

As of March 31st, 2023, based on its current critical vendors list and the programs for those vendors that have undergone privacy reviews, there were no programs with those vendors with high or severe residual privacy risk.[45]

VI. Consultations

In fiscal year 2022-23, PSP did not receive any consultation requests from other federal institutions relating to privacy requests involving PSP records or issues.

VII. 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.

VII.1 Complaints Received and Closed

In fiscal year 2022–23, PSP was not notified of any complaints received by the OPC. In addition, there were no outstanding complaints from previous reporting periods.

---

[43] Under section 18 of the *Privacy Act*, the Governor in Council may designate as exempt banks certain personal information banks that contain files all of which consist predominantly of personal information described in section 21 [International Affairs and defence] and/or 22 [Law enforcement and investigation] of the *Privacy Act*.

[44] Among others, in Canada, to the TBS Privacy and Responsible Data Division, and to the OPC.

[45] With respect to these PSP programs that use these vendors, while contractual and operational recommendations may have been provided, the PSP ATIP office has not fully assessed data protection capability, nor compliance with regulatory requirements.

Table 1: Complaints received, by type, 2022–23	
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

In fiscal year 2022–23, the OPC issued no findings against PSP.

Table 2: Complaints closed by the OPC in 2022–23		
Disposition of complaint	**Numbers of findings**	**Type of complaint**
Not well-founded	0	N/A
Discontinued	0	N/A
Well-founded	0	N/A
Total	**0**	

VII.2 Court Cases

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

VIII. 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 2022–23.

IX. Disclosures under Subsection 8(2) of the Privacy Act

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 2022–23.

X. Training and Awareness

Training

In fiscal 2022–23, the PSP ATIP office continued to expand its outreach activities and offered training sessions to all new PSP employees and staff-augment consultants through the PSP On-boarding program (e-learning). In addition, informal information session, one-on-one training, and orientation sessions were provided as required.

In addition, in September 2022, the PSP Legal-ATIP team organized a training session for the PSP Procurement team (14 people).

Awareness

To mark Data Privacy Day held on January 28, 2023, the PSP ATIP office promoted the importance of sound privacy management practices and the shared responsibility for protecting personal information in day-to-day activities through various awareness-raising activities and a panel discussion attended by over 140 participants.

For its *Privacy Awareness Week 2023*, PSP's campaign focused on "*privacy as an enabler.*" The aim was to show how personal data is interwoven into many aspects of PSP's day-to-day activities, in order to promote both collaboration between PSP business units and the work of the ATIP office. The other facet of the promotion took place online. In addition to e-mail communications about the event, an informative article was published at the beginning of the week, which included a link to a contest. This article was accompanied by a launch e-mail. This article was followed, at the end of the week, by an overview of this training initiative.

XI. Privacy Management Procedures and Initiatives

The delivery of some programs and services by PSP involves the collection, use, and disclosure of personal information. Detailed, and sensitive personal information is required to determine program eligibility or to provide benefits and services, such as PSP's Human Resources ("HR") programs and related activities.

The breadth and scale of PSP's activities means it is responsible for managing one of the most complex personal information program of the federal government institutions in Canada. Hence, as described above, PSP must operate within a complex privacy legal framework that includes the *Privacy Act* in combination with a variety of other international laws, as well as respecting specific legislative requirements imposed by federal and provincial government departments and agencies. Throughout 2022-23, PSP continued to advance a proactive, risk-based approach to privacy management and sought to adapt its activities and processes to the needs of the changing privacy environment. It applied its privacy lens to a large number of PSP initiatives which involved the collection, use and disclosure of personal information.

PSP's *Privacy Act Procedure*,[46] PSP's *Human Resources Procedure*,[47] PSP *Information Management Procedure*,[48] PSP *Information Security Procedure*,[49] PSP's *Privacy Breach Response Plan*, and PSP's *Privacy Notice*[50] support a robust privacy program for the protection and judicious use of personal information by PSP. 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 PSP's privacy management framework, outlined above, and establish PSP's privacy governance mechanisms.

The expected results from the application of these procedures on privacy management include the sound management and safeguarding of personal information by PSP; robust practices for the identification, assessment, and management of risks relating to personal information; and the establishment of clear accountabilities accompanied by effective governance structures and mechanisms to protect and manage personal information under PSP's stewardship.

XI.1 Privacy Impact Assessments and Privacy Reviews

Privacy Impact Assessments

As noted above, in Canada, in accordance with the TBS *Directive on Privacy Impact Assessment*,[51] PSP 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.[52]

[46] "Comm-02."
[47] "HR12" (Privacy – Compliance with the law).
[48] "CORP-17."
[49] "CORP-23."
[50] https://www.investpsp.com/en/privacy/ .
[51] 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.

[52] 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. As a trusted custodian of this information, 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, manage, and mitigate 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.

In fiscal 2022-23, the completion of a PIA on the PSP HR program is on-going. Further, no PIA that would satisfy the TBS *Directive on Privacy Impact Assessment Directive* (at Appendix "C") has been completed and approved under Section 10 of the *Privacy Act*.

Privacy reviews
PSP continually assesses its current level of privacy exposure through rigorous legal privacy reviews. PSP ensures that unique areas of concern or atypical personal data handling practices of which it is made aware are assessed, privacy issues identified, and recommendations are provided to mitigate such issues. In fiscal year 2022-23, in Canada, PSP conducted thirty-nine privacy reviews (compared with fifty-five in fiscal 2021-22).

Strategic risks
PSP refreshed its privacy strategic risk profile in order to identify and focus attention on the most prominent threats to the management and safeguarding of personal information under PSP's control. Significant strides have been made to implement practices that allow for the effective safeguarding of personal information as an integrated part of operations. Risk management includes monitoring a rapidly changing context, including cybersecurity, information management, and contracts.

XI.2 2022-23 Initiatives

- **ATIP Online Request Service**
  As part of its commitment to openness and transparency, PSP is providing simpler and more efficient access to personal information through its participation to the TBS ATIP Online Request Service ("AORS").[53] Once fully implemented, AORS will be a central website where Canadians can submit personal information and access to information requests to government institutions. In 2022-23, PSP requested TBS to update the list of its Wholly-Owned Subsidiaries which appear in the AORS system. The AORS streamlines the process of requesting information and is part of a series of key actions PSP is taking to improve access to personal information in ways that have an immediate impact. This platform also allows international users to submit *Privacy Act* requests. Through its participation and leadership, PSP aims to improve transparency; access to personal information services; processes and timeliness. PSP provides benefits to all Canadians through its contribution to the improvement of the ATIP online user experience, by making it easier for Canadians to access government institution information via a simple, central website, where they can submit requests to government institutions covered by the *Privacy Act*.

- **ATIP Online Management Tool**
  Starting in April 2022, TBS has enrolled PSP and its Wholly-Owned Subsidiaries in the implementation of the ATIP Online Management Tool ("AOMT") pilot project. The AOMT is a request management system designed to enable

[53] https://atip-aiprp.apps.gc.ca/atip/welcome.do

institutions to access and retrieve privacy and access to information requests and provide responses to completed requests. As with any pilot project, AOMT proved to be a challenge for the PSP ATIP office. By contributing to the improvement of AOMT, PSP is bringing benefits to all Canadians.

- **Access to Information and Privacy Community Development**
  The Access to Information and Privacy Community Development Office ("APCDO") contributes to the development and sustainability of the privacy and access to information communities via recruitment, retention, learning, networking, and partnership activities with a spirit of diversity, inclusivity, and accessibility through community engagement. Whenever possible, the PSP ATIP office contributes to the APCDO. PSP aims to strengthen the ATIP community, privacy services, processes, and timeliness. Through its contribution to APCDO, PSP helps strengthen the ability of ATIP Offices to provide Canadians with timely access to government institution information by attracting new talents to ATIP Offices and providing ATIP professionals with centralized training and professional development programs, to the benefit of all Canadians.

- **Development of government-wide training tools** to support the ATIP communities. The APCDO started offering onboarding sessions to new ATIP professionals as well as training sessions on the *Privacy Act*. The PSP ATIP office enthusiastically participated to these training sessions. Through this participation, PSP contributes to strengthening the ATIP community; privacy services; processes and timeliness. Through its contribution to APCDO, PSP supports training and professional development of the ATIP communities which help increase the capacity of ATIP offices to provide access to government institution information in a timely manner, to the benefit of all Canadians.

XI.3 Revised Policies, Guidelines, and Procedures

In 2022-23, the PSP ATIP office:

- Adopted a new AOMT manual.
- Implemented revised AORS procedures.
- Reviewed and revised contractual requirements for third-party engagements (July 11, 2022)
- Updated a "*Security Risk and Privacy Impact Assessment Vendor Information Form"* (May 10, 2022).

There were no other "*new or revised*" policies, guidelines and procedures in 2022-23.

XI.4 2023-24 Upcoming Initiatives

In fiscal 2023-24, the PSP ATIP office intends to complete the following:

- Assessment of privacy program priorities.
- Update of framework of privacy obligations and controls.
- Privacy governance maturity benchmark report.

- Review of privacy policies, procedures, and notices, and providing updates, as necessary.
- Reviewing privacy review processes to improve efficiency.

In addition, with the development of a Privacy Protocol for non-administrative purpose, PSP also intends to innovate in the methods to be used to conduct certain privacy reviews.

Further, the PSP ATIP office intends to participate to:

- **Update PSPIB Information about Programs and Information Holdings.** In addition to completing the annual update of its inventory of information holdings, PSP will realign all content in the publication to bring it into line with the fiscal year 2022–23 Annual Report which enunciates its Results Framework. *Improvements sought:* Compliance with the law; and Transparency. *Benefits sought:* Inform Canadians.

- **PSP Subsidiaries Information about Programs and Information Holdings.** As described below in section XII, in relation to section 11 of the *Privacy Act*, a study will be completed to assess the extent of legislated requirement to all entities described in Appendix **A** of this Report. *Improvements sought:* Compliance with the law; and Transparency. *Benefits sought:* Inform Canadians.

- **Reviewing the approach to the annual statistical reporting** required under the *Privacy Act* to continue to better identify systemic issues in a manner that considers the reporting challenges for institutions. *Improvements sought:* Strengthening the ATIP community; and Transparency. *Benefits sought:* If possible, the PSP ATIP office will assist in improving reporting by government institutions on the administration of the *Privacy Act* to better track ongoing trends and help identify shortcomings.

- **Updating the *Privacy Regulations*** to ensure consistency with the *Privacy Act*, following the 2019 legislative changes, and with the current practices and requirements on identification verification. *Improvements sought:* Strengthening the ATIP community; Transparency; and privacy services. *Benefits sought:* If possible, through the contribution of the PSP ATIP office, PSP will ensure consistency between the *Privacy Regulations* and the *Privacy Act* as well as between the *Privacy Regulations* and the *Access to Information Regulations* as it relates to identity validation requirements.

- **Assess the need for *information sharing agreements*.** Among its privacy responsibilities, PSP must validate that arrangements for making personal information available to other federal institutions, other jurisdictions and service delivery providers are compliant with legislation and policy. *Improvements sought:* PSP must ensure that counterparts have the necessary terms and conditions for the protection and appropriate management of personal

information. Compliance with the law; and Transparency. *Benefits sought:* Mitigate privacy risks.

XII. Information About Programs and Information Holdings

Pursuant to section 11 of the *Privacy Act*, 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 *Privacy Act* and the *Access to Information 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.[54]

XIII. Personal Information Banks

Pursuant to section 10 of the *Privacy Act*, PSPIB President and CEO shall cause to be included in personal information banks all personal information under the control of PSP that has been used, is being used or is available for use for an administrative purpose; or is organized or intended to be retrieved by the name of an individual or by an identifying number, symbol or other particular assigned to an individual.

There were no "*new or revised*" institution-specific personal information banks in 2022-23. These are delayed up until the time that other concomitant priorities are completed.

XIV. Other Factors which Affected the Activities of the PSP ATIP Office

XIV.1 Impact of COVID-19 Pandemic on the PSP ATIP Office Operations

The activities of the PSP ATIP office were unaffected during the period covered by this report.

XIV.2 Impact of Parliamentary Committee Activities on the PSP ATIP Office

On January 18, 2023, the Standing Committee on Government Operations and Estimates ("Committee") issued a document production order that applies to federal departments, agencies and Crown Corporations that entered into any form of contract with McKinsey and Company ("McKinsey") between January 1, 2011, and January 25, 2023. PSP did enter into contracts with McKinsey during the production period. As a

[54] https://www.investpsp.com/en/ .

result, over 10,000 pages of documents were retrieved and are currently being processed in parallel with regular ATIP operations.

Responding to the Committee's production order is a priority, and the PSP ATIP office makes every effort to manage both the requirements of the *Privacy Act* and the Committee's order.

XV. Costs

In fiscal year 2022–23, PSP's total cost for administering the *Privacy Act* was $545,670. The PSP ATIP office incurred $191,913 in salary costs and $353,757 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: List of Relevant Wholly-Owned Subsidiaries

PUBLIC SECTOR PENSION INVESTMENT BOARD / OFFICE D'INVESTISSEMENT DES RÉGIMES DE PENSIONS DU SECTEUR PUBLIC RELEVANT WHOLLY-OWNED SUBSIDIARIES (as of March 31, 2023) FILIALES À PROPRIÉTÉ EXCLUSIVE CONCERNÉES (au 31 mars 2023)			
	Name of Subsidiary / Nom de la filiale	**French Version in Corporate Name / Version française de la dénomination sociale**	**French Business Name / Nom de l'entreprise en français**
1.	14602889 Canada Inc.	N/A	N/A
2.	3Net Indy Holdings Inc.	N/A	Gestion 3Net Indy
3.	3Net Indy Investments Inc.	N/A	Investissements 3Net Indy
4.	7986386 CANADA INC.	N/A	N/A
5.	8599963 Canada Inc.	N/A	N/A
6.	Argentia Private Investments Inc.	N/A	Argentia Investissements Privés
7.	AviAlliance Canada Inc.	N/A	N/A
8.	Belle Bay Private Investments Inc.	N/A	Investissements Privés Belle Bay
9.	Blue & Gold Private Investments Inc.	N/A	Blue & Gold Investissements Privés
10.	Datura Private Investments Inc.	N/A	Datura Investissements Privés
11.	Downsview Metro Devco Inc.	N/A	Gestion Downsview Métro Devco
12.	FirstLight Holding Inc.	N/A	N/A
13.	Galvaude Private Investments Inc.	N/A	Investissements Privés Galvaude
14.	Indo-Infra Inc.	N/A	Gestion Indo-Infra
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	N/A	Port-aux-Choix

PUBLIC SECTOR PENSION INVESTMENT BOARD / OFFICE D'INVESTISSEMENT DES RÉGIMES DE PENSIONS DU SECTEUR PUBLIC RELEVANT WHOLLY-OWNED SUBSIDIARIES (as of March 31, 2023) FILIALES À PROPRIÉTÉ EXCLUSIVE CONCERNÉES (au 31 mars 2023)			
	Name of Subsidiary / Nom de la filiale	**French Version in Corporate Name / Version française de la dénomination sociale**	**French Business Name / Nom de l'entreprise en français**
	Investments Inc.		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 Investments Asia Limited	N/A	N/A
29.	PSP Investments Canada Inc. / Investissements PSP Canada Inc.	Investissements PSP Canada Inc.	N/A
30.	PSP Investments Holding Europe Ltd	N/A	N/A
31.	PSP Investments USA LLC	N/A	N/A
32.	PSP Public Credit I Inc.	N/A	PSP Crédit Public I
33.	PSP Public Credit Opportunities Inc.	N/A	Opportunités de Crédit Public PSP
34.	PSP Public Markets Inc.	N/A	PSP Marchés Publics
35.	PSPIB Bromont Investments Inc.	N/A	Investissements PSPIB Bromont
36.	PSPIB CLUSTER INVESTMENTS INC.	N/A	Investissements PSPIB Cluster
37.	PSPIB Deep South Inc.	N/A	Gestion PSPIB Deep South
38.	PSPIB DevCol Inc.	N/A	Gestion PSPIB DevCol
39.	PSPIB Emerald Inc.	N/A	Gestion PSPIB Emerald
40.	PSPIB G.P. Finance Inc.	N/A	PSPIB Commandité Finance
41.	PSPIB G.P. Inc.	N/A	PSPIB Commandité
42.	PSPIB G.P. Partners Inc.	N/A	PSPIB Commandité Associés
43.	PSPIB GIPP D1 Inc.	N/A	N/A
44.	PSPIB Golden Range Cattle II Inc.	N/A	Gestion PSPIB Golden Range Cattle II
45.	PSPIB Golden Range Cattle Inc.	N/A	Gestion PSPIB Golden Range Cattle

PUBLIC SECTOR PENSION INVESTMENT BOARD / OFFICE D'INVESTISSEMENT DES RÉGIMES DE PENSIONS DU SECTEUR PUBLIC RELEVANT WHOLLY-OWNED SUBSIDIARIES (as of March 31, 2023) FILIALES À PROPRIÉTÉ EXCLUSIVE CONCERNÉES (au 31 mars 2023)			
	Name of Subsidiary / Nom de la filiale	**French Version in Corporate Name / Version française de la dénomination sociale**	**French Business Name / Nom de l'entreprise en français**
46.	PSPIB Homes Inc.	N/A	Gestion PSPIB Homes
47.	PSPIB LUNAR INVESTMENTS INC.	N/A	Investissements PSPIB Lunar
48.	PSPIB MEXICO GP INC.	N/A	Commandité PSPIB Mexico
49.	PSPIB Michigan G.P. Inc.	N/A	PSPIB Michigan Commandité
50.	PSPIB Orchid Inc.	N/A	Gestion PSPIB Orchid
51.	PSPIB Paisas Inc.	N/A	Gestion PSPIB Paisas
52.	PSPIB Pennsylvania Investments Inc.	N/A	Investissements PSPIB Pennsylvania
53.	PSPIB Realty International Inc. / PSPIB Immobilier International Inc.	PSPIB Immobilier International Inc.	N/A
54.	PSPIB Stanley Investments Inc.	N/A	N/A
55.	PSPIB Steam Investments Inc.	N/A	Investissements PSPIB Steam
56.	PSPIB THOR INVESTMENTS INC.	N/A	Investissements PSPIB Thor
57.	PSPIB Unitas Investments II Inc.	N/A	N/A
58.	PSPIB Unitas Investments Inc.	N/A	N/A
59.	PSPIB WEXFORD INVESTMENTS INC.	N/A	Investissements PSPIB Wexford
60.	PSPIB-AI Investments Inc.	N/A	Investissements PSPIB-AI
61.	PSPIB-Andes Inc.	N/A	Gestion PSPIB-Andes
62.	PSPIB-ARE CANADA INC.	N/A	Gestion PSPIB-ARE CANADA
63.	PSPIB-ARE SERVICES INC.	N/A	SERVICES PSPIB-ARE
64.	PSPIB-Condor Inc.	N/A	N/A
65.	PSPIB-Eldorado Inc.	N/A	Gestion PSPIB-Eldorado

PUBLIC SECTOR PENSION INVESTMENT BOARD / OFFICE D'INVESTISSEMENT DES RÉGIMES DE PENSIONS DU SECTEUR PUBLIC **RELEVANT WHOLLY-OWNED SUBSIDIARIES (as of March 31, 2023)** **FILIALES À PROPRIÉTÉ EXCLUSIVE CONCERNÉES (au 31 mars 2023)**			
	Name of Subsidiary / Nom de la filiale	**French Version in Corporate Name / Version française de la dénomination sociale**	**French Business Name / Nom de l'entreprise en français**
66.	PSPIB-ILS INVESTMENTS INC.	N/A	Investissements PSPIB-ILS
67.	PSPIB-LSF Inc.	N/A	N/A
68.	PSPIB-RE FINANCE II INC.	N/A	Gestions PSPIB-RE Finance II
69.	PSPIB-RE Finance Inc.	N/A	N/A
70.	PSPIB-RE Finance Partners II Inc.	N/A	PSPIB-RE Finance Associés II
71.	PSPIB-RE Finance Partners Inc.	N/A	PSPIB-RE Finance Associés
72.	PSPIB-RE MANCHESTER INC.	N/A	Gestion PSPIB-RE Manchester
73.	PSPIB-RE Partners II Inc.	N/A	PSPIB-RE Associés II
74.	PSPIB-RE Partners Inc.	N/A	PSPIB-RE Associés
75.	PSPIB-RE UK Inc.	N/A	Gestion PSPIB-RE UK
76.	PSPIB-SDL Inc.	N/A	N/A
77.	PSPIB-Star Inc.	N/A	PSPIB-Étoile
78.	Red Isle Private Investments Inc.	N/A	Red Isle Investissements Privés
79.	Revera Inc.	N/A	N/A
80.	Sooke Investments Inc.	N/A	Investissements Sooke
81.	Trinity Bay Private Investments Inc.	N/A	Placements Privés Trinity Bay
82.	Vertuous Energy Canada Inc.	N/A	Énergie Vertuous Canada
83.	VOP Investments Inc.	N/A	Investissements VOP

It should be noted that *Revera Inc.* (line 79 above) is an active subsidiary. The reporting requirements of an active subsidiary are met by separate reports, prepared by Revera Inc.'s ATIP Coordinator. If you have any questions, please see: https://www.tbs-sct.canada.ca/ap/atip-aiprp/coord-eng.asp .

Appendix B: 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 her 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 her 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 1st day of September 2022.

DocuSigned by:
52E84EEDE6284E3...
Deborah K. Orida
President and CEO

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
Senior Director or Managing Director, Legal Affairs and ATIP Coordinator	Full authority	Full authority
Advisor/Senior Advisor/Counsel or equivalent, Access to Information and Privacy	Full authority	Full authority
Advisor/Senior Advisor/Counsel or equivalent, Privacy	Full authority	Full authority
Administrative Analyst or equivalent, Legal Affairs	Paragraph 7(a) Section 9	Paragraph 14(a) Section 15

Appendix C: Statistical Report

Government of Canada / Gouvernement du Canada

Statistical Report on the *Privacy Act*

Name of institution: PSPIB and its Wholly-Owned Subsidiairies

Reporting period: 4/1/2022 to 3/31/2023

Section 1: Requests Under the *Privacy Act*

1.1 Number of requests received

		Number of Requests
Received during reporting period		10
Outstanding from previous reporting periods		0
• Outstanding from previous reporting period	0	
• Outstanding from more than one reporting period	0	
Total		10
Closed during reporting period		8
Carried over to next reporting period		2
• Carried over within legislated timeline	2	
• Carried over beyond legislated timeline	0	

1.2 Channels of requests

Source	Number of Requests
Online	5
E-mail	5
Mail	0
In person	0
Phone	0
Fax	0
Total	10

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

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
0	0	0	0	0	0	0	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	4	1	0	0	0	0	0	5
Request abandoned	3	0	0	0	0	0	0	3
Neither confirmed nor denied	0	0	0	0	0	0	0	0
Total	7	1	0	0	0	0	0	8

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	3

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	3	0	0	0	0	0	0	0	0	0
Neither confirmed nor denied	0	0	0	0	0	0	0	0	0	0
Total	3	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	8
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

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 extensions 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	
	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

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		$191,913
Overtime		$0
Goods and Services		$353,757
• Professional services contracts	$353,757	
• Other	$0	
Total		$545,670

12.2 Human Resources

Resources	Person Years Dedicated to Privacy Activities
Full-time employees	1.835
Part-time and casual employees	0.000
Regional staff	0.000
Consultants and agency personnel	0.824
Students	0.000
Total	2.659

Note: Enter values to three decimal places.

Appendix D: Supplemental Statistical Report

Government of Canada / Gouvernement du Canada

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

Name of institution: PSPIB and its Wholly-Owned Subsidiairies

Reporting period: 2022-04-01 to 2023-03-31

Section 1: Capacity to Receive Requests under the Access to Information Act and the Privacy Act

Enter the number of weeks your institution was able to receive ATIP requests through the different channels.

	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 under the Access to Information Act and the Privacy Act

2.1 Enter the number of weeks your institution was able to process paper records in different classification levels.

	No Capacity	Partial Capacity	Full Capacity	Total
Unclassified Paper Records	0	32	20	**52**
Protected B Paper Records	0	32	20	**52**
Secret and Top Secret Paper Records	0	32	20	**52**

2.2 Enter the number of weeks your institution was able to process electronic records in different classification levels.

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

Section 3: Open Requests and Complaints Under the Access to Information Act

3.1 Enter the number of open requests that are outstanding from previous reporting periods.

Fiscal Year Open Requests Were Received	Open Requests that are *Within* Legislated Timelines as of March 31, 2023	Open Requests that are *Beyond* Legislated Timelines as of March 31, 2023	Total
Received in 2022-2023	3	0	**3**
Received in 2021-2022	0	0	**0**
Received in 2020-2021	0	0	**0**
Received in 2019-2020	0	0	**0**
Received in 2018-2019	0	0	**0**
Received in 2017-2018	0	0	**0**
Received in 2016-2017	0	0	**0**
Received in 2015-2016	0	0	**0**
Received in 2014-2015	0	0	**0**
Received in 2013-2014 or earlier	0	0	**0**
Total	**3**	**0**	**3**

Row 11, Col. 3 of Section 3.1 must equal Row 7, Col. 1 of Section 1.1 of the 2022-2023 Statistical Report on the *Access to Information Act*

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

Fiscal Year Open Complaints Were Received by Institution	Number of Open Complaints
Received in 2022-2023	0
Received in 2021-2022	0
Received in 2020-2021	0
Received in 2019-2020	0
Received in 2018-2019	0
Received in 2017-2018	0
Received in 2016-2017	0
Received in 2015-2016	0
Received in 2014-2015	0
Received in 2013-2014 or earlier	1
Total	**1**

Section 4: Open Requests and Complaints Under the Privacy Act

4.1 Enter the number of open requests that are outstanding from previous reporting periods.

Fiscal Year Open Requests Were Received	Open Requests that are *Within* Legislated Timelines as of March 31, 2023	Open Requests that are *Beyond* Legislated Timelines as of March 31, 2023	Total
Received in 2022-2023	2	0	**2**
Received in 2021-2022	0	0	**0**
Received in 2020-2021	0	0	**0**
Received in 2019-2020	0	0	**0**
Received in 2018-2019	0	0	**0**
Received in 2017-2018	0	0	**0**
Received in 2016-2017	0	0	**0**
Received in 2015-2016	0	0	**0**
Received in 2014-2015	0	0	**0**
Received in 2013-2014 or earlier	0	0	**0**
Total	**2**	**0**	**2**

Row 11, Col. 3 of Section 4.1 must equal Row 7, Col. 1 of Section 1.1 of the 2022-2023 Statistical Report on the *Privacy Act*

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

Fiscal Year Open Complaints Were Received by Institution	Number of Open Complaints
Received in 2022-2023	0
Received in 2021-2022	0
Received in 2020-2021	0
Received in 2019-2020	0
Received in 2018-2019	0
Received in 2017-2018	0
Received in 2016-2017	0
Received in 2015-2016	0
Received in 2014-2015	0
Received in 2013-2014 or earlier	0
Total	**0**

Section 5: Social Insurance Number

Has your institution begun a new collection or a new consistent use of the SIN in 2022-2023?	No

Section 6: Universal Access under the Privacy Act

How many requests were received from confirmed foreign nationals outside of Canada in 2022-2023?	0	Row 1, Col. 1 of Section 6 must be equal to or less than Row 1, Col. 1 of Section 1.1 of the 2022-2023 Statistical Report on the *Privacy Act*

Cette publication est également offerte en français.

© His Majesty the King in Right of Canada, as represented by the Auditor General of Canada, 2023.
Cat. No. **XXXX**
ISBN **XXXX**