

Privacy Impact Assessment Summary

Public Sector Pension Investment Board (“PSP Investments”)

Title

Provide the title of the program or activity:

Montreal Access Control System

Description

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

The program consists of the installation of CCTV cameras and upgrading the access card system (“ACS”). The purpose of the project is to enhance the security of PSP’s Montreal office and ensure the safety of PSP personnel and visitors. PSP has experienced physical security breaches in the past. These measures aim to reduce such occurrences and facilitate the investigation of incidents. Currently, PSP does not have security cameras installed broadly across the office, other than in server rooms. The new ACS replaces an externally managed access card system, bringing this function under PSP’s direct administration.

The implementation of the CCTV cameras and the ACS is scheduled to be completed for end of Q4FY26 (by March 31, 2026).

Why a privacy impact assessment was completed

Provide an outline of the reason for completing the PIA:

A Privacy Impact Assessment (PIA) was completed due to the nature of the program. It requires the collection and use of personal information in the event of a security incident. The PIA was completed to ensure that the program is implemented in a manner that respects individuals’ privacy and ensures compliance with the Privacy Act.

Additional information

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

1. **Risk:** Overcollection of personal information through placement and field of vision of cameras. **Mitigation:** Monitoring is limited to entrances and access points but in some cases, this covers common areas and access to some bathrooms. Where placement may carry a risk of potential overcollection, digital masking/barriers and frosting on glass walls/doors are being utilized to mitigate the risk.
2. **Risk:** Need for procedural documentation to cover purpose specification, retention, deletion, disclosures and all necessary controls. **Mitigation:** The Risk Owner, with support from ATIP is developing internal procedures covering when data can be accessed/consulted/disclosed, the full information lifecycle, and any manual deletion

steps. Unblurring and review of CCTV footage to be justified, logged, approved by the CISO (or a delegated senior manager), and supported by an audit trail, with the procedure reviewed annually.

3. Risk: Lack of transparency. Mitigation: Privacy notices and signage in English and French have been posted. Online and hard copies are available. Building management has been notified.

4. Risk: Oversharing of personal information in response to an access request. Mitigation: If unblurred footage containing multiple individuals is subject to an access request, where feasible, Risk Owner will manually blur other individuals.

Related personal information banks

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

PSU 907

For more information about this privacy impact assessment

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

Tammy Marer, Senior Director, Enterprise Affairs Legal Lead and Privacy Officer, Legal Affairs
ATIP@investpsp.ca