



Office of the Superintendent of
Financial Institutions Canada

Bureau du surintendant des
institutions financières Canada

Annual Report to Parliament on the administration of the Privacy Act

2017-2018

May 2018



OSFI
BSIF

Canada 

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1. Introduction

The purpose of the *Privacy Act* is to extend the present laws of Canada that protect the privacy of individuals with respect to personal information about themselves held by a government institution and that provide individuals with a right of access to that information.

This annual report was prepared and submitted in accordance with section 72 of the *Privacy Act* and covers the period from April 1, 2017 to March 31, 2018.

2. Mandate of the Office of the Superintendent of Financial Institutions (OSFI)

Under its legislation, OSFI's mandate is:

Fostering sound risk management and governance practices

OSFI advances a regulatory framework designed to control and manage risk.

Supervision and early intervention

OSFI supervises federally regulated financial institutions and pension plans to determine whether they are in sound financial condition and meeting regulatory and supervisory requirements.

OSFI promptly advises financial institutions and pension plans if there are material deficiencies, and takes corrective measures or requires that they be taken to expeditiously address the situation.

Environmental scanning linked to safety and soundness of financial institutions

OSFI monitors and evaluates system-wide or sectoral developments that may have a negative impact on the financial condition of federally regulated financial institutions.

Taking a balanced approach

OSFI acts to protect the rights and interests of depositors, policyholders, financial institution creditors and pension plan beneficiaries while having due regard for the need to allow financial institutions to compete effectively and take reasonable risks.

OSFI recognizes that management, boards of directors and pension plan administrators are ultimately responsible for risk decisions, that financial institutions can fail, and pension plans can experience financial difficulties resulting in the loss of benefits.

In fulfilling its mandate, OSFI supports the government's objective of contributing to public confidence in the Canadian financial system.

The Office of the Chief Actuary is an independent unit within OSFI that provides a range of actuarial valuation and advisory services to the Government of Canada. In conducting its work, the OCA plays a vital and independent role towards a financially sound and sustainable Canadian public retirement income system.

3. Strategic Outcomes

Primary to OSFI's mandate and central to its contribution to Canada's financial system are two strategic outcomes:

1. A safe and sound Canadian financial system
2. A financially sound and sustainable Canadian public retirement income system.

For the purposes of the *Privacy Act*, the head of OSFI is the Superintendent and the responsible minister is the Minister of Finance.

4. Administration of the *Privacy Act*

4.1 Access to Information and Privacy (ATIP) Unit

The Access to Information and Privacy (ATIP) Unit is part of the Enterprise Information Management (EIM) directorate within the Information Management/Information Technology (IM/IT) Division. The unit is responsible for administering the *Act* for the Office of the Superintendent of Financial Institutions. As such, the ATIP unit coordinates the timely processing of requests under the legislation, handles complaints lodged with the Privacy Commissioner, and responds to informal inquiries. The ATIP unit also provides advice and guidance to Office staff on matters involving the *Act*.

The Manager, Privacy and Access to Information reports to the Director, EIM and is supported by an ATIP Officer and an administrative coordinator. In 2017-2018, the ATIP Officer position was created and staffed. Due to the increased demand for privacy impact assessments and privacy protocols for the use of personal information for a non-administrative purpose the ATIP unit also relied upon the support of contract resources.

4.2 Institutional changes to the administration of the *Privacy Act*

No significant institutional changes to the administration of the *Privacy Act* to report during this reporting period.

4.3 Education and Training

Training efforts over the last year have been focused on continued privacy awareness building with staff in service areas supporting project delivery in Information Management/Information Technology, with Regulatory Data Governance, and within the Office's senior and operational governance committees. Training efforts also focused on ATIP awareness for all OSFI staff as part of an Information Management and ATIP awareness program. OSFI held nine awareness sessions and a total of 340 employees attended. This represents a total of nearly 49 percent of OSFI employees, a 385 percent increase in the number of staff trained over the previous year.

4.4 Processing of Privacy Requests

All formal privacy requests are submitted to the Manager, Privacy and Access to Information, who reviews and assigns them to an ATIP Officer. The Officer requests the information from the head of the division or divisions concerned. In gathering the material and subsequently reviewing it, the ATIP Office provides advice and direction to ensure that the provisions of the *Act* are respected.

Assembled material is reviewed by the ATIP Officer, the Manager, Privacy and Access to Information and Legal Services, as appropriate. The material and the recommendations pertaining to each request are then submitted to the program area for validation. Once agreed, the release package is submitted to the Assistant Superintendent, Corporate Services for review and approval.

Employees have the right to review their personal records at intervals specified in the various collective agreements. To exercise this right, an employee contacts the appropriate official in the Human Resources and Administration Division. The review of personal records is considered informal and no data on these requests is compiled. The employee, however, does have the option of submitting a formal request under the privacy legislation. Employees of the Human Resources and Administration Division are aware of the provisions of the *Privacy Act* as they relate to the use and disclosure of personal information.

4.5 Delegation of Authority

Delegation orders set out what powers, duties and functions for the administration of the *Privacy Act* have been delegated by the head of the institution and to whom. Administration of the *Privacy Act* at OSFI is the responsibility of the Superintendent. The authority to claim exemptions and to issue various statutory notices has been delegated to the Assistant Superintendent, Corporate Services. The authority to issue various statutory notices has also been delegated to the Director, Enterprise Information Management, the Manager, Privacy and Access to Information and the ATIP Coordinator.

4.6 Monitoring Compliance

The time taken to process personal information requests and requests for the correction of personal information is tracked in the ATIP tracking system. The ATIP caseload is reviewed bi-weekly with the Director, EIM and the anticipated responses to privacy requests are ultimately reviewed and approved by the Assistant Superintendent, Corporate Services. Concerns are raised as appropriate throughout the lifecycle of the request and priority is given to fulfilling OSFI's statutory obligations.

4.7 Summary of significant changes to programs, operations, policies or procedures

Since the completion of the enterprise-wide rollout of OSFI's electronic document management system (eSpace) in June 2017, the ATIP Office has modified its procedures to leverage the file capture and storage capabilities of the system in order to receive and processes relevant ATIP documentation electronically. The use of eSpace allows teams to "transfer" files to the ATIP Office, facilitating pre-assessment and pre-sorting of files for review while maintaining necessary access

rights to avoid potential breaches. Business line staff now need only submit a link to the document set created for each specific ATI or privacy request and the ATIP Office can import the documentation into the ATIP redaction software. This process has significantly reduced the burden on business lines and has eliminated the need to print and highlight potential sensitivities, to courier documentation to and from the ATIP Office, and to scan documentation into the ATIP redaction software – time consuming and costly processes that are now no longer necessary.

4.8 Number of new data matching and sharing activities undertaken

No data matching and sharing activities were undertaken during this reporting period.

4.9 Exempt banks

The Office holds no personal information in its Personal Information Banks that requires designation under section 18 of the Act.

4.10 Reading room

In accordance with the *Privacy Act*, a public reading room is available in Ottawa. It is located at 255 Albert Street, on the 16th floor.

5. Interpretation of the Statistical Report

Part 1 – Requests under the *Privacy Act*

Due to the nature of OSFI’s work regulating and supervising financial institutions and private pension plans under federal jurisdiction, much of the information in the Office’s possession is third-party business information rather than personal information about individuals. The financial institutions and pension plans are OSFI’s clients. As OSFI does not provide services directly to individuals, the volume of personal information collected by the Office is relatively small. This information is generally limited to employment records of current and previous OSFI employees and information about individual contract consultants at OSFI.

In 2017-2018, one new request was received. Since the inception of the *Privacy Act*, July 1, 1983, OSFI has received 59 privacy requests.

Part 2 – Requests closed during the reporting period

The following table summarizes the actions taken with respect to the completed requests:

Disposition	Number of requests
All disclosed	0

Disclosed in part	0
All exempted	0
All excluded	0
No records exist	1
Request abandoned	0
Neither confirmed nor denied	0
Total	1

For the one request received in 2017-2018, only two days were required to complete the request as it was quickly determined that no relevant records existed.

Exemptions

No exemptions were applied during the reporting period.

Exclusions

No exclusions were cited during the reporting period.

Format of information released

No information was released pursuant to a request under the *Privacy Act* during the reporting period.

Relevant pages processed and disclosed

No relevant pages were processed or disclosed during the reporting period.

Relevant pages processed and disclosed by size of requests

No relevant pages were processed or disclosed during the reporting period.

Other complexities

No consultations or requests for legal advice were required during this reporting period.

Deemed refusal

There were no deemed refusals during this reporting period.

Request for translation

No requests for translation were made during this reporting period.

Part 3 – Disclosures under Subsections 8(2) and 8(5)

No disclosures were made pursuant to subsections 8(2)(e), 8(2)(m) or 8(5) of the *Privacy Act* during this reporting period.

Part 4 – Request for correction of personal information and notations

No requests for correction of personal information and no notations were made during this reporting period.

Part 5 – Extensions

No extensions were required during this reporting period.

Part 6 – Consultations received from other government institutions and organizations

No consultations from other government institutions and organizations were received during the reporting period.

Part 7 – Completion time of consultations on Cabinet confidences

No consultations with respect to Cabinet confidences were required during the reporting period.

Part 8 – Resources related to the *Privacy Act*

The cost to administer the *Act* during this reporting period was \$76,129.

6. Complaints and Investigations

OSFI did not receive any complaints pursuant to the *Privacy Act* during this reporting period, and no formal investigations regarding OSFI were carried out.

7. Privacy Breaches

There were no material privacy breaches reported during the 2017-2018 fiscal year.

8. Appeals to the Federal Court of Canada

8.1 Major changes implemented as a result of concerns or issues raised by the Privacy Commissioner of Canada in her annual report to Parliament

The Privacy Commissioner of Canada did not raise any concerns or issues related to OSFI, therefore no major changes were implemented.

8.2 Major changes implemented as a result of concerns or issues raised by other agents of Parliament

No major changes were implemented by OSFI as other agents of Parliament did not raise any concerns or issues.

8.3 Number of applications or appeals to the Federal Court or the Federal Court of Appeal during the fiscal year

There were no privacy related applications or appeals to the Federal Court or the Federal Court of Appeal during this fiscal year related to OSFI.

9. Completed Privacy Impacts Assessments

Two privacy impact assessments (PIA) and 10 privacy protocols were completed in 2017-2018. This number represents a significant increase in privacy risk assessment work undertaken by OSFI as part of its Privacy program. Brief descriptions of the completed PIAs are provided below.

Credit Risk Division Program

As part of the Risk Support Sector that supports OSFI's regulatory and supervisory activities, the Credit Risk Division (CRD) contributes to OSFI's mandate of protecting the rights and interests of depositors, policyholders and pension plan members. CRD's mandate is to:

- Provide advice and support to OSFI's regulatory and supervisory activities by undertaking supervisory work and early intervention activities at financial institutions (FRFIs), with respect to credit risk; and
- Support OSFI's regulatory and supervisory efforts to monitor and evaluate system-wide or sectoral issues related to credit risk that may impact institutions negatively.

In carrying out its mandate, more specifically when undertaking on-site reviews, the information reviewed by CRD includes, at times, personal information.

A 2015 internal audit of the Credit Risk Division made a series of recommendations aimed at enhancing compliance with Privacy Act requirements on personal information. As per Management's action plan, a Privacy Impact Assessment (PIA) of the CRD policies and processes for retail and small business reviews was undertaken to assess potential privacy gaps and exposure; identify key privacy risks and mitigations; and develop a privacy protection action plan to address identified risks.

The PIA findings recommended changes in the handling of personal information related to CRD's retail and small business reviews. These recommendations were accepted by Management and work is underway to deliver on the commitments in the Management Action Plan.

eSpace (OSFI's Electronic document and records management system)

OSFI creates, manages and uses a large amount of electronic information to fulfill its regulatory and

supervisory roles; this information exists in the form of documents and emails. The legacy LiveLink Electronic Document Management System (EDMS) had functioned as the official repository of OSFI's electronic information since 2001. However, over time, users had come to lack confidence in the aging system from a performance perspective and found the search capability was ineffective. This resulted in scattered pockets of information (e.g. personal drives and network drives), duplication of effort and less than optimal use of available information. The technology used for the EDMS, was at end-of-life and the system had become unstable. Moreover, LiveLink posed a security risk in that the software and hardware technology it ran on was no longer supported, meaning security vulnerabilities were no longer patched.

In response to these issues, in December 2010, OSFI's Business Council approved a project to replace LiveLink. An in-depth options analysis, guided by OSFI's IM/IT Strategy requirement to consolidate applications on a small number of common enterprise platforms, selected Microsoft SharePoint and established the EDRMS - subsequently renamed "eSpace" - as OSFI's new solution to replace LiveLink. As an enterprise solution, eSpace enables OSFI to manage and protect its information resources.

The PIA findings recommended a re-assessment of the Corporate Information Sharing Policy, monitoring of use and completion of a formal threat and risk assessment. These recommendations were accepted by Management and work is underway to deliver on the commitments in the Management Action Plan.

Both PIAs were submitted to the Office of the Privacy Commissioner and the Treasury Board Secretariat as required under section 6.3 (e) of the *Privacy Act*.

APPENDIX A



Statistical Report on the *Privacy Act*

Name of institution: Office of the Superintendent of Financial Institutions

Reporting period: 2017-04-01 to 2018-03-31

Part 1: Requests Under the *Privacy Act*

	Number of Requests
Received during reporting period	1
Outstanding from previous reporting period	0
Total	1
Closed during reporting period	1
Carried over to next reporting period	0

Part 2: Requests Closed During the Reporting Period

2.1 Disposition and completion time

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

2.2 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	28	0
21	0	22.3	0		

2.3 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

2.4 Format of information released

Disposition	Paper	Electronic	Other formats
All disclosed	0	0	0
Disclosed in part	0	0	0
Total	0	0	0

2.5 Complexity

2.5.1 Relevant pages processed and disclosed

Disposition of Requests	Number of Pages Processed	Number of Pages Disclosed	Number of Requests
All disclosed	0	0	0
Disclosed in part	0	0	0
All exempted	0	0	0
All excluded	0	0	0
Request abandoned	0	0	0
Neither confirmed nor denied	0	0	0
Total	0	0	0

2.5.2 Relevant pages processed and disclosed by size of requests

Disposition	Less Than 100 Pages Processed		101-500 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
All disclosed	0	0	0	0	0	0	0	0	0	0
Disclosed in part	0	0	0	0	0	0	0	0	0	0
All exempted	0	0	0	0	0	0	0	0	0	0
All excluded	0	0	0	0	0	0	0	0	0	0
Request abandoned	0	0	0	0	0	0	0	0	0	0
Neither confirmed nor denied	0	0	0	0	0	0	0	0	0	0
Total	0	0	0	0	0	0	0	0	0	0

2.5.3 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

2.6 Deemed refusals

2.6.1 Reasons for not meeting statutory deadline

Number of Requests Closed Past the Statutory Deadline	Principal Reason			
	Workload	External Consultation	Internal Consultation	Other
0	0	0	0	0

2.6.2 Number of days past deadline

Number of Days Past Deadline	Number of Requests Past Deadline Where No Extension Was Taken	Number of Requests Past Deadline 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

2.7 Requests for translation

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

Part 3: Disclosures Under Subsections 8(2) and 8(5)

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

Part 4: Requests for Correction of Personal Information and Notations

Disposition for Correction Requests Received	Number
Notations attached	0
Requests for correction accepted	0
Total	0

Part 5: Extensions

5.1 Reasons for extensions and disposition of requests

Disposition of Requests Where an Extension Was Taken	15(a)(i) Interference With Operations	15(a)(ii) Consultation		15(b) Translation or Conversion
		Section 70	Other	
All disclosed	0	0	0	0
Disclosed in part	0	0	0	0
All exempted	0	0	0	0
All excluded	0	0	0	0
No records exist	0	0	0	0
Request abandoned	0	0	0	0
Total	0	0	0	0

5.2 Length of extensions

Length of Extensions	15(a)(i) Interference with operations	15(a)(ii) Consultation		15(b) Translation purposes
		Section 70	Other	
1 to 15 days	0	0	0	0
16 to 30 days	0	0	0	0
Total	0	0	0	0

Part 6: Consultations Received From Other Institutions and Organizations

6.1 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
Pending at the end of the reporting period	0	0	0	0

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

Recommendation	Number of Days Required to Complete Consultation Requests							Total
	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	
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
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

6.3 Recommendations and completion time for consultations received from other organizations

Recommendation	Number of days required to complete consultation requests							Total
	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	
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
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

Part 7: Completion Time of Consultations on Cabinet Confidences

7.1 Requests with Legal Services

Number of Days	Fewer Than 100 Pages Processed		101-500 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

7.2 Requests with Privy Council Office

Number of Days	Fewer Than 100 Pages Processed		101-500 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

Part 8: Complaints and Investigations Notices Received

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

Part 9: Privacy Impact Assessments (PIAs)

Number of PIA(s) completed	2
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Part 10: Resources Related to the *Privacy Act*

10.1 Costs

Expenditures		Amount
Salaries		\$64,244
Overtime		\$0
Goods and Services		\$11,885
• Professional services contracts	\$7,890	
• Other	\$3,995	
Total		\$76,129

10.2 Human Resources

Resources	Person Years Dedicated to Privacy Activities
Full-time employees	0.51
Part-time and casual employees	0.01
Regional staff	0.00
Consultants and agency personnel	0.03
Students	0.00
Total	0.55

Note: Enter values to two decimal places.

APPENDIX B

DESIGNATION / DÉLÉGATION

PRIVACY ACT / LOI SUR LA PROTECTION DES RENSEIGNEMENTS PERSONNELS

Privacy Act Designation Order

By this order made pursuant to section 73 of the *Privacy Act*, I hereby authorize those officers and employees of the Office of the Superintendent of Financial Institutions occupying, on an acting basis or otherwise, the positions identified within the attached schedule to perform on my behalf any of the powers, duties or functions specified therein.

This designation replaces and repeals all previous orders.

Dated in Ottawa on this 5 day
of July, 2016

Arrêté sur la délégation en vertu de la Loi sur la protection des renseignements personnels

Par le présent arrêté pris en vertu de l'article 73 de la *Loi sur la protection des renseignements personnels*, j'autorise les agents et les employés du Bureau du surintendant des institutions financières occupant, par intérim ou autrement, les postes identifiés dans l'annexe ci-jointe à exercer en mon nom, les attributions, les fonctions et les pouvoirs qui y sont spécifiés.

Le présent document remplace et annule tous les arrêtés antérieurs.

Fait à Ottawa en ce 5 jour
de juillet, 2016

Superintendent of Financial Institutions/
Le surintendant des institutions financières

SCHEDULE 2
Designation Order - Privacy Act

Section	Powers, Duties or Functions	Assistant Superintendent, Corporate Services	Director, Enterprise Information Management	Manager, Privacy & Access to Information	ATIP Coordinator
8(2)(j)	To disclose personal information when satisfied that the purpose for which the information is disclosed cannot reasonably be accomplished unless the information is provided in a form that identifies the person to whom it relates and obtain a written undertaking that no subsequent disclosure of the information will be made in a form that could reasonably be expected to identify the individual to whom it relates	X			
8(2)(m)	To disclose personal information when public interest outweighs invasion of privacy or when disclosure benefits the individual	X			
8(4)	To keep copies of requests made under 8(2)(e), keep records of information disclosed pursuant to such requests and to make those copies and records available to Privacy Commissioner	X	X	X	X
8(5)	To notify the Privacy Commissioner in writing of disclosure under paragraph 8(2)(m)	X	X	X	X
9(1)	To retain a record of use of personal information.	X	X	X	X
9(4)	To notify the Privacy Commissioner of consistent use of personal information and update index accordingly	X	X	X	X
10	To include personal information in personal information banks	X	X	X	X
14(a)	To give written notice as to whether or not access will be given	X	X	X	X
14(b)	To give access to requester	X	X	X	X
15	To extend time limit and give notice of extension	X	X	X	X

July 2016 1

SCHEDULE 2
Designation Order - Privacy Act

Section	Powers, Duties or Functions	Assistant Superintendent, Corporate Services	Director, Enterprise Information Management	Manager, Privacy & Access to Information	ATIP Coordinator
17(2)(b)	To determine the necessity for a translation or interpretation of a record	X	X	X	
17(3)	To determine whether a record should be provided in an alternative format	X	X	X	
18(2)	To refuse to disclose personal information referred to in that section	X			
19(1)	To refuse to disclose personal information referred to in that section	X			
19(2)	To disclose, with consent, personal information referred to in that subsection	X	X	X	
20	To refuse to disclose personal information referred to in that section	X			
21	To refuse to disclose personal information referred to in that section	X			
22	To refuse to disclose personal information referred to in that section	X			
22.3	To refuse to disclose personal information referred to in that section	X			
23	To refuse to disclose personal information referred to in that section	X			
24	To refuse to disclose personal information under that section	X			
25	To refuse to disclose personal information under that section	X			
26	To refuse to disclose personal information under that section	X			
27	To refuse to disclose personal information under that section	X			
28	To refuse to disclose personal information under that section	X			
31	To receive notice of investigation by the Privacy Commissioner	X	X	X	

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SCHEDULE 2
Designation Order - Privacy Act

Section	Powers, Duties or Functions	Assistant Superintendent, Corporate Services	Director, Enterprise Information Management	Manager, Privacy & Access to Information	ATIP Coordinator
33(2)	To make representations to the Privacy Commissioner	X	X	X	X
35(1)	To receive the report of findings of the investigation and give notice of action taken or proposed to be taken or reasons why no action has been or is proposed to be taken	X	X	X	
35(4)	To provide access to personal information	X	X	X	
36(3)	To receive the report of findings of the investigation of files in exempt banks	X	X	X	
37(3)	To receive the report of findings after investigation in respect of personal information	X	X	X	
51(2)(b)	To request that the matter be heard and determined in the National Capital Region	X	X	X	
51(3)	To request the opportunity to make representations ex parte	X	X	X	
72(1)	To prepare annual report for submission to Parliament	X	X	X	X

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SCHEDULE 2
Designation Order - Privacy Act

Privacy Regulations

Section	Powers, Duties or Functions	Assistant Superintendent, Corporate Services	Director, Enterprise Information Management	Manager, Privacy & Access to Information	ATIP Coordinator
9	Reasonable facilities and time provided to examine personal information	X	X	X	X
11(2)	Notification that correction to personal information has been made	X	X	X	X
11(4)	Notification that correction to personal information has been refused	X	X	X	X
13(1)	Disclosure of personal information relating to physical or mental health may be made to qualified medical practitioner or psychologist for an opinion on whether to release information to requestor	X			
14	Disclosure of personal information relating to physical or mental health may be made to requestor in presence of qualified medical practitioner or psychologist	X			

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