

# **FINTRAC**

# 2020-2021 Annual Report Administration of the *Privacy Act*

September 1, 2021





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ISSN 2563-7339

Cat. No. FD2-6/2E-PDF

# 1. Introduction

This report to Parliament, which is prepared and tabled in accordance with Section 72 of the *Privacy Act* (hereafter the "Act"), describes the activities of the Financial Transactions and Reports Analysis Centre of Canada (FINTRAC) in administrating the Act during fiscal year 2020–21. This report should be considered along with FINTRAC's 2020–21 *Annual Report on the Administration of the Access to Information Act*, which is tabled separately.

The purpose of the Act is to protect the privacy of individuals with respect to personal information about themselves held by government institutions and to provide individuals with a right of access to that information.

# 2. About FINTRAC

FINTRAC is Canada's financial intelligence unit and anti-money laundering and anti-terrorist financing regulator and plays a critical role in combating money laundering, terrorism financing, and threats to the security of Canada. The Centre has two core responsibilities framed around a duty to protect the personal information with which it is entrusted.

First, the Centre is responsible for ensuring compliance with Part 1 and 1.1 of the *Proceeds of Crime (Money Laundering) and Terrorist Financing Act* and its associated Regulations. This legal framework establishes obligations for reporting entities to develop a compliance regime in order to identify clients, monitor business relationships, keep records and report certain types of financial transactions. These compliance obligations allow for certain economic activities to be more transparent, which helps prevent and deter nefarious individuals and organizations from using Canada's legitimate economy to launder the proceeds of their crimes or finance terrorist activities. FINTRAC is committed to working with businesses to help them understand and comply with their obligations. The Centre also maintains a registry of money services businesses in Canada and foreign money services businesses that direct and provide services to persons and entities in Canada.

Second, FINTRAC is also mandated by the *Proceeds of Crime (Money Laundering) and Terrorist Financing Act* to generate actionable financial intelligence that assists Canada's police, law enforcement and national security agencies and other international partners in combatting money laundering, terrorism financing and threats to the security of Canada. In addition, the Centre produces strategic financial intelligence for federal policy and decision-makers, the security and intelligence community, reporting entities across the country, international partners and other stakeholders. FINTRAC's strategic intelligence provides a wide analytic perspective on the nature, scope and threat posed by money laundering and terrorism financing.

# 3. The Access to Information and Privacy Office

FINTRAC's Access to Information and Privacy (ATIP) Office is responsible for leading, coordinating and undertaking the Centre's access to information and privacy responsibilities. The ATIP Office is part of FINTRAC's Communications Group, which falls under the Deputy Director (and Chief Financial Officer) of the Enterprise Policy, Research and Programs Sector. The Deputy Director, who is also the Centre's Chief Privacy Officer, is responsible for the overall management of all access to information and privacy matters within FINTRAC.

FINTRAC's ATIP Office consists of an ATIP Coordinator, and two Senior ATIP Advisors. Key responsibilities of the ATIP Office include:

- developing and implementing policies, procedures, and guidelines to ensure FINTRAC's compliance with the Act and the *Access to Information Act*;
- ensuring the timely processing of privacy and access requests, and meeting proactive disclosure obligations;
- providing advice, guidance, and awareness activities to FINTRAC employees, contractors, and students on ATIP-related matters;
- representing FINTRAC in its discussions and negotiations with external stakeholders, including other government departments, third parties, the Treasury Board Secretariat of Canada, the Office of the Privacy Commissioner, the Office of the Information Commissioner and the general public;
- maintaining Personal Information Banks and conducting privacy impact assessments; and
- preparing annual reports to Parliament and publishing FINTRAC's Info Source Chapter.

To support the ATIP Office in meeting its legislative obligations, FINTRAC established a collaborative network comprised of representatives from all sectors and relevant units within the Centre. These representatives are responsible for coordinating requests, providing guidance on the Act within their work units, and liaising with the ATIP Office on all ATIP-related matters.

# 4. Delegation of Authority

Order in Council P.C. 2000-1066 designates the Director and Chief Executive Officer of FINTRAC as head of FINTRAC for the purposes of administering the Act and FINTRAC's privacy program. Pursuant to Section 73 of the Act, FINTRAC's Director and Chief Executive Officer delegated the authority to exercise the powers, functions, and duties under the Act to the Deputy Director of the Enterprise Policy, Research and Programs Sector, the Manager of Communications and the ATIP Coordinator within the Enterprise Policy, Research and Programs Sector. These functions have full-delegated authority under the Act and the Access Information Act, in accordance with the delegation of authority instrument approved by the Director and Chief Executive Officer in October 2019.

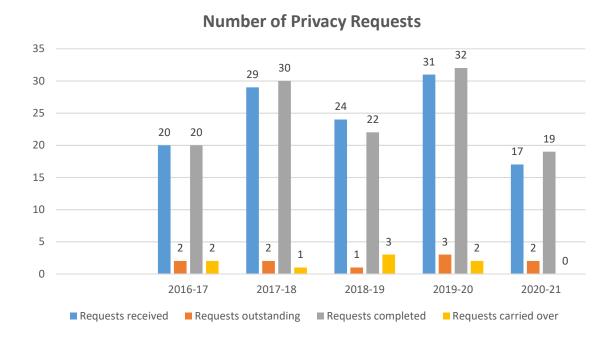
A copy of the Director and Chief Executive Officer's Delegation Order in place during 2020–21 is available in Annex A.

# 5. Statistical Overview and Accomplishments

Annex B contains FINTRAC's detailed Statistical Report on the *Privacy Act* for April 1, 2020 to March 31, 2021.

# **Performance of Privacy Request Case Activity**

During the reporting period of April 1, 2020 to March 31, 2021, there was a 45% decrease in the number of requests received by FINTRAC (17) under the Act compared to the previous reporting year (31). Together with 2 outstanding requests from the previous fiscal year, 19 requests were completed in 2020–21, with no requests carried over to the next year.



FINTRAC maintained an on-time response rate of 95% for all privacy requests in 2020–21, well above the federal government's overall average response rate of 85% in 2019–20.

#### **Method of Access**

When responding to requests under the Act, FINTRAC provided 1 applicant with electronic copies and 1 applicant with paper copies of responsive records.

#### **Responses to Completed Privacy Requests**

FINTRAC responded to 19 requests in 2020–21:

- In 1 case, representing 5% of the overall cases, the applicant received full disclosure of the information.
- In 1 case, representing 5% of the overall cases, the applicant received partial disclosure of the information.
- In 11 cases, representing 58% of the overall cases, FINTRAC responded that it was unable to acknowledge the existence of information.
- In 6 cases, representing 32% of the overall cases, it was determined that no records existed within FINTRAC's information holdings.

#### **Completion Times and Extensions of Privacy Requests**

The Act allows an additional 30-day extension beyond the 30-day statutory period for specific reasons. During the reporting period, FINTRAC completed all requests, with the exception of 1, within the 30-day statutory deadline. In the 1 case, the ATIP Office took an additional 30-day extension beyond the original 30-day statutory period due to the volume of records that it had to process while managing other priority files and operational pressures.

#### **Exemptions Invoked**

The ATIP Office invoked exemptions under the Act, as follows:

•	Section 22 (law enforcement and investigation)	– 8 instances
•	Section 25 (safety of individuals)	– 8 instances
•	Section 26 (personal information about another individual)	– 8 instances
•	Section 27 (solicitor-client privilege)	- 1 instance

#### **Consultations under the Act**

Consultations undertaken between institutions are an essential part of processing requests under the Act. They afford institutions that have an interest in the records proposed for disclosure with an opportunity to make recommendations to the processing institution. For this reporting period, FINTRAC received 1 new consultation request from another government institution which was responded to within 15 days of its receipt.

#### **Corrections and Notations**

For this reporting period, FINTRAC did not receive any requests for corrections of personal information.

#### **Impact of COVID-19**

As a result of the early public health measures and restrictions associated with the COVID-19 global pandemic, FINTRAC directed its focus at fulfilling its core financial intelligence and compliance mandates. The Centre had limited capacity to fully discharge its *Privacy Act* responsibilities between April 1 and August 31 of the reporting year. During this period, FINTRAC's ATIP Office engaged in remote work and made best efforts to process existing and new requests without imposing undue burden on the Centre's employees who were facing challenging circumstances, including, in a number of cases, not having access to FINTRAC's systems.

Between September 2020 and April 2021, on-site access remained limited for some of FINTRAC's employees involved in processing requests under the Act. However, the ATIP Office was able to gain access to FINTRAC's physical workplace and respond to requests that remained in abeyance during the early pandemic months.

### **Complaints and Investigations**

Subsection 29(1) of the Act describes how the Office of the Privacy Commissioner receives and investigates complaints from individuals regarding the processing of requests under the Act. During the reporting year, FINTRAC received notice from the Office of the Privacy Commissioner that a complaint it had received in 2019 alleging that FINTRAC had contravened the access provisions of the Act was finalized. The investigation concluded that FINTRAC properly responded to the complainant's request, and that the complaint was "not well-founded".

FINTRAC did not receive any new complaints under the Act in the reporting period.

#### **Audits**

Pursuant to section 72(2) of the *Proceeds of Crime (Money Laundering) and Terrorist Financing Act*, the Privacy Commissioner is required to conduct a biennial review of the measures taken by FINTRAC to protect information it receives or collects, and to report the results of these audits to Parliament. Such an audit of FINTRAC was initiated in 2019–20; however, it was not finalized by the Office of the Privacy Commissioner during the 2020–21 reporting period.

#### **Federal Court Cases**

There were no court cases involving FINTRAC during the reporting period.

#### **Material Privacy Breaches**

A privacy breach involves improper or unauthorized collection, use, disclosure, retention or disposal of personal information. As required by the Treasury Board Secretariat of Canada's *Directive on Privacy Practices*, institutions and their delegated authorities are required to establish

plans and procedures for addressing privacy breaches. During the reporting period, no material privacy breaches occurred and, therefore, none were reported by FINTRAC to the Office of the Privacy Commissioner, or to the Information and Privacy Policy Division of the Treasury Board of Canada Secretariat.

#### **Privacy Impact Assessments (PIA)**

The Government's *Directive on Privacy Impact Assessments* (PIAs) requires that FINTRAC ensures privacy principles are taken into account when there are proposals for, and during the design, implementation, and evolution of programs and services that raise privacy issues. FINTRAC currently has core PIA reports in place for its main programs and services.

In 2020–21, FINTRAC completed no new core PIAs. However, in accordance with its *Privacy Policy*, FINTRAC routinely conducts privacy impact checklists that must be completed during the design phase of projects involving an addition or a change to a program using personal data. Along with these checklists, FINTRAC's Security, Information Management, and ATIP experts are engaged in projects involving personal information. The ATIP Office provides regular advice and guidance to FINTRAC employees to further ensure that the Centre manages its personal information holdings effectively and in accordance with the Act.

#### Disclosures of Personal Information under Subsection 8(2)(m) of the Act

In accordance with subsection 8(2)(m) of the Act, a government institution may disclose personal information under its control without the consent of the individual to whom the information relates if the disclosure is in the public interest or would clearly benefit the individual. In 2020–21, FINTRAC did not make any disclosures under subsection 8(2)(m) of the Act.

#### **Training and Education**

Information protection is integral to FINTRAC's mandate. As such, the Centre requires its employees (including students and contractors) to have a heightened awareness of security, privacy, information management and access to information. The FINTRAC *Code of Conduct, Values and Ethics* specifically describes employees' legal obligations to protect information under the *Proceeds of Crime (Money Laundering) and Terrorist Financing Act* and makes reference to the *Privacy Act*, the *Canadian Charter of Rights and Freedoms*, the *Access to Information Act*, and FINTRAC's privacy, security and information management policies. Adherence to the *Code of Conduct, Values and Ethics* is a condition of employment for every FINTRAC employee.

The following training and awareness activities took place during the reporting period:

- The ATIP Office published monthly information notices regarding access to information and privacy protection on FINTRAC's intranet site.
- Access to information and privacy protection messaging is incorporated in mandatory Information Management awareness sessions for all new employees. In 2020–21, 10

Information Management awareness sessions were delivered to 27 employees. The sessions raised employee awareness about their information management responsibilities, including in relation to ATIP, and covered the obligations and best practices for managing personal information in accordance with the *Privacy Act*, the *Proceeds of Crime (Money Laundering) and Terrorist Financing Act*, and FINTRAC's privacy, security and information management policies.

- Five FINTRAC employees completed online learning courses at the Canada School of Public Service:
  - Four employees completed the *Access to Information and Privacy Fundamentals* course; and
  - One employee completed the *Access to Information in the Government of Canada* course.
- FINTRAC's Legal Services provides privacy awareness in its training of new employees, *Legal Framework of FINTRAC*, which outlines the various provisions of the PCMLTFA that promote the privacy of Canadians. The sessions reinforce employees' obligations with respect to receiving, collecting, using, disclosing and safeguarding personal information under the PCMLTFA. In 2020–21, 4 sessions were provided to 21 employees.
- The ATIP Office also raises awareness by providing day-to-day coaching as well as targeted information sessions to ATIP representatives. In 2020–21, 2 one-on-one training sessions were delivered. This focused training fosters a spirit of collaboration and has been essential to the success of FINTRAC's broader ATIP program.
- Work is currently underway in relation to FINTRAC's existing ATIP awareness and corporate overview training, which contains privacy, protection of information, and information management components. Typically delivered in an in-person environment, the training is being modified to a self-directed online learning format.
- Given the sensitive information and the environment in which FINTRAC operates, a heightened understanding of information security is required of all employees. In addition to the new 2021 requirement to complete the Canada School of Public Service Security Awareness Course, new and returning employees must also undertake an inhouse mandatory security awareness session. In 2020–21, a total of 62 new employees received the FINTRAC security awareness presentation in digital format and were required to acknowledge and confirm that they understood their responsibilities. These sessions covered the importance of security at FINTRAC; provided an understanding of the potential security risks (e.g., cyber, personal, operational and insider threat) in relation to FINTRAC's environment; highlighted the roles and responsibilities of all employees; discussed classification, transmission, and storage of information; covered

the need to know/need to share principle; and emphasized the consequences of unauthorized disclosure and inappropriate use of information.

• As well as mandatory security training, all FINTRAC employees are made aware of the consequences of unauthorized disclosure and inappropriate use of personal information, which is covered in FINTRAC's Policy on Security. All new employees are required to acknowledge that they have read and understood this policy.

# 6. Operational and Organizational Changes to the Privacy Program

Nothing new to report.

# 7. New Privacy-related Policies, Guidelines, or Procedures

None to report.

# 8. Privacy Request Program Performance and Monitoring

FINTRAC's automated case management system facilitates timely responses to requests, documents important actions and decisions, and monitors performance. The system also includes an audit log, has extensive search capabilities to enable analysis of previously processed information, and generates progress and statistical reports.

The ATIP Office provides updates to senior management within FINTRAC's corporate governance, as well as providing status updates of ATIP files to FINTRAC's Executive Office on a bi-weekly basis.

# 9. Closing

Through its robust privacy management framework, FINTRAC continues to safeguard the personal information under its control as it focuses on protecting Canadians and the integrity of Canada's financial system through the detection and deterrence of money laundering and terrorist activity financing.



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# DELEGATION ORDER ARRÊTÉ DE DÉLÉGATION DE POUVOIRS

# Privacy Act and Regulations Loi sur la protection des renseignements personnels

Pursuant to Section 73 of the Privacv Act. the **Financial** Transactions and Reports Analysis Centre of Canada's Director and **Chief Executive Officer delegates** the full authority to exercise the powers. functions. and duties under the Privacy Act to the Deputy Director, the Manager of Communications, and the Access Information and **Privacy** Coordinator within the Enterprise Policy. Research & **Programs** Sector. This delegation order also applies to persons occupying any of these positions on an acting basis.

En vertu de l'article 73 de la Loi sur la protection des renseignements personnels, directrice et présidente-directrice générale du Centre d'analyse des opérations et déclarations financières du Canada délègue à la sous-directrice de Politiques organisationnelles, recherche et programmes. gestionnaire au Communications et au coordonnateur de l'Accès à l'information et de la protection renseignements personnels pouvoirs et fonctions qui lui sont attribués par cette même loi. Le présent arrêté s'applique également aux personnes occupant les postes susmentionnés par intérim.

This designation takes effect as of October 21, 2019. La présente désignation entre en vigueur le 21 octobre 2019.

#### Nada Semaan

Director and Chief Executive Officer
Financial Transactions and Reports Analysis Centre of Canada
Directrice et présidente-directrice générale
Centre d'analyse des opérations et déclarations financières du Canada

Government of Canada Gouvernement du Canada

# Statistical Report on the *Privacy Act*

Name of institution: FINTRAC

Reporting period: 01/04/2020 31/03/2021

# Section 1: Requests Under the Privacy Act

### 1.1 Number of requests

	Number of Requests
Received during reporting period	17
Outstanding from previous reporting period	2
Total	19
Closed during reporting period	19
Carried over to next reporting period	0

## Section 2: Requests Closed During the Reporting Period

#### 2.1 Disposition and completion time

Diamonition of		Completion Time								
Disposition of 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		
All disclosed	0	1	0	0	0	0	0	1		
Disclosed in part	0	1	0	0	0	0	0	1		
All exempted	0	0	0	0	0	0	0	0		
All excluded	0	0	0	0	0	0	0	0		
No records exist	2	3	0	0	0	1	0	6		
Request abandoned	0	0	0	0	0	0	0	0		
Neither confirmed nor denied	2	9	0	0	0	0	0	11		
Total	4	14	0	0	0	1	0	19		



# 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)	8	24(b)	0
19(1)(d)	0	22(1)(c)	0	25	8
19(1)(e)	0	22(2)	0	26	8
19(1)(f)	0	22.1	0	27	1
20	0	22.2	0	27.1	0
21	0	22.3	0	28	0
	•	22.4	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

Paper	Electronic	Other
1	1	0

# 2.5 Complexity

# 2.5.1 Relevant pages processed and disclosed

Number of Pages Processed	Number of Pages Disclosed	Number of Requests
49	33	13

# 2.5.2 Relevant pages processed and disclosed by size of requests

	Less Than 100 Pages Processed		101-500 Pages Processed		501-1000 Pages Processed		1001-5000 Pages Processed		More Than 5000 Pages Processed	
Disposition	Number of Requests	Pages Disclosed	Number of Requests		Number of Requests	Pages Disclosed	Number of Requests	Pages Disclosed	Number of Requests	Pages Disclosed
All disclosed	1	2	0	0	0	0	0	0	0	0
Disclosed in part	1	31	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	11	0	0	0	0	0	0	0	0	0
Total	13	33	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 Closed requests

### 2.6.1 Number of requests closed within legislated timelines

	Requests closed within legislated timelines
Number of requests closed within legislated timelines	18
Percentage of requests closed within legislated timelines (%)	94.7

#### 2.7 Deemed refusals

# 2.7.1 Reasons for not meeting legislated timelines

	Principal Reason					
Number of Requests Closed Past the Legislated Timelines	Interference with Operations / Workload	External Consultation	Internal Consultation	Other		
1	0	0	0	1		

# 2.7.2 Requests 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	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	1	0	1
181 to 365 days	0	0	0
More than 365 days	0	0	0
Total	1	0	1

#### 2.8 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 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

# Section 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

# Section 5: Extensions

### 5.1 Reasons for extensions and disposition of requests

		15(a)(i) Interferen	ce with operations	15 (a)(ii) (				
Number of								
requests	Further review				Cabinet			15(b)
where an	required to				Confidence			Translation
extension	determine	Large volume of	Large volume of	Documents are	Section (Section			purposes or
was taken	exemptions	pages	requests	difficult to obtain	70)	External	Internal	conversion
0	0	0	0	0	0	0	0	0

### 5.2 Length of extensions

		15(a)(i) Interferen	ce with operations	15 (a)(ii) (	Consultati	on		
Length of Extensions	Further review required to determine exemptions	Large volume of pages	Large volume of requests	Documents are difficult to obtain	Cabinet Confidence Section (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 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	1	23	10	0
Outstanding from the previous reporting period	0	0	0	0
Total	1	23	10	0
Closed during the reporting period	1	23	10	0
Carried over to the next reporting period	0	0	0	0

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

	Number of Days Required to Complete Consultation Requests							
Recommendation	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	1	0	0	0	0	0	0	1
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	1	0	0	0	0	0	0	1

### 6.3 Recommendations and completion time for consultations received from other organizations

	Number of days required to complete consultation requests								
Recommendation	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	10	0	0	0	0	0	0	10	
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	10	0	0	0	0	0	0	10	

# Section 7: Completion Time of Consultations on Cabinet Confidences

# 7.1 Requests with Legal Services

	Fewer Than 1 Process		101-500 Proce	-		-1000 rocessed	1001-5000 d Pages Processed		More than 5000 Pages Processed	
Number of Days	Number of Requests	Pages Disclosed	Number of Requests		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

	Fewer Than 1 Proces	-	101–500 Proce	٠ ١	501-1000 Pages Processed			1-5000 Processed	More than 5000 Pages Processed	
Number of Days	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 8: Complaints and Investigations Notices Received

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

# Section 9: Privacy Impact Assessments (PIA) and Personal Information Banks (PIB)

### 9.1 Privacy Impact Assessments

Number of PIA(s) completed	0

#### 9.2 Personal Information Banks

Personal Information Banks	Active	Created	Terminated	Modified
	45	0	0	3

# Section 10: Material Privacy Breaches

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

# Section 11: Resources Related to the Privacy Act

#### 11.1 Costs

Expenditures	Amount	
Salaries	\$89,291	
Overtime		\$2,500
Goods and Services	\$6,547	
Professional services contracts	\$0	
Other	\$6,547	
Total		\$98,338

#### 11.2 Human Resources

Resources	Person Years Dedicated to Privacy Activities
Full-time employees	0.800
Part-time and casual employees	0.000
Regional staff	0.000
Consultants and agency personnel	0.000
Students	0.000
Total	0.800

Note: Enter values to three decimal places.

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

Name of institution: FINTRAC - Financial Transactions and Reports Analysis C

**Reporting period:** 2020-04-01 to 2021-03-31

#### **Section 1: Capacity to Receive Requests**

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	29
Able to receive requests by email	52
Able to receive requests through the digital request service	52

# **Section 2: Capacity to Process Records**

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	23	29	0	52
Protected B Paper Records	23	29	0	52
Secret and Top Secret Paper Records	23	29	0	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	23	29	0	52



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