

CANADA DEPOSIT INSURANCE CORPORATION

PRIVACY ACT

**ANNUAL REPORT
2019-2020**

Prepared as at March 31, 2020

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TAB A

Introduction

The *Privacy Act* (the “Act”) provides Canadian citizens and permanent residents with the right to access personal information held by government institutions and protection of that information against unauthorized use and disclosure. This annual report, covering the period from April 1, 2019 to the end of the financial year, March 31, 2020, is prepared and submitted by Canada Deposit Insurance Corporation (“CDIC”) for tabling in Parliament in accordance with section 72 of the *Privacy Act*.

Mandate and Governance

CDIC was established in 1967 by the *Canada Deposit Insurance Corporation Act*. The objects of the Corporation are:

- a) to provide insurance against the loss of part or all of deposits;
- b) to promote and otherwise contribute to the stability of the financial system in Canada;
- c) to pursue the objects set out in paragraphs (a) and (b) for the benefit of persons having deposits with member institutions and in such manner as will minimize the exposure of the Corporation to loss; and
- d) to act as the resolution authority for its members.

CDIC is administered by a board of directors headed by the Chairperson, who is appointed by the Governor in Council. There are five *ex officio* directors (the Governor of the Bank of Canada, the Deputy Minister of Finance, the Superintendent of Financial Institutions, a Deputy Superintendent of Financial Institutions or an officer of the Office of the Superintendent of Financial Institutions appointed by the Minister, and the Commissioner of the Financial Consumer Agency of Canada), as well as five private sector directors appointed by the Governor in Council. For more information about CDIC, please refer to www.cdic.ca.

Organizational Structure/Administration of the Act

CDIC is a relatively small Crown corporation, which typically receives very few requests for personal information in any given year. As a result, CDIC does not have a formalized Access to Information and Privacy (“ATIP”) office with staff dedicated to ATIP matters on a full-time basis. Rather, the General Counsel, Corporate Secretary & Chief Legal Officer assumes the role of ATIP Coordinator and is supported in this capacity by the Director, Legal Services as primary contact and by the Legal Services Department as required. The Law Clerk & ATIP Officer in the Legal Services Department assists with ATIP matters on a part-time basis. In order to ensure timely and accurate responses to ATIP requests, CDIC has standby agreements with external ATIP consultants who are available to assist as needed. CDIC did not enter into any service agreements under section 73.1 of the Act during the reporting period.

Delegation by Head of Corporation**Delegation Order – April 25, 2018**

The Delegation Order dated April 25, 2018 (the “2018 Delegation Order”) which was applicable throughout a portion of 2019-2020 is attached hereto and forms part of this annual report (Tab B).

Delegation Order – January 14, 2020

The updated Delegation Order dated January 14, 2020 (the “2020 Delegation Order”) designating the President & CEO, General Counsel, Corporate Secretary & Chief Legal Officer/ Access to Information and Privacy Coordinator and Director, Legal Services to exercise certain powers and perform certain duties and functions of the Chairperson under the Act replaces the 2018 Delegation Order and is attached hereto and forms part of this annual report (Tab C).

Privacy Act**Performance 2019-2020: Statistical Report and Interpretation**

CDIC's statistical report for 2019-2020 is attached and forms part of this annual report (Tab D). During the period covered by this report, CDIC received one formal request under the provisions of the Act. One 30-day extension was agreed upon and this information was provided electronically within that time frame without the use of any exemptions (i.e. 100% of the formal requests were responded to within the legislated timeframe).

CDIC received ten additional requests for personal information that were not formal requests as they were missing adequate identification.

No requests were carried forward from the previous reporting period. No consultations were received.

Five-Year Trend

	2015-2016	2016-2017	2017-2018	2018-2019	2019-2020
No. of Formal Requests Received	2	2	0	0	1
No. of Formal Requests Closed	2	2	0	0	1

CDIC received no more than 2 formal personal information requests each fiscal year for the last 5 years and these requests have been responded to within the legislated timeframes.

COVID-19-related measures

CDIC's offices closed on March 12, 2020 and all employees continued to work from home for the remainder of the fiscal year. CDIC's ATIP officer worked from home and did not receive any formal requests for personal information. One personal information request was received that was missing adequate identification between March 12 - 31, 2020. During this time, CDIC's ability to respond to personal information requests would have been limited to conducting electronic searches.

Training and Awareness

In 2019-2020, all 135 CDIC employees completed annual declarations of compliance with CDIC policies, including CDIC's Privacy Policy. During 2019-2020, all CDIC employees received ethics and security training, and all new employees received security training, both of which included information regarding their responsibilities under the Act. This training is provided on an annual basis and when new employees join. In addition to the above, a comprehensive powerpoint presentation concerning ATIP is available on CDIC's intranet portal to all employees. CDIC does not track access by employees to this portal.

New/revised Policies, Guidelines and Procedures

In 2019-2020, CDIC commenced the process of revising internal policies, guidelines and procedures relating to privacy in light of changes in Bill C-58. These documents were not finalized in 2019-2020.

Complaints, Investigations and Appeals

As at March 31, 2020, no complaint, investigation, or appeal was brought to the attention of CDIC in relation to the processing and outcome of privacy requests.

Monitoring Processing Time of Privacy Requests

CDIC has established procedures to monitor the time to process privacy requests by completing an internal tracking log spreadsheet, which is updated to reflect key dates and activities for all requests, including deadlines, and automated reminders are set. The ATIP Coordinator oversees the ATIP program at CDIC, and receives reports from the Director, Legal Services as the status of any requests change.

Material Privacy Breaches

During the period covered by this report, no material privacy breaches occurred at CDIC.

Privacy Impact Assessments (PIA)

During the period covered by this report, CDIC did not complete any PIAs.

Disclosures under Paragraph 8(2)(m) of the Act

During the period covered by this report, CDIC did not disclose personal information pursuant to paragraph 8(2)(m) of the Act.

TAB B

Privacy Act Delegation Order

The Chairperson of Canada Deposit Insurance Corporation, pursuant to section 73 of the *Privacy Act*, hereby delegates to the persons holding the positions set out below, or the persons occupying those positions on an acting basis, the exercise of the powers and functions of the Chairperson, as the head of a government institution under the *Privacy Act*, as follows:

<u>Position</u>	<u>Delegation of Authority under Privacy Act and Regulations</u>
President & Chief Executive Officer	Full authority
Vice-President, Corporate Affairs, General Counsel and Corporate Secretary/ Access to Information and Privacy Coordinator	Full authority
Director, Legal Services	Full authority

This designation replaces and repeals all previous *Privacy Act* delegation orders.


Robert Sanderson, Chair

April 25, 2018
Date

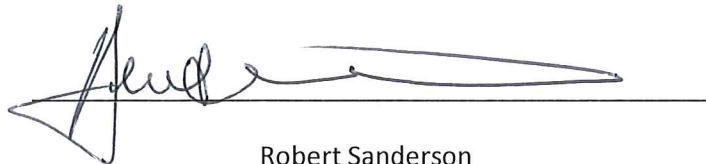
TAB C

Access to Information Act and Privacy Act Delegation Order

The Chairperson of Canada Deposit Insurance Corporation, pursuant to section 95(1) of the Access to Information Act and section 73(1) of the Privacy Act, hereby delegates to the persons holding the positions set out below, or the persons occupying on an acting basis those positions, the exercise of the powers, duties and functions of the Chairperson of Canada Deposit Insurance Corporation as the head of Canada Deposit Insurance Corporation, under the provisions of the Access to Information Act and Privacy Act and their related regulations. This delegation replaces all previous Access to Information Act and Privacy Act delegation orders.

Position	Access to Information Act and Regulations	Privacy Act and Regulations
President & Chief Executive Officer	Full Authority	Full Authority
General Counsel, Corporate Secretary & Chief Legal Officer /Access to Information and Privacy Coordinator	Full Authority	Full Authority
Director, Legal Services	Full Authority	Full Authority

Dated, at the City of Ottawa, this 14th day of January, 2020



Robert Sanderson
Chairperson of Canada Deposit Insurance Corporation

TAB D



Statistical Report on the *Privacy Act*

Name of institution Canada Deposit Insurance Corporation

Reporting period: 2019-04-01 to 2020-03-31

Section 1: Requests Under the *Privacy Act*

1.1 Number of requests

	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

Section 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	Than 365 Days	
All disclosed	0	0	1	0	0	0	0	1
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	0	0	0	0	0	0	0	0
Request abandoned	0	0	0	0	0	0	0	0
Neither confirmed nor denied	0	0	0	0	0	0	0	0
Total	0	0	1	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	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

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	1	3	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	1
Percentage of requests closed within legislated timelines (%)	100

2.7 Deemed refusals

2.7.1 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

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 Legislated Timelines 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

2.8 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

Number of requests where an extension was taken	15(a)(i) Interference with operations				15 (a)(ii) Consultation			15(b) Translation purposes or conversion
	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	
1	0	0	0	1	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 or conversion
	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	
1 to 15 days	0	0	0	1	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	1	0	0	0	0

Section 6: Consultations Received From Other Institutions and Organization

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
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

Recommendation	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	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

	Number of days required to complete consultation requests
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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	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
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 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	
	of Requests	Pages Disclosed	of Requests	Pages Disclosed	of Requests	Pages Disclosed	of Requests	Pages Disclosed	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	Pages Processed		101-500 Pages Processed		501-1000 Pages Processed		1001-5000 Pages Processed		more than 5000 Pages Processed	
	Number of Request	Pages Disclosed	Number of Request	Pages Disclosed	Number of Request	Pages Disclosed	Number of Request	Pages Disclosed	Number of Request	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
0	0	0	0	0

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

9.1 Privacy Impact Assessments

Number of PIA(s) completed	0
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9.2 Personal Information Banks

Personal Information Banks	Active	Created	Terminated	Modified
	6	0	0	0

Section 10: Material Privacy Breaches

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

Section 11: Resources Related to the *Privacy Act*

11.1 Costs

Expenditures		Amount
Salaries		\$7,376
Overtime		\$0
Goods and Services		\$128,957
• Professional services contracts	\$128,710	
• Other	\$247	
Total		\$136,333

11.2 Human Resources

Resources	Dedicated to Privacy Activities
Full-time employees	0.12
Part-time and casual employees	0.00
Regional staff	0.00
Consultants and agency personnel	2.15
Students	0.00
Total	2.27

Note: Enter values to two decimal places.

2019-2020 Supplemental Statistical Report – Requests affected by COVID-19 measures

In addition to completing the forms for the Statistical Reports on the ATIA and Privacy Act for 2019-20, institutions are asked to complete this Supplemental Report to help identify the impact of COVID-19 measures on institutional performance for 2019-20 and going forward. The data requirements are set out in the tables below.

Supplemental Statistical Report on the *Privacy Act*

The following table reports the total number of formal requests received during two periods; 2019-04-01 to 2020-03-13 and 2020-03-14 to 2020-03-31.

Table 4 – Requests Received

		Column (Col.) 1
		Number of requests
Row 1	Received from 2019-04-01 to 2020-03-13	1
Row 2	Received from 2020-03-14 to 2020-03-31	0
Row 3	Total¹	1

¹ – Total for Row 3 should equal the total in the Privacy Statistical Report Section 1.1 Row 1

The following table reports the total number of requests closed within the legislated timelines and the number of closed requests that were deemed refusals during two periods 2019-04-01 to 2020-03-13 and 2020-03-14 to 2020-03-31.

Table 5 – Requests Closed

		Col. 1	Col. 2
		Number of requests closed within the legislated timelines	Number of requests closed past the legislated timelines
Row 1	Received from 2019-04-01 to 2020-03-13 and outstanding from previous reporting periods	1	0
Row 2	Received from 2020-03-14 to 2020-03-31	0	0
Row 3	Total²	1	0

² – Total for Row 3 Col. 1 should equal the total in the Privacy Statistical Report Section 2.6.1 Row 1 – Total for Row 3 Col. 2 should equal the total in the Privacy Statistical Report Section 2.7.1. Col. 1 Row 1

The following table reports the total number of requests carried over during two periods; 2019-04-01 to 2020-03-13 and 2020-03-14 to 2020-03-31.

Table 6-- Requests Carried Over

		Col. 1
		Number of requests
Row 1	Requests from 2019-04-01 to 2020-03-13 and outstanding from previous reporting period that were carried over to the 2020-2021 reporting period	0
Row 2	Requests from 2020-03-14 to 2020-03-31 that were carried over to the 2020-2021 reporting period	0
Row 3	Total³	0

³ – Total for Row 3 should equal the total in the Privacy Statistical Report Section 1.1 Row 5