



Financial Transactions and  
Reports Analysis Centre  
of Canada

Centre d'analyse des opérations  
et déclarations financières  
du Canada

# FINTRAC

## 2023–24 Annual Report on the Administration of the *Privacy Act*

*September 1, 2024*



Safe Canadians,  
Secure Economy

Canada

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# 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 administering the Act during fiscal year 2023–24. This report should be considered along with FINTRAC’s 2023–24 *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 supervisor and plays a critical role in combatting money laundering, terrorist activity 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, FINTRAC 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 specified businesses to develop a compliance regime in order to identify clients, monitor business relationships, keep records and report certain types of financial transactions to FINTRAC. These 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 takes firm action when it is required to ensure that businesses take their responsibilities seriously. This includes undertaking compliance enforcement action such as follow-up examinations, the development and monitoring of action plans imposed on businesses and the levying of administrative monetary penalties. The Centre also maintains a registry of Canadian-based money services businesses and foreign money services businesses that direct and provide services to persons and entities in Canada.

Second, FINTRAC generates actionable financial intelligence that assists Canada's law enforcement, national security agencies and international partners in combatting money laundering, terrorist activity 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, businesses 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 and led by the Centre's Head of Communications, who reports directly to FINTRAC's Director and Chief Executive Officer. The Head of Communications, 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 to information 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 of Canada Secretariat, 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 on the administration of the Act and the *Access to Information Act* to Parliament and publishing FINTRAC's Info Source Chapter.

To support the ATIP Office in meeting its legislative obligations, FINTRAC has 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. FINTRAC is not party to any service agreements under section 73.1 of the Act.

### **4. Delegation of authority**

Order in Council P.C. 2000-1066 designates the Director and Chief Executive Officer of the Centre 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 FINTRAC's Head of Communications and its ATIP Coordinator. 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 March 2023.

A copy of the Director and Chief Executive Officer's Delegation Order is available at Annex A.

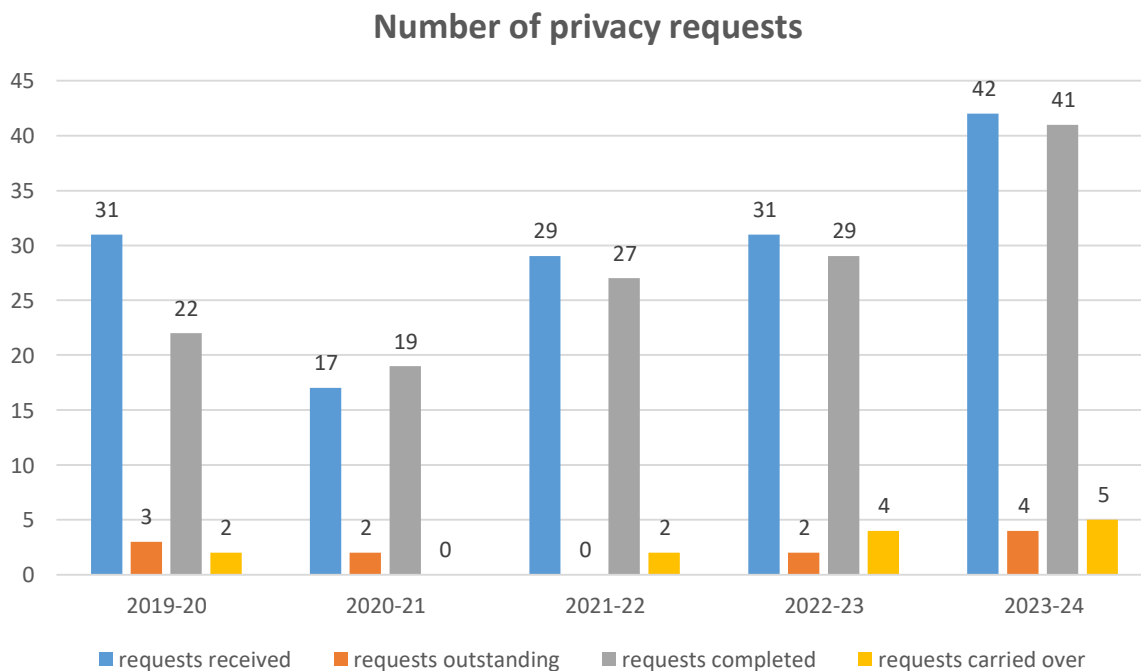
## 5. Statistical overview and accomplishments

Annex B contains FINTRAC’s detailed Statistical Report on the *Privacy Act* for April 1, 2023 to March 31, 2024.

### Performance of privacy request case activity

During the reporting period of April 1, 2023 to March 31, 2024, there was a 26% increase in the number of requests received by FINTRAC (42) under the Act compared to the previous reporting year (31). With 4 outstanding requests from the previous fiscal year, FINTRAC had a total caseload of 46 requests in 2023–24, of which 41 were closed, as follows:

- 17 requests were completed in 1-15 days;
- 22 requests were completed in 16-30 days;
- 2 requests were completed in 31-60 days.



Five remaining requests were carried over to be completed in 2024–25. FINTRAC maintained an on-time response rate of 100% for all privacy requests in 2023–24, well above the federal government's overall average response rate of 73% in 2022–23.

### Disposition of completed privacy requests

FINTRAC completed 41 requests in 2023–24:

- In 2 cases, representing 5% of the overall cases, the applicants received full disclosure of the information.
- In 6 cases, representing 15% of the overall cases, the applicants received partial disclosure of the information.
- In 19 cases, representing 46% of the overall cases, FINTRAC responded that it was unable to acknowledge the existence of information.
- In 13 cases, representing 32% of the overall cases, it was determined that no records existed within FINTRAC's information holdings.
- In 1 case, representing 2% of the overall cases, the applicant abandoned their request.

### **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 39 requests within the 30-day statutory deadline, and 2 were completed with an additional 30 day extension required to process a large volume of pages (as per section 15(a)(i)).

### **Consultations under the Act**

Consultations undertaken between institutions are an essential part of processing requests under the Act. They provide 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 did not receive any consultation requests from other government institutions.

### **Corrections and notations**

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

### **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.

FINTRAC did not receive any new complaints under the Act in 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 of Canada Secretariat'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.

FINTRAC has a unique mandate as it relates to safeguarding the personal information that it receives on Canadians, and the Centre works with the Office of the Privacy Commissioner to ensure that it is fulfilling this mandate to the fullest extent. In 2023-24, in respect of three separate non-material privacy incidents, FINTRAC proactively notified, out of an abundance of caution, the Office of the Privacy Commissioner of the measures it was taking to manage these incidents.

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

The Government's *Directive on Privacy Impact Assessments* (PIAs) requires that FINTRAC ensure 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 2023–24, FINTRAC completed a new core PIA that reviewed and documented its adoption and transition to a cloud-based software solution as its new HR management system. A summary of the PIA can be found at <https://fintrac-canafe.canada.ca/atip-airp/privacy-privee2-eng>.

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. The Centre completed one privacy impact checklist in 2023–24. 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 2023–24, FINTRAC notified the Office of the Privacy Commissioner about how it was managing two different aspects of a sensitive internal privacy-related matter. Neither circumstance involved the external disclosure of personal information; however, out of an abundance of caution, the Centre advised the Office of the Privacy Commissioner of the exceptional situation involving an individual's personal information.

### **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 the Centre'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.
- The ATIP Office also raises awareness by providing day-to-day coaching and targeted information sessions to ATIP representatives across the Centre. In 2023–24, 4 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 to modify FINTRAC's existing ATIP awareness training to a self-directed, online learning format. While working on this modified training format, the ATIP Office delivered 1 virtual ATIP awareness session to 15 employees in 2023–24.
- Access to information and privacy protection messaging is incorporated in mandatory Information Management awareness sessions and in New Employee Orientation Training. In 2023–24:
  - Information Management awareness training was received by 151 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.
  - The New Employee Orientation Training moved to a virtual/hybrid format and is currently being redesigned into a self-directed, online learning format. The training provides information about the Centre's mandate and reinforces to employees the importance of information management and safeguarding information and privacy as fundamental components of the work undertaken by FINTRAC. A total of 60 employees and students completed this virtual training.
- FINTRAC employees completed the following online learning courses at the Canada School of Public Service:
  - *Access to Information and Privacy Fundamentals* (4 employees)
  - *Access to Information in the Government of Canada* (2 employee)
  - *Privacy in the Government of Canada* (1 employee)
- FINTRAC's Legal Services unit provides privacy awareness in its training of new employees, *Legal Framework of FINTRAC*, which outlines the various provisions of the *Proceeds of Crime (Money Laundering) and Terrorist Financing Act* that promote the protection of Canadians' privacy. The sessions reinforce employees' obligations with respect to receiving, collecting, using, disclosing and safeguarding personal information

- Given the sensitive information and environment in which FINTRAC operates, a heightened understanding of information security is required of all employees. In addition to the requirement to complete the Canada School of Public Service Security Awareness Course (A230), new and returning employees must also undertake an in-house mandatory security awareness session. In 2023–24, a total of 145 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 threats) 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.
- In 2023–24, FINTRAC continued its partnership with a specialized vendor to provide additional optional security awareness training for all employees. Employees have access to videos, simulations and best practices to reinforce their security knowledge.

## **6. New privacy-related policies, guidelines, procedures, or initiatives**

None to Report

## **7. Privacy request program performance and compliance 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. During the reporting year, FINTRAC adopted the centralized platform ATIP Online Management Tool to receive requests under the Act and communicate with applicants.

Privacy is a key consideration in all FINTRAC programs and activities. As per its *Privacy Policy* FINTRAC’s ATIP Office is engaged and assesses all new projects and programs, including contracts and agreements, that involve the use of personal information to ensure that privacy and information safeguards are at the forefront of these activities.

The ATIP Office provides updates to senior management within FINTRAC's corporate governance, as well as providing briefings on ATIP files to FINTRAC's Executive Committee on a regular basis.

## **8. 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 et règlements*

Pursuant to Section 73 of the *Privacy 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 Manager of Communications and Chief Privacy Officer, and to the Access to Information and Privacy Coordinator. 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*, la directrice et présidente-directrice générale du Centre d'analyse des opérations et déclarations financières du Canada délègue au gestionnaire des Communications et chef de la protection des renseignements personnels, et au coordonnateur de l'Accès à l'information et de la protection des renseignements personnels les 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 March 31, 2023  
La présente désignation entre en vigueur le 31 mars 2023

Paquet, Sarah

Digitally signed by: Paquet, Sarah  
DN: CN = Paquet, Sarah C = CA O = GC OU =  
FINTRAC-CANAFE  
Date: 2023.03.29 17:53:18 -04'00'

Sarah Paquet

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

## Statistical Report on the *Privacy Act*

Name of institution: FINTRAC

Reporting period: 01/04/2023 to 31/03/2024

### Section 1: Requests Under the *Privacy Act*

#### 1.1 Number of requests received

|   |   | Number of Requests |
|---|---|--------------------|
| Received during reporting period                  |   | 42                 |
| Outstanding from previous reporting periods       |   | 4                  |
| • Outstanding from previous reporting period      | 4 |                    |
| • Outstanding from more than one reporting period | 0 |                    |
| <b>Total</b>                                      |   | <b>46</b>          |
| Closed during reporting period                    |   | 41                 |
| Carried over to next reporting period             |   | 5                  |
| • Carried over within legislated timeline         | 5 |                    |
| • Carried over beyond legislated timeline         | 0 |                    |

#### 1.2 Channels of requests

| Source       | Number of Requests |
|--------------|--------------------|
| Online       | 34                 |
| E-mail       | 5                  |
| Mail         | 3                  |
| In person    | 0                  |
| Phone        | 0                  |
| Fax          | 0                  |
| <b>Total</b> | <b>42</b>          |

### 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 |   |
| <b>Total</b>                                      |   | 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                  |
| <b>Total</b> | 0                  |

## 2.3 Completion time of informal requests

| Completion Time |               |               |                |                 |                 |                    |       |
|-----------------|---------------|---------------|----------------|-----------------|-----------------|--------------------|-------|
| 0 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 |               |               |                |                 |                 |                    | Total |
|-------------------------|-----------------|---------------|---------------|----------------|-----------------|-----------------|--------------------|-------|
|                         | 0 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           | 1               | 1             | 0             | 0              | 0               | 0               | 0                  | 2     |

|                              |    |    |   |   |   |   |   |    |
|------------------------------|----|----|---|---|---|---|---|----|
| Disclosed in part            | 3  | 1  | 2 | 0 | 0 | 0 | 0 | 6  |
| All exempted                 | 0  | 0  | 0 | 0 | 0 | 0 | 0 | 0  |
| All excluded                 | 0  | 0  | 0 | 0 | 0 | 0 | 0 | 0  |
| No records exist             | 5  | 8  | 0 | 0 | 0 | 0 | 0 | 13 |
| Request abandoned            | 1  | 0  | 0 | 0 | 0 | 0 | 0 | 1  |
| Neither confirmed nor denied | 7  | 12 | 0 | 0 | 0 | 0 | 0 | 19 |
| Total                        | 17 | 22 | 2 | 0 | 0 | 0 | 0 | 41 |

### 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)      | 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       | 5                  | 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     | 8          | 0        | 0     | 0     | 0     |

### 3.5 Complexity

#### 3.5.1 Relevant pages processed and disclosed for paper, e-record and dataset formats

| Number of Pages Processed | Number of Pages Disclosed | Number of Requests |
|---------------------------|---------------------------|--------------------|
| 2592                      | 774                       | 28                 |

#### 3.5.2 Relevant pages processed per request disposition for paper, e-record and dataset formats by size of requests

| Less Than 100 Pages Processed | 100-500 Pages Processed | 501-1000 Pages Processed | 1001-5000 Pages Processed | More Than 5000 Pages Processed |
|-------------------------------|-------------------------|--------------------------|---------------------------|--------------------------------|
|                               |                         |                          |                           |                                |



| <b>Disposition</b>           | <b>Number of Requests</b> | <b>Pages Processed</b> | <b>Number of Requests</b> | <b>Pages Processed</b> | <b>Number of Requests</b> | <b>Pages Processed</b> | <b>Number of Requests</b> | <b>Pages Processed</b> | <b>Number of Requests</b> | <b>Pages Processed</b> |
|------------------------------|---------------------------|------------------------|---------------------------|------------------------|---------------------------|------------------------|---------------------------|------------------------|---------------------------|------------------------|
| All disclosed                | 2                         | 4                      | 0                         | 0                      | 0                         | 0                      | 0                         | 0                      | 0                         | 0                      |
| Disclosed in part            | 4                         | 90                     | 1                         | 398                    | 0                         | 0                      | 1                         | 2100                   | 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            | 1                         | 0                      | 0                         | 0                      | 0                         | 0                      | 0                         | 0                      | 0                         | 0                      |
| Neither confirmed nor denied | 19                        | 0                      | 0                         | 0                      | 0                         | 0                      | 0                         | 0                      | 0                         | 0                      |
| <b>Total</b>                 | 26                        | 94                     | 1                         | 398                    | 0                         | 0                      | 1                         | 2100                   | 0                         | 0                      |

**3.5.3 Relevant minutes processed and disclosed for audio formats**

| <b>Number of Minutes Processed</b> | <b>Number of Minutes Disclosed</b> | <b>Number of Requests</b> |
|------------------------------------|------------------------------------|---------------------------|
| 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                 |
| <b>Total</b>                 | 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                 |
| <b>Total</b>                 | 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     |
| <b>Total</b>                 | 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         | 41  |
| 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     |
| <b>Total</b>                             | 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     |
| <b>Total</b>         | 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                 | 2                 | 2               | 4     |

**Section 5: Requests for Correction of Personal Information and Notations**

| Disposition for Correction Requests Received | Number   |
|--|----------|
| Notations attached                           | 0        |
| Requests for correction accepted             | 0        |
| <b>Total</b>                                 | <b>0</b> |

**Section 6: Extensions**

**6.1 Reasons for 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 ConfidenceSection (Section 70) | External | Internal |  |
| <b>Number of extensions taken</b> | 0   | 2                     | 0                        | 0                                 | 0                                      | 0        | 0        | 0  |

**6.2 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 ConfidenceSection (Section 70) | External | Internal |  |
| <b>Length of Extensions</b> |   |                       |                          |                                   |  |          |          |  |
| 1 to 15 days                | 0   | 0                     | 0                        | 0                                 | 0                                      | 0        | 0        | 0  |
| 16 to 30 days               | 0   | 2                     | 0                        | 0                                 | 0                                      | 0        | 0        | 0  |
| 31 days or greater          |   |                       |                          |                                   |  |          |          | 0  |
| <b>Total</b>                | 0   | 2                     | 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               |
| <b>Total</b>   | <b>0</b>                       | <b>0</b>        | <b>0</b>                | <b>0</b>        | <b>0</b>                 | <b>0</b>        | <b>0</b>                  | <b>0</b>        | <b>0</b>                       | <b>0</b>        |

## 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 | 1 |
| Number of PIAs modified  | 0 |

### 10.2 Institution-specific and Central Personal Information Banks

| Personal Information Banks | Active    | Created  | Terminated | Modified |
|----------------------------|-----------|----------|------------|----------|
| Institution-specific       | 3         | 0        | 0          | 0        |
| Central                    | 47        | 0        | 0          | 0        |
| <b>Total</b>               | <b>50</b> | <b>0</b> | <b>0</b>   | <b>0</b> |



## 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 | 3 |
|---|---|

## Section 12: Resources Related to the Privacy Act

### 12.1 Allocated Costs

| Expenditures                      |         | Amount           |
|-----------------------------------|---------|------------------|
| Salaries                          |         | \$119,404        |
| Overtime                          |         | \$6,494          |
| Goods and Services                |         | \$4,954          |
| • Professional services contracts | \$0     |                  |
| • Other                           | \$4,954 |                  |
| <b>Total</b>                      |         | <b>\$130,852</b> |

### 12.2 Human Resources

| Resources                        | Person Years Dedicated to Privacy Activities |
|----------------------------------|--|
| Full-time employees              | 1.000  |
| Part-time and casual employees   | 0.000  |
| Regional staff                   | 0.000  |
| Consultants and agency personnel | 0.000  |
| Students                         | 0.000  |
| <b>Total</b>                     | <b>1.000</b>                                 |

**Note:** Enter values to three decimal places.

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

Name of institution: FINTRAC

Reporting period: 2023-04-01 to 2024-03-31

### Section 1: Open Requests and Complaints Under the *Access to Information Act*

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

| Fiscal Year Open Requests Were Received | Open Requests that are <i>Within</i> Legislated Timelines as of March 31, 2024 | Open Requests that are <i>Beyond</i> Legislated Timelines as of March 31, 2024 | Total     |
|---|--|--|-----------|
| Received in 2023-24                     | 14   | 3  | 17        |
| Received in 2022-23                     | 0  | 2  | 2         |
| Received in 2021-22                     | 0  | 8  | 8         |
| Received in 2020-21                     | 0  | 0  | 0         |
| Received in 2019-20                     | 0  | 0  | 0         |
| Received in 2018-19                     | 0  | 0  | 0         |
| Received in 2017-18                     | 0  | 0  | 0         |
| Received in 2016-17                     | 0  | 0  | 0         |
| Received in 2015-16                     | 0  | 0  | 0         |
| Received in 2014-15 or earlier          | 0  | 0  | 0         |
| <b>Total</b>                            | <b>14</b>  | <b>13</b>  | <b>27</b> |

Row 11, Col. 3 of Section 1.1 must equal Row 7, Col. 1 of Section 1.1 of the 2023-24 Statistical Report on the *Access to Information Act*

1.2 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 2023-24                                      | 6                         |

|                                |          |
|--------------------------------|----------|
| Received in 2022-23            | 2        |
| Received in 2021-22            | 0        |
| Received in 2020-21            | 0        |
| Received in 2019-20            | 0        |
| Received in 2018-19            | 0        |
| Received in 2017-18            | 0        |
| Received in 2016-17            | 0        |
| Received in 2015-16            | 0        |
| Received in 2014-15 or earlier | 0        |
| <b>Total</b>                   | <b>8</b> |

**Section 2: Open Requests and Complaints Under the *Privacy Act***

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

| Fiscal Year Open Requests Were Received | Open Requests that are <i>Within</i> Legislated Timelines as of March 31, 2024 | Open Requests that are <i>Beyond</i> Legislated Timelines as of March 31, 2024 | Total    |
|---|--|--|----------|
| Received in 2023-24                     | 5  | 0  | 5        |
| Received in 2022-23                     | 0  | 0  | 0        |
| Received in 2021-22                     | 0  | 0  | 0        |
| Received in 2020-21                     | 0  | 0  | 0        |
| Received in 2019-20                     | 0  | 0  | 0        |
| Received in 2018-19                     | 0  | 0  | 0        |
| Received in 2017-18                     | 0  | 0  | 0        |
| Received in 2016-17                     | 0  | 0  | 0        |
| Received in 2015-16                     | 0  | 0  | 0        |
| Received in 2014-15 or earlier          | 0  | 0  | 0        |
| <b>Total</b>                            | <b>5</b>   | <b>0</b>   | <b>5</b> |

Row 11, Col. 3 of Section 2.1 must equal Row 7, Col. 1 of Section 1.1 of the 2023-24 Statistical Report on the *Privacy Act*

2.2 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 2023-24                                      | 0                         |
| Received in 2022-23                                      | 0                         |
| Received in 2021-22                                      | 0                         |
| Received in 2020-21                                      | 0                         |
| Received in 2019-20                                      | 0                         |
| Received in 2018-19                                      | 0                         |
| Received in 2017-18                                      | 0                         |
| Received in 2016-17                                      | 0                         |
| Received in 2015-16                                      | 0                         |
| Received in 2014-15 or earlier                           | 0                         |
| <b>Total</b>   | <b>0</b>                  |

**Section 3: Social Insurance Number**

|  |    |
|--|----|
| Has your institution begun a new collection or a new consistent use of the SIN in 2023-24? | No |
|--|----|

**Section 4: Universal Access under the Privacy Act**

|  |   |
|--|---|
| How many requests were received from foreign nationals outside of Canada in 2023-24? | 0 |
|--|---|

Row 1, Col. 1 of Section 4 must be equal to or less than Row 1, Col. 1 of Section 1.1 of the 2023-24 Statistical Report on the *Privacy Act*

