



*Report on the administration of
the Privacy Act 2024-2025*

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Introduction

Summary of the purpose of the *Privacy Act*

The *Privacy Act* (the Act), promulgated on July 1, 1983, aims to extend the present laws of Canada that protect the privacy of individuals with respect to personal information about themselves held by a government institution.

The purpose of the Act is to protect personal information by allowing individuals to consult information about them. It also imposes strict controls on how such information is gathered, used, and shared.

The *Privacy Act* gives individuals general access to personal information about themselves held by federal institutions, subject to specific and limited exceptions.

Annual report prepared in accordance with section 72

This document was prepared in response to section 72 of the Act, which requires federal institutions to submit an annual report to Parliament on the administration of the Act. This report provides details on activities related to the administration of the Act at Canada Economic Development for Quebec Regions (CED).

About the institution

CED is the key federal organization for economic development in the regions and among small and medium-sized enterprises (SMEs) in Quebec. It aims to stimulate the start-up and growth of businesses to make the regions more innovative, productive and competitive. CED thus offers adapted services and fosters local collaboration. This support also attracts investments for greater economic prosperity in Quebec and Canada.

CED's mission is to promote the long-term economic development of the regions of Quebec by giving special attention to those where slow economic growth is prevalent or opportunities for productive employment are inadequate. In addition to playing a crucial role in dynamizing regional economies by drawing on regional strengths, CED helps help communities diversify their economies, especially those hit by economic shocks. We support SMEs and non-profit organizations (NPOs) through strategic investments. CED keeps abreast of the needs of Quebec's regions and businesses through its 11 business offices across the province and through the links it establishes with other economic development players.

To learn more about CED's mandate, programming and activities, visit its website: ced.canada.ca.

Organizational structure

Access to Information and Privacy Office

CED fulfills its responsibilities under the *Access to Information Act* (ATIA), including Part 2 on proactive publication, and the *Privacy Act* (PA) through an Access to Information and Privacy (ATIP) Office to process requests. ATIP Office reports to the manager of the Corporate Secretariat, which in turn reports to the Chief of Staff to The Deputy Minister/President.

The ATIP Office has an access to information and privacy coordinator and an advisor. In addition to being responsible for all daily ATIP activities, the coordinator, who is supported by the advisor, oversees the development, coordination and implementation of policies, guidelines and procedures necessary to manage the agency's compliance with the acts.

Through its delegated authority, the ATIP Office represents CED on matters relating to the ATIA and PA in dealings with the public, the Treasury Board Secretariat, information and privacy commissioners, and with other federal institutions and departments.

During the reporting period, CED did not receive or provide any services under section 73.1 of the PA.

The ATIP Office is primarily responsible for the following functions:

- Processing requests and coordinating all attendant administrative and legal operations.
- Assisting applicants.
- Developing opinions, general guidelines and procedures relating to the application of the ATIA and the PA.
- Reporting on CED's application of the ATIA and the PA.
- Meeting the information and training needs of CED employees.

Agreement with the Access to Information and Privacy Communities Development Office

In 2022-2023, CED joined the newly formed Access to Information and Privacy Communities Development Office (APCDO). This was created to address capacity issues within the Access to Information and Privacy community across Government of Canada institutions subject to the Acts.

During the reporting period, CED's ATIP Office actively participated in several training sessions offered by the APCDO. Thus, the APCDO contributed to the development and sustainability of the Access to Information and Privacy community by conducting recruitment, retention, learning, networking and partnership activities in the spirit of diversity, inclusiveness and accessibility focused on community engagement.

Delegation Order

In accordance with its enabling act, CED defines its chief executive officer as being the Deputy Minister/President. In addition to leading the institution and overseeing management of its staff, he is responsible for administering the *Access to Information Act* and the *Privacy Act*.

To this end, he has delegated authority for the application of these acts to the position of Manager of the Corporate Secretariat and to the position of Coordinator, Access to Information and Privacy. Administrative authorities were also delegated to the position of Advisor, Access to Information and Parliamentary Affairs.

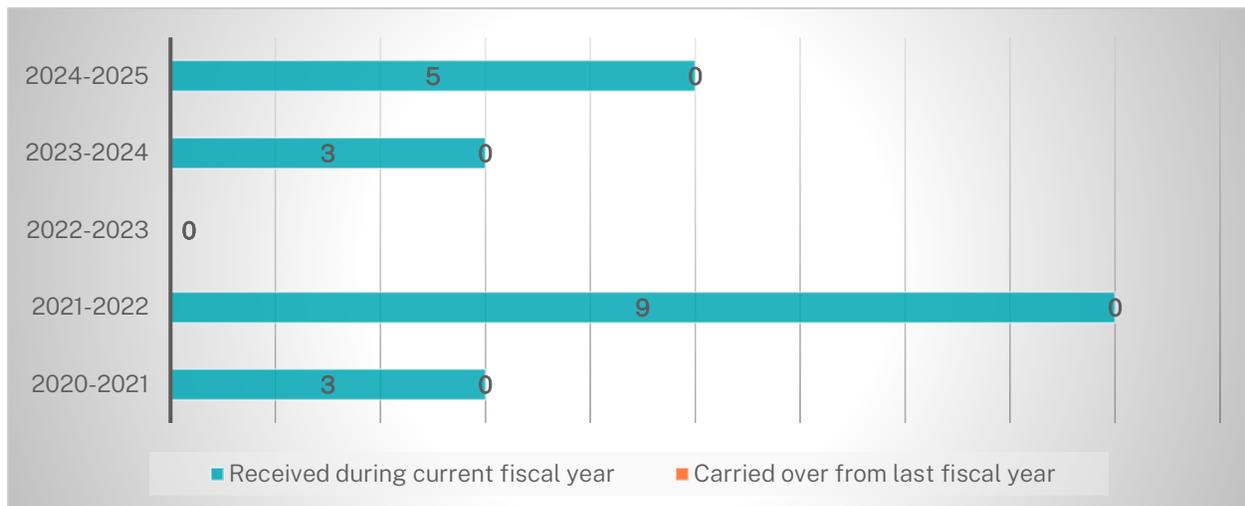
A signed and dated copy of the delegation order is appended to this report.

2024-2025 Performance

Requests received and processed

During fiscal year 2024–2025, the number of requests for access to personal information received and processed increased by 67% compared to the previous fiscal year. CED received and processed 5 requests for access to personal information and no requests were carried over from the previous reporting period.

TABLE 1: REQUESTS RECEIVED



Disposition and processing times

Of the 5 requests closed in 2024-2025, 3 were answered in less than 15 days (60%) and 2 within 30 days (40%).

TABLE 2: DISPOSITION AND COMPLETION TIME

	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	1	0	0	0	0	0	0	1
Disclosed in part	0	2	1	0	0	0	0	2
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	1
Request transferred	0	0	0	0	0	0	0	0
Request abandoned	2	0	0	0	0	0	0	2
Neither confirmed nor denied	0	0	0	0	0	0	0	0
TOTAL	3	2	0	0	0	0	0	5

Exemptions and exclusions invoked

Considering the 3 requests for which documents were disclosed, only one was disclosed in full (33%), without applying protection. In the other 2 cases (67%), section 26 concerning information relating to another individual was invoked, as well as section 27 concerning information protected by solicitor-client privilege or the professional secrecy of advocates and notaries or to litigation privilege.

TABLE 3 : EXEMPTIONS INVOKED¹

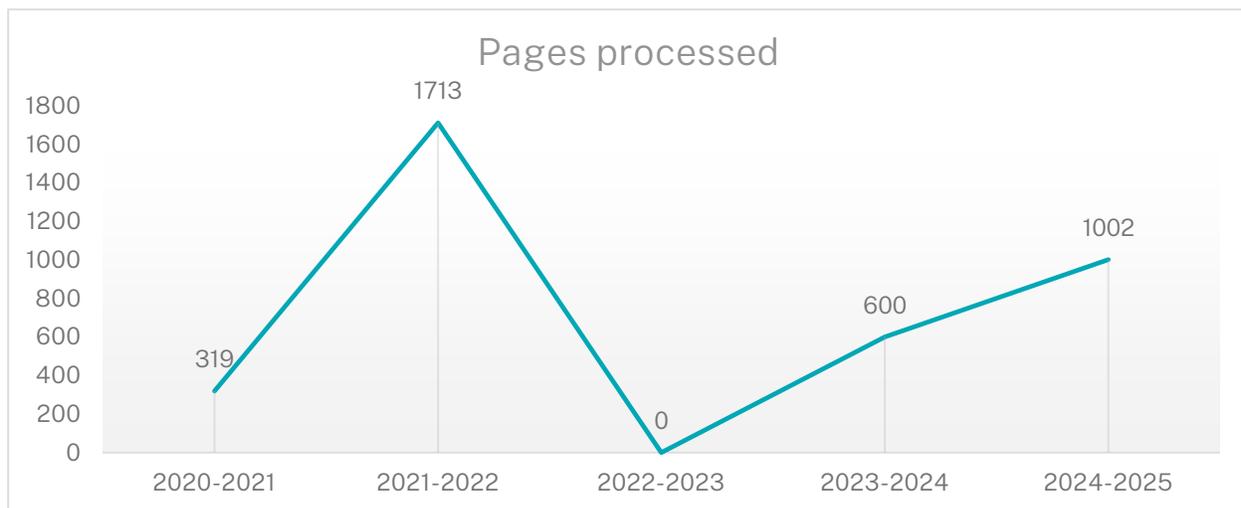
Section	Number of requests	
Information about another individual	26	2
Protected information — solicitors, advocates and notaries	27	1

¹ A request may lead to the administration of more than one section.

Pages processed and pages disclosed

In 2024-2025, requests for access to personal information led the ATIP Office to process and disclosed 1,002 pages. This represents a significant increase of 67% over the previous year, during which 600 pages were reviewed or disclosed in connection with requests for access to personal information.

TABLE 4: PAGES PROCESSED



Extension

The Act stipulates that a request for access to personal information must be answered within 30 calendar days. Extensions are only granted in exceptional cases. During the reporting period, no request required an extension.

Consultations

During the 2023-2024 fiscal year, CED did not conduct any consultations in connection with the requests for access to personal information received. In addition, CED did not receive any consultations from another institution.

Active complaints

CED did not receive any complaints in 2024-2025, and there are no active complaints with the Office of the Privacy Commissioner for previous reporting periods.

Training and awareness

The ATIP Office provides ongoing advisory services to all employees of the organization on the interpretation of the *Access to Information Act* and the *Privacy Act*, as well as on the processing of ATIP requests to ensure the efficient and consistent processing of all requests received.

In 2024-2025, various training and awareness activities were offered to employees of the organization regarding access to information and privacy. An awareness video and training material on the principles of access to information and protection of personal information, created

by the ATIP Office, are an integral part of the information kit given to all new employees of the organization.

Furthermore, an internal communication to all CED employees was also shared via the organization's intranet platform to mark Privacy Awareness Week 2024, highlight best practices in ATIP and remind employees of the obligation to complete the Canada School of Public Service's online training on access to information and privacy. During the fiscal year, 85 more employees completed this training. As a result, by the end of the reporting period, 67% of CED employees had taken the course.

The ATIP Office remains available to provide employees whose tasks require some knowledge of access to information with specific training.

Policies, guidelines, and procedures

Internal procedure for recording meetings

During the reporting period, the ATIP Office continued to apply the internal procedure to record meetings in Teams. This procedure was drafted and implemented in 2023-2024. Since the audio and video recording option disabled by default in Teams, the organization's employees must follow the procedure in order to submit a request for temporary activation of recording. In addition to raising awareness among the organization's employees, this procedure is designed to minimize the risk of disclosing personal and confidential information. In 2024-2025, 11 requests were submitted to the ATIP Office for analysis. This represents a significant increase compared to the previous fiscal year, during which 3 requests were submitted.

Info Source

In 2024-2025, the ATIP Office conducted its annual update of the information contained on the *Info Source* page of CED's website. As a result, CED has complied with *Info Source's* online publication requirements, which came into effect in July 2023. These requirements were established under paragraph 70(1)(c) of the *Access to Information Act* and paragraph 71(1)(d) of the *Privacy Act*. They also apply to the objectives and expected results stipulated in sections 3.1.1 and 3.2.1 of the Access to Information Policy, and sections 3.1.2 and 3.2.2 of the Privacy Policy.

Initiatives and projects to improve privacy protection

Request management and processing systems

Since 2022, CED has subscribed to the Treasury Board Secretariat (TBS) services of ATIP Online Portal, following TBS's announcement of the completion of its online system for filing access to information and personal information requests used by CED. TBS's new ATIP Online Portal enables requesters to submit access to information and personal information requests to any government institution, and institutions to provide responses to completed requests. This ATIP Online Portal, under the operational responsibility of TBS on behalf of all government institutions subject to the *Access to Information Act* and *Privacy Act* includes the ATIP Online Management Tool (AOMT), the ATIP Online Request Service (AORS), and the ATIP Online Administration Service.

In addition, during the reporting period, CED initiated a process to replace the software for managing and processing access to information and personal information requests used by the

organization since 2011, because the software will soon be no longer available to government institutions. The objective of this new system is to better equip the ATIP Office in the processing and management of access to information and privacy requests, intergovernmental consultations, informal requests and complaints filed with the Office of the Information Commissioner or the Office of the Privacy Commissioner.

It should be noted that a temporary stop-work order was issued by Public Services and Procurement Canada in January 2023, which was officially lifted on April 15, 2024. Work on the replacement project subsequently resumed at CED and was still ongoing at the end of the reporting period.

Summary of key issues and actions taken on complaints

No new complaints were received or concluded during the reporting period.

Material privacy breaches

No material privacy breaches occurred at CED during the period covered by this report.

Privacy Impact Assessments

During the reporting period, no Privacy Impact Assessment (PIA) were conducted.

To view CED's PIA, use the following link: [Privacy impact assessment](#)

Public interest disclosures

In fiscal year 2024–2025, no information was disclosed pursuant to paragraph 8(2)(m) of the PA.

Monitoring compliance

Monitoring of the processing time

Since 2011, the ATIP Office has monitored the processing time of privacy requests using software for managing and processing requests for access to information and personal information. This system also facilitates the tracking of the various activities and tasks surrounding the processing of a request and serves as a tool to ensure compliance with the deadlines set out in the PA. The time required to process requests for personal information is tracked through the software dashboard, and a status report on the file is provided to the ATIP Office manager.

Limitations on consultations between institutions

In order to limit the need for inter-institutional consultations, the ATIP Office ensures that it targets only the information in each request for which it needs more information to properly

exercise its discretion not to disclose information or where the ATIP Office intends to disclose potentially sensitive information.

As CED effectively identifies the need for such consultations, no specific monitoring was conducted during the period covered by this report to limit them.

Frequently requested information

Year after year, the same trend is seen with respect to information frequently sought in requests received at CED, namely, information related to grants and contributions granted by CED or information related to the institution's internal activities.

Since some of this information is already available through the proactive publications that CED issues in accordance with the requirements set out in Part 2 of the ATIA, no specific monitoring was conducted during the period covered by this report to make this information available by other means.

Privacy measures included in contracts, agreements, and arrangements

When entering into a contract, agreement or arrangement that involves personal information, besides the standard clauses and conditions, CED ensures that appropriate additional clauses are included to protect and manage personal information, such as the storage of personal information and the obligation for the third party to immediately notify the institution of any security breach involving personal information.

Furthermore, in accordance with the Policy on Government Security, CED is required to use the Security Requirements Checklist (SRCL) for entry into contracts, agreements or arrangements.

As CED meets all requirements for contracts, agreements and arrangements, no specific monitoring was conducted during the reporting period.

Monitoring requests for correction

Requests for correction of personal information are processed by the ATIP Office and recorded in an internal tracking system. No requests for correction of personal information were received during the reporting period.

Conclusion

Canada Economic Development for Quebec Regions recognizes the right to privacy as a fundamental right. The Agency is aware of the crucial importance of protecting personal information in the context of its programs and activities and ensures compliance with related principles such as transparency, need-to-know, and adequate data collection and protection standards, whether it be the personal information of employees or that of its clients.

To do so, CED deploys multiple means such as ensuring the security of its computer systems, good information management practices as well as training and messages to employees to make them aware of their obligations and responsibilities in this regard. Canada Economic Development for Quebec Regions is proud to have contributed to the application of these principles during the 2024–2025 fiscal year and will continue its efforts in this regard in the coming years.

Appendice



ACCESS TO INFORMATION AND PRIVACY ACT DELEGATION ORDER

ARRÊTÉ DE DÉLÉGATION EN VERTU DE LA LOI SUR L'ACCÈS À L'INFORMATION ET DE LA
LOI SUR LA PROTECTION DES RENSEIGNEMENTS PERSONNELS

The President, pursuant to section 95 of the *Access to Information Act* and to section 73 of the *Privacy Act*, hereby designates the persons holding the positions set out in the schedule hereto, or the persons occupying on an acting basis those positions, to exercise the powers, duties and functions of the President as the head of the Economic Development Agency for the Regions of Quebec, under the provisions of the Acts and related regulations set out in the schedule opposite each position. This delegation order replaces all previous delegation orders.

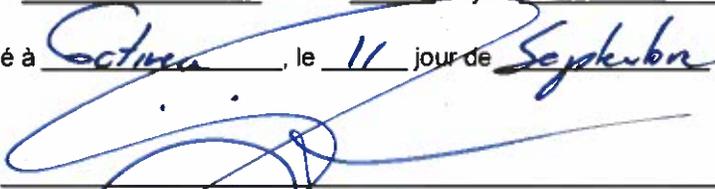
En vertu de l'article 95 de la *Loi sur l'accès à l'information* et de l'article 73 de la *Loi sur la protection des renseignements personnels*, le président délègue aux titulaires des postes mentionnés à l'annexe ci-après, ainsi qu'aux personnes occupant à titre intérimaire lesdits postes, les attributions dont il est, en qualité de responsable de l'Agence de développement économique du Canada pour les régions du Québec, investi par les dispositions des Lois mentionnées et de leurs règlements en regard de chaque poste. Le présent document remplace et annule tout arrêté antérieur.

Schedule / Annexe

Position / Poste	<i>Access to Information Act</i> and Regulations / <i>Loi sur l'accès à l'information</i> et règlements	<i>Privacy Act</i> and Regulations / <i>Loi sur la protection des renseignements personnels</i> et règlements
Manager, Corporate Secretariat / Gestionnaire, Secrétariat ministériel	Full authority / Autorité absolue	Full authority / Autorité absolue
Coordinator, Access to Information and Privacy / Coordonnateur, Accès à l'information et protection des renseignements personnels	Full authority / Autorité absolue	Full authority / Autorité absolue
Advisor, Parliamentary Affairs and Access to Information / Conseiller, Affaires parlementaires et accès à l'information	Section / Disposition: 7, 8(1), 9, 12(2)(b), 12(3)(b), 27(1)(4), 29(1), 44(2); Regulation / Règlement: 6(1)	Section / Disposition: 14(1)

Signed in _____ on this _____ day of _____, 2023

Signé à Secteur, le 11 jour de Septembre 2023


Sony Perron, Deputy Minister/President of
Canada Economic Development for Quebec Regions

Sony Perron, sous-ministre/président de
Développement économique Canada pour les régions du Québec

