Farm Credit Canada

ANNUAL REPORT ON THE ADMINISTRATION OF THE

PRIVACY ACT

For the period
April 1, 2024, to March 31, 2025

PRIVACY ACT

Pursuant to section 72 of the Privacy Act (the Act), Farm Credit Canada (FCC) has prepared for submission to Parliament the annual report on the administration of the Act for the reporting period of 2024-25.

Privacy Act

The Act protects the privacy of individuals with respect to their personal information. It governs the federal government's collection, retention, use and disclosure of that information. The Act also provides individuals with a right of access to their personal information.

Introduction and mandate of FCC

FCC is a federal Crown corporation reporting to Canadians and Parliament through the Minister of Agriculture and Agri-Food and was established through an act of Parliament, the Farm Credit Canada Act. FCC provides financing and other non-financing services to approximately 103,781 customers across the country. FCC's more than 2,500 employees work from 101 offices located primarily in rural Canada, with the head office located in Regina, Saskatchewan.

FCC's mandate is to support agriculture and agri-food and our aspiration is to help the industry succeed as a global leader in food security and sustainable food production by driving innovation and being a catalyst for value creation in the ecosystem. In addition to delivering on our core business, we fulfil our mandate by:

- advancing innovation and opportunities for under-represented groups in Canadian agriculture and agri-food
- delivering products to make intergenerational transfers easier and help young and new farmers entering the industry
- partnering with customers and industry to work toward achieving climate and sustainability goals

FCC did not have any non-operational subsidiaries during this reporting period.

Organizational structure

As of March 31, 2025, FCC's Privacy and Access to Information team was part of the Risk and Legal Division and reported to the Executive Vice-President of Risk and Legal through the Vice-President, Law and Corporate Secretary. A copy of the Delegation Order signed by the Head of the institution (Chairperson of the Board of Directors) in effect at the end of the reporting period is included in this report.

The Privacy and Access to Information team is comprised of four full-time positions, in addition to a manager position reporting to the Vice-President, Ethics, Regulatory Compliance and Privacy. The four positions include one Technician, two Specialists and one Senior Specialist. During the 2024-25 reporting period, FCC engaged up to three consultants to assist with the Privacy program build and the processing of Privacy Impact Assessments (PIA).

FCC was not party to an agreement, as described under section 73.1 of the Act, during the reporting period.

FARM CREDIT CANADA – Delegation of powers, duties and functions

I. Delegation of Authority: Delegation of powers, duties and functions of the Head of the institution pursuant to section 73(1) of the Privacy Act and Regulations

Privacy Act		CEO	VP, Law & CS	Senior Director, ERC&P	Manager, Privacy & Access to Information Program
8(2)(j)	Disclosure for research purposes	X	X	X	X
8(2)(m)	Disclosure in the public interest or in the interest of the individual	X	X	X	
8(4)	Copies of requests under 8(2)(e) to be retained	X	X	X	X
8(5)	Notice of disclosure under 8(2)(m)	X	X	X	
9(1)	Record of disclosures to be retained	X	X	X	X
9(4)	Consistent uses	X	X	X	
10	Personal information to be included in personal information banks	X	X	X	X
14	Notice where access requested	X	X	X	X
15	Extension of time limits	X	X	X	X
16	Where access is refused	X	X	X	X
17(2)(b)	Language of access	X	X	X	X
17(3)(b)	Access to personal information in alternative format	X	X	X	X

Privacy Act		CEO	VP, Law & CS	Senior Director, ERC&P	Manager, Privacy & Access to Information Program
18(2)	Exemption (exempt bank) – Disclosure may be refused	X	X	X	X
19(1)	Exemption – Personal information obtained in confidence	X	X	X	X
19(2)	Exemption – Where authorized to disclose	X	X	X	X
20	Exemption – Federal-provincial affairs	X	X	X	X
21	Exemption – International affairs and defence	X	X	X	X
22	Exemption – Law enforcement and investigation	X	X	X	X
21	Exemption – Advice, etc.	X	X	X	X
22	Exemption – Testing procedures, tests and audits	X	X	X	X
22.3	Exemption – Public Servants Disclosure Protection Act	X	X	X	X
23	Exemption – Security clearances	X	X	X	X
24	Exemption – Individuals sentenced for an offence	X	X	X	X
25	Exemption – Safety of individuals	X	X	X	X
26	Exemption – Information about another individual	X	X	X	X

Privacy Act		CEO	VP, Law & CS	Senior Director, ERC&P	Manager, Privacy & Access to Information Program
27	Exemption – Protected information – solicitors, advocates and notaries	X	X	X	X
27.1	Exemption – Protected information – patents and trademarks	X	X	X	X
28	Exemption – Medical record	X	X	X	X
33(2)	Right to make representation	X	X		
35(4)	Access to be given	X	X		
51(2)(b)	Special rules for hearings	X	X		
72(1) (4)	Report to Parliament	X	X	X	

Privacy regulations		CEO	VP, Law & CS	Senior Director, ERC&P	Manager, Privacy & Access to Information Program
9	Reasonable facilities and time provided to examine personal information	X	X	X	X
11(2)	Notification that correction to personal information has been made	X	X	X	X
11(4)	Notification that correction to personal information has been refused	X	X	X	X

Privacy regulations		CEO	VP, Law & CS	Senior Director, ERC&P	Manager, Privacy & Access to Information Program
13(1)	Disclosure of personal information relating to physical or mental health may be made to a qualified medical practitioner or psychologist for an opinion on whether to release information to the requester	X	X	X	
14	Disclosure of personal information relating to physical or mental health may be made to a requester in the presence of a qualified medical practitioner or psychologist	X	X	X	

II. Designation – ATIP Coordinator: The Manager, Privacy & Access to Information Program is designated Access to Information and Privacy Coordinator for the purpose of administering the day-to-day activities of the *Privacy Act*.

III. Designation – Chief Privacy Officer: The Vice-President, Law & Corporate Secretary is designated Chief Privacy Officer for the purpose of developing, implementing and reporting on FCC's Privacy & Access to Information program.

IV. All current delegations of authority and designations executed by the Chairperson of the Board of Directors of FCC in the capacity of the Head of the corporation are replaced by this Delegation of powers, duties and functions.

Jane Halford
Chairperson of the Board of Directors

July 12, 2023
Date

Performance 2024-25

In the 2024-25 reporting period, FCC received eight formal requests for information under the Act, with two requests being carried into the next reporting period. All requests were completed within legislated timeframes. Of the completed requests, 37.50% of requests were "all disclosed", and 62.50% were "disclosed in part".

Of the formal requests received, two were completed within 0-15 days, three within 16-30 days, and the remaining three within 31-60 days.

One informal request was received, which was processed in the spirit of the Act and completed within 16-30 days.

Four extensions were provided for the following reasons: one was an external consultation, and three extensions were completed as part of section 15(a)(i) of the Act.

No consultation requests were received under the Act.

FCC does not have open complaints related to the Act.

Additional details can be found in the Statistical Report on the Act for the period April 1, 2024, to March 31, 2025.

Training and awareness

FCC embeds awareness and compliance activities related to the Act into all areas of the company's operations, including online services. In addition to the training provided to Privacy and Access to Information staff, communication and awareness tactics continue to be rolled out to all staff and management. Privacy and access-to-information content forms part of a broader corporate online training program on information risk.

The Privacy and Access to Information team also delivered two training sessions specific to Business Liaison Officers (BLOs), with a total of 15 participants. This training aimed to establish BLOs throughout FCC to assist with record collection. It covered BLO duties in gathering responsive records, as well as legislative guidelines and timelines.

Policies, guidelines, procedures and initiatives to improve privacy

The build-out of the foundational components of the Privacy program was completed on March 31, 2025.

FCC has also automated components of the program to ensure consistency, efficiency and robust metrics for monitoring and reporting.

Among the program components, the following procedures were developed to supplement FCC's Privacy policy: assessing risk for privacy impact assessments; privacy issues management; privacy training; privacy monitoring and testing; and an updated Privacy Incident Response Plan.

Additional initiatives to further mature the Privacy program include collaborating with the Canada Revenue Agency on a secure transmission portal via the Amanda software. This collaboration aims to enhance the security and efficiency of data transmission processes, ensuring that sensitive information is handled with the utmost care.

Complaints and appeals

No complaints have been filed with the Office of the Privacy Commissioner of Canada.

Monitoring compliance

FCC monitors the processing time of privacy requests through a dashboard in the Amanda software. Each request is closely monitored by a Specialist.

The FCC standard Professional Services Agreement and general contracts include a clause advising that FCC is governed by the Act and that the information contained within the contract may, if required, be disclosed under the authority of the Act as well as the Access to Information Act. The agreement and contracts are signed by service providers external to FCC, and the head, or delegate, of the business unit within FCC.

Material privacy breaches

Of the privacy incidents reported to FCC's Privacy and Access to Information team for the 2024-25 reporting period, none were assessed as a material privacy breach. As a result, no material privacy breaches have been reported to the Office of the Privacy Commissioner of Canada or the Treasury Board of Canada Secretariat.

Privacy impact assessments (PIAs)

Four full PIAs were completed during the reporting period.

The PIAs completed can be found on FCC's website: Privacy impact assessments | FCC

Public interest disclosures

There were no disclosures of information under paragraph 8(2)(m) of the Act during the reporting period.

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