

## CANADIAN COMMERCIAL CORPORATION

### Annual Report to Parliament on the Administration of the *Privacy Act*

April 1, 2016 – March 31, 2017

#### 1. Introduction

The purpose of the *Privacy Act* (the “Act”) is to protect the privacy of individuals by controlling the way in which federal government institutions collect, use, store, disclose and dispose of personal information. The Act also gives individuals a right of access to personal information about themselves held by a government institution.

This report is prepared and tabled in Parliament in accordance with section 72 of the *Privacy Act*.

The Canadian Commercial Corporation (CCC), a Crown corporation listed in Schedule III Part I of the *Financial Administration Act*, reports to Parliament through the Minister of International Trade. CCC has a mandate to facilitate international trade and acts as Canada’s international contracting and procurement agency.

The Corporation’s primary service involves the establishment of government-to-government contracts with foreign government buyers to provide goods and services available for export from Canada. CCC then enters into contracts with Canadian exporters to fulfill the requirements of these government-to-government contracts. The procurement and contracting services provided for the benefit of Canadian exporters allows them to access markets where risk, transparency and competitiveness require a government-to- government arrangement.

While CCC is actively engaged in the aerospace, defence, security and infrastructure sectors, it also supports emerging and developing markets where foreign governments may require additional capacity to undertake complex and timely projects. CCC can operate either as prime contractor selling to governments, or as a procurement agent sourcing Canadian goods and services on behalf of governments in other countries. The Corporation also procures goods and services on behalf of other federal government institutions to assist the Government of Canada fulfill its in-kind aid contributions worldwide

#### 2. Organizational Structure

The administration of the *Privacy Act* within CCC is managed by the Access to Information and Privacy Unit within the Corporation’s Legal Services branch. The Access to Information and Privacy Unit is responsible for responding to all requests

submitted to CCC under the Act, developing internal policies and procedures, providing training and awareness, and ensuring compliance with the Act, its regulations and related policy instruments.

The role of CCC's Access to Information and Privacy (ATIP) Coordinator is assigned to the Vice President of Legal Services who is a member of the Corporation's executive committee and reports directly to the President. The ATIP Coordinator is supported by one full time law clerk, with assistance from additional legal counsel as needed.

### **3. Delegation Order**

For the purposes of section 3 of the *Privacy Act*, the President of CCC is designated as the "Head" of the institution.

Pursuant to section 73 of the Act, the President's authority has been delegated to enable the Corporation to meet its legislated requirements. The President has delegated all of his powers and duties under the Act to the Vice-President Legal Services, General Counsel and Corporate Secretary, who is also the ATIP Coordinator.

A copy of the Delegation Order, dated April 20, 2015, is attached as Annex A.

### **4. Highlights of the 2016-2017 Statistical Report**

CCC did not receive any requests for personal information under the *Privacy Act* during the 2016-2017 reporting period. This figure coincides with the historical trend. In the past 5 years CCC has only received one *Privacy Act* which was subsequently abandoned.

During the reporting period, CCC spent \$ 8,072 on the administration of the *Privacy Act*. The cost is in relation to providing advice and awareness, conducting a Privacy Impact Assessment (PIA) and ensuring compliance with the Act, its regulations and related policy instruments.

Attached as Annex B is a copy of the Statistical Report on the *Privacy Act* that was submitted to the Treasury Board of Canada.

### **5. Education and Training**

CCC did not undertake any formal training initiatives during the reporting period. However, due to the size of the corporation (roughly 140 employees) relative to its operational demands, the Access to Information and Privacy Unit is able to offer 1:1 or small group training and guidance as the need arises.

## **6. Policy, Guidelines, Procedures and Initiatives**

During the reporting period, CCC implemented a new core PIA template that is in accordance with TBS' *Directive of Privacy Impact Assessments* and its related policy instruments. CCC did not implement any other new and/or revised *Privacy Act* policies, guidelines or procedures during the reporting period.

## **7. Complaints and Investigations**

CCC did not receive any privacy act complaints, nor were any privacy audits or investigations conducted during the 2016-2017 reporting period.

## **8. Time Monitoring to Process Requests**

ATIP employees can monitor and track the time taken to process personal information requests in an excel database and report their findings in the annual *Statistical Report*. However, since no requests for personal information were received during the reporting period, CCC did not monitor or track processing times.

## **9. Material Privacy Breaches**

No privacy breaches occurred during the report period.

## **10. Privacy Impact Assessments**

CCC completed one privacy impact assessment (PIA) during the 2016-2017 reporting period. The PIA was in regards to a new electronic employee performance management review system.

## **11. Public Interest Disclosures**

CCC did not disclose any personal information pursuant to subsection 8(2)(m) of the *Privacy Act* during the reporting period.



## Delegation Order

## Arrêté de délégation

The President and Chief Executive Officer of the Canadian Commercial Corporation, pursuant to section 73 of the *Access to Information Act* and 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 and Chief Executive Officer as the head of the Canadian Commercial Corporation, under the provisions of the Act and related regulations set out in the schedule opposite each position. This designation replaces all previous delegation orders.

Dated, at the City of Ottawa, this 20th day of April, 2015

En vertu de l'article 73 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 et Chef de la direction de la Corporation Commerciale Canadienne 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 la Corporation Commerciale Canadienne, investi par les dispositions de la Loi ou de son règlement mentionnées dans l'annexe en regard de chaque poste. Le présent document remplace et annule tout arrêté antérieur.

Fait à la ville d'Ottawa, le 20e jour d'avril 2015



Martin Zablocki  
President and Chief Executive Officer / Président et Chef de la direction



## Schedule / Annexe

<b>Position / Poste</b>	<i>Access to Information Act and Regulations / Loi sur l'accès à l'information et Règlement</i>	<i>Privacy Act and Regulations / Loi sur la protection des renseignements personnels et Règlement</i>
Vice-President Legal Services, General Counsel and Corporate Secretary / Vice-présidente Services juridiques, avocate générale et secrétaire de la Corporation	Full authority / Autorité absolue	Full authority / Autorité absolue



## Statistical Report on the *Privacy Act*

Name of institution: Canadian Commercial Corporation

Reporting period: 2016-04-01 to 2017-03-31

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

	Number of Requests
Received during reporting period	0
Outstanding from previous reporting period	0
<b>Total</b>	0
Closed during reporting period	0
Carried over to next reporting period	0

### Part 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	More 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
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
<b>Total</b>	0	0	0	0	0	0	0	0

## 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	28	0
21	0	22.3	0		

## 2.3 Exclusions

Section	Number of Requests	Section	Number of Requests	Section	Number of Requests
69(1)(a)	0	70(1)	0	70(1)(d)	0
69(1)(b)	0	70(1)(a)	0	70(1)(e)	0
69.1	0	70(1)(b)	0	70(1)(f)	0
		70(1)(c)	0	70.1	0

## 2.4 Format of information released

Disposition	Paper	Electronic	Other formats
All disclosed	0	0	0
Disclosed in part	0	0	0
<b>Total</b>	0	0	0

## 2.5 Complexity

### 2.5.1 Relevant pages processed and disclosed

Disposition of Requests	Number of Pages Processed	Number of Pages Disclosed	Number of Requests
All disclosed	0	0	0
Disclosed in part	0	0	0
All exempted	0	0	0
All excluded	0	0	0
Request abandoned	0	0	0
Neither confirmed nor denied	0	0	0
<b>Total</b>	0	0	0

## 2.5.2 Relevant pages processed and disclosed by size of requests

Disposition	Less Than 100 Pages Processed		101-500 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
All disclosed	0	0	0	0	0	0	0	0	0	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
<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>

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

## 2.6 Deemed refusals

### 2.6.1 Reasons for not meeting statutory deadline

Number of Requests Closed Past the Statutory Deadline	Principal Reason			
	Workload	External Consultation	Internal Consultation	Other
0	0	0	0	0



## 2.6.2 Number of days past deadline

Number of Days Past Deadline	Number of Requests Past Deadline Where No Extension Was Taken	Number of Requests Past Deadline 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

## 2.7 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

## Part 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

## Part 4: 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>	0

## Part 5: Extensions

### 5.1 Reasons for extensions and disposition of requests

Disposition of Requests Where an Extension Was Taken	15(a)(i) Interference With Operations	15(a)(ii) Consultation		15(b) Translation or Conversion
		Section 70	Other	
All disclosed	0	0	0	0
Disclosed in part	0	0	0	0
All exempted	0	0	0	0
All excluded	0	0	0	0
No records exist	0	0	0	0
Request abandoned	0	0	0	0
<b>Total</b>	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
		Section 70	Other	
1 to 15 days	0	0	0	0
16 to 30 days	0	0	0	0
<b>Total</b>	0	0	0	0

## Part 6: Consultations Received From Other Institutions and Organizations

### 6.1 Consultations received from other Government of Canada institutions and other organizations

Consultations	Other Government of Canada Institutions	Number of Pages to Review	Other Organizations	Number of Pages to Review
Received during the reporting period	0	0	0	0
Outstanding from the previous reporting period	0	0	0	0
<b>Total</b>	0	0	0	0
Closed during the reporting period	0	0	0	0
Pending at the end of the reporting period	0	0	0	0

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

Recommendation	Number of Days Required to Complete Consultation 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	More 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
<b>Total</b>	0	0	0	0	0	0	0	0

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

Recommendation	Number of days required to complete consultation requests							
	1 to 15 Days	16 to 30 Days	31 to 60 Days	61 to 120 Days	121 to 180 Days	181 to 365 Days	More Than 365 Days	Total
All disclosed	0	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
<b>Total</b>	0	0	0	0	0	0	0	0

## Part 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	
	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>	0	0	0	0	0	0	0	0	0	0

### 7.2 Requests with Privy Council Office

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	
	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>	0	0	0	0	0	0	0	0	0	0

**Part 8: Complaints and Investigations Notices Received**

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

**Part 9: Privacy Impact Assessments (PIAs)**

Number of PIA(s) completed	1
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**Part 10: Resources Related to the Privacy Act**

**10.1 Costs**

Expenditures	Amount
Salaries	\$8,072
Overtime	\$0
Goods and Services	\$0
• Professional services contracts	\$0
• Other	\$0
<b>Total</b>	<b>\$8,072</b>

**10.2 Human Resources**

Resources	Person Years Dedicated to Privacy Activities
Full-time employees	0.10
Part-time and casual employees	0.00
Regional staff	0.00
Consultants and agency personnel	0.00
Students	0.00
<b>Total</b>	<b>0.10</b>

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