



Annual Reports to Parliament on the *Access to Information Act* and *Privacy Act*

2024-2025



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Part 1: Annual Report on CCC's Administration of the Access to Information Act

Introduction

The *Access to Information Act* (ATIA), enacted in 1983 and amended in 2019, provides individuals in Canada with a right of access to records under the control of federal government institutions. The principles encompassed by the ATIA are that government information should be available to the public, that exceptions to the right of access should be limited and specific, and that decisions on the disclosure of information should be reviewed independently of government.

The ATIA is intended to complement existing procedures for obtaining government information and is not to limit in any way the type of information that is normally available to the public, thereby denoting the importance of informal access and proactive disclosure.

This report is prepared and tabled in Parliament in accordance with section 94 of the *Access to Information Act*.

The Canadian Commercial Corporation (CCC) is a federal Crown corporation accountable to the Parliament of Canada through the Minister of International Trade. CCC's mandate is to facilitate the export of Canadian goods and services and act as Canada's international contracting and procurement agency. There are no non-operational subsidiaries affiliated with CCC.

One of the Corporation's primary activities 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 the government-to-government contracts. The procurement and contracting services CCC provides 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 export markets where foreign governments may require additional capacity to undertake complex and timely projects.

CCC also plays an important role in administering the Canada-US Defence Production Sharing Agreement (DPSA), which allows Canadian exporters to compete for procurement opportunities with the US Department of Defense on a level playing field with US-based companies. The Corporation also procures goods and services on behalf of other federal government institutions to assist the Government of Canada in delivering in-kind aid contributions worldwide.

Organizational Structure

The responsibilities under the *Access to Information Act* are fulfilled by the Corporation's Legal Services. In the 2024-2025 reporting period, the Access to Information and Privacy (ATIP) Office was managed by one Legal Counsel with support from ATIP consultants. The office was responsible for processing requests for information, preparing internal and external reports, developing and reviewing internal policies and procedures, providing training and advice, and ensuring that CCC is compliant with the ATIA, its

regulations and related policy instruments. In the 2024-2025 reporting period, CCC also relied on a consultant with expertise in access to information and privacy (ATIP) to process requests. The Legal Counsel responsible for ATIP reported to the Vice President, Legal Services, General Counsel and Corporate Secretary, who has delegated authority under the ATIA and is also designated as CCC's ATIP Coordinator for the purpose of receiving requests under the ATIA.

Proactive publication of travel and hospitality expenses (ATIA, sections 82 and 83) was fulfilled by the Travel Management Analyst. The proactive publication of reports tabled in Parliament pursuant to section 84 of the ATIA is fulfilled by CCC's Communications Services. For a breakdown of the groups and positions responsible for meeting each applicable proactive publication requirement under Part 2 of the ATIA.

CCC was not a party to any service agreements under section 96 of the *Access to Information Act* during this reporting period.

Delegation Order

The head of CCC, as defined by the ATIA, is the President and Chief Executive Officer. Pursuant to section 95 of the ATIA, the President may delegate all or some of their authority under the ATIA.

By way of a Delegation Order, the President delegated all of their powers, duties and functions under the ATIA to the Vice-President, Legal Services, General Counsel and Corporate Secretary.

A copy of the Delegation Order is attached at Annex A.

Performance Overview

The following chart provides an overview of key data about formal requests, as reflected in the 2024-25 Statistical Report, and provides information about multi-year trends. The institution saw a slight increase in requests received under the ATIA compared to the previous fiscal year. CCC responded to 100% of requests within the legislated timelines. While CCC's performance is measured in terms of the percentage of requests completed within the legislated time limit, the volume and complexity of individual requests can greatly impact those results.

Formal Requests	This year (FY 2024-25)	Trend	Last year (FY 2023-24)	5 years ago (FY 2019-20)
Number of requests received	6	↑	3	9
Number of requests closed	4	↑	2	11
		—		
Total number of pages processed	96	↑	43	334
Percentage completed within time limit	100%	—	100%	90.91

CCC had one outstanding request from the previous reporting period and received six new requests under ATIA, of which four requests were closed during the reporting period. Of the four completed requests, 50% were disclosed in full and 50% had no records responsive to the request. CCC did not take any

extensions for the completed requests. Three were completed in 16 to 30 days and one was completed in 32 days because the statutory deadline landed on a weekend.

As of the last day of the reporting period, CCC had three active requests, all of which were received in the 2024-25 fiscal year. CCC did not have any active complaints as of the end of the fiscal year.

The following table provides data on consultations completed for other government institutions, of which there was a slight increase compared to the previous reporting period.

Consultations from other Institutions	This year (FY 2024-25)	Trend	Last year (FY 2023-24)	5 years ago (FY 2019-20)
Number of consultations received	5	↑	3	10
Total number of pages consulted	388	↑	171	N/A*
Average completion time in days	74	↑	68	16

* No data available

Training and Awareness

CCC did not provide any formal training with respect to the *Access to Information Act* during the reporting period. Legal Services employees are knowledgeable in the application of the ATIA and promote awareness regarding CCC's obligations under the ATIA throughout the course of corporate programs and activities. All employees undertake mandatory annual training on CCC's Code of Conduct and Business Ethics, which includes a section on confidentiality, disclosure of information and transparency. There is a summary of employee ATIP obligations on CCC's internal portal as a resource for employees.

Policies, Guidelines, and Procedures

During the reporting period, CCC did not implement any new policies, guidelines, or procedures pertaining to access to information or proactive publication requirements under Part 2 of the ATIA.

Initiatives and Projects

CCC implemented a *Transparency and Disclosure Policy* in 2019 that designates the proactive disclosure of information pertaining to its business, and continues to publish information about its responsible business conduct policies, transactions, business events, disclosure of wrongdoing, and diversity and inclusion. The information can be found on CCC's Transparency and Disclosure [webpage](#). CCC did not implement any new initiatives or projects during the reporting period.

Key Issues and Complaints

CCC did not have any active complaints, nor were any issues raised during the reporting period.

Proactive Publication

CCC is considered a government institution for the purpose of Part 2 of the *Access to Information Act*, and as such, is subject to the following proactive publication requirements:

Proactive Publication Requirements Table

Legislative Requirement	Section of ATIA	Publication Timeline	Does requirement apply to your institution? (Y/N)	Internal group(s) or positions(s) responsible for fulfilling requirement	% of proactive publication requirements published within legislated timelines*	Link to web page where published**
Apply to all Government Institutions as defined in section 3 of the <i>Access to Information Act</i>						
Travel Expenses	82	Within 30 days after the end of the month of reimbursement	Y	Financial Services	100%	https://www.ccc.ca/en/about/travel-and-hospitality/
Hospitality Expenses	83	Within 30 days after the end of the month of reimbursement	Y	Financial Services	100%	https://www.ccc.ca/en/about/travel-and-hospitality/
Reports tabled in Parliament	84	Within 30 days after tabling	Y	Communications Services	100%	https://www.ccc.ca/en/about/transparency-and-disclosure/

Monitoring Compliance

CCC did not monitor the time taken to process access to information requests during the reporting period and the information provided in section 11.2 of the statistical report is based on best estimates. CCC uses an excel sheet to track the processing of requests for administrative and statistical purposes. A summary of active and closed requests and any outstanding complaints are reported to the Board of Directors on a quarterly basis. Legal Services regularly reviews contracts to ensure that any agreements pertaining to information sharing include provisions that comply with legislative ATIA requirements. The expense reports for travel and hospitality disclosure are approved by the Manager of Finance Operations and occasionally reviewed by Internal Audit.

Part 2: Annual Report on CCC's Administration of the *Privacy Act*

Introduction

The *Privacy Act* (PA), enacted in 1983, enhances the privacy of individuals by limiting the way in which government institutions can collect, use, disclose, retain and dispose of personal information. The PA also provides individuals with a right of access to and correction of their personal information under the control of a government institution. If an individual is concerned about the way in which a government institution handles their personal information, they can make a complaint to the Office of the Privacy Commissioner.

The PA only applies to federal government institutions. Private sector institutions are governed by the *Personal Information Protection and Electronic Documents Act* (PIPEDA) and by provincial or territorial legislation.

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

The Canadian Commercial Corporation (CCC) is a Crown corporation listed in Schedule III, Part I of the *Financial Administration Act* that reports to Parliament through the Minister of International Trade. CCC's mandate is to facilitate the export of Canadian goods and services and act as Canada's international contracting and procurement agency. The Corporation establishes government-to-government contracts with foreign government buyers to provide goods and services available for export from Canada. There are no non-operational subsidiaries affiliated with CCC. A further description of CCC's role and activities can be found in Part 1 of this document. Given the nature of CCC's business, it does not routinely collect or use the personal information about members of the general public. Most of the personal information that CCC handles belongs to its employees.

Organizational Structure

In addition to administering the *Access to Information Act*, the Corporation's Legal Services is also responsible for the administration of the *Privacy Act*. A single Legal Counsel was responsible during the 2024-2025 reporting period for carrying out privacy related activities, such as processing privacy requests, preparing internal and external reports, developing and reviewing internal policies and procedures, reviewing contracts that have privacy implications, conducting Privacy Impact Assessments (PIAs), providing training and awareness, and ensuring that CCC is compliant with the *Privacy Act*, its regulations and related policy instruments. In the 2024-2025 reporting period, CCC also relied on a consultant with expertise in access to information and privacy (ATIP) to process requests for personal information under the Act. The Legal Counsel responsible for privacy reported to the Vice-President, Legal Services, General Counsel and Corporate Secretary, who has delegated authority under the *Privacy Act* is also designated as CCC's ATIP Coordinator for the purpose of receiving requests under the Act. The proactive publication of the Report on the Administration of the Privacy Act tabled in Parliament is fulfilled by CCC's Communications Services.

CCC was not a party to any service agreements under section 73.1 of the *Privacy Act* during the reporting period.

Delegation Order

For the purposes of section 3 of the *Privacy Act*, the “head” of CCC is the President and Chief Executive Officer. Pursuant to section 73, the head may delegate all or some of their authority under the Act.

By way of a Delegation Order, the President delegated all of their powers, duties and functions under the *Privacy Act* to the Vice-President, Legal Services, General Counsel and Corporate Secretary. Some administrative duties and functions are also delegated to Legal Counsel, Compliance.

A copy of the Delegation Order is attached at Annex A.

Performance Overview

CCC completed two requests for personal information under the *Privacy Act* during the reporting period. One hundred percent (100%) of requests were completed within the legislated timelines. One request (50%) was disclosed in part within 31-60 days. The other request, for which there were no responsive records, was also closed within 31-60 days. Extensions were necessary because processing the volume of pages would unreasonably interfere with operations and consultations could not be completed within the original time limit. Most of the personal information collected by CCC pertains to its employees, and employees can request access to their personal information on an informal basis without having to resort to a formal request under the *Privacy Act*. As CCC does not track informal requests for personal information, there is no data to provide an overview of CCC’s performance in this regard.

CCC did not complete any consultations for other institutions during the reporting period. There were no active requests or active complaints as of the last day of the reporting period.

Training and Awareness

CCC did not provide any formal privacy training initiatives during the reporting period, however, employees across all program areas consult with and seek guidance from Legal Services as the need arises, particularly with respect to activities or contracts that involve personal information or privacy considerations.

All employees undertake mandatory annual training on cyber security, which covers topics such as security awareness and working securely from home, protecting mobile data and devices, and phishing defence essentials. This training supports CCC’s privacy protection framework and reduces the risk of a privacy breach since most of the personal information under CCC’s control resides or is accessed through its information technology systems.

Policies, Guidelines, and Procedures

CCC did not implement any new and/or revised policies, guidelines, or procedures with respect to the *Privacy Act* during the reporting period.

Initiatives and Projects

CCC did not implement any new and/or revised privacy-related initiatives or projects during the reporting period.

Key Issues and Complaints

CCC did not receive any complaints under the *Privacy Act*, nor were any privacy issues identified during the reporting period.

Material Privacy Breaches

No material privacy breaches occurred at CCC during the reporting period.

Privacy Impact Assessments

CCC did not complete any new Privacy Impact Assessments during the reporting period.

Public Interest Disclosures

During the reporting period, CCC did not make any disclosures pursuant to section 8(2)(m) of the *Privacy Act*.

Monitoring Compliance

CCC does not monitor the time taken to process personal information requests or requests for the correction of personal information since it rarely receives these types of requests.

CCC regularly updates, tests and reviews the security of its IT systems, which would identify gaps in the protection of personal information, and none were identified. A cybersecurity and data governance report is submitted to the Board of Directors on a quarterly basis.

Legal Services regularly reviews contracts to ensure that any agreements that could have an impact on privacy include provisions that comply with legislative requirements.

Annex A: Delegation Order

	Annex A	 Canadian Commercial Corporation Corporation Commerciale Canadienne
Delegation Order	Arrêté de délégation	
The President and Chief Executive Officer of the Canadian Commercial Corporation, pursuant to section 95 of the <i>Access to Information Act</i> and section 73 of the <i>Privacy Act</i>, 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.	En vertu de l'article 95 de la <i>Loi sur l'accès à l'information</i> et de l'article 73 de la <i>Loi sur la protection des renseignements personnels</i>, 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.	
Dated, at the City of Ottawa, this <u>14th</u> day of May, 2021.	Fait à la ville d'Ottawa, le <u>14</u> jour de mai 2021.	
 ----- Bobby Kwon President and Chief Executive Officer / Président et Chef de la direction		
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  Canadian Commercial Corporation Corporation Commerciale Canadienne		
Schedule / Annexe		
Position / Poste	Access to Information Act and Regulations / Loi sur l'accès à l'information et Règlement	Privacy Act and Regulations / Loi sur la protection des renseignements personnels et Règlement
Vice-President Legal Services, General Counsel and Corporate Secretary / Vice-président Services juridiques, avocat générale et secrétaire de la Corporation	Full authority / Autorité absolue	Full authority / Autorité absolue
Law Clerk / Adjointe Judiciaire	Sections 4(2.1), 9, 11(2) and 27 of the Access to Information Act / L'articles 4(2.1), 9, 11(2) and 27 de la Loi sur l'accès à l'information	Section 15(a) of the Privacy Act / L'article 15(a) de la Loi sur la protection des renseignements personnels

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