

Annual Report to Parliament on the *Privacy Act*

2025-2026

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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. The institution did not have any wholly owned subsidiaries at any time during the reporting period. 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 Legal Counsel was responsible during the 2025-2026 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 2025-2026 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 and provide discreet advice on privacy related matters. 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.

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

Performance Overview

CCC received no requests for personal information under the *Privacy Act* during the reporting period.

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

All employees undertake mandatory annual training on cybersecurity, 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 in or is accessed through its information technology systems.

In addition, CCC has implemented mandatory sensitivity labels for corporate information and materials, aligned with Treasury Board standards for the classification and handling of protected information. Employees receive training and guidance on the appropriate application of sensitivity labels, including the secure handling, sharing, and encryption of sensitive documents and communications. CCC also employs Data Loss Prevention (DLP) controls that notify employees when emails containing sensitive information are being sent outside the organization, helping to prevent the inadvertent disclosure of protected information and strengthening the organization's overall privacy and information protection posture.

Finally, CCC conducts regular phishing simulation exercises to test employees' ability to identify and respond appropriately to fraudulent or malicious communications and performs remediation training for staff who fail the tests, reinforcing security awareness and strengthening organizational resilience against cyber threats.

CCC 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.

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

The President and Chief Executive Officer of the Canadian Commercial Corporation, pursuant to section 95 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 _14th ___ day of May, 2021.

Arrêté de délégation

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 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 __14___ jour de mai 2021.

Bobby Kwon
President and Chief Executive Officer / Président et Chef de la direction

Collaborative, Credible, Competitive • Collaboration, Crédibilité, Compétitivité

Canada

CCC
Canadian Commercial Corporation
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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*