

# **Annual Report on the *Privacy Act***

**For the period from April 1, 2023, to March 31, 2024**

**Public Sector Pension Investment  
Board and its Relevant Wholly-  
Owned Subsidiaries**

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# I. Introduction

## I.1 Executive Summary

As federal Crown corporations, the Public Sector Pension Investment Board (“PSPIB”) and its relevant wholly-owned subsidiaries (collectively “PSP”) are subject to the *Privacy Act*.<sup>1</sup>

PSP operates from its offices in Montréal (Québec) and Ottawa (Ontario), as well as from international offices operated by its wholly-owned subsidiaries in London (United Kingdom), New York (United States) and Hong Kong (Special Administrative Region [SAR]). PSP maintains global personal information holdings and protecting them is a top priority. Some PSP programs require the collection, use and disclosure of detailed and sensitive personal information.

This year’s results show that PSP has maintained its high levels of performance. Here is an overview of main results in terms of privacy activities during the reporting period:

- Privacy requests completed within legislated timelines: **100%** compliance.
- Privacy requests received: **190 (+ 1,800%** from the previous year).
- **6** privacy reviews were completed in 2023-24.

This report describes PSP’s performance in meeting its obligations under the *Privacy Act* and reflects our commitment to openness and transparency as core principles for a modern, open, and ethical administration.

This report is submitted and tabled to Parliament.

## I.2 Presentation of the Report

PSP is pleased to present to Parliament its annual report on the administration of the *Privacy Act* for fiscal year 2023-24 (April 1, 2023, to March 31, 2024).

The *Privacy Act* was proclaimed into force on July 1, 1983. This report is prepared and tabled in accordance with the following:

- Section 3.01 of the *Privacy Act*, which states that PSPIB is a parent Crown corporation for the purposes of the Act.
- Section 72 of the *Privacy Act*, which requires every head of a federal government institution to submit a report to Parliament on the administration of the Act during the fiscal year.

Section 73.1 of the *Privacy Act* allows government institutions to provide Access to Information and Privacy (“ATIP”) services to another government institution chaired by the same minister. As noted above, PSPIB is a parent Crown corporation for the purposes

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<sup>1</sup> R.S.C. 1985, c. P-21, at sections 3, and 3.01. Please see <https://laws-lois.justice.gc.ca/PDF/P-21.pdf>.

of the *Privacy Act* and, as such, provides ATIP services on behalf of almost all of its wholly-owned subsidiaries subject to the *Privacy Act*. A list of PSPIB's relevant wholly-owned subsidiaries (as of March 31, 2024), to which the *Privacy Act* applies, is included in **Appendix A**.<sup>2</sup>

### **I.3 Purpose of the Privacy Act and Related Legal Framework**

The *Privacy Act* provides individuals with the right of access to and correction of personal information about themselves that is under the control of a government institution. It also provides the legal framework for the collection, retention, use, disclosure, disposition, and accuracy of personal information in the administration of programs and activities by government institutions subject to the Act.

As noted in the Executive Summary above, PSP operates globally and has employees located in multiple countries. Its legal obligations include those set out in the *Privacy Act* and in other applicable privacy legislation.

### **I.4 Mandate of PSP**

PSP manages the amounts transferred to it by the Government of Canada for the funding of benefits earned from April 1, 2000, by members of the public sector pension plans of the federal Public Service, the Canadian Forces, the Royal Canadian Mounted Police and, since March 1, 2007, the Reserve Force.

In accordance with the *Public Sector Pension Investment Board Act*,<sup>3</sup> PSP's statutory mandate is to:

- Manage amounts that are transferred to it in the best interests of the contributors and beneficiaries under the acts related to the Plans.
- Invest its assets with a view to achieving a maximum rate of return, without undue risk of loss, having regard to the funding, policies and requirements of the Plans and the ability of the Plans to meet their financial obligations.

## **II. Organizational Structure**

The ATIP office is part of the Legal Affairs Department. As ATIP Coordinator, the Senior Director, Legal Affairs, has delegated authority and is responsible for the implementation and management of programs and services related to PSP's administration of, among

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<sup>2</sup> This list includes all first level Canadian subsidiaries, subject to the *Privacy Act*, that are wholly owned by PSPIB (including those that were dissolved or created during the reporting period) as of March 31, 2024. In addition, the reporting requirements of three active subsidiaries (Canada Growth Fund Investment Management Inc.; Downsview Metro Devco Inc.; and Revera Inc.) are met through separate reports, in accordance with TBS content requirements for the 2023-24 annual report to Parliament under the *Privacy Act*.

<sup>3</sup> <https://laws-lois.justice.gc.ca/PDF/P-31.7.pdf>, at section 4.

other things, the *Privacy Act*, and the *Access to Information Act*, as well as advising PSP employees to fulfill their obligations.

The ATIP office is responsible for providing privacy awareness within the organization, ensuring that PSP is compliant with its obligations in relation to the processing and the administration of personal information in compliance with applicable privacy laws, regulations policies, directives, and procedures.

## II.1 PSP ATIP Office

The ATIP office is the central coordinating body for all ATIP requests received by PSP. As of March 31, 2024, for the application of the *Privacy Act*, the ATIP Coordinator is supported by 2 employees and 3 consultants who collectively share responsibility for the Intake, Operations, Policies and Procedures. During fiscal 2023-24, ATIP support was provided by PSP offices in Montréal, and Ottawa.

The ATIP office directs all activities within PSP relating to the administration, application, and promotion of the *Privacy Act*, and the *Access to Information Act*. It provides advice to senior management on the implementation of the statutes, and prepares reports to Parliament, the Treasury Board Secretariat (“TBS”) and senior management. The ATIP office represents PSP in complaints and investigations conducted by the Privacy Commissioner of Canada, and the Information Commissioner and in any Federal Court applications.

## II.2 Privacy Governance Specifics

PSP's Senior Director, Legal Affairs and ATIP Coordinator oversees privacy governance, risk monitoring, and decision-making. The Senior Director also leads the stewardship and management of personal information and privacy across PSP. Among others, the Senior Director supports the integration of data management, privacy, and cyber security; provides oversight of PSP's risk management processes with respect to personal information; and promotes a culture that recognizes that the protection of privacy is a core organizational value.

## II.3 Service Agreements

During the reporting period, PSP was not party to any service agreements under section 73.1 of the *Privacy Act*.

## III. Delegation Order

In accordance with section 73 of the *Privacy Act*, the President and CEO, in her capacity as Head of PSP, has delegated all powers, duties and functions related to the application of the *Privacy Act* to the following PSP officials:

- Senior Vice-President and Chief Legal and People Officer.

- Senior Director, Legal Affairs and ATIP Coordinator.
- Advisor / Senior Advisor / Counsel or equivalent, ATIP.
- Advisor/Senior Advisor/Counsel or equivalent, Privacy.
- Administrative Analyst or equivalent, Legal Affairs.

The delegation order in effect during the reporting period was signed on September 1, 2022, and a copy can be found in **Appendix B**.

## IV. Performance in Fiscal Year 2023–24

The following sections highlight PSP's performance in fiscal year 2023-24, as reflected in PSP's 2023-24 Statistical Report.

### IV.1 Statistical Report

Statistical reports prepared by government institutions provide aggregate data on the application of the *Privacy Act* and the *Access to Information Act*. This information is made public each year in a statistical report that accompanies the annual reports on privacy and access to information tabled in Parliament by each institution. The PSP 2023-24 Statistical Report on the *Privacy Act*, at **Appendix C**, consists of data submitted by PSP as part of TBS annual collection of ATIP-related statistics.

In addition, TBS has asked institutions to report on other ancillary performance data. As a result, PSP presents the 2023-24 Supplemental Statistical Report on the *Access to Information Act* and *Privacy Act* in **Appendix D**.

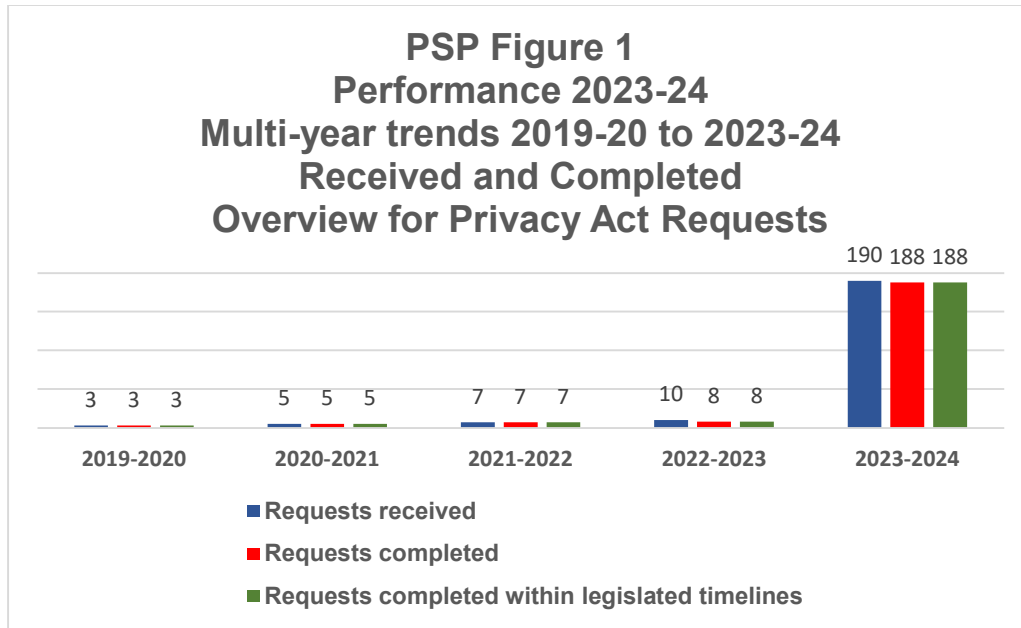
The following sections highlight PSP's performance in fiscal 2023-24 in relation to its obligations under the *Privacy Act*, as well as analyses of notable statistical data for this year compared with previous years.

### IV.2 Requests Received and Carried Forward

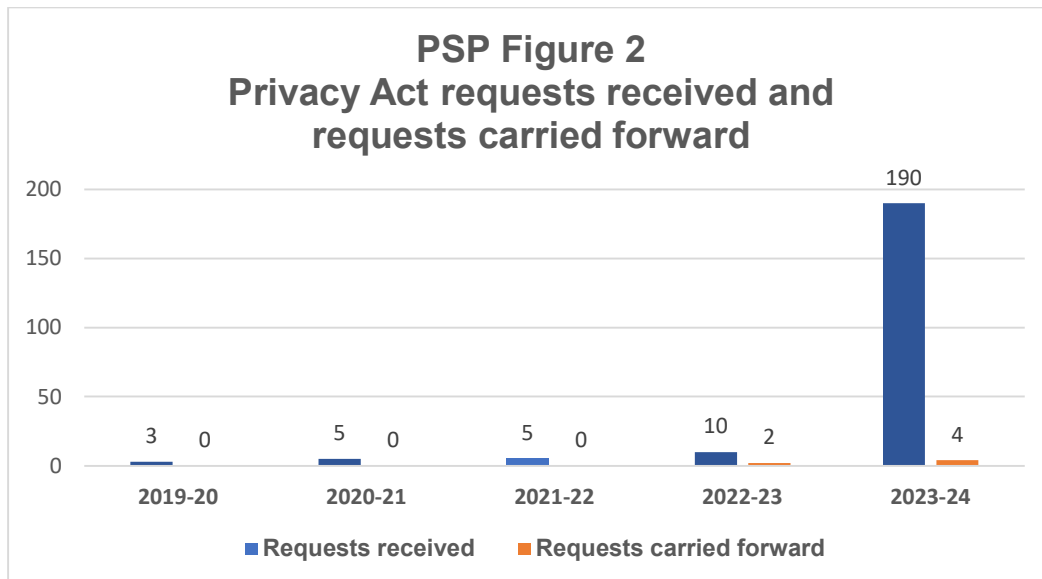
In fiscal year 2023-24, PSP received a total of 190 new requests under the *Privacy Act*. This represents a **1,800%** increase from the 2022–23 total of 10.

The number of requests carried forward increased from 2 in 2022–23 to 4 in 2023-24. The requests were carried over as a result of the date they were received (March 2024).

**Figure 1** shows how many privacy requests PSP received each year and how many were completed for 2019–20 to 2023-24.



**Figure 2** shows how many privacy requests PSP received each year and how many were carried forward for 2019–20 to 2023-24.

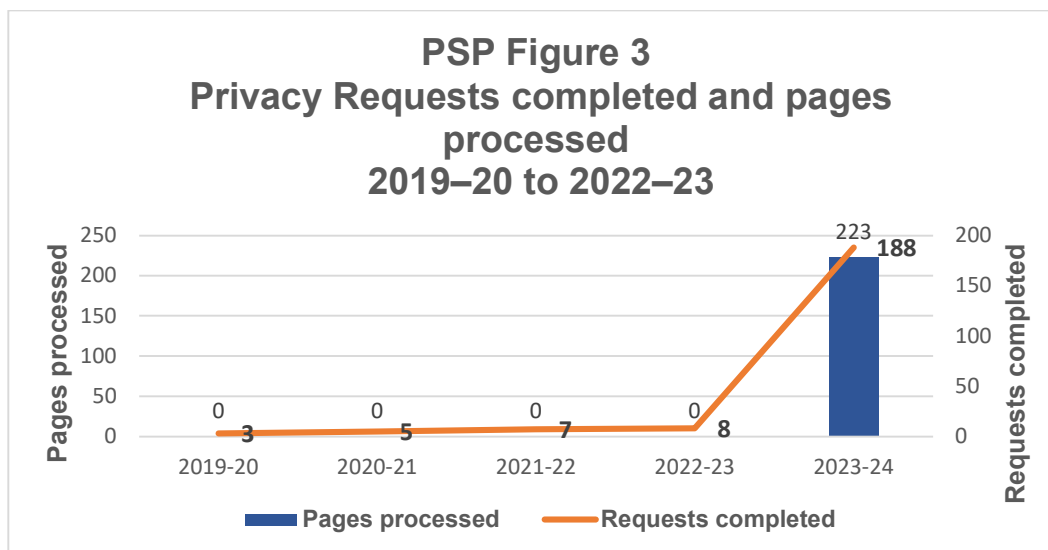


All requests carried forward (4) were received in fiscal year 2023-24. At the time of completion of this report, all of them were already closed.

### IV.3 Requests Completed and Pages Processed

PSP completed 188 privacy requests in 2023-24. This is an increase of **+2,250%** compared with the previous year.

**Figure 3** shows, for the years 2019–20 to 2023-24, data relating to privacy requests processed each year by PSP.



The PSP ATIP office also receives inquiries from the public on how and where to obtain information under the *Privacy Act* or the *Access to Information Act*. PSP redirects some of these requests to other federal government institutions and, occasionally, to provincial Freedom of Information and Privacy offices. These are not counted as requests for the purposes of this report.

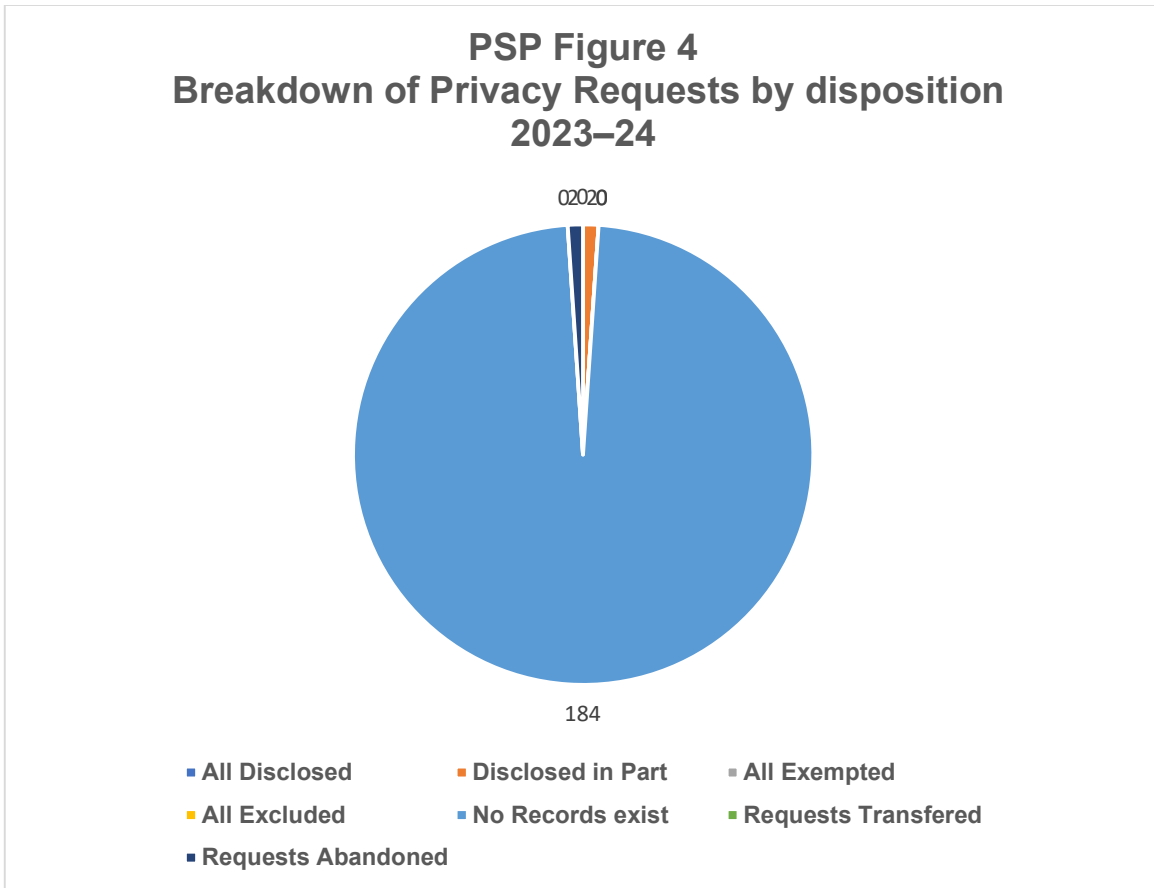
#### IV.4 Disposition of Requests, Exemptions and Exclusions

##### Disposition of Requests

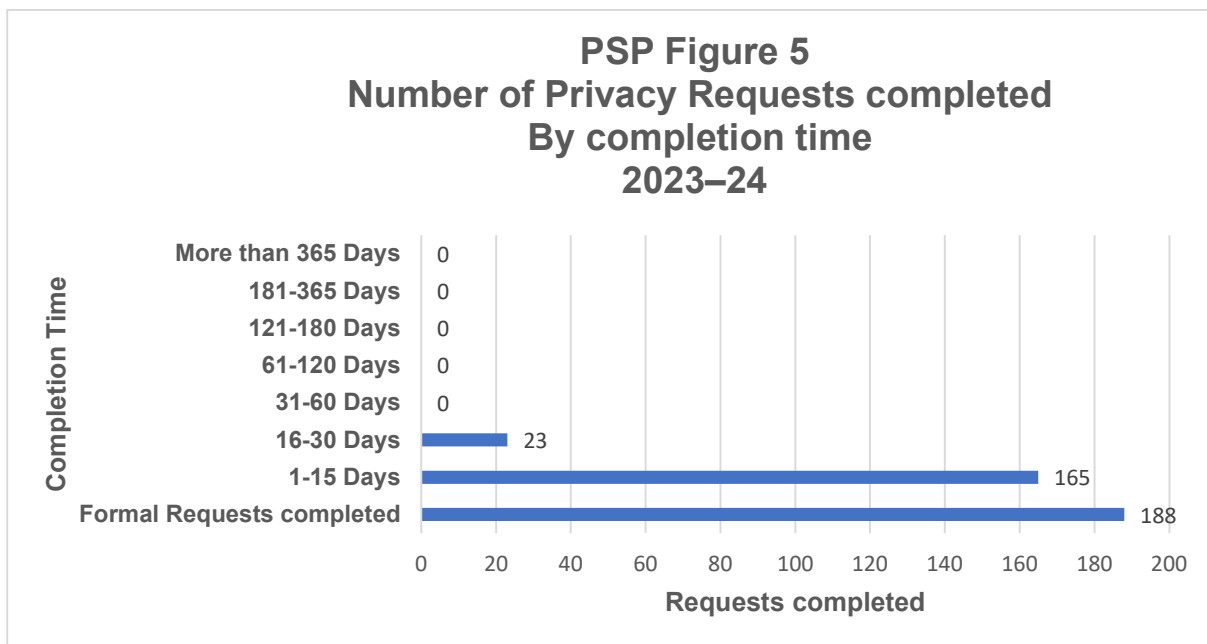
Of the 188 requests completed, no relevant documents were found in 184 instances (98%). In addition, 2 requests were abandoned (0.01%), and records were partially disclosed in 2 files (0.01%).

**Figure 4** summarizes the breakdown of privacy requests according to their disposition.





**Figure 5** shows the number of requests completed, broken down by completion time.



Lastly, **Appendix D, Section 2**, shows the number of active privacy requests as of the last day of the reporting period, broken down by the fiscal year in which they were received.

### **Exemptions**

The *Privacy Act* allows, and in some cases requires, that certain information be exempted from release. Subsection 22(1) (Law enforcement and investigation) was applied in 1 case. With respect to other exemptions, section 26 (information about other individuals) and section 27 (solicitor-client privileged information) were respectively invoked in 2 cases.

### **Exclusions**

The *Privacy Act* does not apply to and excludes information that is already publicly available, such as library material preserved solely for public reference or exhibition purposes. No records were subject to exclusions in fiscal year 2023-24.

### **Format of requests**

All requests were received electronically, and all responses were provided in this format.

## **IV.5 Complaints Received and Closed**

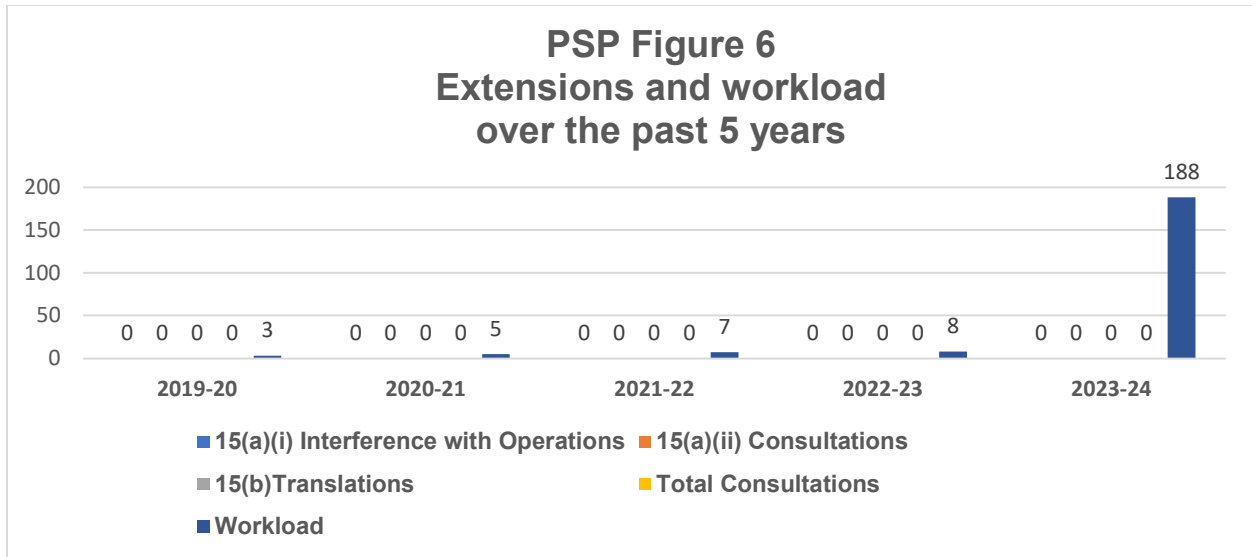
In fiscal year 2023-24, PSP was not notified of any complaints received by the Office of the Privacy Commissioner of Canada (“OPC”). In addition, there were no outstanding complaints from previous reporting periods.

**Appendix D, Section 2**, shows the number of active privacy complaints as of the last day of the reporting period, broken down by the fiscal year in which they were received.

## **IV.6 Extensions**

The legislation sets timelines for responding to privacy requests and allows for extensions when the response requires the review of a large amount of information; consultations with other organizations; or extra time for documents to be translated. In fiscal year 2023-24, PSP did not seek extensions.

**Figure 6** shows the number of completed requests that required an extension for fiscal years 2019-20 to 2023-24.



### IV.7 Consultations

In fiscal year 2023-24, PSP did not receive any consultation requests from other federal institutions relating to privacy requests involving PSP records or issues.

## V. Training and Awareness

### PSP Privacy Management Framework

PSP’s privacy management framework promotes a proactive approach to the management of personal information by fostering the integration of privacy practices into program, system, and business process design. The framework, which is currently in the process of being enhanced, consists of the following elements:

- Governance and accountability: Roles and responsibilities for privacy are defined.
- Stewardship of personal information: Privacy protections are implemented to manage personal information properly throughout its life cycle.
- Assurance of compliance: Processes and practices are in place to ensure adherence to applicable privacy laws.
- Effective risk management: Risk identification and assessments are conducted to limit the probability and impact of negative events.
- Culture, training, and awareness: Privacy training and awareness activities that promote the protection and stewardship of personal information.

The framework is a clear and succinct foundational element in establishing and operating a comprehensive privacy program at PSP.

### Training

In fiscal 2023-24, the PSP ATIP office continued to expand its outreach activities and offered training sessions to all new PSP employees and staff-augment consultants through the PSP On-boarding program (e-learning). In addition, informal information sessions, one-on-one training, and orientation sessions were provided throughout the reporting period.

Concurrently, PSP ATIP staff participated in TBS training sessions on the right of access under the *Privacy Act*; possible exemptions for the management of personal information arising from international affairs; and the management of publicly available personal information obtained online.

### **Awareness**

To mark Data Privacy Day held on January 28, 2024, PSP's ATIP office promoted the importance of sound privacy management practices and shared responsibility for protecting personal information in day-to-day activities through various awareness-raising activities.

For its *Privacy Awareness Week 2024*, PSP's campaign focused on "*everything you always wanted to know about privacy but were afraid to ask.*" Over 200 employees/consultants responded to a survey and almost 140 colleagues visited our "Privacy pop-up" booth. PSP's campaign also included an online component. In addition to an email communication about the event and information about PSP's privacy education resources, an article was published that included a link to a contest. This article was accompanied by a launch email and an article inviting colleagues to visit the redesigned intranet site to find additional privacy resources and support.

## **VI. Policies, Guidelines, and Procedures**

PSP's policies and procedures support a robust privacy program for the protection and judicious use of personal information by PSP. Supplementing TBS policies, directives and standards, these policies and procedures codify the requirements for the management and protection of personal information, articulate clear and universal privacy principles, and specify roles and responsibilities for the management of personal information, including discrete functional responsibilities and accountabilities for privacy.

### **VI.1 New or Revised Policies, Guidelines, and Procedures**

There were no "*new or revised*" institution-specific policies, guidelines, and procedures related to privacy that were implemented in the PSP during the reporting period (2023-24).

## VI.2 New Collection or New Consistent Use of Social Insurance Number

In 2023-24, PSP did not undertake any new collection or consistent use of Social Insurance Numbers.

## VII. Initiatives and Projects to Improve Privacy

Below is a short list of initiatives and projects currently under review or consideration.

### Algorithmic Impact Assessment Tool

Since June 9, 2023, the Algorithmic Impact Assessment is a risk assessment tool<sup>4</sup> intended to support the TBS *Directive on Automated Decision-Making*.<sup>5</sup> The tool is a questionnaire that determines the impact level of an automated decision-system. It is composed of 51 risk and 34 mitigation questions. Assessment scores are based on many factors, including the system's design, algorithm, decision type, impact, and data. Where applicable, PSP ATIP office will review whether it needs to align any internal initiatives, described above in VI.1, with those set out in this risk assessment tool.

### De-identification

The TBS *Privacy Implementation Notice 2023-01: De-identification* was published on March 17, 2023.<sup>6</sup> This TBS implementation notice provides information and guidance to PSP on the use of de-identification as a privacy-preserving technique to bolster the privacy protections around the personal information under its control in support of its obligations under section 3.1.3 of the TBS *Policy on Privacy Protection*. Where necessary, PSP ATIP office will review whether it needs to align any internal initiatives, described above in VI.1, with those set out in TBS *Privacy Implementation Notice 2023-01*.

### Digital Advertising

On January 18, 2024, TBS published its *Privacy Implementation Notice 2024-01: Digital Advertising*.<sup>7</sup> This TBS implementation notice provides guidance to federal institutions on how to protect the privacy of individuals when purchasing advertising for placement on digital platforms. Where applicable, PSP ATIP office will review whether it needs to align any internal initiatives, described above in VI.1, with those set out in TBS *Privacy Implementation Notice 2024-01*.

### Digital Privacy Playbook

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<sup>4</sup> <https://www.canada.ca/en/government/system/digital-government/digital-government-innovations/responsible-use-ai/algorithmic-impact-assessment.html>.

<sup>5</sup> <https://www.tbs-sct.canada.ca/pol/doc-eng.aspx?id=32592>.

<sup>6</sup> <https://www.canada.ca/en/treasury-board-secretariat/services/access-information-privacy/access-information-privacy-notices/2023-01-de-identification.html>.

<sup>7</sup> <https://www.canada.ca/en/treasury-board-secretariat/services/access-information-privacy/access-information-privacy-notices/privacy-implementation-notice-2024-01.html>.

TBS *Digital Privacy Playbook* was published on March 27, 2023.<sup>8</sup> The Playbook summarizes important and timely privacy advice. Where necessary, PSP ATIP office will review whether it needs to align any internal initiatives, described above in VI.1, with those set out in TBS *Digital Privacy Playbook*.

### **Generative Artificial Intelligence**

On September 28, 2023, TBS published its *Guide on the use of generative artificial intelligence*.<sup>9</sup> The TBS Guide provides high-level considerations of generative artificial intelligence, including related privacy advice. The Guide is intended to support the TBS *Directive on Automated Decision-Making*. Where applicable, PSP ATIP office will review whether it needs to align any internal initiatives, described above in VI.1, with those set out in this guide.

### **Information Sharing Agreements**

TBS *Guidance on Preparing Information Sharing Agreements Involving Personal Information*<sup>10</sup> was published on August 3, 2023. TBS guidance is designed to assist parties in completing the Information Sharing Agreement template as well as its supporting annexes when sharing personal information among federal institutions. Where necessary, PSP ATIP office will review whether it needs to align any internal initiatives, described above in VI.1, with those set out in this guidance.

### **Personal Information Publicly Available Online**

On August 1, 2023, TBS published “*Privacy Implementation Notice 2023-03: Guidance pertaining to the collection, use, retention and disclosure of personal information that is publicly available online*.”<sup>11</sup> This TBS Privacy Implementation Notice provides guidance in accordance with the requirements of the *Privacy Act* and related policy instruments on the collection, use, disclosure, and retention of personal information that is publicly available online. Where applicable, PSP ATIP office will review whether it needs to align any internal initiatives, described above in VI.1, with those set out in this document since PSP manages, personal information that is publicly available online for various purposes, such as: outreach and public communications; research, examining trends and identifying emerging issues; and activities in support of administrative investigations.

### **Privacy Act: Plain Language Guide to Exemptions and Exclusions**

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<sup>8</sup> <https://www.canada.ca/en/government/system/digital-government/digital-privacy-playbook.html>.

<sup>9</sup> <https://www.canada.ca/en/government/system/digital-government/digital-government-innovations/responsible-use-ai/guide-use-generative-ai.html>.

<sup>10</sup> <https://www.canada.ca/en/treasury-board-secretariat/services/access-information-privacy/privacy/guidance-preparing-information-sharing-agreements-involving-personal-information.html>.

<sup>11</sup> <https://www.canada.ca/en/treasury-board-secretariat/services/access-information-privacy/access-information-privacy-notices/privacy-implementation-notice-2023-03.html>.

On October 4, 2023, TBS published its guide entitled: “*Privacy Act: Plain Language Guide to Exemptions and Exclusions*”.<sup>12</sup> The publication of this guide fulfills a commitment made by the Minister in her “*National Action Plan on Open Government*”. The guide provides clear language on the context, rationale, and details for each exemption or exclusion applied under the *Privacy Act*. With this publication, the Minister aims to provide transparency to requesters on why information has been redacted in their access requests. To support the TBS Minister, PSP ATIP office will review whether it needs to align its response letters, issued under the *Privacy Act*, to include a reference to the guide.

## Privacy Breaches

On March 1, 2024, the TBS Minister updated Appendix B of TBS *Directive on Privacy Practices*. With this update, the Minister established revised mandatory procedures to contain any potential or confirmed privacy breaches. These revised mandatory procedures for privacy breaches were updated to include new required information to be provided to TBS and the OPC when reporting material privacy breaches. It also prescribes the *Privacy Act Material Breach Reporting form* to be used.<sup>13</sup> By using the form, PSP ATIP office will ensure that it meets its material breach reporting requirements. The TBS/OPC privacy breach form is accompanied by an update to the TBS *Privacy Breach Management Toolkit*.<sup>14</sup> The TBS toolkit provides guidance on managing privacy breaches and is meant to provide guidance to employees working in programs across federal institutions as well as ATIP officials. The toolkit includes downloadable tools to assist in assessing and communicating breaches. Where appropriate, PSP ATIP office will review whether it needs to align any internal initiatives, described above in VI.1, with those set out in the updated TBS *Directive on Privacy Practices* and the TBS *Privacy Breach Management Toolkit*.

Concurrently, by updating Appendix I of TBS *Directive on Security Management*,<sup>15</sup> the TBS Minister has implemented the TBS *Standard on Security Event Reporting*.<sup>16</sup> This standard came into effect on March 1, 2024. PSP ATIP office has already aligned its internal initiatives with those set out in this standard.

## Program Monitoring

<sup>12</sup> <https://www.canada.ca/en/treasury-board-secretariat/services/access-information-privacy/pa-plain-language-guide.html#toc-1>.

<sup>13</sup> <https://www.canada.ca/en/treasury-board-secretariat/corporate/forms.html> (TBS Form entitled: “*Privacy Act Material Breach Report Form*”); or at <https://www.priv.gc.ca/en/report-a-concern/report-a-privacy-breach-at-your-organization/report-a-privacy-breach-at-your-federal-institution/> (OPC Form entitled: “*Report a privacy breach at your federal institution*”).

<sup>14</sup> <https://www.canada.ca/en/treasury-board-secretariat/services/access-information-privacy/privacy/privacy-policies-guidance/breach-management.html>.

<sup>15</sup> <https://www.tbs-sct.canada.ca/pol/doc-eng.aspx?id=32611>.

<sup>16</sup> <https://www.tbs-sct.canada.ca/pol/doc-eng.aspx?id=32613>.

On July 24, 2023, TBS published *Privacy Implementation Notice 2023-02: Personal information for program monitoring, evaluation and reporting purposes*.<sup>17</sup> The TBS implementation notice serves to assist PSP in collecting, using, retaining, and disclosing personal information for program monitoring, evaluation and reporting purposes, including for Gender-based Analysis Plus, and provides guidance regarding the management of personal information for such non-administrative uses. Where necessary, PSP ATIP office will review whether it needs to align any internal initiatives, described above in VI.1, with those set out in Privacy Implementation Notice 2023-02.

### PSPIB Info Source

PSPIB is currently completing the annual update of its information holdings inventory and will review whether it needs to realign the overall content of the publication to align it with the 2023-24 *Access to Information Act Annual Report*, and with the 2023-24 *Privacy Act Annual Report*, which set out its Results Framework.

## VIII. Summary of Key Issues and Actions Taken on Complaints and Court Cases

Applicants have the right to register a complaint with the OPC regarding any matter relating to the processing of a request.

<b>Type of complaint</b>	<b>Numbers of complaints</b>
Time limits	0
Delay: deemed refusal	0
Refusal: exemptions	0
Refusal: exclusion	0
Refusal: missing records	0
Miscellaneous	0
Total	0

In fiscal year 2023-24, the OPC issued no findings against PSP.

<sup>17</sup> <https://www.canada.ca/en/treasury-board-secretariat/services/access-information-privacy/access-information-privacy-notices/2023-02-evaluation.html>.



**Table 2: Complaints closed by the OPC in 2023-24**

Disposition of complaint	Numbers of findings	Type of complaint
Not well-founded	0	N/A
Discontinued	0	N/A
Well-founded	0	N/A
<b>Total</b>	<b>0</b>	

### Court Cases

There have been no court cases against PSP, in relation to the *Privacy Act*, since 2004.

## IX. Material Privacy Breaches

The PSP ATIP office continues to provide awareness regarding privacy risks, breach avoidance and breach responses. In fiscal year 2023-24, PSP experienced 1 material privacy breach caused by a service provider (third party) related to an email transmission error. The service provider's employee mistakenly sent PSP data (names, personal identifiers, date of birth, etc.) by secure email directly to another third party. Upon receipt, the unintended recipient immediately informed PSP of the situation. The email and the PSP data were promptly deleted. The unintended recipient also confirmed that no one else had access to the PSP data before it was deleted. PSP reported this material privacy breach to the TBS Privacy and Responsible Data Division, and to the OPC. The OPC indicated that it has closed its file on the matter.

## X. Privacy Impact Assessments and Privacy Reviews

### Privacy reviews

PSP continually assesses its current level of privacy exposure through rigorous legal privacy reviews. PSP ensures that unique areas of concern or atypical personal data handling practices of which it is made aware are assessed, privacy issues identified, and recommendations are provided to mitigate such issues. In fiscal year 2023-24, in Canada, PSP conducted 8 privacy reviews (compared with 39 in fiscal 2022-23, and 55 in fiscal 2021-22).

### Privacy Impact Assessments

In fiscal 2023-24, a PIA on the PSP HR program was submitted for review and approval. No other PIAs, which would satisfy the TBS *Directive on Privacy Impact Assessment Directive* were completed, and approved under section 10 of the *Privacy Act*.

### Strategic risks

PSP refreshed its privacy strategic risk profile to identify and focus attention on the most prominent threats to the management and safeguarding of personal information under PSP's control. Significant strides have been made to implement practices that allow for the effective safeguarding of personal information as an integrated part of operations. Risk management includes monitoring a rapidly changing context, including cybersecurity, information management, and contracts.

## XI. Public Interest Disclosures

Paragraphs 8(2)(e), (f), (g), and (m) of the *Privacy Act* permit the disclosure of personal information to various investigative/regulatory bodies or to Members of Parliament, or if disclosure is in the public interest.

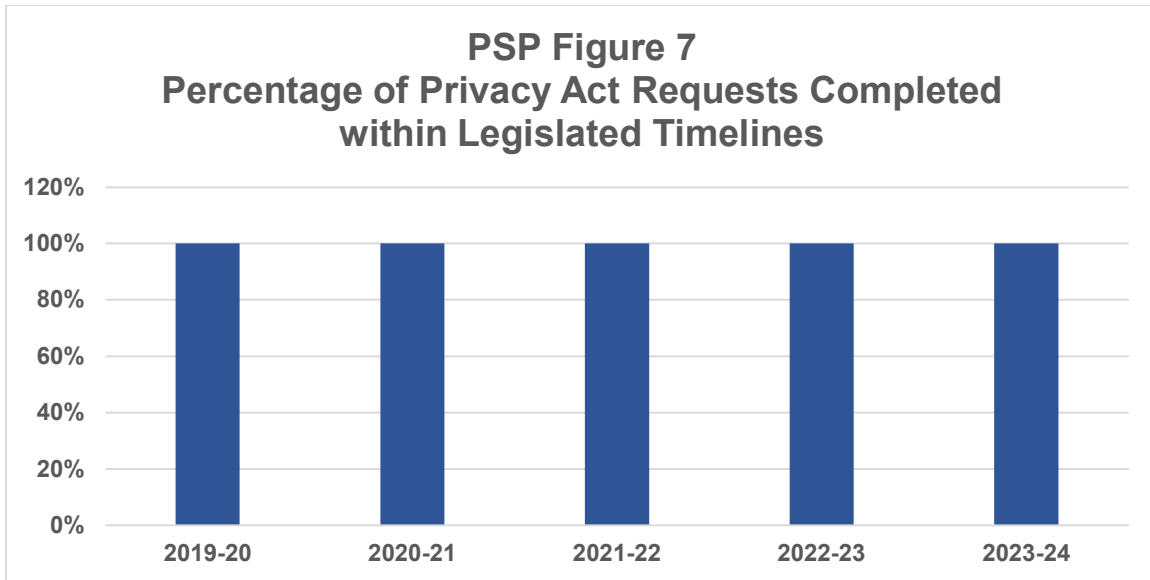
No disclosures under subsection 8(2), including under paragraph 8(2)(m), were made in fiscal year 2023-24.

## XII. Monitoring Compliance

As evidenced by our **100%** on-time performance year after year, PSP's ATIP office closely monitors the time it takes to process privacy requests. Compliance is ensured on an on-going basis through the use of a privacy request tracking system.

### On-Time Compliance Rate and Completion Times

The on-time compliance rate is the percentage of requests responded to within their legislative timelines, including requests for which the institution invoked legislative extensions. In fiscal year 2023-24, the PSP ATIP office achieved **100%** on-time compliance rate. **Figure 7** shows, for the years 2019-20 to 2023-24, PSP's compliance rate for processing formal requests under the *Privacy Act*.



During the fiscal year 2023-24, **87.8%** of all responses were issued within 15 days of receipt of requests, and the remaining within the initial 30 days of receipt of requests.

When required, follow-up is conducted on an on-going basis, and reminders of unassigned tasks are sent.

Finally, the ATIP office produces a variety of regular and ad hoc reports to monitor PSP's compliance with the *Privacy Act* through the quarterly review of key risk indicators and regular reviews of key performance indicators.

**Appendix A: List of Relevant Wholly-Owned Subsidiaries**

<b>PUBLIC SECTOR PENSION INVESTMENT BOARD/ OFFICE D'INVESTISSEMENT DES RÉGIMES DE PENSIONS DU SECTEUR PUBLIC</b>			
<b>RELEVANT WHOLLY-OWNED SUBSIDIARIES (as of March 31, 2024) FILIALES À PROPRIÉTÉ EXCLUSIVE CONCERNÉES (au 31 mars 2024)</b>			
	<b>Name of Subsidiary</b>	<b>French Version in Corporate Name</b>	<b>French Business Name</b>
1.	14602889 Canada Inc.	N/A	N/A
2.	3Net Indy Holdings Inc.	N/A	Gestion 3Net Indy
3.	3Net Indy Investments Inc.	N/A	Investissements 3Net Indy
4.	7986386 CANADA INC.	N/A	N/A
5.	8599963 Canada Inc.	N/A	N/A
6.	Argentia Private Investments Inc.	N/A	Argentia Investissements Privés
7.	AviAlliance Canada Inc.	N/A	N/A
8.	Belle Bay Private Investments Inc.	N/A	Investissements Privés Belle Bay
9.	Blue & Gold Private Investments Inc.	N/A	Blue & Gold Investissements Privés
10.	Canada Growth Fund Investment Management Inc./Gestion d'actifs fonds de croissance du Canada Inc.	Gestion d'actifs fonds de croissance du Canada Inc.	N/A
11.	Datura Private Investments Inc.	N/A	Datura Investissements Privés
12.	Downsview Metro Devco Inc.	N/A	Gestion Downsview Métro Devco
13.	FirstLight Holding Inc.	N/A	N/A
14.	Galvaude Private Investments Inc.	N/A	Investissements Privés Galvaude
15.	Indo-Infra Inc.	N/A	Gestion Indo-Infra
16.	Infra TM Investments Inc.	N/A	Investissements Infra TM
17.	Infra-PSP Canada Inc.	N/A	N/A
18.	Infra-PSP Credit Inc.	N/A	Infra-PSP Crédit
19.	Infra-PSP ECEF Inc.	N/A	N/A
20.	Infra-PSP Partners Inc.	N/A	Infra-PSP Associés
21.	Ivory Private Investments Inc.	N/A	Ivory Investissements Privés
22.	Kings Island Private Investments Inc.	N/A	Kings Island Investissements Privés
23.	Northern Fjord Holdings Inc.	N/A	Gestion Northern Fjord
24.	Port-aux-Choix Private Investments Inc.	N/A	Port-aux-Choix Investissements Privés
25.	Potton Holdings Inc.	N/A	Gestion Potton
26.	PSP Capital Inc.	N/A	N/A
27.	PSP FINCO Inc.	N/A	N/A
28.	PSP FINCO LATAM INC.	N/A	Gestion PSP Finco Latam
29.	PSP Investments Asia Limited	N/A	N/A

<b>PUBLIC SECTOR PENSION INVESTMENT BOARD/ OFFICE D'INVESTISSEMENT DES RÉGIMES DE PENSIONS DU SECTEUR PUBLIC</b>				
<b>RELEVANT WHOLLY-OWNED SUBSIDIARIES (as of March 31, 2024) FILIALES À PROPRIÉTÉ EXCLUSIVE CONCERNÉES (au 31 mars 2024)</b>				
	<b>Name of Subsidiary</b>	<b>French Version in Corporate Name</b>	<b>French Business Name</b>	
30.	PSP Investments Canada Inc./Investissements Canada Inc.	Investissements PSP Canada Inc.	N/A	
31.	PSP Investments Holding Europe Ltd	N/A	N/A	
32.	PSP Investments USA LLC	N/A	N/A	
33.	PSP Public Credit I Inc.	N/A	PSP Crédit Public I	
34.	PSP Public Credit Opportunities Inc.	N/A	Opportunités de Crédit Public PSP	
35.	PSP Public Markets Inc.	N/A	PSP Marchés Publics	
36.	PSPIB Bromont Investments Inc.	N/A	Investissements PSPIB Bromont	
37.	PSPIB CLUSTER INVESTMENTS INC.	N/A	Investissements PSPIB Cluster	
38.	PSPIB Deep South Inc.	N/A	Gestion PSPIB Deep South	
39.	PSPIB DevCol Inc.	N/A	Gestion PSPIB DevCol	
40.	PSPIB Emerald Inc.	N/A	Gestion PSPIB Emerald	
41.	PSPIB G.P. Finance Inc.	N/A	PSPIB Commandité Finance	
42.	PSPIB G.P. Inc.	N/A	PSPIB Commandité	
43.	PSPIB G.P. Partners Inc.	N/A	PSPIB Commandité Associés	
44.	PSPIB GIPP D1 Inc.	N/A	N/A	
45.	PSPIB Golden Range Cattle II Inc.	N/A	Gestion PSPIB Golden Range Cattle II	
46.	PSPIB Golden Range Cattle Inc.	N/A	Gestion PSPIB Golden Range Cattle	
47.	PSPIB Homes Inc.	N/A	Gestion PSPIB Homes	
48.	PSPIB LUNAR INVESTMENTS INC.	N/A	Investissements PSPIB Lunar	
49.	PSPIB MEXICO GP INC.	N/A	Commandité PSPIB Mexico	
50.	PSPIB Michigan G.P. Inc.	N/A	PSPIB Michigan Commandité	
51.	PSPIB Orchid Inc.	N/A	Gestion PSPIB Orchid	
52.	PSPIB Paisas Inc.	N/A	Gestion PSPIB Paisas	
53.	PSPIB Pennsylvania Investments Inc.	N/A	Investissements Pennsylvania	PSPIB
54.	PSPIB Realty International Inc. / PSPIB Immobilier International Inc.	PSPIB Immobilier International Inc.	N/A	
55.	PSPIB REITCO I Inc.	N/A	Gestion PSPIB REITCO I	
56.	PSPIB SERVICES USA LLC	N/A	N/A	
57.	PSPIB Stanley Investments Inc.	N/A	N/A	
58.	PSPIB Steam Investments Inc.	N/A	Investissements PSPIB Steam	

<b>PUBLIC SECTOR PENSION INVESTMENT BOARD/ OFFICE D'INVESTISSEMENT DES RÉGIMES DE PENSIONS DU SECTEUR PUBLIC</b>			
<b>RELEVANT WHOLLY-OWNED SUBSIDIARIES (as of March 31, 2024) FILIALES À PROPRIÉTÉ EXCLUSIVE CONCERNÉES (au 31 mars 2024)</b>			
	<b>Name of Subsidiary</b>	<b>French Version in Corporate Name</b>	<b>French Business Name</b>
59.	PSPIB THOR INVESTMENTS INC.	N/A	Investissements PSPIB Thor
60.	PSPIB Unitas Investments II Inc.	N/A	N/A
61.	PSPIB Unitas Investments Inc.	N/A	N/A
62.	PSPIB WEXFORD INVESTMENTS INC.	N/A	Investissements PSPIB Wexford
63.	PSPIB-AI Investments Inc.	N/A	Investissements PSPIB-AI
64.	PSPIB-Andes Inc.	N/A	Gestion PSPIB-Andes
65.	PSPIB-ARE CANADA INC.	N/A	Gestion PSPIB-ARE CANADA
66.	PSPIB-ARE SERVICES INC.	N/A	SERVICES PSPIB-ARE
67.	PSPIB-Condor Inc.	N/A	N/A
68.	PSPIB-Eldorado Inc.	N/A	Gestion PSPIB-Eldorado
69.	PSPIB-ILS INVESTMENTS INC.	N/A	Investissements PSPIB-ILS
70.	PSPIB-LSF Inc.	N/A	N/A
71.	PSPIB-RE FINANCE II INC.	N/A	Gestions PSPIB-RE Finance II
72.	PSPIB-RE Finance Inc.	N/A	N/A
73.	PSPIB-RE Finance Partners II Inc.	N/A	PSPIB-RE Finance Associés II
74.	PSPIB-RE Finance Partners Inc.	N/A	PSPIB-RE Finance Associés
75.	PSPIB-RE MANCHESTER INC.	N/A	Gestion PSPIB-RE Manchester
76.	PSPIB-RE Partners II Inc.	N/A	PSPIB-RE Associés II
77.	PSPIB-RE Partners Inc.	N/A	PSPIB-RE Associés
78.	PSPIB-RE UK Inc.	N/A	Gestion PSPIB-RE UK
79.	PSPIB-SDL Inc.	N/A	N/A
80.	PSPIB-Star Inc.	N/A	PSPIB-Étoile
81.	Red Isle Private Investments Inc.	N/A	Red Isle Investissements Privés
82.	Revera Inc.	N/A	N/A
83.	Sooke Investments Inc.	N/A	Investissements Sooke
84.	Trinity Bay Private Investments Inc.	N/A	Placements Privés Trinity Bay
85.	Vertuous Energy Canada Inc.	N/A	Énergie Vertuous Canada
86.	VOP Investments Inc.	N/A	Investissements VOP

It should be noted that *Revera Inc.* (line 82 above) is an active subsidiary. The reporting requirements of an active subsidiary are met by separate reports, prepared by Revera Inc.'s ATIP Coordinator. If you have any questions, please see <https://www.tbs-sct.canada.ca/ap/atip-airpr/coord-eng.asp>.

## Appendix B: Delegation Order

**Public Sector Pension Investment Board  
("PSPIB")  
and its Wholly-Owned Subsidiaries**


**Delegation Order ("Order")**

(section 95(1), *Access to Information Act*,

R.S.C. 1985, c. A-1, as amended and section 73, *Privacy Act*, R.S.C. 1985, c. P-21, as amended)

1. This Order may be cited as the "PSPIB and wholly-owned subsidiaries of PSPIB Head of Institution Delegation Order pursuant to the *Access to Information Act* and *Privacy Act*".
2. Pursuant to Section 95(1) of the *Access to Information Act* and Section 73 of the *Privacy Act*, the undersigned, acting in her capacity of head of PSPIB, its Wholly-Owned Subsidiaries in existence as of the date of this Order as well as those which may hereafter be established, PSP Investments USA LLC, PSP Investments Holding Europe Ltd and PSP Investments Asia Limited (the "**Government Institutions**"), hereby designate the persons holding the positions set out in the schedule set forth in the attached Section 4 below, or the persons occupying on an acting basis those positions, to exercise her powers, duties and functions, 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 for the Government Institutions.
3. For the purposes of this Order, "**Wholly-Owned Subsidiaries**" shall include all Canadian wholly-owned subsidiaries of PSPIB which are corporations, with the exception of those subsidiaries with their own heads.

This Delegation Order has been made in Montreal and is effective starting on the 1st day of September 2022.

DocuSigned by:  
  
62E84EED667B4E3  
Deborah K. Orida  
President and CEO

## 4. Schedule

**PSPIB**  
**Delegation of Authority**  
 Under the *Access to Information Act* and the *Privacy Act*

<b>Position/Title</b>	<b><i>Access to Information Act</i> and Regulations</b>	<b><i>Privacy Act</i> and Regulations</b>
<b>Senior Vice President and Chief Legal Officer</b>	Full authority	Full authority
<b>Senior Director or Managing Director, Legal Affairs and ATIP Coordinator</b>	Full authority	Full authority
<b>Advisor/Senior Advisor/Counsel or equivalent, Access to Information and Privacy</b>	Full authority	Full authority
<b>Advisor/Senior Advisor/Counsel or equivalent, Privacy</b>	Full authority	Full authority
<b>Administrative Analyst or equivalent, Legal Affairs</b>	Paragraph 7(a) Section 9	Paragraph 14(a) Section 15



## Appendix C: Statistical Report



### Statistical Report on the *Privacy Act*

Name of institution: PSPIB and relevant wholly-owned subsidiaries

Reporting period: 2023-04-01 to 2024-03-31

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

##### 1.1 Number of requests received

		Number of Requests
Received during reporting period		190
Outstanding from previous reporting periods		2
• Outstanding from previous reporting period	2	
• Outstanding from more than one reporting period	0	
<b>Total</b>		<b>192</b>
Closed during reporting period		188
Carried over to next reporting period		4
• Carried over within legislated timeline	4	
• Carried over beyond legislated timeline	0	

##### 1.2 Channels of requests

Source	Number of Requests
Online	183
E-mail	7
Mail	0
In person	0
Phone	0
Fax	0
<b>Total</b>	<b>190</b>

#### Section 2: Informal requests

##### 2.1 Number of informal requests

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

##### 2.2 Channels of informal requests

Source	Number of Requests
Online	0
E-mail	0
Mail	0
In person	0
Phone	0
Fax	0
<b>Total</b>	<b>0</b>

##### 2.3 Completion time of informal requests

Completion Time							Total
0 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	
0	0	0	0	0	0	0	0

2.4 Pages released informally

Less Than 100 Pages Released		100-500 Pages Released		501-1000 Pages Released		1001-5000 Pages Released		More Than 5000 Pages Released	
Number of Requests	Pages Released	Number of Requests	Pages Released	Number of Requests	Pages Released	Number of Requests	Pages Released	Number of Requests	Pages Released
0	0	0	0	0	0	0	0	0	0

**Section 3: Requests Closed During the Reporting Period**

3.1 Disposition and completion time

Disposition of Requests	Completion Time							Total
	0 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	2	0	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	163	21	0	0	0	0	0	184
Request abandoned	2	0	0	0	0	0	0	2
Neither confirmed nor denied	0	0	0	0	0	0	0	0
<b>Total</b>	<b>165</b>	<b>23</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>188</b>

3.2 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)	1	24(b)	0
19(1)(d)	0	22(1)(c)	0	25	0
19(1)(e)	0	22(2)	0	26	2
19(1)(f)	0	22.1	0	27	2
20	0	22.2	0	27.1	0
21	0	22.3	0	28	0
		22.4	0		

3.3 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

3.4 Format of information released

Paper	Electronic				Other
	E-record	Data set	Video	Audio	
0	2	0	0	0	0

3.5 Complexity

3.5.1 Relevant pages processed and disclosed for paper, e-record and dataset formats

Number of Pages Processed	Number of Pages Disclosed	Number of Requests
223	223	2

3.5.2 Relevant pages processed per request disposition for paper, e-record and dataset formats by size of requests

Disposition	Less Than 100 Pages Processed		100-500 Pages Processed		501-1000 Pages Processed		1001-5000 Pages Processed		More Than 5000 Pages Processed	
	Number of Requests	Pages Processed	Number of Requests	Pages Processed	Number of Requests	Pages Processed	Number of Requests	Pages Processed	Number of Requests	Pages Processed
All disclosed	0	0	0	0	0	0	0	0	0	0
Disclosed in part	1	6	1	217	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>1</b>	<b>6</b>	<b>1</b>	<b>217</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>

3.5.3 Relevant minutes processed and disclosed for audio formats

Number of Minutes Processed	Number of Minutes Disclosed	Number of Requests
0	0	2

3.5.4 Relevant minutes processed per request disposition for audio formats by size of requests

Disposition	Less than 60 Minutes processed		60-120 Minutes processed		More than 120 Minutes processed	
	Number of requests	Minutes Processed	Number of requests	Minutes Processed	Number of requests	Minutes Processed
All disclosed	0	0	0	0	0	0
Disclosed in part	0	0	0	0	0	0
All exempted	0	0	0	0	0	0
All excluded	0	0	0	0	0	0
Request abandoned	2	0	0	0	0	0
Neither confirmed nor denied	0	0	0	0	0	0
<b>Total</b>	<b>2</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>

3.5.5 Relevant minutes processed and disclosed for video formats

Number of Minutes Processed	Number of Minutes Disclosed	Number of Requests
0	0	0

3.5.6 Relevant minutes processed per request disposition for video formats by size of requests

Disposition	Less than 60 Minutes processed		60-120 Minutes processed		More than 120 Minutes processed	
	Number of requests	Minutes Processed	Number of requests	Minutes Processed	Number of requests	Minutes Processed
All disclosed	0	0	0	0	0	0
Disclosed in part	0	0	0	0	0	0
All exempted	0	0	0	0	0	0
All excluded	0	0	0	0	0	0
Request abandoned	0	0	0	0	0	0
Neither confirmed nor denied	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>

3.5.7 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>

3.6 Closed requests

3.6.1 Number of requests closed within legislated timelines

Number of requests closed within legislated timelines	188
Percentage of requests closed within legislated timelines (%)	100

3.7 Deemed refusals

3.7.1 Reasons for not meeting legislated timelines

Number of requests closed past the legislated timelines	Principal Reason			
	Interference with operations / Workload	External Consultation	Internal Consultation	Other
0	0	0	0	0

3.7.2 Request closed beyond legislated timelines (including any extension taken)

Number of days past legislated timelines	Number of requests past legislated timeline where no extension was taken	Number of requests past legislated timeline 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>	<b>0</b>	<b>0</b>	<b>0</b>

3.8 Requests for translation

Translation Requests	Accepted	Refused	Total
English to French	0	0	0
French to English	0	0	0
<b>Total</b>	<b>0</b>	<b>0</b>	<b>0</b>

**Section 4: Disclosures Under Subsections 8(2) and 8(5)**

Paragraph 8(2)(e)	Paragraph 8(2)(m)	Subsection 8(5)	Total
0	0	0	0

**Section 5: 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>	<b>0</b>

**Section 6: Extensions**

6.1 Reasons for extensions

Number of extensions taken	15(a)(i) Interference with operations				15 (a)(ii) Consultation			15(b) Translation purposes or conversion
	Further review required to determine exemptions	Large volume of pages	Large volume of requests	Documents are difficult to obtain	Cabinet ConfidenceSection (Section 70)	External	Internal	
0	0	0	0	0	0	0	0	0

6.2 Length of extensions

Length of Extensions	15(a)(i) Interference with operations				15 (a)(ii) Consultation			15(b) Translation purposes or conversion
	Further review required to determine exemptions	Large volume of pages	Large volume of requests	Documents are difficult to obtain	Cabinet ConfidenceSection (Section 70)	External	Internal	
1 to 15 days	0	0	0	0	0	0	0	0
16 to 30 days	0	0	0	0	0	0	0	0
31 days or greater	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>

**Section 7: Consultations Received From Other Institutions and Organizations**

7.1 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>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>
Closed during the reporting period	0	0	0	0
Carried over within negotiated timelines	0	0	0	0
Carried over beyond negotiated timelines	0	0	0	0

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

Recommendation	Number of Days Required to Complete Consultation Requests							Total
	0 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	
Disclose entirely	0	0	0	0	0	0	0	0
Disclose in part	0	0	0	0	0	0	0	0
Exempt entirely	0	0	0	0	0	0	0	0
Exclude entirely	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>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>

7.3 Recommendations and completion time for consultations received from other organizations outside the Government of Canada

Recommendation	Number of days required to complete consultation requests							Total
	0 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	
Disclose entirely	0	0	0	0	0	0	0	0
Disclose in part	0	0	0	0	0	0	0	0
Exempt entirely	0	0	0	0	0	0	0	0
Exclude entirely	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>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>

**Section 8: Completion Time of Consultations on Cabinet Confidences**

8.1 Requests with Legal Services

Number of Days	Fewer Than 100 Pages Processed		100-500 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>	<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>

8.2 Requests with Privy Council Office

Number of Days	Fewer Than 100 Pages Processed		100-500 Pages Processed		501-1000 Pages Processed		1001-5000 Pages Processed		More than 5000 Pages Processed	
	Requests	Pages Disclosed	Requests	Pages Disclosed	Requests	Pages Disclosed	Requests	Pages Disclosed	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>	<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>

**Section 9: Complaints and Investigations Notices Received**

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

**Section 10: Privacy Impact Assessments (PIAs) and Personal Information Banks (PIBs)**

10.1 Privacy Impact Assessments

Number of PIAs completed	0
Number of PIAs modified	0

10.2 Institution-specific and Central Personal Information Banks

Personal Information Banks	Active	Created	Terminated	Modified
Institution-specific	0	0	0	0
Central	0	0	0	0
<b>Total</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>

**Section 11: Privacy Breaches**

11.1 Material Privacy Breaches reported

Number of material privacy breaches reported to TBS	1
Number of material privacy breaches reported to OPC	1

11.2 Non-Material Privacy Breaches

Number of non-material privacy breaches	3
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**Section 12: Resources Related to the Privacy Act**

12.1 Allocated Costs

Expenditures	Amount
Salaries	\$147 984
Overtime	\$0
Goods and Services	\$845 222
• Professional services contracts	\$845 222
• Other	\$0
<b>Total</b>	<b>\$993 206</b>

12.2 Human Resources

Resources	Person Years Dedicated to Privacy Activities
Full-time employees	1,231
Part-time and casual employees	0,000
Regional staff	0,000
Consultants and agency personnel	1,035
Students	0,000
<b>Total</b>	<b>2,266</b>

Note: Enter values to three decimal places.

## Appendix D: Supplemental Statistical Report



### Supplemental Statistical Report on the *Access to Information Act* and the *Privacy Act*

Name of institution: PSPIB and relevant wholly-owned subsidiaries

Reporting period: 2023-04-01 to 2024-03-31

**Section 1: Open Requests and Complaints Under the *Access to Information Act***

1.1 Enter the number of open requests that are outstanding from previous reporting periods.

Fiscal Year Open Requests Were Received	Open Requests that are <i>Within</i> Legislated Timelines as of March 31, 2024	Open Requests that are <i>Beyond</i> Legislated Timelines as of March 31, 2024	Total
Received in 2023-24	3	0	3
Received in 2022-23	0	0	0
Received in 2021-22	0	0	0
Received in 2020-21	0	0	0
Received in 2019-20	0	0	0
Received in 2018-19	0	0	0
Received in 2017-18	0	0	0
Received in 2016-17	0	0	0
Received in 2015-16	0	0	0
Received in 2014-15 or earlier	0	0	0
<b>Total</b>	<b>3</b>	<b>0</b>	<b>3</b>

Row 11, Col. 3 of Section 1.1 must equal Row 7, Col. 1 of Section 1.1 of the 2023-24 Statistical Report on the *Access to Information Act*

1.2 Enter the number of open complaints with the Information Commissioner of Canada that are outstanding from previous reporting periods.

Fiscal Year Open Complaints Were Received by Institution	Number of Open Complaints
Received in 2023-24	2
Received in 2022-23	0
Received in 2021-22	0
Received in 2020-21	0
Received in 2019-20	0
Received in 2018-19	0
Received in 2017-18	0
Received in 2016-17	0
Received in 2015-16	0
Received in 2014-15 or earlier	1
<b>Total</b>	<b>3</b>

**Section 2: Open Requests and Complaints Under the *Privacy Act***

2.1 Enter the number of open requests that are outstanding from previous reporting periods.

Fiscal Year Open Requests Were Received	Open Requests that are <i>Within</i> Legislated Timelines as of March 31, 2024	Open Requests that are <i>Beyond</i> Legislated Timelines as of March 31, 2024	Total
Received in 2023-24	4	0	4
Received in 2022-23	0	0	0
Received in 2021-22	0	0	0
Received in 2020-21	0	0	0
Received in 2019-20	0	0	0
Received in 2018-19	0	0	0
Received in 2017-18	0	0	0
Received in 2016-17	0	0	0
Received in 2015-16	0	0	0
Received in 2014-15 or earlier	0	0	0
<b>Total</b>	<b>4</b>	<b>0</b>	<b>4</b>

Row 11, Col. 3 of Section 2.1 must equal Row 7, Col. 1 of Section 1.1 of the 2023-24 Statistical Report on the *Privacy Act*

2.2 Enter the number of open complaints with the Privacy Commissioner of Canada that are outstanding from previous reporting periods.

Fiscal Year Open Complaints Were Received by Institution	Number of Open Complaints
Received in 2023-24	0
Received in 2022-23	0
Received in 2021-22	0
Received in 2020-21	0
Received in 2019-20	0
Received in 2018-19	0
Received in 2017-18	0
Received in 2016-17	0
Received in 2015-16	0
Received in 2014-15 or earlier	0
<b>Total</b>	<b>0</b>

**Section 3: Social Insurance Number**

Has your institution begun a new collection or a new consistent use of the SIN in 2023-24?	No
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**Section 4: Universal Access under the *Privacy Act***

How many requests were received from foreign nationals outside of Canada in 2023-24?	178
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Row 1, Col. 1 of Section 4 must be equal to or less than Row 1, Col. 1 of Section 1.1 of the 2023-24 Statistical Report on the *Privacy Act*





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