ANNUAL REPORT ON THE ADMINISTRATION OF THE *PRIVACY ACT*

Export Development Canada

1 April 2025 – 31 March 2026



Canada

EDC
TAKE ON THE WORLD

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INTRODUCTION

The purpose of the *Privacy Act* ("Act") is to protect the privacy of individuals with respect to their personal information held by government institutions and provide them with a right of access to that information.

Export Development Canada ("EDC") is a crown corporation and an agent of His Majesty in Right of Canada with a mandate to support and develop trade between Canada and other countries and Canada's competitiveness in the international marketplace, and to provide development financing and other forms of development support. EDC's mandate also includes supporting and developing domestic business, where requested by the Minister of International Trade and the Minister of Finance.

This report is prepared and tabled in Parliament in accordance with section 72 of the Act. For clarity, this report relates to EDC and also meets the reporting requirements of EDC's wholly owned non-operational subsidiary, Exinvest Inc. A separate report is prepared and tabled for EDC's wholly owned operating subsidiary, Development Finance Institute Canada Inc. ("FinDev Canada").

ORGANIZATIONAL STRUCTURE

EDC's Privacy and Information Risk ("P&IR") Team is part of the Compliance and Ethics Group. The P&IR Team has, among other responsibilities, primary responsibility for administering the *Privacy Act* and the *Access to Information Act* and is responsible for responding to requests submitted to EDC under these Acts. Throughout the reporting period, the team was comprised of 6 full-time employees, with 2 employees dedicated to Privacy. The team was overseen by the Director, Ethics, Privacy and Information Risk, who reported to the Chief Compliance and Ethics Officer, who in turn reported to EDC's Senior Vice-President, Global Risk Management and Chief Risk Officer.

EDC has agreements in place, entered into pursuant to section 73.1 of the Act, for the provision of privacy services to FinDev Canada and Exinvest Inc.

DELEGATION ORDER

A copy of the delegation order that was made pursuant to section 73.1 of the Act and was in effect at the end of the reporting period is attached at Appendix A.

PERFORMANCE 2025-2026

Below is an overview of key data on EDC's performance in managing requests received under the Privacy Act during the reporting period.

- EDC received 7 new requests under the Act during the reporting period.
- 10 requests were completed during the reporting period. All (100%) were completed within legislated timelines, including 3 that were carried over from the previous reporting period.
- Of the 10 requests completed during the reporting period:

- 0 were completed within 1-15 days;
- 8 were completed within 16-30 days; and
- 2 were completed within 31-60 days.

- No requests remained active at the end of the reporting period.

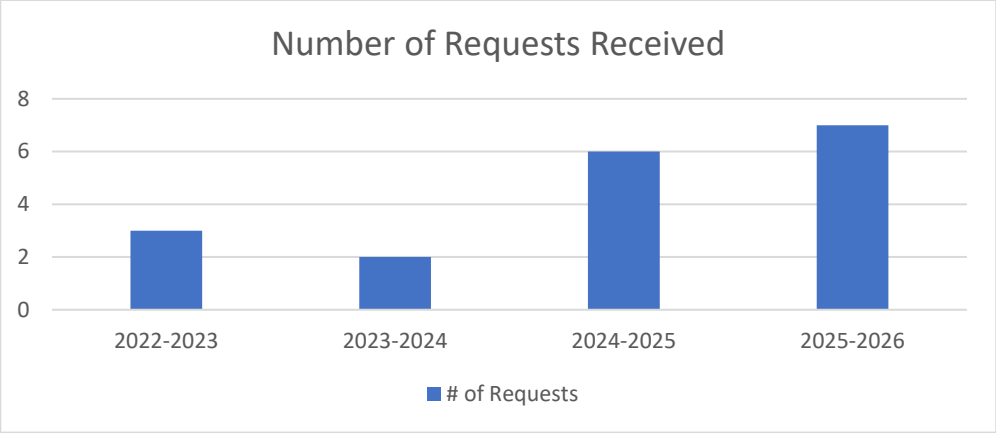
- 2 requests required an extension: 1 under section 15(a)(i) for further review to determine exemptions, and 1 under 15(a)(ii) to allow time for internal consultations.

- Of the requests completed:
  - 8 involved records that were "disclosed in part" (as compared to "all disclosed");
  - 1 request was abandoned by the applicant; and
  - 1 request resulted in no records being identified.

- As of the last day of the reporting period, there were no active complaints.

- No requests for consultation were received from other government institutions; 1 consultation request was received from another organization.

EDC had an increase in the number of personal information requests compared to the previous reporting periods. The chart below shows the trend for the past 4 reporting periods.



TRAINING AND AWARENESS

EDC implemented various training and awareness initiatives during the reporting period to ensure compliance with the Act.

Mandatory Privacy Training for All Employees

EDC maintained its commitment to mandatory privacy and access to information training during the year. This training is delivered through structured e-learning modules that include narrated content, interactive slides, and assessment questions to reinforce learning outcomes.

New employees must complete training upon commencement of their employment. Completion is tracked automatically in the learning management system. Leaders are responsible for ensuring that employees fulfill the mandatory privacy and access training requirements and for promoting privacy and access awareness within their teams.

A privacy and access refresher training was also launched for the first time during the reporting period. This mandatory e-learning module was delivered to all employees. Completion was tracked through the learning management system. Going forward, annual recurrent training will be updated and delivered to employees on a mandatory basis each year.

During the reporting period, all employees completed formal privacy and access training.

Specialized Training

Members of the P&IR Team with functional responsibility for the administration of the Act continued to receive in-depth training required to uphold their duties under the Act.

During the reporting period, team members participated in several events organized by Treasury Board Secretariat (e.g., ATIP Communities meetings, Deep Dive Series, Info Blitz, "Ask me Anything" Sessions). Some of the members also attended conferences organized by leading information privacy associations.

Awareness Initiatives and Informal Learning

EDC promoted privacy awareness through various informal and organization-wide efforts, including publication of several privacy-related articles on its internal communications platform to highlight timely privacy topics and reinforce best practices.

POLICIES, GUIDELINES AND PROCEDURES

During the reporting period, EDC made a series of updates to a range of institution-specific privacy procedures. Some changes apply to internal privacy team operations, and others apply organization wide. These updates were primarily intended to enhance alignment with Treasury Board Secretariat policies and directives. They introduced more refined triggers for privacy impact assessments and privacy protocols, as well as the required use of Treasury Board Secretariat-prescribed forms and documentation.

The following procedures were updated during the reporting period:

- Managing Privacy Impact Procedure
- Access to Personal Information Procedure
- Correction of Personal Information Procedure
- Privacy Complaints Handling Procedure
- Personal Information Index Procedure

Social Insurance Numbers

EDC did not initiate any new collections or consistent uses of Social Insurance Numbers during the reporting period.

Contractual Safeguards

To ensure the protection of personal information in contractual arrangements and information sharing agreements, EDC's standard contractual templates, particularly those used for vendors and service providers, set out clear obligations regarding the handling of personal information. These agreements generally include the following standard protections:

- Acknowledgement that EDC is the controller of the personal information;
- Limits on the collection, use and disclosure of personal information to what is necessary for the performance of contractual obligations;
- Requirements to notify EDC of unauthorised access to personal information;
- Requirements to implement appropriate technical and organizational safeguards;
- Limits on retention, and requirements for the return or secure disposal of personal information; and
- Requirements to obtain EDC approval for subcontractors and ensure they are bound by equivalent privacy protections.

INITIATIVES AND PROJECTS TO IMPROVE PRIVACY

During the reporting period, EDC did not undertake any significant initiatives or projects to improve access to personal information or privacy beyond those mentioned above.

SUMMARY OF KEY ISSUES AND ACTIONS TAKEN ON COMPLAINTS

During the reporting period 1 complaint was received which was not in regard to personal information and was determined to be not well-founded. No other complaints were received or concluded regarding requests for personal information under the Act.

MATERIAL PRIVACY BREACHES

No material privacy breaches occurred or were reported to the Office of the Privacy Commissioner or Treasury Board Secretariat during the reporting period.

PRIVACY IMPACT ASSESSMENTS

One privacy impact assessment was completed during the reporting period for a new or substantially modified activity, as defined in the Treasury Board Secretariat's *Standard on Privacy Impact Assessment*. The assessment related to the implementation of EDC's in-office attendance monitoring activity.

This activity supports EDC's Hybrid Work Standard, which establishes minimum in-office attendance requirements based on employee roles. To promote consistent application of the standard, EDC uses employee access card (swipe) data to generate attendance reports.

The privacy impact assessment was conducted to identify and mitigate associated privacy risks.

PUBLIC INTEREST DISCLOSURES

During the reporting period, no disclosures of personal information were made pursuant to section 8(2)(m) of the Act (disclosures in the public interest).

MONITORING COMPLIANCE

EDC uses AccessPro Suite, developed by CSDC Systems Inc., to manage all requests for personal information under the Act. The software has a dashboard that enables ongoing monitoring of the request status and processing timelines. In addition to regular team oversight through daily meetings, access compliance metrics, including response times, are a standing item in senior management reporting.

APPENDIX A – DELEGATION OF AUTHORITY

Delegation Order for the *Access to Information Act* and *Privacy Act*

Export Development Canada

The President & Chief Executive Officer of Export Development Canada, in accordance with section 95 of the *Access to Information Act* and section 73 of the *Privacy Act*, hereby delegates the powers, duties and functions of the head of the institution under those Acts to the persons holding the positions set out in the table below (or equivalent positions under future designations), including those occupying these positions on an acting basis. A description of the powers, duties and functions is set out in Schedule A. This delegation supersedes all previous delegations.

Delegation of Authority Table: Powers, Duties, and Functions

Position	***Access to Information Act* & Regulations**	***Privacy Act* & Regulations**
Senior Vice President (Global Risk Management) & Chief Risk Officer	Full authority, except: Sections 41(2), 52(2)(b), 94(4)	Full authority, except: Section 72(4)
Chief Compliance & Ethics Officer	Full authority, except: Sections 41(2), 52(2)(b), 52(3), 94(4)	Full authority, except: Section 72(4)
Director, Ethics, Privacy & Information Risk	Full authority, except: Sections 41(2), 52(2)(b), 52(3), 94(4)	Full authority, except: Section 72(4)
CEBA Call Centre Management	N/A	Authority limited to section 8(2)(m) only[1]

President & Chief Executive Officer

Name: Alison MacKinnell

Signature: Alison MacKinnell **Date:** 25 March 2025

[1] This delegation is for the purposes of enabling timely and informed decision-making in emergency situations. It is specific and limited to authority to making the determination disclosure is authorized in accordance with criteria defined for this purpose by the Director, Ethics, Privacy & Information Risk.

Schedule A – Description of Powers, Duties, and Functions

Access to Information Act

4(2.1)	Responsibility of government institutions
6.1(1)	Reasons for declining to act on request
6.1(1.3)	Notice of suspension
6.1(1.4)	Notice of end of suspension
6.1(2)	Notice of decision to decline to act on request
7	Notice where access requested
8(1)	Transfer of request
9(1)	Extension of time limits
9(2)	Notice of extension to Information Commissioner
10(1)	Where access is refused
10(2)	Existence of a record not required to be disclosed
11(2)	Waiver of fee
12(3)(b)	Access to record in alternative format
13	Exemption - Information obtained in confidence
14	Exemption - Federal-provincial affairs
15	Exemption - International affairs and defense
16	Exemption - Law enforcement and investigations
16.5	Exemption - Public Servants Disclosure Protection Act
17	Exemption - Safety of individuals
18	Exemption - Economic interests of Canada
18.1	Exemption - Economic interests of certain government institutions
19	Exemption - Personal information
20	Exemption - Third party information
21	Exemption - Operations of government
22	Exemption - Testing procedures, tests and audits
22.1	Exemption - Internal audits
23	Exemption - Protected information - solicitors, advocates and notaries
23.1	Exemption - Protected information - patents and trademarks
24(1)	Exemption - Statutory prohibitions against disclosure
25	Severability
26	Refusal of access if information is to be published
27	Notice to third parties
28(1)(b)	Representation of third party and decision
28(4)	Disclosure of record
35(2)(b)	Right to make representations
37(4)	Access to be given
41(2)	Review by Federal Court - government institution
43(2)	Service or notice
44(2)	Notice to person who requested record
52(2)(b)	Special rules for hearings
52(3)	*Ex parte* representations
94(1)	Prepare a report on the administration of the Act

94(4)	Provide a copy of the report to the designated Minister

Access to Information Regulations

5	Procedures
6(1)	Transfer of request
7(2)	Fees
7(3)	Fees
8	Access
8.1	Limitation in Respect of Format

Privacy Act

8(2)(j)	Disclosure for research purposes
8(2)(m)	Disclosure in public interest or in interest of the individual
8(4)	Copies of requests under paragraph 8(2)(e) to be retained
8(5)	Notice of disclosure under paragraph 8(2)(m)
9(1)	Record of disclosures to be retained
9(4)	Consistent uses
10	Personal information to be included in personal information banks
14	Notice where access requested
15	Extension of time limits
16(1)	Notice where access is refused
16(2)	Notice where personal information does not exist
17(2)(b)	Language of access
17(3)(b)	Access to personal information in alternative format
18(2)	Exemption (exempt bank) – Disclosure may be refused
19(1)	Exemption - Personal information obtained in confidence
19(2)	Exemption – Where authorized to disclose
20	Exemption - Federal-provincial affairs
21	Exemption - International affairs and defence
22	Exemption - Law enforcement and investigation
22.3	Exemption – *Public Servants Disclosure Protection Act*
23	Exemption - Security clearances
24	Exemption - Individuals sentenced for an offence
25	Exemption - Safety of individuals
26	Exemption - Information about another individual
27	Exemption - Solicitor-client privilege
27.1	Exemption – Patents and trademarks
28	Exemption - Medical record
31	Notice of intention to investigate
33(2)	Right to make representation
35(1)	Findings and recommendations of the Privacy Commissioner (complaints)
35(4)	Access to be given

36(3)	Report of findings and recommendations (exempt banks)
37(3)	Report of findings and recommendations (compliance review)
51(2)(b)	Special rules for hearings
51(3)	*Ex parte* representations
72(1)	Prepare report on administration of the Act
72(4)	Provide a copy of the report to the designated Minister

Privacy Regulations

7	Retention for two years
9	Reasonable facilities and time provided to examine personal information
11(2)	Notification that correction to personal information has been made
11(4)	Notification that correction to personal information has been refused
13(1)	Disclosure of personal information relating to physical or mental health may be made to a qualified medical practitioner or psychologist for an opinion on whether to release information to the requestor
14	Disclosure of personal information relating to physical or mental health may be made to requestor in the presence of a qualified medical practitioner or psychologist