

Privacy Annual Report 2021-22

April 2021-March 2022



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1. Introduction

The *Privacy Act* (the Act) governs the privacy practices of federal government institutions including Canada Post Corporation (Canada Post or the Corporation). The Act regulates these institutions' collection, use and disclosure of personal information of individuals, including employees, and gives anyone in Canada the right to seek access to their personal information held by these institutions. Among other things, the Act requires that government institutions protect personal information against unauthorized collection, use and disclosure.

Canada Post is pleased to submit to Parliament its Annual Report related to the administration of the Act, prepared in accordance with section 72. Canada Post's financial year aligns with the calendar year and reporting is done annually. As required by the Treasury Board of Canada Secretariat (TBS), this report covers the period from April 1, 2021, to March 31, 2022.

2. Mandate

The Canada Post Group of Companies consists of the Canada Post segment and subsidiaries Purolator Holdings Ltd., SCI Group Inc. and Innovapost Inc. The Group of Companies employed more than 84,500 people (paid full-time and part-time employees, including temporary, casual and term employees) in 2021, including more than 68,000 in the Canada Post segment. The Group of Companies delivered approximately 6.9 billion pieces of mail, parcels, and messages in 2021 to 17 million addresses across Canada. The Canada Post segment operates the largest retail network in Canada with close to 6,000 post offices across the country. It has a mandate to securely serve every Canadian address while maintaining financial self-sustainability.

In 2021, Canadian households and businesses continued to migrate to digital communication, online banking and online shopping, trends that accelerated due to COVID-19. At the same time, Lettermail™ volumes have declined significantly and steadily for more than a decade. Canada Post delivered 62 per cent fewer pieces of mail per address in 2021 than in the peak year of 2006. While the drop in Lettermail has significantly impacted Canada Post's business model, which was founded on paper-based communications, it has provided the Corporation with an opportunity to transform the business and refocus its strategic direction on the e-commerce boom and the changing needs of Canadians.

Parcels revenue (nearly \$3.7 billion) generated 50 per cent of Canada Post revenue in 2021, compared to 21 per cent in 2011. While Canada Post continues to move record-high domestic parcel volumes through our network, it must respond to the rapidly evolving marketplace to remain competitive and economically self-sustaining. In addition, Canada Post is investing to expand capacity, improve the customer experience and

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innovate its operations to better serve the changing postal needs of Canadians and Canadian businesses.

3. Canada Post and the *Privacy Act*

Every day, Canada Post interacts with vast amounts of personal information of Canadians across the country. Canada Post's employees, customers, and the public trust the Corporation to properly handle and protect this information and respect its obligations under the Act. Canada Post has consistently demonstrated strong compliance with the Act and continues to evolve its privacy practices to incorporate national and international best practices as well as guidance from its regulators.

At Canada Post privacy is considered proactively, and privacy principles are built into the design and development of products, services, and programs including the use of innovative technologies by the lines of business.

This commitment to privacy plays a critical role in Canada Post's ability to achieve its business and human resources objectives and maintain the high level of trust Canadians have in the Canada Post brand.

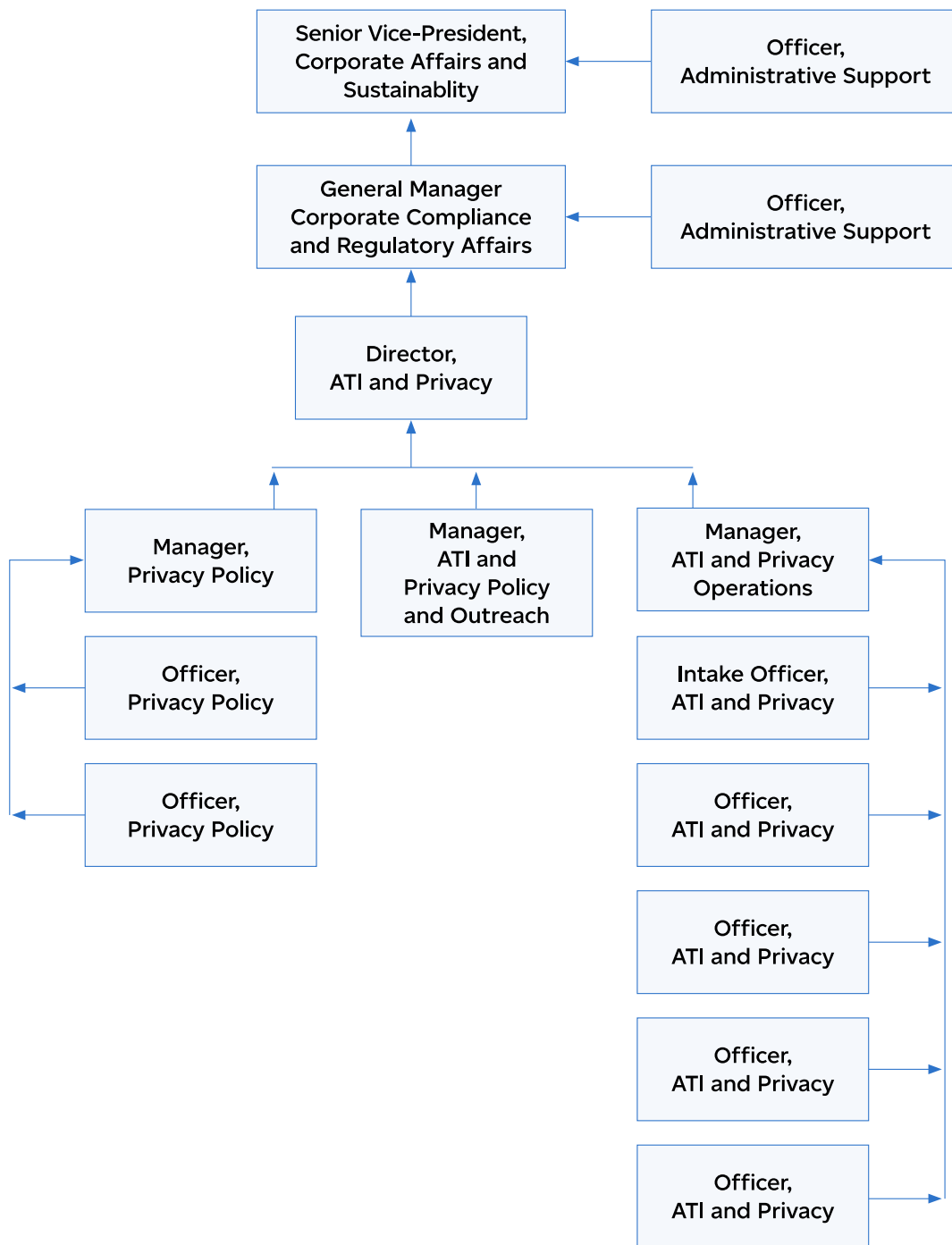
4. Organizational Structure

The Privacy Office is a part of the Corporate Compliance and Regulatory Affairs team within the Sustainability and Legal Affairs portfolio. It is responsible for the administration of the Act and the operational accountability for the privacy program. The processing of access requests under the *Privacy Act* falls within the portfolio of the Access to Information and Privacy (ATI and Privacy) Directorate.

During the 2021-22 reporting period, the Privacy Office included two privacy officers reporting to the Manager of Privacy Policy. The ATI and Privacy Directorate included four ATI and Privacy Officers and one Intake Officer reporting to the Manager of ATI and Privacy Operations. During this year, the ATI and Privacy Directorate expanded to include a Manager of ATI Policy and Outreach. All managers report to the Director of Access to Information and Privacy, who in turn reports to the General Manager of Corporate Compliance and Regulatory Affairs, who also acts as Chief Privacy Officer. The Director acts as the Access to Information and Privacy Coordinator and point of contact for the Corporation in liaising with the TBS, the Office of the Privacy Commissioner (OPC) of Canada, the Office of the Information Commissioner (OIC) of Canada and other government institutions.

The chart below outlines our organizational structure as of March 31, 2022.

Corporate Compliance and Regulatory Affairs organizational chart



5. Delegation of Authority

Pursuant to section 73 of the *Privacy Act*, the President and CEO's authority has been delegated for the Corporation to meet key legislative requirements, while enabling efficiencies and managing risk at the appropriate levels in the Corporation. As required by the TBS, the delegation order is included in Appendix A.

6. The Privacy Program

6.1 Successes and Challenges

The Privacy Office acts as a centre of excellence for privacy, data protection and anti-spam matters across the Corporation. It works closely with the lines of business and functional areas to ensure a proactive approach to privacy during the design and development of products, services, and programs, as well as in the implementation of projects.

In 2021-22, the Privacy Office continued to collaborate with the relevant areas of business to develop and implement a key component of the Global Preferences project intended to improve customer experience and further empower Canadians with the ability and choices to express their preferences in the handling of their personal information by Canada Post. During the reporting period, the work focused on configuring and implementing a solution to help Canada Post manage cookies and other tracking preferences of its website visitors. In addition, Canada Post procured a tool to assist the Privacy Office with automating its multi-year project intended to develop an updated and comprehensive inventory of the Corporation's personal information holdings.

In 2021-22, the Privacy Office provided support to the Corporation in the context of the development and launch of Canada Post MyMoney™ Loan. This is a new service offered in partnership with the Toronto Dominion Bank to provide Canadians with access to fair and transparent money service and help underserved communities connect to the financial services they need.

In the fall of 2021, at the direction of the Government of Canada, the Corporation adopted a Mandatory Vaccination Practice that mirrored the Policy on COVID-19 Vaccination for the Core Public Administration. The Privacy Office played a key role in the development and administration of the Practice by working collaboratively with, and providing guidance to, the internal parties such as Health and Safety, Disability Management, Legal Affairs, Labour Relations, and others. The Privacy Office was challenged in responding to numerous inquiries from the Corporation's employees in relation to its COVID-19 protocols, including the adoption and administration of the Practice.

During the reporting period, in conjunction with key internal parties such as the cybersecurity and physical security functions, the Privacy Office tested its updated privacy

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breach management and response protocols to ensure alignment and clear articulation and delineation of relevant roles and responsibilities.

In addition, in the reporting period, the Privacy Office continued to mature its online privacy centre – an integral part of the Transparency and Trust portal on the Canada Post’s website. The Corporation’s InfoSource chapter was also re-launched in a new format to ensure the content is presented in a clear, user-friendly manner and meets the accessibility standards.

The Privacy Office provides advice and leadership to the Corporation on all matters with respect to privacy. In 2021-22, key advice was provided in the following areas:

- Applicability of the General Data Protection Regulation (GDPR) to Canada Post:
 - contracting with GDPR-exposed customers
 - Canada Post’s GDPR-exposed services
- Innovative postal services:
 - digitizing some aspects of the mail delivery
 - providing best-in-class delivery experience
 - next generation CRM platforms
- Direct marketing and privacy regimes in Canada and around the globe, including the United States and the European Union:
 - leveraging third-party data for marketing
- Commercial partnerships and vendor risk management:
 - the maturation various commercial partnership involving the use and exchange of customer information
 - Solutions for Small Business initiatives
 - privacy compliance audits by major commercial customers
- Employee personal information:
 - using employee personal information for various corporate research and forecasting activities, as well as employee engagement initiatives
 - review of external investigators for workplace matters
- Ownership and control of personal information:
 - third-party service providers administering personal information of Canada Post employees

During the COVID-19 pandemic, Canada Post was deemed an essential service, which resulted in adjustments and changes to its operations. The Privacy Office provided critical advice with respect to operational changes to the business, occupational health and safety, and human resource issues. During this reporting period, key advice was given to the business about collecting, storing and sharing of information related to COVID-19 issues and contact tracing applications. The volume of requests for advice, the complexity

of the issues as well as the frequent urgency of some matters presented challenges to the team during this reporting period.

As an essential service for Canadians, it was imperative that the Corporation focused on critical operational priorities to fulfil its mandate. While the ATI and Privacy Directorate was able to remain fully functional, the ongoing operational pressures sometimes limited the ability of areas of the Corporation to retrieve and review records. This resulted in some delays, leading to lateness and necessitated the use of section 15 of the Act to seek extensions for several files. However, in 2021-22, 90.5% of the formal requests were completed on time representing a 6.7% improvement when compared to 83.8% in 2020-21. In 2019-20, 91.6% were completed on time.

7. Requests

7.1 Number

The right of individuals to access and correct their personal information held in Canada Post's personal information banks is included in the Corporation's customer and employee privacy policies that are posted on the intranet site (Intrapost) and on the website at canadapost.ca.

In 2021-22, Canada Post received 253 formal access to personal information requests under the *Privacy Act*. This significant decrease can be mostly attributed to the fact that the TBS now requires that institutions report on "informal requests for information"¹. In previous reporting periods, these informal requests were captured in the total of access to personal information requests received by the ATI and Privacy Directorate. Consequently, for 2021-22, since it is now required to make a distinction between formal and informal access to personal information requests, the latter represents over 70% of the total of requests.

In addition, inquiries although the ATI and Privacy Directorate still received and processed a large number of inquiries from Canada Post customers requesting a copy of their Customer Service Tickets, such requests are not considered as requests under the *Privacy Act* or the *Access to Information Act*. Therefore, as of the 2021-22 reporting period, these customer service ticket requests are now subtracted from the total number of requests (formal or informal) received for accuracy purposes and to align with the definition of informal requests provided by the TBS. Of note is that, in the near future, this process will become the purview of Canada Post's Customer Service team.

¹ As per the TBS definition, an "informal request for information" is: "a request for information made to the ATIP Office of a Government of Canada institution that is either not made or not processed under the Act. There are no timelines for responding under the Act for informal requests. The requester also has no statutory right of complaint to the Privacy Commissioner.

7.2 Origin

In 2021-22, the Huron-Rideau region generated the largest number of formal requests (84), almost doubling the number received by the Greater Toronto Area (GTA) region (48).

Office	2021-22	2020-21	2019-20
Head Office	1	332	170
Atlantic	27	36	41
Quebec	44	59	64
Greater Toronto Area (GTA)	48	188	360
Huron-Rideau	84	138	77
Prairies	28	53	72
Pacific	21	142	202
Total	253	948	986

7.3 Consultations

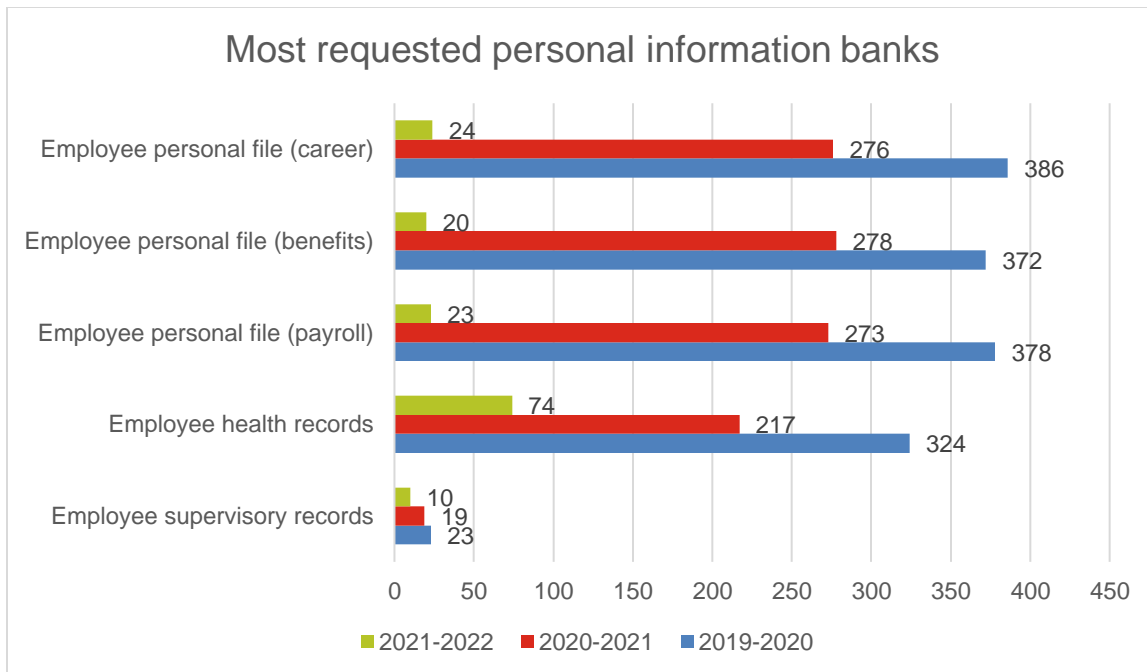
In 2021-22, there were no privacy consultation requests received.

7.4 Personal Information Banks

In 2021-22, no new personal information banks were created, terminated, or modified.

The most requested information was from the following personal information banks:

- Employee personal file (career)
- Employee personal file (benefits)
- Employee personal file (payroll)
- Employee health records
- Employee supervisory records



7.5 Processing Performance

A total of 220 formal requests were closed in 2021-22, 199 of which were closed within legislated timelines (90.5%).

7.6 Exemptions

The majority of exemptions invoked fell under three sections of the Act:

- Section 26: which protects personal information about another individual, was invoked in 74 access requests (33.6 %)
- Section 22(1)(b): which protects law enforcement and investigations, was invoked in 19 access requests (8.6 %)
- Section 27: which protects information deemed solicitor-client privileged, was invoked in 11 access requests (5 %)

8. Section 8 Disclosures

The *Privacy Act* allows for the disclosure of personal information without consent to investigative bodies listed in the regulations, under section 8(2)(e) of the Act. Canada Post's ATI and Privacy Directorate conducts a comprehensive review of each request and determines in its discretion whether the information can be disclosed. In 2021-22, although the number of such disclosures decreased significantly from previous reporting years, Canada Post continued to receive a large volume of requests under section 8(2) of the Act; a total of 528 requests were received in 2021-22 for all paragraphs of section 8(2).

	Disclosures in 2021-22	Disclosures in 2020-21	Disclosures in 2019-20
<i>Privacy Act</i> Section 8(2)(e)	129	214	202

There were no disclosures made under section 8(2)(m) of the Act in 2021-22.

During this reporting period, an extensive review of the internal processing of these requests for disclosure has been undertaken. The purpose of this review was to ensure consistency in the disclosure, accuracy of the information provided as well as improved communication and collaboration with relevant stakeholders within the corporation.

9. Monitoring of Privacy Access Requests

To strengthen accountability and assist Canada Post in meeting its legislative requirements, the ATI and Privacy Directorate developed a variety of measures to monitor and evaluate the performance of responding to access requests under the *Privacy Act*. In 2021-22, the ATI and Privacy Directorate:

- conducted monthly reviews of privacy access requests
- produced and monitored monthly scorecards to measure the following criteria against objectives set for the year
 - the percentage of active privacy requests on time
 - the percentage of privacy requests completed on time
- produced a monthly scorecard to monitor progress
- provided regular briefings on key files to senior executives and the Board of Directors
- monitored access request processing for quality with a focus on:
 - timeliness of input and processing
 - appropriateness of exemptions
 - consistency of redaction

10. Complaints

10.1 Number and Type

In 2021-22, the OPC forwarded sixteen privacy complaints to Canada Post. Nine complaints concerned the processing of access requests (in addition, two complaints of this nature were outstanding from 2020-21), and seven complaints related to the protection of privacy, including in the context of the collection, use and disclosure of personal information.

10.2 Disposition of Resolved Complaints

Access to Personal Information Complaints

With respect to the complaints concerning the processing of access to personal information requests, two complaints were determined by the OPC to be not well-founded and one to be well-founded; as of the close of the 2021-22 reporting period, there were eight active complaints.

Collection, Use and Disclosure Complaints

Concerning the seven “protection of privacy” complaints, four complaints were successfully resolved through the OPC’s Early Resolution process, one other complaint was closed by the OPC as not well-founded. The two remaining complaints are currently active.

11. Training and Awareness

The Privacy Office is committed to raising awareness and building knowledge of privacy throughout the Corporation. In 2021-22, the following training and awareness initiatives took place:

- All new employees were required to take the privacy e-learning training module developed by the Privacy Office.
- Targeted training was delivered to key internal groups that were considered high risk due to the amount and sensitivity of the employee or customer information they manage.
- The Chief Privacy Officer delivered privacy briefings to the senior executive team as part of onboarding new executives on their accountabilities under the *Privacy Act* and targeted, proactive risk management/mitigation. The focus was on trends in regulatory reform, changing customer expectations and impacts on Canada Post's business and workplace.

12. Policies and Guidelines

In 2021, the Privacy Office continued to mature its online Privacy Centre - an integral part of the Transparency and Trust portal on the Canada Post's website. The Corporation's InfoSource chapter was re-launched in a new format to ensure the content is presented in a clear, user-friendly manner and meets the accessibility standards.

The Privacy Centre houses the Corporation's comprehensive privacy policy, InfoSource, Annual Reports to Parliament under the *Privacy Act*, links to helpful external resources. Information on how to submit access requests under the *Privacy Act* is available through both the online Privacy Centre and the Access to Information hub. In 2022, employee-facing privacy policies will be reviewed and updated.

During the reporting period, following extensive testing with the applicable key internal parties, the Privacy Office communicated its updated privacy breach management and response protocols to the Corporation's Board of Directors. The Privacy Office also provided the Corporation with privacy guidelines regarding taking photographs of customers' properties for Health and Safety and related reasons.

13. Summary of Material Privacy Breaches

In 2021-22, Canada Post experienced one material privacy breach. As a result of a printing error, letters intended to remind non-complying employees of the requirement to provide their attestation under Canada Post's Mandatory Vaccination Practice by the established deadline were mailed to addresses of wrong employees. These letters contained employees' names, employee IDs, and the 'non-attested' vaccination status. Several of these letters also contained the 'partially vaccinated' status of the employee whose name appeared on the letter.

The error was immediately contained and promptly investigated and addressed to prevent a recurrence. The Canada Post Privacy Office notified the impacted employees of the breach and the corrective measures undertaken to respond and mitigate the impact of the breach. As required by the TBS *Guidelines for Privacy Breaches*, the Canada Post Privacy Office reported the breach to the OPC and the TBS.

14. Privacy Impact Assessments and Risk Assessments

The Canada Post Privacy Office conducts risk assessments and formal privacy impact assessments to identify and mitigate risks to privacy interests, which may be present in new or existing corporate programs or initiatives. The Privacy Office also participates in the agile program management process providing risk assessments and advice through the development of Canada Post products and services.

15. Conclusion

In 2021-22, Canada Post continued to successfully function as an essential service to all Canadians during the challenges of the ongoing COVID-19 pandemic. Despite these challenges, the Corporation remained steadfast in transforming itself and its business to better meet the needs of Canadians and otherwise deliver a stronger Canada. To this end, Canada Post was dedicating significant resources and attention to moving record-high e-commerce parcel volumes through its network while striving to meet the needs of its commercial customers and consumers. Another big step taken by the Corporation on this transformation journey was the launch of a project to pilot a more accessible loan to improve access to financial services for all Canadians, particularly those in rural, remote, and Indigenous communities.

This transformation means increasingly complex business models, strategic partnerships with other government institutions and private-sector organizations, and greater use of new technologies to deliver services. The success of these innovations and initiatives quite often depends on the ability to leverage employee and customer data. With that comes the ever-present need to ensure this data is collected and used in a responsible manner that ensures adequate protection of the privacy interests of Canadians. The Canada Post Privacy Office will continue to be a key enabler and partner to the business to support its transformative goals, while ensuring those are achieved without compromising on the privacy interests of people we proudly serve.

Appendix A – Delegation Order

CANADA POST CORPORATION DELEGATION ORDER

The President and Chief Executive Officer of the Canada Post Corporation, Doug Ettinger, on this 23 day of Sept. 2021, pursuant to section 73(1) of the *Privacy Act*, hereby designates the persons holding the positions set out in the schedule hereto to exercise the powers and perform the duties and functions of the President and Chief Executive Officer, the Head of the Institution, for the purposes of the *Privacy Act* as set out hereto in the schedule below.

Delegation of Powers, Duties or Functions Pursuant to Section 73(1) of the *Privacy Act*

Delegation Order							
Section	Power, Duties or Functions	Chief Executive Officer	Senior Vice President Corporate Affairs and Sustainability	General Manager & Chief Privacy Officer (CPO)	Director, Access to Information and Privacy	Manager, Access to Information and Privacy	Officer, Access to Information and Privacy
8(2)(j)	May disclose PI for research purposes	X	X	X		X	
8(2)(m)	May disclose PI in the public interest or in the interest of the individual	X	X	X	X		
8(4)	To retain copies of requests received under 8(2)(e)	X	X	X	X	X	
8(5)	To notify the Privacy Commissioner of disclosures under 8(2)(m)	X	X	X	X		
9(1)	To retain record of PI use/disclosures not included in InfoSource	X	X	X	X	X	
9(4)	Shall notify OPC of disclosure of use consistent with Consistent uses	X	X	X	X	X	
10	Shall cause PI to be included in personal information banks	X	X	X	X	X	

		Delegation Order					
Section	Power, Duties or Functions	Chief Executive Officer	Senior Vice President Corporate Affairs and Sustainability	General Manager & Chief Privacy Officer (CPO)	Director, Access to Information and Privacy	Manager, Access to Information and Privacy	Officer, Access to Information and Privacy
14	Notice where access requested: Shall notify applicant within 30 days after receipt of request whether access is to be given or not and to provide access to PI	X	X	X	X	X	
15	May extend time limits and notify applicant	X	X	X	X	X	
17(2)(b)	Language of access: to determine the necessity for translation	X	X	X	X	X	
17(3)(b)	May provide access to personal information in alternative format	X	X	X	X	X	

Exemption Provisions of the *Privacy Act*

		Delegation Order					
Section	Power, Duties or Functions	Chief Executive Officer	Senior Vice President Corporate Affairs and Sustainability	General Manager & Chief Privacy Officer (CPO)	Director, Access to Information and Privacy	Manager, Access to Information and Privacy	Officer, Access to Information and Privacy
18(2)	Exemption (exempt bank) – May refuse disclosure of any PI contained in a personal information bank	X	X	X	X		
19(1)	Exemption – To refuse disclosure of PI obtained in confidence from other governments	X	X	X	X		
19(2)	Exemption – May disclose PI where authorized to disclose	X	X	X	X		

		Delegation Order					
Section	Power, Duties or Functions	Chief Executive Officer	Senior Vice President Corporate Affairs and Sustainability	General Manager & Chief Privacy Officer (CPO)	Director, Access to Information and Privacy	Manager, Access to Information and Privacy	Officer, Access to Information and Privacy
20	Exemption – May refuse disclosure of PI where it could be injurious to Federal-provincial relations	X	X	X	X		
21	Exemption – May refuse disclosure of PI where it could be injurious to conduct of international affairs and defence	X	X	X	X		
22(1)(2)	Exemption – Law enforcement and investigation: (1) May refuse to disclose PI in course of investigations (2) To refuse to disclose PI compiled by RCMP where GoC has refused to release	X	X	X	X		
22.3	Exemption – Public Servants Disclosure Protection Act	X	X	X	X		
23	Exemption – May refuse to disclose PI that could reveal the identity of a confidential security clearance source	X	X	X	X		
24	Exemption – May refuse to disclose PI re individuals sentenced for an offence	X	X	X	X		
25	Exemption – May refuse to disclose PI if it threatens the safety of individuals	X	X	X	X		
26	Exemption – May refuse to disclose PI about another individual and shall refuse to disclose PI under section 8	X	X	X	X		

		Delegation Order					
Section	Power, Duties or Functions	Chief Executive Officer	Senior Vice President Corporate Affairs and Sustainability	General Manager & Chief Privacy Officer (CPO)	Director, Access to Information and Privacy	Manager, Access to Information and Privacy	Officer, Access to Information and Privacy
27 ¹	Exemption – May refuse to disclose PI subject to Solicitor-client privilege	X	X	X	X		
28 ²	Exemption – May refuse to disclose PI relating to health of individual where contrary to best interests	X	X	X	X		

¹ In consultation with Legal

² In consultation with a qualified medical professional

Other Provisions of the *Privacy Act*

		Delegation Order					
Section	Power, Duties or Functions	Chief Executive Officer	Senior Vice President Corporate Affairs and Sustainability	General Manager & Chief Privacy Officer (CPO)	Director, Access to Information and Privacy	Manager, Access to Information and Privacy	Officer, Access to Information and Privacy
31	Notice of intention to investigate by the Office of the Privacy Commissioner	X	X	X	X		
33(2)	Right to make re presentation: May make representations to the Commissioner	X	X	X	X		
35(1)(2)	Findings and recommendations of Privacy Commissioner (complaints) received and notice given to Commissioner of any action or proposed action to be taken on recommendations	X	X	X	X		

		Delegation Order					
Section	Power, Duties or Functions	Chief Executive Officer	Senior Vice President Corporate Affairs and Sustainability	General Manager & Chief Privacy Officer (CPO)	Director, Access to Information and Privacy	Manager, Access to Information and Privacy	Officer, Access to Information and Privacy
35(4)	May notify the Commissioner that access to be given	X	X	X	X		
36(3)	Review of Exempt Banks: Report of findings and recommendations (exempt banks)	X	X	X	X		
37(3)	Review of Compliance with sections 4 to 8: Report of findings and recommendations by Privacy Commissioner	X	X	X	X		
51(2)(b)	May request special rules for hearings	X	X	X	X		
51(3)	May request Ex parte representations	X	X	X	X		
72(1)	Shall prepare an Annual Report to Parliament	X	X	X			

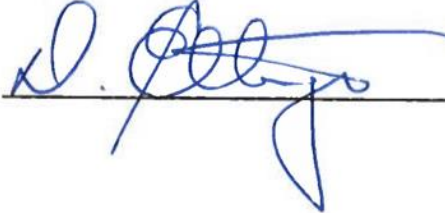
Delegation of Powers, Duties or Functions Pursuant to the Privacy Act Regulations

		Delegation Order					
Section	Power, Duties or Functions	Chief Executive Officer	Senior Vice President Corporate Affairs and Sustainability	General Manager & Chief Privacy Officer (CPO)	Director, Access to Information and Privacy	Manager, Access to Information and Privacy	Officer, Access to Information and Privacy
9	To provide reasonable facilities and time provided to examine personal information	X	X	X	X	X	
11(2)	To provide notification that correction to personal information has been made	X	X	X	X	X	
11(4)	To provide notification that correction to personal information has been refused	X	X	X	X	X	
13(1)	Disclosure of personal information relating physical or mental health may be made to a qualified medical practitioner or psychologist for an opinion on whether to release information to the requester	X	X	X	X		
14	Disclosure of personal information relating to physical or mental health may be made to a requester in the presence of a qualified medical practitioner or psychologist	X	X	X	X		

The Director, Access to Information and Privacy is also authorized to make decisions under sections 8(1) and 8(2)(a) to (i), (k) and (l) of the *Privacy Act*.

The Director, Access to Information and Privacy, the Manager, Access to Information and Privacy, and the Manager, Privacy Policy are authorized to designate in writing a member of their staff to act on their behalf in case of absence or unavailability.

DATED, at the City of Ottawa, this 23 day of Sept., 2021

 - Doug Ettinger, President and CEO, Canada Post Corporation

Appendix B – Canada Post Corporation Wholly Owned Subsidiaries

1. Introduction

The information contained in this report relates to the administration of the *Privacy Act* at the following wholly owned subsidiaries of the Corporation from April 1, 2021, to March 31, 2022.

2. Activities

2.1 2875039 Canada Limited

As a holding company, 2875039 Canada Limited does not employ staff, but elects a director who is also the president and secretary of the company.

2875039 Canada Limited was incorporated on December 4, 1992, under the *Canada Business Corporations Act*. The company is a wholly owned subsidiary of Canada Post Corporation and holds interests in Purolator Holdings Ltd.

2.2 2875047 Canada Limited

As a holding company, 2875047 Canada Limited does not employ staff, but elects a director who is also the president and secretary of the company.

2875047 Canada Limited was incorporated on December 4, 1992, under the *Canada Business Corporations Act*. The company is a wholly owned subsidiary of Canada Post Corporation. It is currently inactive.

2.3 3906949 Canada Inc.

As a holding company, 3906949 Canada Inc. does not employ staff, but elects a director who is also the president and secretary of the company.

3906949 Canada Inc. was incorporated on June 15, 2001, under the *Canada Business Corporations Act*. The company is a wholly owned subsidiary of Canada Post Corporation and holds interests in SCI Group Inc.

Appendix C – Treasury Board of Canada Secretariat Statistical Report



Government of Canada / Gouvernement du Canada

Statistical Report on the *Privacy Act*

Name of institution: Canada Post Corporation

Reporting period: 2021-04-01 to 2022-03-31

Section 1: Requests Under the *Privacy Act*

1.1 Number of requests

		Number of Requests
Received during reporting period		253
Outstanding from previous reporting period		20
• Outstanding from previous reporting period	20	
• Outstanding from more than one reporting period	0	
Total		273
Closed during reporting period		220
Carried over to next reporting period		53
• Carried over within legislated timeline	50	
• Carried over beyond legislated timeline	3	

1.2 Channels of requests

Source	Number of Requests
Online	53
E-mail	140
Mail	40
In person	0
Phone	0
Fax	20
Total	253



Section 2: Informal requests

2.1 Number of informal requests

		Number of Requests
Received during reporting period		683
Outstanding from previous reporting periods		136
• Outstanding from previous reporting period	133	
• Outstanding from more than one reporting period	3	
Total		819
Closed during reporting period		628
Carried over to next reporting period		191

2.2 Channels of informal requests

Source	Number of Requests
Online	0
E-mail	598
Mail	50
In person	0
Phone	0
Fax	35
Total	683

2.3 Completion time of informal requests

Completion Time							
1 to 15 Days	16 to 30 Days	31 to 60 Days	61 to 120 Days	121 to 180 Days	181 to 365 Days	More Than 365 Days	Total
125	176	150	137	32	8	0	628

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
511	6174	79	29149	30	22857	8	10436	0	0

Section 3: Requests Closed During the Reporting Period

3.1 Disposition and completion time

Disposition of Requests	Completion Time							Total
	1 to 15 Days	16 to 30 Days	31 to 60 Days	61 to 120 Days	121 to 180 Days	181 to 365 Days	More Than 365 Days	
All disclosed	13	42	14	5	0	0	0	74
Disclosed in part	6	31	30	18	2	1	0	88
All exempted	0	0	0	0	0	0	0	0
All excluded	0	0	0	0	0	0	0	0
No records exist	14	2	2	0	1	0	0	19
Request abandoned	34	3	2	0	0	0	0	39
Neither confirmed nor denied	0	0	0	0	0	0	0	0
Total	67	78	48	23	3	1	0	220

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)	19	24(b)	0
19(1)(d)	0	22(1)(c)	0	25	0
19(1)(e)	0	22(2)	0	26	74
19(1)(f)	0	22.1	0	27	11
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	
9	162	0	0	0	0

3.5 Complexity

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

Number of Pages Processed	Number of Pages Disclosed	Number of Requests
25495	19861	201

3.5.2 Relevant pages processed and disclosed by size of requests

Disposition	Less than 100 Pages Processed		101-500 Pages Processed		501-1000 Pages Processed		1001-5000 Pages Processed		More than 5000 Pages Processed	
	Number of Requests	Pages Disclosed	Number of Requests	Pages Disclosed	Number of Requests	Pages Disclosed	Number of Requests	Pages Disclosed	Number of Requests	Pages Disclosed
All disclosed	72	6264	2	212	0	0	0	0	0	0
Disclosed in part	46	3680	25	3571	13	7267	4	4501	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	39	0	0	0	0	0	0	0	0	0
Neither confirmed nor denied	0	0	0	0	0	0	0	0	0	0
Total	157	9944	27	3783	13	7267	4	4501	0	0

3.5.3 Relevant minutes processed and disclosed for audio formats

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

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	0	0	0	0	0	0
Neither confirmed nor denied	0	0	0	0	0	0
Total	0	0	0	0	0	0

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
Total	0	0	0	0	0	0

3.5.7 Other complexities

Disposition	Consultation Required	Legal Advice Sought	Interwoven Information	Other	Total
All disclosed	3	0	0	0	3
Disclosed in part	8	3	74	0	85
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
Total	11	3	74	0	88

3.6 Closed requests

3.6.1 Number of requests closed within legislated timelines

	Requests closed within legislated timelines
Number of requests closed within legislated timelines	199
Percentage of requests closed within legislated timelines (%)	90.45454545

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
21	21	0	0	0

3.7.2 Requests 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 Timelines Where an Extension Was Taken	Total
1 to 15 days	0	8	8
16 to 30 days	0	5	5
31 to 60 days	0	3	3
61 to 120 days	0	3	3
121 to 180 days	0	1	1
181 to 365 days	0	1	1
More than 365 days	0	0	0
Total	0	21	21

3.8 Requests for translation

Translation Requests	Accepted	Refused	Total
English to French	0	0	0
French to English	0	0	0
Total	0	0	0

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

Paragraph 8(2)(e)	Paragraph 8(2)(m)	Subsection 8(5)	Total
129	0	0	129

Section 5: Requests for Correction of Personal Information and Notations

Disposition for Correction Requests Received	Number
Notations attached	0
Requests for correction accepted	1
Total	1

Section 6: Extensions

6.1 Reasons for extensions

Number of requests where an extension was 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 Confidence Section (Section 70)	External	Internal	
66	0	42	24	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 Confidence Section (Section 70)	External	Internal	
1 to 15 days	0	0	0	0	0	0	0	0
16 to 30 days	0	42	24	0	0	0	0	0
31 days or greater								0
Total	0	42	24	0	0	0	0	0

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
Total	0	0	0	0
Closed during the reporting period	0	0	0	0
Carried over to the next reporting period	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
	1 to 15 Days	16 to 30 Days	31 to 60 Days	61 to 120 Days	121 to 180 Days	181 to 365 Days	More Than 365 Days	
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
Total	0	0	0	0	0	0	0	0

7.3 Recommendations and completion time for consultations received from other organizations

Recommendation	Number of days required to complete consultation requests							Total
	1 to 15 Days	16 to 30 Days	31 to 60 Days	61 to 120 Days	121 to 180 Days	181 to 365 Days	More Than 365 Days	
All disclosed	0	0	0	0	0	0	0	0
Disclosed in part	0	0	0	0	0	0	0	0
All exempted	0	0	0	0	0	0	0	0
All excluded	0	0	0	0	0	0	0	0
Consult other institution	0	0	0	0	0	0	0	0
Other	0	0	0	0	0	0	0	0
Total	0	0	0	0	0	0	0	0

Section 8: Completion Time of Consultations on Cabinet Confidences

8.1 Requests with Legal Services

Number of Days	Fewer than 100 Pages Processed		101-500 Pages Processed		501-1000 Pages Processed		1001-5000 Pages Processed		More than 5000 Pages Processed	
	Number of Requests	Pages Disclosed	Number of Requests	Pages Disclosed	Number of Requests	Pages Disclosed	Number of Requests	Pages Disclosed	Number of Requests	Pages Disclosed
1 to 15	0	0	0	0	0	0	0	0	0	0
16 to 30	0	0	0	0	0	0	0	0	0	0
31 to 60	0	0	0	0	0	0	0	0	0	0
61 to 120	0	0	0	0	0	0	0	0	0	0
121 to 180	0	0	0	0	0	0	0	0	0	0
181 to 365	0	0	0	0	0	0	0	0	0	0
More than 365	0	0	0	0	0	0	0	0	0	0
Total	0	0	0	0	0	0	0	0	0	0

8.2 Requests with Privy Council Office

Number of Days	Fewer Than 100 Pages Processed		101-500 Pages Processed		501-1000 Pages Processed		1001-5000 Pages Processed		More than 5000 Pages Processed	
	Number of Requests	Pages Disclosed	Number of Requests	Pages Disclosed	Number of Requests	Pages Disclosed	Number of Requests	Pages Disclosed	Number of Requests	Pages Disclosed
1 to 15	0	0	0	0	0	0	0	0	0	0
16 to 30	0	0	0	0	0	0	0	0	0	0
31 to 60	0	0	0	0	0	0	0	0	0	0
61 to 120	0	0	0	0	0	0	0	0	0	0
121 to 180	0	0	0	0	0	0	0	0	0	0
181 to 365	0	0	0	0	0	0	0	0	0	0
More than 365	0	0	0	0	0	0	0	0	0	0
Total	0	0	0	0	0	0	0	0	0	0

Section 9: Complaints and Investigations Notices Received

Section 31	Section 33	Section 35	Court action	Total
9	0	0	0	9

Section 10: Privacy Impact Assessments (PIA) and Personal Information Banks (PIB)

10.1 Privacy Impact Assessments

Number of PIA(s) 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	36	0	0	0
Central	15	0	0	0
Total	51	0	0	0

Section 11: Privacy Breaches

11.1 Material Privacy Breaches reported

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

11.2 Non-Material Privacy Breaches

Number of non-material privacy breaches	16
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Section 12: Resources Related to the *Privacy Act*

12.1 Allocated Costs

Expenditures		Amount
Salaries		\$533,211
Overtime		\$0
Goods and Services		\$143,198
• Professional services contracts	\$112,972	
• Other	\$30,226	
Total		\$676,409

12.2 Human Resources

Resources	Person Years Dedicated to Privacy Activities
Full-time employees	6.065
Part-time and casual employees	0.000
Regional staff	0.000
Consultants and agency personnel	0.583
Students	0.000
Total	6.648

Note: Enter values to three decimal places.



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

Name of institution: Canada Post Corporation

Reporting period: 2020-04-01 to 2021-03-31

Section 1: Capacity to Receive Requests

Enter the number of weeks your institution was able to receive ATI and Privacy requests through the different channels.

	Number of Weeks
Able to receive requests by mail	52
Able to receive requests by email	52
Able to receive requests through the digital request service	52

Section 2: Capacity to Process Records

2.1 Enter the number of weeks your institution was able to process paper records in different classification levels.

	No Capacity	Partial Capacity	Full Capacity	Total
Unclassified Paper Records	23	0	29	52
Protected B Paper Records	23	0	29	52
Secret and Top Secret Paper Records	23	0	29	52

2.2 Enter the number of weeks your institution was able to process electronic records in different classification levels.

	No Capacity	Partial Capacity	Full Capacity	Total
Unclassified Electronic Records	0	0	52	52
Protected B Electronic Records	0	0	52	52
Secret and Top Secret Electronic Records	0	0	52	52



Section 3: Open Requests and Complaints Under the *Access to Information Act*

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

Fiscal Year Open Requests Were Received	Open Requests that are Within Legislated Timelines as of March 31, 2022	Open Requests that are Beyond Legislated Timelines as of March 31, 2022	Total
Received in 2021-2022	13	5	18
Received in 2020-2021	1	2	3
Received in 2019-2020	0	0	0
Received in 2018-2019	0	0	0
Received in 2017-2018	0	0	0
Received in 2016-2017	0	0	0
Received in 2015-2016 or earlier	0	0	0
Total	14	7	21

3.2 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 2021-2022	10
Received in 2020-2021	6
Received in 2019-2020	2
Received in 2018-2019	1
Received in 2017-2018	1
Received in 2016-2017	1
Received in 2015-2016 or earlier	0
Total	21

Section 4: Open Requests and Complaints Under the Privacy Act

4.1 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, 2022	Open Requests that are <i>Beyond</i> Legislated Timelines as of March 31, 2022	Total
Received in 2021-2022	50	3	53
Received in 2020-2021	0	0	0
Received in 2019-2020	0	0	0
Received in 2018-2019	0	0	0
Received in 2017-2018	0	0	0
Received in 2016-2017	0	0	0
Received in 2015-2016 or earlier	0	0	0
Total	50	3	53

4.2 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 2021-2022	6
Received in 2020-2021	1
Received in 2019-2020	0
Received in 2018-2019	0
Received in 2017-2018	1
Received in 2016-2017	0
Received in 2015-2016 or earlier	0
Total	8

Section 5: Social Insurance Number (SIN)

Did your institution receive authority for a new collection or new consistent use of the SIN in 2021-2022?	No
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