

Privacy Annual Report 2024-2025

April 2024-March 2025



Contents

1	Intro	oduction	3
	1.1	Canada Post's responsibility	3
	1.2	Canada Post and the <i>Privacy Act</i>	4
2.	Org	anizational Structure	5
3.	Dele	gation Order	7
4.	Perf	ormance of the Privacy Program in 2024-2025	7
	4.1	Volume of requests	7
	4.2	Time limits	9
	4.3	Extensions	9
	4.4	Disclosure	10
	4.5	Complaints	11
	4.6	Personal information banks	11
5.	Trair	ning and Awareness	12
6.	Poli	cies, Guidelines and Procedures	12
7.	Initia	atives and Projects to Improve Privacy	13
	7.1	Privacy risk assessments	13
	7.2	Privacy considerations pertaining to the responsible use of	
		Artificial Intelligence	13
	7.3	Case management software upgrade	13
	7.4	Strategy to address backlogged requests and reduce the deemed refusal rate	13
8.	Sum	mary of Key Issues and Actions Taken on Complaints	14
	8.1	Access to personal information complaints	14
	8.2	Collection, use and disclosure complaints	14
9.	Mate	erial Privacy Breaches	14
10.	Priva	acy Impact Assessments and Risk Assessments	15
11.	Pub	lic Interest Disclosures	15
12.	Mon	itoring Compliance	15
13.	Con	clusion	16
		lix A – Delegation Order	
-	•	lix B – Canada Post Corporation's Wholly Owned Subsidiaries	
•	•	lix C – Treasury Board of Canada Secretariat Statistical Report	
		lix D – Supplemental Statistical Report on the Access to Information Ac	
•	•	Act	

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, 2024, to March 31, 2025.

1.1 Canada Post's responsibility

The Canada Post Group of Companies (the Group) consists of the core Canada Post segment and its non-wholly owned subsidiary Purolator Holdings Ltd. For part of 2024, the Group included subsidiaries SCI Group Inc. (up to March 1, 2024), and Innovapost Inc. (up to April 15, 2024).

In 2024, the Group employed more than 76,000 people (paid full-time and part-time employees, including temporary, casual and term employees), including over 62,300 in the Canada Post segment. The Group delivered approximately 6.6 billion pieces of mail, parcels and messages in 2024 to over 17.6 million addresses across Canada. The Canada Post segment operates the largest retail network in Canada, with over 5,700 post offices across the country. The Corporation has a mandate to conduct its operations on a self-sustaining financial basis, while providing a standard of service that meets the needs of the people of Canada.

In 2024, digital solutions continued to disrupt the company's Transaction Mail and Direct Marketing businesses. Canadians and Canadian businesses have witnessed an accelerated shift from peak mail volumes to digital commerce. Over the last two decades, Lettermail™ volumes have significantly declined. Canada Post delivered 70 per cent fewer pieces of mail per address in 2024 than in the peak mail year of 2006.

The parcel delivery industry has transformed over the past few years, resulting in increased competition on a global scale. Although the Canadian ecommerce market is expected to double over the next decade, Canada Post continues to struggle to retain or gain market share. Several constraints are restricting the company's success in the ecommerce market and adversely affecting Canada Post's overall performance. These constraints include limitations and inflexibility imposed by our collective agreements, a

rigid regulatory and policy framework, the rapid expansion of (and competition from) low-cost, agile competitors, and the Corporation's ongoing financial challenges. Canadians expect Canada Post, its bargaining agents and its sole shareholder, the Government of Canada, to work together as stewards of the national postal service. The goal is a self-sustainable postal service that has the flexibility to modernize and serve all Canadians in today's economy.

The needs of Canadians and Canadian businesses are changing significantly, and Canada Post must change with them. The Corporation continues to work with its shareholder and bargaining agents to address the significant structural, regulatory and financial issues facing the postal service, and ensure this critical national infrastructure is there for all Canadians long into the future. Canada Post is a lifeline for many Canadians, businesses, organizations and communities in every corner of the country. We're the only delivery company with the people, network and commitment to deliver to all of Canada. We understand the important role we play as a publicly owned corporation and a responsible corporate citizen.

Canada Post's revenue is generated in a highly competitive ecommerce and parcels market; its Parcels line of business generated 46 per cent (nearly \$2.8 billion) of the Corporation's revenue in 2024.

1.2 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 *Privacy 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 and functional areas.

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.

2. Organizational Structure

The Access to Information and Privacy Directorate (the Directorate) is led by the ATI and Privacy Director, who also acts as the ATIP Coordinator. It is one of the portfolios under the responsibility of the General Manager of Corporate Compliance, who is also Canada Post's Chief Privacy Officer. The Corporate Compliance Team is part of the Legal and Corporate Affairs team. The Directorate is responsible for the administration of the Access to Information Act and the Privacy Act, the operational accountability for the programs, the administration and processing of access requests received by Canada Post under both acts and the response to complaints from the Office of the Privacy Commissioner of Canada (OPC) and the Office of the Information Commissioner of Canada (OIC). The Directorate's portfolio is divided among two managers.

The Privacy Policy Manager is responsible for the administration of the *Privacy Act* and operational accountability for the privacy management program. The Privacy Office is the centre of excellence for privacy, data protection and anti-spam matters across the Corporation. It works with the lines of business and functional areas to proactively ensure that privacy is built into the design, development and implementation of products, services and programs. During the reporting period, the Privacy Office included two Privacy officers reporting to the Privacy Policy Manager (who also conducted the role of ATIP Policy and Outreach for most of the reporting period). A third Privacy officer joined the Privacy Office, early in 2025.

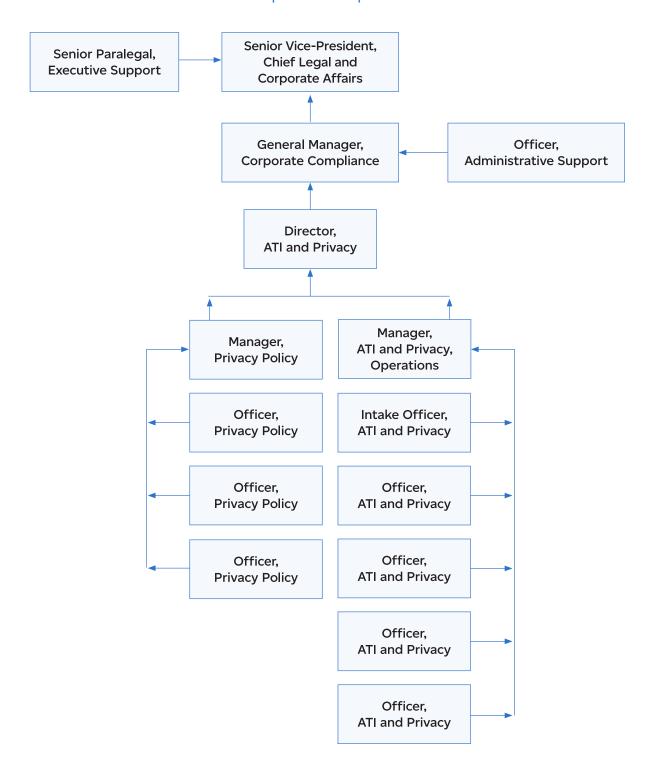
The ATI and Privacy Manager, Operations, oversees the processing of active access requests (under both acts), the performance of the program, and acts as the first level of approval of access to information requests and access to personal information request. In 2024-2025, four ATI and Privacy officers and one intake officer were reporting to the ATI and Privacy Manager, Operations.

The responsibilities of the ATI and Privacy Manager, Policy and Outreach, include the oversight of access policies compliance, the development, implementation and maintenance of internal processes, the development and implementation of the ATI and Privacy Awareness Strategy as well as the delivery of training and awareness sessions throughout the Corporation.

In 2024-2025, Canada Post was not a party to any agreements under section 73.1 of the *Privacy Act*.

The chart below outlines our organizational structure as of March 31, 2025.

Corporate Compliance



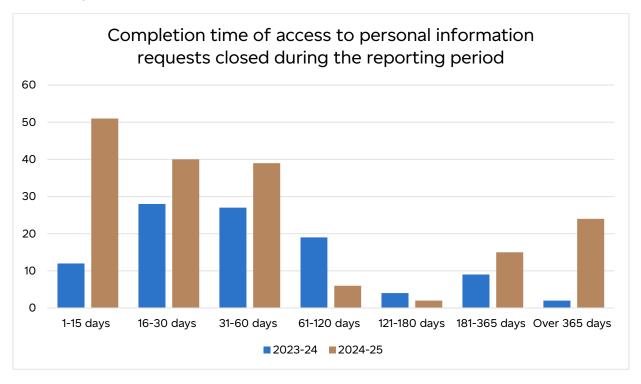
3. Delegation Order

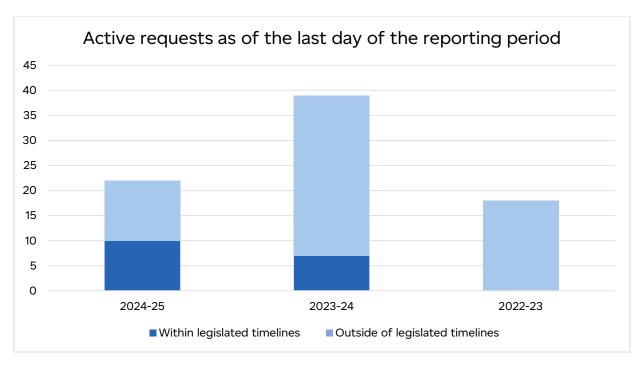
Pursuant to section 73 of the *Privacy Act*, the Board of Directors Chair's authority has been delegated for the Corporation to meet key legislative requirements, while enabling efficiencies and managing risk at the appropriate levels in the Corporation. As required by the TBS, the delegation order is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

4. Performance of the Privacy Program in 2024-2025

4.1 Volume of requests

In 2024-2025, Canada Post processed 109 new formal access requests and closed 177 requests, including some carried over from previous reporting periods, under the *Privacy Act*.

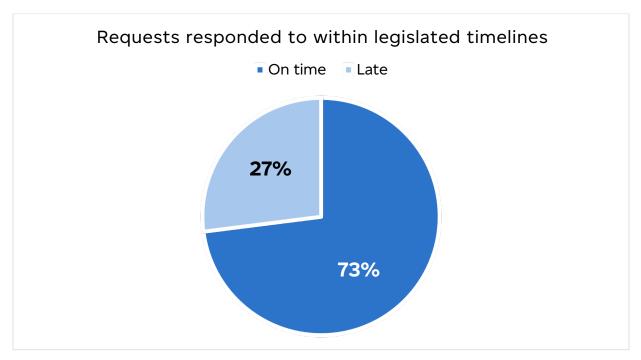




Many of the requests that were processed beyond the legislative timelines involved requests for a voluminous number of records involving several offices of primary interest (OPIs).

The vast majority of the access to personal information requests received during the reporting period pertained to Canada Post employees seeking access to their employee files and for email communications from multiple record holders.

4.2 Time limits



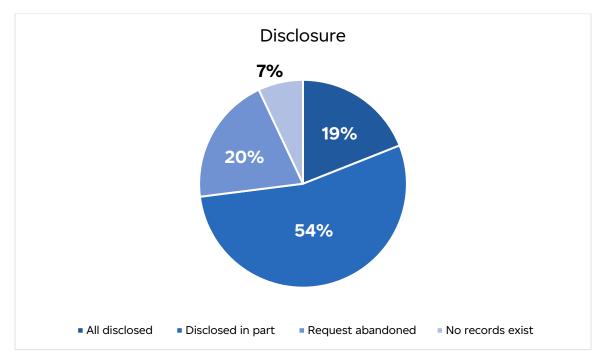
As of March 31, 2025, 73 per cent of the requests were closed within legislated timelines during the reporting period.

4.3 Extensions

In 2024-2025, among the total of 177 requests closed by the ATI and Privacy Directorate, 60 requests required a 30-day extension.

All the extensions were required under section 15(a)i) of the *Privacy Act*, which allows institutions to extend the initial time limit in instances where processing the request would unreasonably interfere with their operations. At Canada Post, ATI and Privacy officers are responsible for processing formal and informal requests under the *Privacy Act* and the *Access to Information Act*, in addition to consultations from other government institutions and requests from law enforcement.

4.4 Disclosure



The following three exemptions were most frequently applied for partially disclosed records:

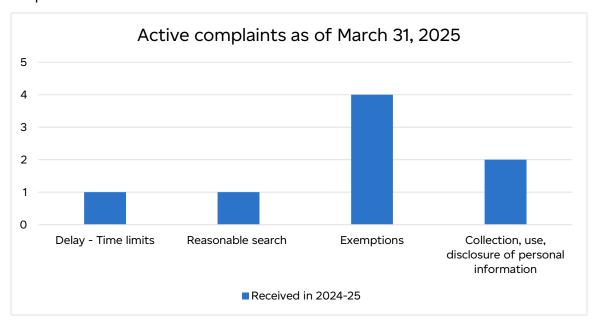
- Section 26, protecting personal information about another individual (invoked in 79 requests).
- Section 22(1)(b), protecting information the disclosure of which could be injurious to the enforcement of any Canadian law or the conduct of lawful investigations (invoked in 31 requests).
- Section 27, protecting information subject to solicitor-client privilege or litigation privilege (invoked in 14 requests).

In addition to formal access to personal information requests, Canada Post also received 31 requests from investigative bodies seeking the disclosure of personal information without the consent of the individuals concerned, as authorized under section 8(2)(e) of the *Privacy Act*. These requests resulted in 17 disclosures.

4.5 Complaints¹

In 2024-2025, the Office of the Privacy Commissioner of Canada (OPC) forwarded a total of 13 privacy complaints to Canada Post. This is a notable decrease in the receipt of complaints compared to the previous reporting period which was 28 in total. The following is a breakdown of the 13 privacy complaints received:

- 10 were concerning the processing of access requests.
- 3 were related to the protection of privacy in the collection, use and disclosure of personal information.



4.6 Personal information banks

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 2024-2025, no new personal information banks were created, terminated or modified.

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

- employee supervisory records
- employee health records
- employee personal file (career)
- employee personal file (benefits)
- employee personal file (payroll)
- worker's compensation board records (10)

¹ As of the last day of the reporting period, there were no active complaints received in the previous reporting periods.

5. Training and Awareness

The Privacy Office is committed to raising awareness and building knowledge of privacy throughout the Corporation. In 2024-2025, the following training and awareness initiatives took place:

- The mandatory privacy e-learning training with a two-year refresher cycle for all management employees was launched.
- New privacy e-learning modules have been developed for management and exempted employees. They will replace the current e-learning materials and will be launched in 2025. This training was designed with a focus on "privacy by design" as well as an understanding of personal information through its lifecycle.
- Additional targeted privacy awareness training was delivered to AccessHR, who is responsible for Human Resources at Canada Post.
- The Privacy Office has continued to collaborate with other areas of Corporate
 Compliance, including ATIP and Information and Records Management to ensure
 that the training and awareness strategy is comprehensive. These joint efforts
 positively contribute to increasing awareness of the importance of privacy as well
 as the need to manage records appropriately.

6. Policies, Guidelines and Procedures

In 2024-2025, the Privacy Office made advancements in updating its policies and procedures.

The Board of Directors approved a revised Privacy Policy. The key objectives achieved with the updated Privacy Policy are:

- to consolidate the Canada Post Employee Privacy Policy and the Canada Post Customer Privacy Policy, which were both in effect since 2008;
- to broaden the scope of application of the Policy so it includes the personal information that is managed on behalf of the Canada Post's commercial customers;
- to clarify pertinent privacy obligations and general practices (as well as practices that apply to specific Canada Post roles and functions);
- to foster a culture of privacy at Canada Post to ensure the responsible management of employee and customer personal information under its control and/or in its care;
- to reflect a more modern view of privacy and personal information protection.

7. Initiatives and Projects to Improve Privacy

7.1 Privacy risk assessments

During the 2024-2025 reporting period, the Privacy Office continued its comprehensive review of the existing privacy risk assessment tools and processes. Among the significant improvements to this process, since September 2024, there are automatic notifications when new initiatives requiring significant investment may involve personal information. This inclusion has led to a deliberate increase in the privacy-by-design approach, which engages project managers in preliminary assessments of privacy risks. This approach decentralizes accountability for privacy to the business/project managers, who are responsible for collaborating with the Privacy Office to identify privacy risks and implement mitigation measures.

7.2 Privacy considerations pertaining to the responsible use of Artificial Intelligence

The Privacy Office worked collaboratively with Canada Post's Data Governance Office to develop a policy² and procedures for the responsible use of Artificial Intelligence (AI). In addition, the Privacy Office is a regular member of an AI working group, composed of internal stakeholders in various key business units across the Corporation. Its role is to review and assess potential privacy risks in "proof of concepts" for the use of AI in projects and initiatives. The privacy risks and recommendations are instrumental in the final decision-making process leading to the approval of the projects.

7.3 Case management software upgrade

During the reporting period, the ATI and Privacy Directorate carried out a major upgrade to its case management software and redaction program, which facilitated the processing and management of access to personal information (ATI) requests. This upgrade introduced automation for tasks previously performed manually and transitioned to a cloud-based infrastructure to enhance system speed, particularly for handling large volume requests.

The software upgrade was fully completed on December 29, 2024.

7.4 Strategy to address backlogged requests and reduce the deemed refusal rate

In 2024, an action plan was developed to address the Deemed Refusal Rate (DRR) and ensure timely processing of all new requests. The plan focused on the root causes of the late files and put into place measures including new procedures and timelines to process requests. These efforts were reflected in a gradual reduction of the DRR throughout the reporting period.

² The Policy is scheduled to be formally launched during the fall of 2025.

8. Summary of Key Issues and Actions Taken on Complaints

8.1 Access to personal information complaints

Canada Post has received a total of 10 access to personal information complaints during the reporting period, six of which were closed during the same reporting period.

Most of the complaints received in 2024–2025 related to delays in providing the requested records. Some of these delays were due to the high volume of records and the involvement of multiple Offices of Primary Interest (OPIs). One complaint concerned the right of correction; the requester indicated that they had not received the form needed to correct their personal information. The form was promptly reissued, and the complaint was resolved.

Canada Post continues to work closely with investigators of the Office of the Privacy Commissioner of Canada (OPC) and has been proactive in meeting with the OPC to ensure the timely and efficient processing of complaints.

8.2 Collection, use and disclosure complaints

Three complaints were received from the OPC related to collection, use or disclosure. One formal complaint, successfully resolved, concerned the disclosure of a disciplinary measure to a workers' compensation board.

Two complaints were received via the OPC's early resolution process. In both instances, the complaints involved employee personal information being inadvertently shared via email to other employees. The impacted individuals were notified of the incidents and the employees who had sent the emails were reminded of key privacy considerations to take into account before sending personal information via email.

9. Material Privacy Breaches

In 2024-2025, Canada Post experienced one material privacy breach. Canada Life, a service provider who manages Canada Post's employee benefits, reported a cyber incident impacting the My Canada Life at Work™ accounts of 27 employees. The incident impacted profile details, contact information, financial information, credential information, and recent benefits claim history. Canada Life's security experts contained the issue and implemented additional security measures. The impacted employees were offered identity theft protection subscriptions.

10. Privacy Impact Assessments and Risk Assessments

The Canada Post Privacy Office conducts risk assessments and formal privacy impact assessments (PIAs) 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 throughout the development of Canada Post products and services.

During the reporting period, no formal PIAs were completed.

11. Public Interest Disclosures

No disclosures under paragraph 8(2)(m) were made during the reporting period.

12. Monitoring Compliance

In accordance with the requirements stated in the *Policy on Privacy Protection*, the Directorate continued to closely monitor and evaluate Canada Post's performance in responding to access requests under the *Privacy Act*. For example:

- Active access to personal information requests are monitored on a weekly basis by the ATI and Privacy Manager, Operations, and the ATI and Privacy Director. This ensures that there is a strategic view on all files and an adequate prioritization and assignment of files to minimize the risks of deemed refusals.
- A monthly scorecard is in place containing statistics to measure the following criteria against objectives set for the year:
 - the number of requests received during the month;
 - o the percentage of privacy requests completed on time;
 - o the number of extensions taken:
 - the deemed refusal rate.

The monthly scorecard is provided to the ATI and Privacy Director and to the General Manager, Corporate Compliance. On a quarterly basis, metrics, key strategic files and areas of risk, and regulatory updates are raised with the executive team. Briefings on key strategic files are given to senior executives and the Board of Directors, as required.

The Canada Post Privacy Office equally monitors the Corporation's compliance with its statutory and regulatory obligations regarding the collection, use, disclosure, retention and disposition of customer and employee information. The monitoring mechanisms include:

- Reviewing corporate projects and initiatives that involve personal information to identify potential privacy risks and recommend mitigation.
- Fielding employee and customer inquiries about Canada Post's privacy practices.
- Investigating customer and employee privacy concerns and providing guidance to business units about privacy risk mitigation strategies.
- Providing privacy awareness and education to Canada Post's business units and program areas responsible for managing customer or employee personal information.
- Managing privacy incidents and breaches.
- Reviewing privacy posture of all potential vendors that may be required to manage customer or employee information on behalf of Canada Post; ensuring strict data privacy and security requirements are included in agreements with such vendors.

13. Conclusion

In 2024-2025, Canada Post remained committed to the transformation of the business to better meet the needs of Canadians.

The Corporation continues to explore the growth and expansion of its financial services portfolio to improve access for all Canadians, particularly in rural, remote and Indigenous communities.

This transformation requires 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 use employee and customer data along with new technologies. Privacy will continue to be a key consideration for business in supporting our transformative goals, while ensuring that we achieve them without compromising the privacy interests of the people we proudly serve.

Canada Post is committed to ensuring transparency in how data is collected and used responsibly to protect the privacy interests of all Canadians.

Privacy Annual Report 2024-25 Canada Post Corporation

Appendix A – Delegation Order

Canada Post Corporation Delegation Order

The President and Chief Executive Officer of the Canada Post Corporation, Doug Ettinger, on this <u>23</u> day of <u>September</u> 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 and 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	Х		Х		
8(2)(m)	May disclose PI in the public interest or in the interest of the individual	Х	Х	Х	Х			
8(4)	To retain copies of requests received under 8(2)(e)	Х	Х	Х	Х	х		
8(5)	To notify the Privacy Commissioner of disclosures under 8(2)(m)	Х	Х	Х	Х			
9(1)	To retain record of PI use/disclosures not included in InfoSource	Х	Х	X	x	Х		
9(4)	Shall notify OPC of disclosure of use consistent with Consistent uses	Х	Х	Х	Х	х		
10	Shall cause PI to be included in personal information banks	Х	х	Х	Х	х		

Privacy Annual Report 2024-2025 Canada Post Corporation

		Delegation Order					
Section	Power, Duties or Functions	Chief Executive Officer	Senior Vice-President, Corporate Affairs and Sustainability	General Manager and 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 Pl	X	x	X	×	х	
15	May extend time limits and notify applicant	х	х	Х	Х	х	
17(2)(b)	Language of access: to determine the necessity for translation	Х	Х	Х	Х	Х	
17(3)(b)	May provide access to personal information in alternative format	Х	Х	Х	Х	Х	

Exemption Provisions of the *Privacy Act*

				Delegation	on Order		
Section	Power, Duties or Functions	Chief Executive Officer	Senior Vice-President, Corporate Affairs and Sustainability	General Manager and 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	Х	х	X	Х		
19(1)	Exemption – To refuse disclosure of PI obtained in confidence from other governments	Х	х	Х	Х		
19(2)	Exemption – May disclose PI where authorized to disclose	Х	Х	Х	Х		
20	Exemption – May refuse disclosure of PI where it could be injurious to Federal-provincial relations	Х	х	Х	Х		
21	Exemption – May refuse disclosure of PI where it could be injurious to conduct of international affairs and defence	Х	х	х	х		

Privacy Annual Report 2024-2025 Canada Post Corporation

				Delegation	on Order		
Section	Power, Duties or Functions	Chief Executive Officer	Senior Vice-President, Corporate Affairs and Sustainability	General Manager and Chief Privacy Officer (CPO)	Director, Access to Information and Privacy	Manager, Access to Information and Privacy	Officer, Access to Information and Privacy
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	Х	х	Х	Х		
24	Exemption – May refuse to disclose PI re individuals sentenced for an offence	Х	х	Х	Х		
25	Exemption – May refuse to disclose Pl if it threatens the safety of individuals	Х	Х	Х	x		
26	Exemption – May refuse to disclose Pl about another individual and shall refuse to disclose Pl under section 8	Х	х	Х	Х		
27 ¹	Exemption – May refuse to disclose Pl subject to Solicitor-client privilege	Х	Х	Х	x		
28 ²	Exemption – May refuse to disclose PI relating to health of individual where contrary to best interests	Х	Х	Х	Х		

¹ In consultation with Legal ² In consultation with a qualified medical professional

Privacy Annual Report 2024-2025 Canada Post Corporation

Other Provisions of the *Privacy Act*

				Delegati	on Order		
Section	Power, Duties or Functions	Chief Executive Officer	Senior Vice-President, Corporate Affairs and Sustainability	General Manager and 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	Х	Х	Х	х		
33(2)	Right to make re presentation: May make representations to the Commissioner	Х	х	Х	х		
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	Х	х	Х	х		
35(4)	May notify the Commissioner that access to be given	Х	Х	Х	Х		
36(3)	Review of Exempt Banks: Report of findings and recommendations (exempt banks)	Х	х	Х	Х		
37(3)	Review of Compliance with sections 4 to 8: Report of findings and recommendations by Privacy Commissioner	Х	х	Х	х		
51(2)(b)	May request special rules for hearings	Х	Х	Х	Х		
51(3)	May request Ex parte representations	Х	Х	Х	Х		
72(1)	Shall prepare an Annual Report to Parliament	Х	Х	Х			

Privacy Annual Report 2024-2025 Canada Post Corporation

Delegation of Powers, Duties or Functions Pursuant to the <u>Privacy Act Regulations</u>

				Delegation	on Order		
Section	Power, Duties or Functions	Chief Executive Officer	Senior Vice-President, Corporate Affairs and Sustainability	General Manager and 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	Х	×	Х	X	Х	
11(2)	To provide notification that correction to personal information has been made	х	х	Х	х	Х	
11(4)	To provide notification that correction to personal information has been refused	Х	х	Х	Х	Х	
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 requester	х	х	х	х		
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	х	х	х	х		

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 Ollawn, this _______ day of _______, 2021

- Doug Ettinger, President and CEO, Canada Post Corporation

Appendix B – Canada Post Corporation's 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, 2024, to March 31, 2025.

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 2875039 Canada Limited.

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: 2024-04-01 to 2025-03-31

Section 1: Requests Under the Privacy Act

1.1 Number of requests

		Number of Requests
Received during reporting period	period	
Outstanding from previous reporting period		90
Outstanding from previous reporting period	46	
Outstanding from more than one reporting period	44	
Total		199
Closed during reporting period		177
Carried over to next reporting period		22
Carried over within legislated timeline	10	
Carried over beyond legislated timeline	12	

1.2 Channels of requests

Source	Number of Requests
Online	29
Email	74
Mail	5
In person	0
Phone	0
Fax	1
Total	109



Section 2: Informal requests

2.1 Number of informal requests

		Number of Requests
Received during reporting period		375
Outstanding from previous reporting periods		295
Outstanding from previous reporting period	234	
Outstanding from more than one reporting period	61	
Total		670
Closed during reporting period		528
Carried over to next reporting period		142

2.2 Channels of informal requests

Source	Number of Requests
Online	8
Email	331
Mail	8
In person	0
Phone	0
Fax	28
Total	375

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
180	127	101	120	0	0	0	528

2.4 Pages released informally

Less Than 100 Pages 100-500 Released Pages Released					1001-5000 Pages Released		More Than 5000 Pages Released		
Number of Requests	Pages Released	Number of Requests	Pages Released	Number of Pages Requests Released		Number of Requests	Pages Released	Number of Requests	Pages Released
324	6,318	155	32,297	40	29,674	9	10,398	0	0

Section 3: Requests Closed During the Reporting Period

3.1 Disposition and completion time

	Completion Time							
Disposition of Requests	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
All disclosed	6	13	7	0	0	4	3	33
Disclosed in part	11	23	29	5	2	8	18	96
All exempted	0	0	0	0	0	0	0	0
All excluded	0	0	0	0	0	0	0	0
No records exist	5	3	3	1	0	1	0	13
Request abandoned	29	1	0	0	0	2	3	35
Neither confirmed nor denied	V	0	0	0	0	0	0	0
Total	51	40	39	6	2	15	24	177

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)	3	23(b)	0
19(1)(b)	0	22(1)(a)(iii)	0	24(a)	0
19(1)(c)	0	22(1)(b)	31	24(b)	0
19(1)(d)	0	22(1)(c)	0	25	0
19(1)(e)	0	22(2)	0	26	79
19(1)(f)	0	22.1	0	27	14
20	0	22.2	0	27.1	0
21	0	22.3	1	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

		Electronic						
Paper	E-record	Other						
46	83	0	0	0	0			

3.5 Complexity

3.5.1 Relevant pages processed and disclosed for <u>paper</u> and <u>e-record</u> formats

Number of Pages Processed	Number of Pages Disclosed	Number of Requests
29,833	23,886	164

3.5.2 Relevant pages processed and disclosed by size of requests

		nan 100 rocessed	101-500 Pages Processed		501-1000 Pages Processed		1001-5000 Pages Processed		More than 5000 Pages Processed	
Disposition	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	32	512	1	111	0	0	0	0	0	0
Disclosed in part	44	2097	35	8750	11	8909	6	9417	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	35	37	0	0	0	0	0	0	0	0
Neither confirmed nor denied	0	0	0	0	0	0	0	0	0	0
Total	111	2646	36	8861	11	8909	6	9417	0	0

3.5.3 Relevant minutes processed and disclosed for <u>audio</u> 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

	Less than 6	_	60-120 Minut	es processed	More than 120 Minutes processed	
Disposition	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 $\underline{\text{video}}$ formats by size of requests

	Less than 6 proce		60-120 Minut	es processed	More than 120 Minutes processed		
Disposition	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	0	0	0	0	0
Disclosed in part	0	0	88	0	88
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	0	0	88	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	130
Percentage of requests closed within legislated timelines (%)	73.44632768

3.7 Deemed refusals

3.7.1 Reasons for not meeting legislated timelines

		Principal Rea	son	
Number of Requests Closed Past the Legislated Timelines	Interference with Operations / Workload	External Consultation	Internal Consultation	Other
47	47	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	1	1
16 to 30 days	1	0	1
31 to 60 days	3	0	3
61 to 120 days	1	2	3
121 to 180 days	3	0	3
181 to 365 days	6	7	13
More than 365 days	8	15	23
Total	22	25	47

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
17	0	0	17

Section 5: Requests for Correction of Personal Information and Notations

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

Section 6: Extensions

6.1 Reasons for extensions

	15(a)(i)	Interferen	ce with ope	erations	15(a)(ii	ion		
Number o requests where an extension was taken	review required to determine	Large volume of pages	Large volume of requests	Documents are difficult to obtain	Cabinet Confidence Section (Section 70)	External	Internal	15(b) Translation purposes or conversion
60	0	22	37	1	0	0	0	0

6.2 Length of extensions

	15(a)(i) Interference	with opera	15(a)(ii				
Length of extensions	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	15(b) Translation purposes or conversion
1 to 15 days	0	0	0	0	0	0	0	0
16 to 30 days	0	22	37	1	0	0	0	0
31 days or greater								0
Total	0	22	37	1	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

		Number of Days Required to Complete Consultation Requests								
Recommendation	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		
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 institutions	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

		Number of days required to complete consultation requests										
Recommendation	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				
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 institutions	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

	Fewer than 100 Pages Processed		3			501-1000 Pages Processed		5000 rocessed	More than 5000 Pages Processed	
Number of Days	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

	Fewer Than 100 Pages Processed		101-500 Pages Processed		501-1000 Pages Processed		1001-5000 Pages Processed		More than 5000 Pages Processed	
Number of Days	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
10	0	0	0	10

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	0	0	0	0
Total	36	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	21

Section 12: Resources Related to the Privacy Act

12.1 Allocated Costs

Expenditures		Amount
Salaries		\$782,417
Overtime		\$0
Goods and Services		\$62,101
Professional services contracts		
• Other \$62,101		
Total		\$844,518

12.2 Human Resources

Resources	Person Years Dedicated to Privacy Activities
Full-time employees	8.172
Part-time and casual employees	0.000
Regional staff	0.000
Consultants and agency personnel	0.000
Students	0.250
Total	8.422

Note: Enter values to three decimal places.

Appendix D – Supplemental Statistical Report on the Access to Information Act and Privacy Act

*	Government of Canada	Gouvernement du Canada

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

Name of institution: Canada Post Corporation

Reporting period: <u>2024-04-01</u> to <u>2025-03-31</u>



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 Within Legislated Timelines as of March 31, 2024	Open Requests that are Beyond Legislated Timelines as of March 31, 2024	Total
Received in 2024-2025	8	2	10
Received in 2023-2024	0	2	2
Received in 2022-2023	0	4	4
Received in 2021-2022	0	0	0
Received in 2020-2021	0	1	1
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	0	0	0
Received in 2014-2015 or earlier	0	0	0
Total	8	9	17

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 2024-2025	7
Received in 2023-2024	7
Received in 2022-2023	1
Received in 2021-2022	1
Received in 2020-2021	o
Received in 2019-2020	O
Received in 2018-2019	1
Received in 2017-2018	0
Received in 2016-2017	O
Received in 2015-2016	0
Received in 2014-2015 or earlier	o
Total	17

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 Within Legislated Timelines as of March 31, 2022	Open Requests that are Beyond Legislated Timelines as of March 31, 2022	Total
Received in 2024-2025	10	3	13
Received in 2023-2024	0	5	5
Received in 2022-2023	0	2	2
Received in 2021-2022	0	2	2
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	0	0	0
Received in 2014-2015	0	0	0
Total	10	12	22

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 2024-2025	6
Received in 2023-2024	0
Received in 2022-2023	0
Received in 2021-2022	0
Received in 2020-2021	0
Received in 2019-2020	0
Received in 2018-2019	0
Received in 2017-2018	0
Received in 2016-2017	0
Received in 2015-2016	0
Received in 2014-2015 or earlier	0
Total	6

Section 3: Social Insurance Number (SIN)

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

Section 4: Universal Access under the Privacy Act

How many requests were received from confirmed foreign nationals outside of Canada i	۱
2022-2023?	0