

**Canadian Commercial Corporation**  
**Annual Report to Parliament on the *Privacy Act***  
**April 1, 2011 – March 31, 2012**

**1. Introduction**

The *Privacy Act* extends to individuals the right of access to information about themselves held by the government, subject to specific and limited exceptions. This *Act* also protects individuals' privacy by preventing others from having access to their personal information and gives individuals substantial control over its collection, use and disclosure. The *Privacy Act* took effect on July 1, 1983.

Section 72 of the *Privacy Act* requires that the head of every government institution prepare for submission to Parliament an annual report on the administration of the *Act* within the institution during each financial year.

A Crown corporation of the Government of Canada, the Canadian Commercial Corporation (CCC) acts as Canada's international contracting and procurement agency. CCC reports to Parliament through the Minister of International Trade under Schedule III Part I of the Financial Administration Act.

CCC connects government buyers with Canadian expertise through the negotiation and execution of government-to-government contracts. Our strong relationships with international buyers and our access to Canada's innovative industrial base puts us in a unique position to facilitate and promote international trade.

The Corporation focuses on areas where there is a clear role for government, operating in sectors outside of World Trade Organization agreements, such as aerospace and defence. We also focus on emerging and developing markets, where governments of other countries may require additional capacity to undertake complex and timely procurements and projects. CCC can operate either as Prime Contractor selling to governments, or as a Procurement Agent sourcing Canadian goods and services on behalf of governments in other countries. The Corporation also procures equipment, supplies and expertise to help the Government of Canada fulfill its in-kind aid contributions worldwide.

**2. Structure**

The administration of the *Privacy Act* which, due to the size of the Corporation (under 150 employees), is a function assumed by Legal Services. The Vice President Legal Services and General Counsel is a member of the Corporation's executive committee and is the Access to Information and Privacy Coordinator. Two administrative staff from Legal Services supports this position.

The Coordinator ensures compliance by the Corporation by processing requests for information in accordance with the legislative obligations, relevant regulations, directives and guidelines of the *Act*.

### **3. Delegation Order**

While there has been no Delegation Order, in accordance with Section 3 of the *Privacy Act*, the President, as the chief executive officer of the Corporation, is the "head" for the purposes of the *Act*.

### **4. Statistical Report**

The number of requests the Corporation has received over the past several years has been consistently low. In fiscal year 2011-12, CCC did not process any requests under the *Privacy Act*. The statistical report is attached for your information and has been forwarded to the Treasury Board of Canada.

There were no costs associated with the administration of the *Privacy Act* during the reporting period.

### **5. Education and Training**

The Canadian Commercial Corporation provided a "Lunch and Learn" session to employees on the *Privacy Act*. It was a beginner session with a focus on the basic aspects of the *Act*. As most of our Lunch and Learn sessions are largely interactive, small groups of 10 to 12 staff members are encouraged to participate on a first come first served basis. This session was extremely successful with further sessions are planned for the future.

### **6. Policy, Guidelines and Procedures**

Our institution did not implement any new and/or revised Privacy Act policies, guidelines or procedures during the reporting period.

### **7. Complaints and Investigations**

During the reporting period, CCC did not receive notification of any complaints and/or investigations.

### **8. PIA (Privacy Impact Assessment)**

The Canadian Commercial Corporation completed one (1) Privacy Impact Assessment during the reporting period and it was forwarded to the Office of the Privacy Commissioner and Treasury Board of Canada Secretariat.

CCC outsources various human resources functions such as the processing of payroll and leave balances to another federal government institution, being Public Works and Government Services Canada. The relationship with the current third party provider is in the midst of significant change and as a result CCC has reviewed various options to determine if these functions can be completed more effectively and cost efficiently by a private third party while still maintaining privacy controls. Over 80 hours were spent in the preparation of the PIA. Please find below a link to the PIA on our website.

<http://www.ccc.ca/en/ccc/about-ccc/access-to-information-and-privacy>

### **9. Disclosure of Personal Information pursuant to paragraph 8(2)(m).**

During the reporting period, the Canadian Commercial Corporation did not disclose any personal information pursuant to subsections 8(2)(m) of the *Privacy Act*.



## Statistical Report on the *Privacy Act*

Name of institution: Canadian Commercial Corporation

Reporting period: 4/1/2011 to 31-Mar-12

### PART 1 – Requests under the *Access to Information Act*

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

### PART 2 – Requests closed during the reporting period

#### 2.1 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	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
No records exist	0	0	0	0	0	0	0	0
Request transferred	0	0	0	0	0	0	0	0
Request abandoned	0	0	0	0	0	0	0	0
<b>Total</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>

#### 2.2 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)	0	24(b)	0
19(1)(d)	0	22(1)(c)	0	25	0
19(1)(e)	0	22(2)	0	26	0
19(1)(f)	0	22.1	0	27	0
20	0	22.2	0	28	0
21	0	22.3	0		

#### 2.3 Exclusions

Section	Number of requests	Section	Number of requests	Section	Number of requests
69(1)(a)	0	70(1)(a)	0	70(1)(d)	0
69(1)(b)	0	70(1)(b)	0	70(1)(e)	0
69.1	0	70(1)(c)	0	70(1)(f)	0
				70.1	0

## 2.4 Format of information released

Disposition	Paper	Electronic	Other formats
All disclosed	0	0	0
Disclosed in part	0	0	0
<b>Total</b>	0	0	0

## 2.5 Complexity

### 2.5.1 Relevant pages processed and disclosed

Disposition of requests	Number of pages processed	Number of pages disclosed	Number of requests
All disclosed	0	0	0
Disclosed in part	0	0	0
All exempted	0	0	0
All excluded	0	0	0
Request abandoned	0	0	0

### 2.5.2 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	
	Requests	Pages disclosed	Requests	Pages disclosed	Requests	Pages disclosed	Requests	Pages disclosed	Requests	Pages disclosed
All disclosed	0	0	0	0	0	0	0	0	0	0
Disclosed in part	0	0	0	0	0	0	0	0	0	0
All exempted	0	0	0	0	0	0	0	0	0	0
All excluded	0	0	0	0	0	0	0	0	0	0
Abandoned	0	0	0	0	0	0	0	0	0	0
<b>Total</b>	0	0	0	0	0	0	0	0	0	0

Disposition	Consultation required	Legal advice sought	Interwoven Information	Other	Total
All disclosed	0	0	0	0	0
Disclosed in part	0	0	0	0	0
All exempted	0	0	0	0	0
All excluded	0	0	0	0	0
Abandoned	0	0	0	0	0
<b>Total</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>

## 2.6 Deemed refusals

### 2.6.1 Reasons for not meeting statutory deadline

Number of requests closed past the statutory deadline	Principal Reason			
	Workload	External consultation	Internal consultation	Other
0	0	0	0	0

### 2.6.2 Number of days past deadline

Number of days past deadline	Number of requests past deadline where no extension was taken	Number of requests past deadline where an extension was taken	Total
1 to 15 days	0	0	0
16 to 30 days	0	0	0
31 to 60 days	0	0	0
61 to 120 days	0	0	0
121 to 180 days	0	0	0
181 to 365 days	0	0	0
More than 365 days	0	0	0
<b>Total</b>	<b>0</b>	<b>0</b>	<b>0</b>

## 2.7 Requests for translation

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

## PART 3 – Disclosures under subsection 8(2)

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

## PART 4 – Requests for correction of personal information and notations

	Number
Requests for correction received	0
Requests for correction accepted	0
Requests for correction refused	0
Notations attached	0

## **PART 5 – Extensions**

### **5.1 Reasons for extensions and disposition of requests**

<b>Disposition of requests where an extension was taken</b>	<b>15(a)(i) Interference with operations</b>	<b>15(a)(ii) Consultation</b>		<b>15(b) Translation or coversation</b>
		<b>Section 70</b>	<b>Other</b>	
All disclosed	0	0	0	0
Disclosed in part	0	0	0	0
All exempted	0	0	0	0
All excluded	0	0	0	0
No records exist	0	0	0	0
Request abandoned	0	0	0	0
<b>Total</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>

### **5.2 Length of extensions**

<b>Length of extensions</b>	<b>15(a)(i) Interference with operations</b>	<b>15(a)(ii) Consultation</b>		<b>15(b) Translation purposes</b>
		<b>Section 70</b>	<b>Other</b>	
1 to 15 days	0	0	0	0
16 to 30 days	0	0	0	0
<b>Total</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>

## PART 6 – Consultations received from other institutions and organizations

### 6.1 Consultations received from other government institutions and organizations

Consultations	Other government institutions	Number of pages to review	Other organizations	Number of pages to review
Received during reporting period	0	0	0	0
Outstanding from the previous reporting period	0	0	0	0
<b>Total</b>	0	0	0	0
Closed during the reporting period	0	0	0	0
Pending at the end of the reporting period	0	0	0	0

### 6.2 Recommendations and completion time for consultations received from other government 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
<b>Total</b>	0	0	0	0	0	0	0	0

### 6.3 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	
Disclose entirely	0	0	0	0	0	0	0	0
Disclose in part	0	0	0	0	0	0	0	0
Exempt entirely	0	0	0	0	0	0	0	0
Exclude entirely	0	0	0	0	0	0	0	0
Consult other institution	0	0	0	0	0	0	0	0
Other	0	0	0	0	0	0	0	0
<b>Total</b>	0	0	0	0	0	0	0	0

## PART 7 – Completion time of consultations on Cabinet confidences

Number of days	Number of responses received	Number of responses received past deadline
1 to 15	0	0
16 to 30	0	0
31 to 60	0	0
61 to 120	0	0
121 to 180	0	0
181 to 365	0	0
More than 365	0	0
<b>Total</b>	<b>0</b>	<b>0</b>

## PART 8 – Resources related to the *Privacy Act*

### 8.1 Costs

Expenditures		Amount
Salaries		\$0
Overtime		\$0
Goods and Services		\$0
• Contracts for privacy impact assessments	\$0	
• Professional services contracts	\$0	
• Other	\$0	
<b>Total</b>		<b>\$0</b>

### 8.2 Human Resources

Resources	Dedicated full-time	Dedicated part-time	Total
Full-time employees	0	3	3
Part-time and casual employees	0	0	0
Regional staff	0	0	0
Consultants and agency personnel	0	0	0
Students	0	0	0
<b>Total</b>	<b>0</b>	<b>3</b>	<b>3</b>



## APPENDIX A

### Additional Reporting Requirements – *Privacy Act*

Treasury Board Secretariat is monitoring compliance with the Privacy Impact Assessment (PIA) Policy (which came into effect on May 2, 2002) and the Directive on Privacy Impact Assessment (which takes effect April 1, 2010) through a variety of means. Institutions are therefore required to report the following information for this reporting period. Note that because some institutions are using the Core PIA as outlined in the Directive in advance of the implementation deadline, they will not have Preliminary PIAs to report.

Indicate the number of:

- Preliminary Privacy Impact Assessments initiated: 0
- Preliminary Privacy Impact Assessments completed: 0
- Privacy Impact Assessments initiated: 0
- Privacy Impact Assessments completed: 1
- Privacy Impact Assessments forwarded to the Office of the Privacy Commissioner (OPC): 1

*Note:* If your institution did not undertake any of the activities noted above during the reporting period, this must be stated explicitly.

The Canadian Commercial Corporation completed one Privacy Impact Assessment during the reporting period and it was forwarded to the OPC and TBS.

In addition, institutions are required to report on the following:

#### Part III – Exemptions invoked

Paragraph 19(1)(e) 0

Paragraph 19(1)(f) 0

Subsection 22.1 0

Subsection 22.2 0

Subsection 22.3 0

#### Part IV – Exclusions cited

Subsection 69.1 0

Subsection 70.1 0

*Note:* If your institution did not invoke any exemptions or cite any exclusions noted above during the reporting period, this must be stated explicitly.

The Canadian Commercial Corporation did not invoke any exemptions or cite any exclusions noted during the reporting period.