

# Privacy Annual Report 2020-21

April 2020-March 2021



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## 1. Introduction

The *Privacy Act* (the Act) governs the management and the accountability of information practices with respect to personal information held by federal institutions including Canada Post Corporation (Canada Post or the Corporation). The Act applies to the personal information these institutions collect, use and disclose about individuals, including employees, and it gives Canadians the right to access their personal information held by government institutions. Among other things, the Act requires that government institutions protect that 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 Secretariat (TBS) of Canada, this report covers the period from April 1, 2020, to March 31, 2021.

## 2. Mandate

The Canada Post Group of Companies, which includes Canada Post and its subsidiaries – Purolator Holdings Ltd., SCI Group Inc. and Innovapost Inc. – employed nearly 70,000 paid full-time and part-time employees in 2020, including almost 54,000 in the Canada Post segment. The workforce also included approximately 14,000 paid temporary, casual and term employees in the Canada Post segment. The Group of Companies delivered approximately 6.4 billion pieces of mail, parcels, and messages in 2020 to over 16.7 million addresses across Canada. Canada Post operates the largest retail network in Canada with approximately 6,000 retail post offices across the country. It has a mandate to provide a standard of postal services that meets the needs of Canadians in a secure and financially self-sustaining manner.

In 2020, Canadian households and businesses continued to migrate to digital communication and online bill payment, a trend that accelerated due to COVID-19. Lettermail™ volumes have declined steadily and significantly for more than a decade. Canada Post delivered 2.8 billion (53%) fewer pieces of mail in 2020 than in the peak year of 2006. While this volume decline has had a significant effect on Canada Post's business model, which had been founded on paper-based communications, it has given the Corporation an opportunity to transform the business and refocus its strategic direction.

The COVID-19 pandemic has also accelerated the pace at which Canadians are adopting e-commerce. Canada Post proudly delivers nearly half of all e-commerce parcels to Canadians and continues to be the country's top delivery company for online purchases. In 2020, for the second consecutive year, revenue from Canada Post's Parcels line of business surpassed revenue from Transaction Mail (mostly bills, letters

and statements). Exceeding \$3.4 billion, parcels revenue generated 49% of the Canada Post segment's revenue in 2020, compared to 21% in 2011.

In response to COVID-19 pandemic – and to keep employees and Canadians safe – the Corporation has changed how it operates and delivers items. Canada Post continues to provide an essential service to Canadians, by moving record-high domestic parcel volumes through its network.

### 3. Canada Post and the *Privacy Act*

Every day, Canada Post comes into contact 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* (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.

Privacy is considered proactively, and privacy principles are built into the design and development of products and services 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 objectives and maintain the high level of trust Canadians have in the Canada Post brand. A consumer trust survey conducted by the University of Victoria's Gustavson Brand Trust Index in April 2020 found that Canada Post has been one of the most-trusted brands in Canada during the COVID-19 pandemic.

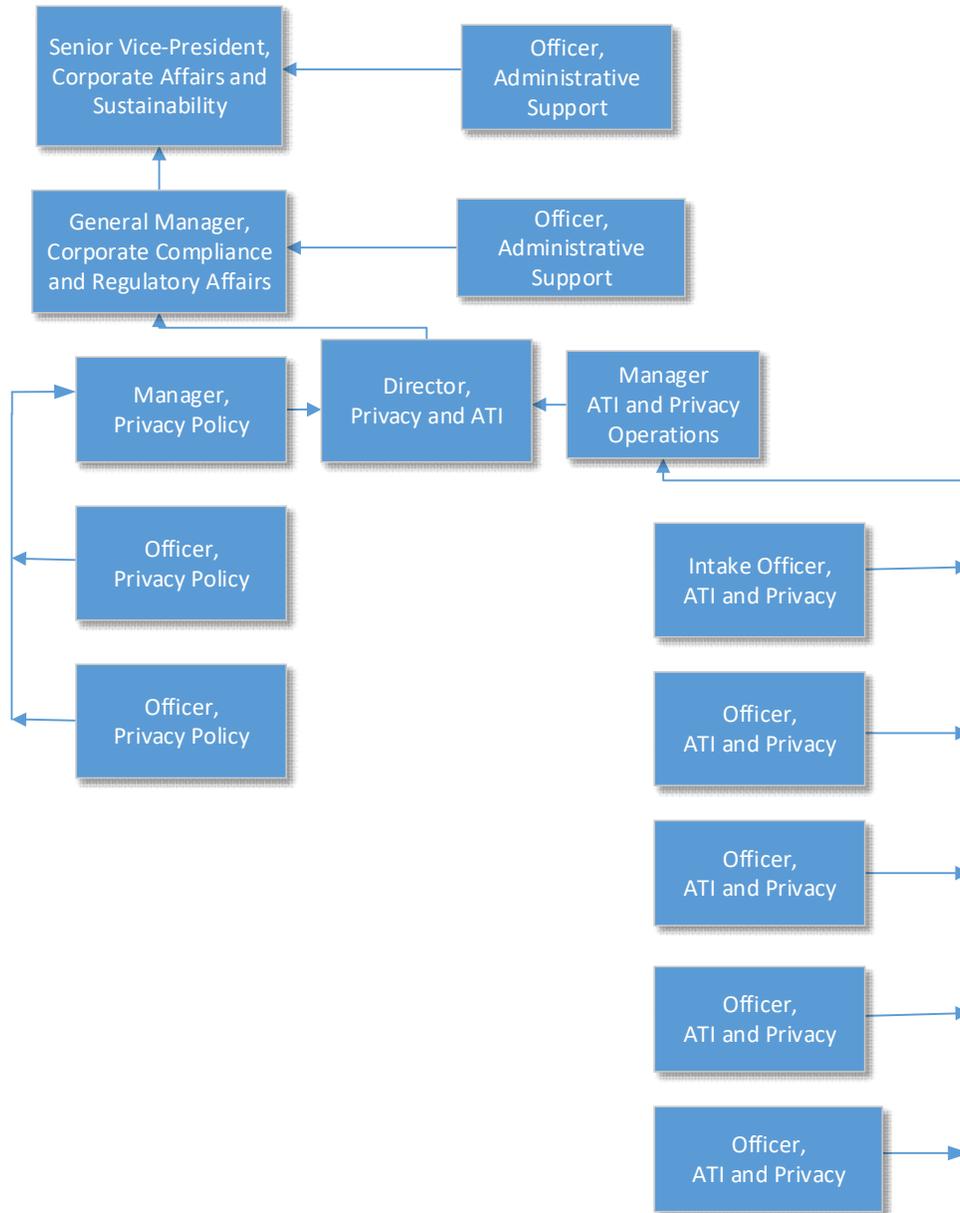
### 4. Organizational structure

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

During the 2020-21 reporting period, the Privacy Office included two privacy officers reporting to the Manager of Privacy Policy. The ATIP Directorate included four ATI and Privacy Officers and one Intake Officer reporting to the Manager of ATI and Privacy Operations. Both 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 is the Access to Information and Privacy Coordinator and point of contact for the Corporation in liaising with the Treasury Board Secretariat of Canada, the Office of the Privacy Commissioner (OPC) of Canada, the Office of the Information Commissioner of Canada and other government and private institutions for privacy matters.

The chart below outlines our organizational structure as of May 3, 2021.

Corporate Compliance and Regulatory Affairs



### 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 Treasury Board Secretariat of Canada, the delegation order is included in Appendix A.

## 6. The Privacy Program

### 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 2020-21, 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 developing requirements and procuring a solution to help Canada Post manage cookies and other tracking preferences of its website visitors. This procurement project also included securing 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 2020-21, a new Transparency and Trust section was created and deployed on the Canada Post's website. This new section serves as a single online entry portal for Canada Post customers with respect to all matters related to privacy, access to information, and transparency. During the reporting period, two components of this new section were deployed: Canada Post's online Privacy Centre and the Access to Information hub. The Privacy Centre houses the Corporation's comprehensive privacy policy, InfoSource, Annual Reports to Parliament required under the *Privacy Act* and links to helpful external resources. Information on how to submit access to information requests under the *Privacy Act* is available through both the online Privacy Centre and the Access to Information hub. The launch of this new section represented the next step toward implementing a multi-year privacy and related policy renewal project, with a focus to modernize privacy practices that align with Canada Post's transformation, the evolution of the e-commerce marketplace, enhanced data analytics and new digital marketing techniques.

During the reporting period, the Privacy Office reviewed and updated its policies to clarify internal roles and responsibilities with key stakeholders in the event of a security and/or privacy breach. In addition, the updated practice will be finalized and launched internally in 2021.

The Privacy Office provides advice and leadership to the Corporation on all matters with respect to privacy. In 2020-21, 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;
- direct marketing and privacy regimes in Canada and around the globe, including the United States and the European Union:
  - leveraging geo-location data for marketing;
- information sharing practices:
  - sharing employee personal information with bargaining agents;
  - sharing customer personal information with third parties, including municipal, provincial and federal authorities;
- ownership and control of personal information:
  - third-party service providers administering personal information of Canada Post employees;
- identification and prevention of data breaches:
  - collaborating with the security and cybersecurity functions to ensure the identification and remediation of vulnerabilities.

A privacy risk assessment was completed for:

- a new digital mailbox service to provide Canadians with electronic alerts about their upcoming physical mail.

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 the 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 ATIP 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. Of the formal requests processed in 2020-21, 83.8% were completed on time compared to 97.8% in 2019-20 and 94.6 % in 2018-19.

The use of the ePost Connect™ service for the delivery of release packages was a great success this year as it enabled the ATIP Directorate to become virtually paperless during the reporting period. It has continued to be the method to disclose records, with minimal ad hoc paper requests.

## 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 Corporation's customer and employee privacy policies that are posted on the intranet site (Intrapost) and on the website at canadapost.ca.

In 2020-21, Canada Post received 948 access requests under the *Privacy Act*, a slight decrease from the previous year. These requests originated mostly from employees or their representatives requesting access to their personal information held in several areas across the Corporation.

### 7.2 Origin

In 2020-21, both Head Office and Huron-Rideau regions generated the most significant increase of number of requests. The increase in Head Office requests, is a result of a reclassification of some requests that were previously counted as originating from the regions.

Office	2020-21	2019-20	2018-19
Head Office	332	170	55
Atlantic	36	41	44
Quebec	59	64	42
Greater Toronto Area (GTA)	188	360	316
Huron-Rideau	138	77	104
Prairies	53	72	69
Pacific	142	202	179
<b>Total</b>	<b>948</b>	<b>986</b>	<b>809</b>

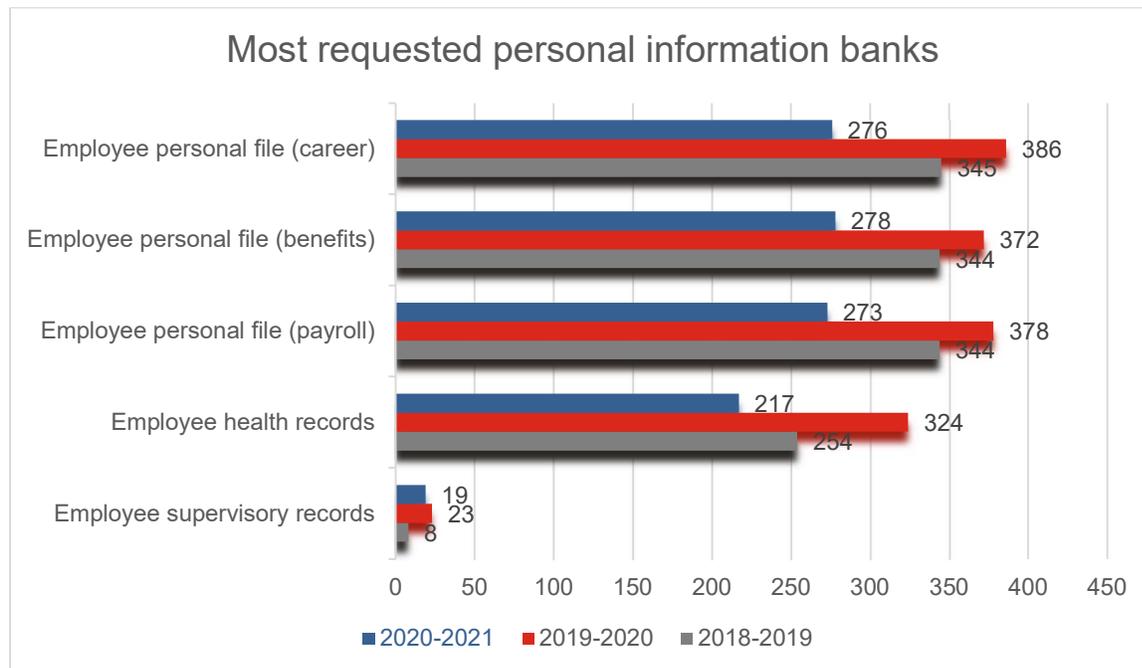
### 7.3 Consultations

In 2020-21, one privacy consultation was received from a Government of Canada institution.

### 7.4 Personal information banks

In 2020-21, 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 902 requests were closed in 2020-2021 compared to 956 requests in 2019-20 and 909 requests in 2018-19.

## 7.6 Exemptions

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

Section 26, which protects personal information about another individual, was invoked in 89 access requests (9.9%)

Section 27, an exemption which protects information deemed solicitor-client privileged, was invoked in five access requests (0.6%)

## 8. Section 8 disclosures

The *Privacy Act* allows for the disclosure of personal information without consent to federal investigative bodies listed in the regulations, as well as to law enforcement agencies, under section 8(2)(e) of the Act. Canada Post's ATIP Directorate conducts a comprehensive review of each request and determines whether the information can be disclosed. In 2020-21, the number of such disclosures increased significantly from previous reporting years. Canada Post has continued to receive a large volume of these requests.

	Disclosures in 2020-21	Disclosures in 2019-20	Disclosures in 2018-19
<i>Privacy Act</i> Section 8(2)(e)	253	227	164

## 9. Monitoring of privacy access requests

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

- conducted monthly reviews of privacy access requests;
- produced and monitored monthly scorecards to measure the following criteria against objectives set for the year:
  - percentage of active privacy requests on time
  - percentage of privacy requests completed on time
- distributed a monthly scorecard to the General Manager, Compliance and CPO;
- provided regular briefings on key files to senior executives and the Board of Directors;
- regularly 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 2020-21, the OPC forwarded 10 privacy complaints to Canada Post. Two complaints concerned the processing of access requests, and eight complaints related to 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, one complaint was determined by the OPC to be well-founded; the other was resolved (no action required).

#### Collection, Use and Disclosure Complaints

Concerning the eight “collection, use and disclosure” complaints, seven complaints were successfully resolved through the OPC’s Early Resolution process. One complaint could not be resolved and is currently active.

## 11. Training and Awareness

The Privacy Office is committed to raising awareness and building knowledge of privacy throughout the Corporation. In 2020-21, 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

The Privacy Office developed phase 3 of a multi-year online privacy program renewal project that will update the program to keep pace with the evolution of Canada Post’s business, meeting customer expectations and focusing on the digital and e-commerce marketplace. In the reporting period, a new “Transparency and Trust” section was launched on the Canada Post’s website within the “About Us” page. This new section serves as a single online entry portal for Canada Post customers with respect to all

matters related to privacy, mandated access to information, and intentional transparency. Two components were deployed in the reporting period: Canada Post's online Privacy Centre and the Access to Information hub.

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 2021, employee-facing privacy policies will be reviewed and updated.

The Privacy Office provided the Corporation with privacy guidelines in several key areas:

- proper handling of employee and contractor information, including its sharing with public health authorities, for COVID-related purposes;
- personal information residency and protection issues in the context of a move to cloud-based computing services;
- draft guidelines of the Privacy Breach Management Practice;
- engagement of external consultants to conduct workplace investigations.

### 13. Summary of material privacy breaches

In 2020-21, Canada Post experienced one material privacy breach. A delivery agent shared the details of mail received by a customer, as well as the details about the sender gleaned from an Internet search, with the customer's ex-husband.

The matter was promptly investigated and addressed with the delivery agent who, among other things, was removed from the route to which the customer's address belongs. The Canada Post Privacy Office notified the impacted customer 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. The OPC reviewed the breach report and advised Canada Post that it was satisfied with the breach response provided.

### 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.

A privacy risk assessment was completed for a new digital application to provide Canadians with electronic alerts about their upcoming physical mail.

## 15. Conclusion

In 2020-21, Canada Post successfully functioned as an essential service to all Canadians during the challenges of the ongoing COVID-19 pandemic. For both Canada Post's customers and consumers, the acceleration of online digital sales increased at a rate that would not have been expected for several years. The Parcels line of business continues to grow at an exponential rate as the Corporation competes in an ever-challenging marketplace. As Canada Post pivoted its business to respond to this new reality, challenges became opportunities that provided an impetus to transform the business.

This transformation will call for increasingly complex business models, greater use of new technologies to deliver services through digital and physical channels, and business strategies based on the use of employee and customer data. Enhancing transparency and trust with our customers, consumers, employees and the general public is foundational to achieving these goals. Privacy will continue to be a key enabler and partner to the business in building trust and transparency to support the business and its transformative goals.

Appendix A – Delegation of authority- **To be revised with new delegation pending CEO's signature**

**CANADA POST CORPORATION**  
**DELEGATION ORDER**

The President and Chief Executive Officer of the Canada Post Corporation, Doug Ettinger, on this \_\_\_ day of \_\_\_\_\_ 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	

<b>Delegation Order</b>							
<b>Section</b>	<b>Power, Duties or Functions</b>	<b>Chief Executive Officer</b>	<b>Senior Vice President Corporate Affairs and Sustainability</b>	<b>General Manager &amp; Chief Privacy Officer (CPO)</b>	<b>Director, Access to Information and Privacy</b>	<b>Manager, Access to Information and Privacy</b>	<b>Officer, Access to Information and Privacy</b>
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

<b>Delegation Order</b>							
<b>Section</b>	<b>Power, Duties or Functions</b>	<b>Chief Executive Officer</b>	<b>Senior Vice President Corporate Affairs and Sustainability</b>	<b>General Manager &amp; Chief Privacy Officer (CPO)</b>	<b>Director, Access to Information and Privacy</b>	<b>Manager, Access to Information and Privacy</b>	<b>Officer, Access to Information and Privacy</b>
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		
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		

		<b>Delegation Order</b>					
<b>Section</b>	<b>Power, Duties or Functions</b>	<b>Chief Executive Officer</b>	<b>Senior Vice President Corporate Affairs and Sustainability</b>	<b>General Manager &amp; Chief Privacy Officer (CPO)</b>	<b>Director, Access to Information and Privacy</b>	<b>Manager, Access to Information and Privacy</b>	<b>Officer, Access to Information and Privacy</b>
<b>22(1)(2)</b>	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		
<b>22.3</b>	Exemption – <i>Public Servants Disclosure Protection Act</i>	X	X	X	X		
<b>23</b>	Exemption – May refuse to disclose PI that could reveal the identity of a confidential security clearance source	X	X	X	X		
<b>24</b>	Exemption – May refuse to disclose PI re individuals sentenced for an offence	X	X	X	X		
<b>25</b>	Exemption – May refuse to disclose PI if it threatens the safety of individuals	X	X	X	X		
<b>26</b>	Exemption – May refuse to disclose PI about another individual and shall refuse to disclose PI under section 8	X	X	X	X		
<b>27<sup>1</sup></b>	Exemption – May refuse to disclose PI subject to Solicitor-client privilege	X	X	X	X		
<b>28<sup>2</sup></b>	Exemption – May refuse to disclose PI relating to health of individual where contrary to best interests	X	X	X	X		

<sup>1</sup> In consultation with Legal

<sup>2</sup> In consultation with a qualified medical professional

### Other Provisions of the *Privacy Act*

		<b>Delegation Order</b>					
<b>Section</b>	<b>Power, Duties or Functions</b>	<b>Chief Executive Officer</b>	<b>Senior Vice President Corporate Affairs and Sustainability</b>	<b>General Manager &amp; Chief Privacy Officer (CPO)</b>	<b>Director, Access to Information and Privacy</b>	<b>Manager, Access to Information and Privacy</b>	<b>Officer, Access to Information and Privacy</b>
31	Notice of intention to investigate by the Office of the Privacy Commissioner	X	X	X	X		
33(2)	Right to make representation: 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		
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

		<b>Delegation Order</b>					
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 \_\_\_\_\_, this \_\_\_\_\_ day of \_\_\_\_\_, 2020

\_\_\_\_\_ - 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, 2020, to March 31, 2021.

### 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 Secretariat Statistical Report



Government of Canada / Gouvernement du Canada

### Statistical Report on the Access to Privacy Act

Name of institution: Canada Post Corporation

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

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

##### 1.1 Number of requests

	Number of Requests
Received during reporting period	948
Outstanding from previous reporting period	110
<b>Total</b>	<b>1058</b>
Closed during reporting period	902
Carried over to next reporting period	156

#### Section 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	130	100	135	34	0	0	0	399
Disclosed in part	42	135	146	65	16	20	0	424
All exempted	2	1	0	0	0	0	0	3
All excluded	1	0	0	0	0	0	0	1
No records exist	23	8	3	5	0	0	0	39
Request abandoned	21	5	8	2	0	0	0	36
Neither confirmed nor denied	0	0	0	0	0	0	0	0
<b>Total</b>	<b>219</b>	<b>249</b>	<b>292</b>	<b>106</b>	<b>16</b>	<b>20</b>	<b>0</b>	<b>902</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)	3	24(b)	0
19(1)(d)	0	22(1)(c)	0	25	0
19(1)(e)	0	22(2)	0	26	89
19(1)(f)	0	22.1	0	27	5
20	0	22.2	0	27.1	0
21	0	22.3	0	28	0
		22.4	0		

## 2.3 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

## 2.4 Format of information released

Paper	Electronic	Other
0	823	0

## 2.5 Complexity

### 2.5.1 Relevant pages processed and disclosed

Number of Pages Processed	Number of Pages Disclosed	Number of Requests
112755	103667	863

## 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	
	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	396	2231	3	622	0	0	0	0	0	0
Disclosed in part	180	5972	178	42448	52	36436	14	15958	0	0
All exempted	3	0	0	0	0	0	0	0	0	0
All excluded	1	0	0	0	0	0	0	0	0	0
Request abandoned	35	0	0	0	0	0	1	0	0	0
Neither confirmed nor denied	0	0	0	0	0	0	0	0	0	0
<b>Total</b>	<b>615</b>	<b>8203</b>	<b>181</b>	<b>43070</b>	<b>52</b>	<b>36436</b>	<b>15</b>	<b>15958</b>	<b>0</b>	<b>0</b>

## 2.5.3 Other complexities

Disposition	Consultation Required	Legal Advice Sought	Interwoven Information	Other	Total
All disclosed	5	0	0	0	5
Disclosed in part	14	2	5	0	21
All exempted	0	0	0	0	0
All excluded	0	0	0	0	0
Request abandoned	1	0	0	0	1
Neither confirmed nor denied	0	0	0	0	0
<b>Total</b>	<b>20</b>	<b>2</b>	<b>5</b>	<b>0</b>	<b>27</b>

## 2.6 Closed requests

### 2.6.1 Number of requests closed within legislated timelines

	Requests closed within legislated timelines
Number of requests closed within legislated timelines	868
Percentage of requests closed within legislated timelines (%)	96.2

## 2.7 Deemed refusals

### 2.7.1 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
34	34	0	0	0

### 2.7.2 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	8	7	15
16 to 30 days	3	0	3
31 to 60 days	1	7	8
61 to 120 days	0	5	5
121 to 180 days	0	2	2
181 to 365 days	0	1	1
More than 365 days	0	0	0
<b>Total</b>	12	22	34

## 2.8 Requests for translation

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

### Section 3: Disclosures Under Subsections 8(2) and 8(5)

Paragraph 8(2)(e)	Paragraph 8(2)(m)	Subsection 8(5)	Total
253	1	0	254

### Section 4: Requests for Correction of Personal Information and Notations

Disposition for Correction Requests Received	Number
Notations attached	2
Requests for correction accepted	0
<b>Total</b>	<b>2</b>

### Section 5: Extensions

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

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	
78	9	22	32	15	0	0	0	0

#### 5.2 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	9	22	32	15	0	0	0	0
31 days or greater								0
<b>Total</b>	<b>9</b>	<b>22</b>	<b>32</b>	<b>15</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>

**Section 6: Consultations Received From Other Institutions and Organizations**

**6.1 Consultations received from other Government of Canada institutions and other organizations**

<b>Consultations</b>	<b>Other Government of Canada Institutions</b>	<b>Number of Pages to Review</b>	<b>Other Organizations</b>	<b>Number of Pages to Review</b>
Received during the reporting period	1	100	0	0
Outstanding from the previous reporting period	0	0	0	0
<b>Total</b>	1	100	0	0
Closed during the reporting period	1	100	0	0
Carried over to the next reporting period	0	0	0	0

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

<b>Recommendation</b>	<b>Number of Days Required to Complete Consultation Requests</b>							<b>Total</b>
	<b>1 to 15 Days</b>	<b>16 to 30 Days</b>	<b>31 to 60 Days</b>	<b>61 to 120 Days</b>	<b>121 to 180 Days</b>	<b>181 to 365 Days</b>	<b>More Than 365 Days</b>	
All disclosed	0	1	0	0	0	0	0	1
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
<b>Total</b>	0	1	0	0	0	0	0	1

### 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	
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
<b>Total</b>	0	0	0	0	0	0	0	0

## Section 7: Completion Time of Consultations on Cabinet Confidences

### 7.1 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
<b>Total</b>	0	0	0	0	0	0	0	0	0	0

## 7.2 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
<b>Total</b>	0	0	0	0	0	0	0	0	0	0

## Section 8: Complaints and Investigations Notices Received

Section 31	Section 33	Section 35	Court action	Total
2	0	0	0	2

## Section 9: Privacy Impact Assessments (PIA) and Personal Information Banks (PIB)

### 9.1 Privacy Impact Assessments

Number of PIA(s) completed	0
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### 9.2 Personal Information Banks

Personal Information Banks	Active	Created	Terminated	Modified
	51	0	0	0

## Section 10: Material Privacy Breaches

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

## Section 11: Resources Related to the *Privacy Act*

### 11.1 Costs

<b>Expenditures</b>	<b>Amount</b>
Salaries	\$445,122
Overtime	\$0
Goods and Services	\$145,769
• Professional services contracts	\$73,947
• Other	\$71,822
<b>Total</b>	<b>\$590,891</b>

### 11.2 Human Resources

<b>Resources</b>	<b>Person Years Dedicated to Privacy Activities</b>
Full-time employees	5.063
Part-time and casual employees	0.000
Regional staff	0.000
Consultants and agency personnel	0.366
Students	0.000
<b>Total</b>	<b>5.429</b>

Note: Enter values to three decimal places.



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

#### Section 1: Capacity to Receive Requests

Enter the number of weeks your institution was able to receive ATIP 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

