

**DEVELOPMENT FINANCE INSTITUTE
CANADA (DFIC) INC.**



**ANNUAL REPORT
ON THE ADMINISTRATION
OF THE
*PRIVACY ACT***

1 APRIL 2022 – 31 MARCH 2023

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INTRODUCTION

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

FinDev Canada is Canada’s bilateral Development Finance Institution (DFI), supporting development through the private sector. We provide financing, investment, and blended finance solutions, as well as technical assistance and knowledge, to promote sustainable and inclusive growth in Latin America & the Caribbean, Sub-Saharan Africa and the Indo-Pacific region, aligned with the Sustainable Development Goals (SDGs) and Paris Agreement commitments. We target strategic development objectives in three impact areas: climate action, women’s economic empowerment and market development. Our services are directed towards three sectors: financial intermediaries; agribusiness, forestry and value chains; and sustainable infrastructure.

This report is tabled in Parliament and prepared in accordance with section 72 of the Act.

ORGANIZATIONAL STRUCTURE

FinDev Canada relies on EDC’s Privacy and Information Risk (“P&IR”) Team to administer and respond to requests made under the Act.

Throughout the reporting period, the team was comprised of 7 full-time employees, of whom 3 were dedicated to ATI. The team was overseen by a Director, Compliance & Ethics, who reported to the EDC’s Chief Compliance and Ethics Officer, who in turn reported to the Chief Executive Officer of FinDev Canada.

FinDev Canada has an agreement in place, entered into pursuant to section 73.1 of the Act, for the receipt of privacy services from Export Development Canada.

DELEGATION ORDER

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

PERFORMANCE 2022-2023

As reflected in FinDev Canada’s Statistical Report on the Act at Appendix B and Supplemental ATIP Statistical Report for 2022-2023 at Appendix C, the institution did not receive any requests for personal information during the reporting period. FinDev Canada has not received any such requests since it was established.

IMPACT OF COVID-19 PANDEMIC

FinDev Canada’s COVID-19 pandemic related measures did not impact the institution’s ability to fulfill its responsibilities under the Act during reporting period.

TRAINING AND AWARENESS PROGRAM

FinDev Canada staff are employees of Export Development Canada. During the reporting period, all new Export Development Canada employees were subject to mandatory privacy and access to information awareness training.

INSTITUTION SPECIFIC POLICIES, GUIDELINES AND PROCEDURES

FinDev Canada did not implement any new or revised institution-specific policies, guidelines, procedures related to privacy during the reporting period.

FinDev Canada did not have any new collections or consistent uses of Social Insurance Numbers that began during the reporting period.

INITIATIVES AND PROJECTS TO IMPROVE ACCESS TO INFORMATION

FinDev Canada commenced the process for onboarding to ATIP Online, a centralized, publicly facing website hosted by the Treasury Board Secretariat for individuals to submit requests for access to information, including personal information, and is expected to be fully onboarded during the 2023-2024 reporting period.

COMPLAINTS

No complaints under the Act were received or concluded during the reporting period.

MATERIAL PRIVACY BREACHES

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

PRIVACY IMPACT ASSESSMENTS

FinDev Canada did not complete any privacy impact assessments during the reporting period on new or substantially modified programs or activities, as defined in the Directive on Privacy Impact Assessments.

PUBLIC INTEREST DISCLOSURE

No disclosures of personal information pursuant to section 8(2)(m) of the Act were made during the reporting period.

MONITORING COMPLIANCE

FinDev Canada did not receive any requests for personal information or correction of personal information under the Act during the reporting period, therefore the time to process such requests did not require monitoring.

APPENDIX A – DELAGATION OF AUTHORITY

**DEVELOPMENT FINANCE INSTITUTE CANADA (DFIC) INC. (“FinDev Canada”) TABLE OF AUTHORITY
DELEGATIONS OF AUTHORITY
PURSUANT TO SECTION 73(1) OF PRIVACY ACT AND REGULATIONS
PRIVACY AND ACCESS TO INFORMATION TEAM (PRIVACY & ATI), GLOBAL RISK MANAGEMENT (GRM)**

Authorization

1. Authorization to exercise or perform powers, duties or functions of the head of the institution under the *Privacy Act* and Privacy Regulations.

<i>Privacy Act – Section 73</i>																											<i>Privacy Regulations</i>							
SECTIONS	8(2)(j)	8(2)(m)	8(4)	8(5)	9(1) & (4)	10	14	15	17(2)(b) & (3)(b)	18(2)	19(1) & (2)	20	21	22	22.3	23	24	25	26	27	28	31	33(2)	35(1) & (4)	36(3)	37(3)	51(2)(b) & (3)	72(1) & (4)	9	11(2)	11(4)	13(1)	14	
CHIEF EXECUTIVE OFFICER	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X
CHIEF COMPLIANCE AND ETHICS OFFICER	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X

2. Authorization to exercise or perform powers, duties or functions of the head of the institution falling outside of the *Privacy Act* and Privacy Regulations.

In addition, for the purposes of this Table of Authority, “Administrative Function Authorizations” refer to the authority to: (i) respond to requests where the relevant personal information is disclosed entirely, without exemption under the *Privacy Act*; (ii) respond to requests where there is no relevant personal information to be disclosed; and (iii) refer a requester to another institution (i.e., when a requester has submitted the request to EDC in error). Any Administrative Function Authorization requires approval by one officer whose title is one mentioned in the Table of Authority above.

**FinDev Canada TABLE OF AUTHORITY
DELEGATIONS OF AUTHORITY
PURSUANT TO SECTION 73(1) OF *PRIVACY ACT* AND REGULATIONS**

<i>Privacy Act – Sections</i>			<i>Privacy Regulations - Sections</i>
8(2)(j) disclosure for research purposes	18(2) exemption (exempt bank) – disclosure may be refused	27 exemption - solicitor-client privilege	9 reasonable facilities and time provided to examine personal information
8(2)(m) disclosure in public interest or in interest of the individual	19(1) exemption - personal information obtained in confidence	28 exemption - medical record	
8(4) copies of requests under paragraph 8(2)(e) to be retained	19(2) exemption – where authorized to disclose	31 notice of intention to investigate	
8(5) notice of disclosure under paragraph 8(2)(m)	20 exemption - federal-provincial affairs	33(2) right to make representation	
9(1) record of disclosures to be retained	21 exemption - international affairs and defence	35(1) findings and recommendations of the Privacy Commissioner (complaints)	
9(4) consistent uses	22 exemption - law enforcement and investigation	35(4) access to be given	
10 personal information to be included in personal information banks	22.3 exemption – <i>Public Servants Disclosure Protection Act</i>	36(3) report of findings and recommendations (exempt banks)	
14 notice where access requested	23 exemption - security clearances	37(3) report of findings and recommendations (compliance review)	
15 extension of time limits	24 exemption - individuals sentenced for an offence	51(2)(b) special rules for hearings	
17(2)(b) language of access	25 exemption - safety of individuals	51(3) <i>ex parte</i> representations	
17(3)(b) access to personal information in alternative format	26 exemption - information about another individual	72(1)(4) report to Parliament	11(2) notification that correction to personal information has been made
			11(4) notification that correction to personal information has been refused
			13(1) disclosure of personal information relating to physical or mental health may be made to a qualified medical practitioner or psychologist for an opinion on whether to release information to the requestor
			14 disclosure of personal information relating to physical or mental health may be made to requestor in the presence of a qualified medical practitioner or psychologist

3. Titles

All of the above titles include their equivalent under any future designation.

**FinDev Canada TABLE OF AUTHORITY
DELEGATIONS OF AUTHORITY
PURSUANT TO SECTION 73(1) OF *PRIVACY ACT* AND REGULATIONS**

4. **Previous Authorities**

All current authority designations executed by the Chief Executive Officer of FinDev Canada (i.e. the head of the institution) (the “Designations”), are replaced by these Table of Authority and Table Notes without in any way affecting the validity of acts done pursuant to such Designations.

5. **Signing Authority**

The Chief Executive Officer, acting alone or with one of the following, or any two of the following, acting together:

Chief Compliance and Ethics Officer (FinDev Canada) Director, Compliance and Ethics (EDC)

Principal, Privacy and Access to Information (EDC)

are hereby authorized and directed to: (a) execute or cause to be executed all such instruments, agreements and documents; and (b) do or cause to be done all acts and things; as may be necessary or desirable to give effect to this Delegation of Authorities. “EDC” means Export Development Canada.



Chief Executive Officer (Acting)

July 24, 2020

Date

APPENDIX B - STATISTICAL REPORT 2022 - 2023

Statistical Report on the *Privacy Act*

Name of institution: FinDev Canada
 Reporting period: 4/1/2022 to 3/31/2023

Section 1: Requests Under the *Privacy Act*

1.1 Number of requests received

		Number of Requests
Received during reporting period		0
Outstanding from previous reporting periods		0
• Outstanding from previous reporting period	0	
• Outstanding from more than one reporting period	0	
Total		0
Closed during reporting period		0
Carried over to next reporting period		0
• Carried over within legislated timeline	0	
• Carried over beyond legislated timeline	0	

1.2 Channels of requests

Source	Number of Requests
Online	0
E-mail	0
Mail	0
In person	0
Phone	0
Fax	0
Total	0

Section 2: Informal requests

2.1 Number of informal requests

		Number of Requests
Received during reporting period		0
Outstanding from previous reporting periods		0
• Outstanding from previous reporting period	0	
• Outstanding from more than one reporting period	0	
Total		0
Closed during reporting period		0
Carried over to next reporting period		0

2.2 Channels of informal requests

Source	Number of Requests
Online	0
E-mail	0
Mail	0
In person	0
Phone	0
Fax	0
Total	0

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
0	0	0	0	0	0	0	0

2.4 Pages released informally

Less Than 100 Pages Released		100-500 Pages Released		501-1000 Pages Released		1001-5000 Pages Released		More Than 5000 Pages Released	
Number of Requests	Pages Released	Number of Requests	Pages Released	Number of Requests	Pages Released	Number of Requests	Pages Released	Number of Requests	Pages Released
0	0	0	0	0	0	0	0	0	0

Section 3: Requests Closed During the Reporting Period

3.2 Exemptions

Section	Number of Requests	Section	Number of Requests	Section	Number of Requests
18(2)	0	22(1)(a)(i)	0	23(a)	0
19(1)(a)	0	22(1)(a)(ii)	0	23(b)	0
19(1)(b)	0	22(1)(a)(iii)	0	24(a)	0
19(1)(c)	0	22(1)(b)	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	27.1	0
21	0	22.3	0	28	0
		22.4	0		

3.3 Exclusions

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

3.4 Format of information released

Paper	Electronic				Other
	E-record	Data set	Video	Audio	
0	0	0	0	0	0

3.5 Complexity

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

Number of Pages Processed	Number of Pages Disclosed	Number of Requests
0	0	0

3.5.2 Relevant pages processed by request disposition for paper and e-record formats by size of requests

Disposition	Less Than 100 Pages Processed		100-500 Pages Processed		501-1000 Pages Processed		1001-5000 Pages Processed		More Than 5000 Pages Processed	
	Number of Requests	Pages Processed	Number of Requests	Pages Processed	Number of Requests	Pages Processed	Number of Requests	Pages Processed	Number of Requests	Pages Processed
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
Request abandoned	0	0	0	0	0	0	0	0	0	0
Neither confirmed nor denied	0	0	0	0	0	0	0	0	0	0
Total	0	0	0	0	0	0	0	0	0	0

3.5.3 Relevant minutes processed and disclosed for audio formats

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

3.5.4 Relevant minutes processed per request disposition for audio formats by size of requests

Disposition	Less than 60 Minutes processed		60-120 Minutes processed		More than 120 Minutes processed	
	Number of requests	Minutes Processed	Number of requests	Minutes Processed	Number of requests	Minutes Processed
All disclosed	0	0	0	0	0	0
Disclosed in part	0	0	0	0	0	0
All exempted	0	0	0	0	0	0
All excluded	0	0	0	0	0	0
Request abandoned	0	0	0	0	0	0
Neither confirmed nor denied	0	0	0	0	0	0
Total	0	0	0	0	0	0

3.5.5 Relevant minutes processed and disclosed for video formats

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

3.5.6 Relevant minutes processed per request disposition for video formats by size of requests

Disposition	Less than 60 Minutes processed		60-120 Minutes processed		More than 120 Minutes processed	
	Number of requests	Minutes Processed	Number of requests	Minutes Processed	Number of requests	Minutes Processed
All disclosed	0	0	0	0	0	0
Disclosed in part	0	0	0	0	0	0
All exempted	0	0	0	0	0	0
All excluded	0	0	0	0	0	0
Request abandoned	0	0	0	0	0	0
Neither confirmed nor denied	0	0	0	0	0	0
Total	0	0	0	0	0	0

3.5.7 Other complexities

Disposition	Consultation Required	Legal Advice Sought	Interwoven Information	Other	Total
All disclosed	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
Request abandoned	0	0	0	0	0
Neither confirmed nor denied	0	0	0	0	0
Total	0	0	0	0	0

3.6 Closed requests

3.6.1 Number of requests closed within legislated timelines

Number of requests closed within legislated timelines	0
Percentage of requests closed within legislated timelines (%)	0

3.7 Deemed refusals

3.7.1 Reasons for not meeting legislated timelines

Number of requests closed past the legislated timelines	Principal Reason			
	Interference with operations / Workload	External Consultation	Internal Consultation	Other
0	0	0	0	0

3.7.2 Request 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 timeline 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
Total	0	0	0

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
0	0	0	0

8.2 Requests with Privy Council Office

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

Section 9: Complaints and Investigations Notices Received

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

Section 10: Privacy Impact Assessments (PIAs) and Personal Information Banks (PIBs)

10.1 Privacy Impact Assessments

Number of PIAs 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	0	1	0	0
Central	0	0	0	0
Total	0	1	0	0

Section 11: Privacy Breaches**11.1 Material Privacy Breaches reported**

Number of material privacy breaches reported to TBS	0
Number of material privacy breaches reported to OPC	0

11.2 Non-Material Privacy Breaches

Number of non-material privacy breaches	0
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Section 12: Resources Related to the Privacy Act**12.1 Allocated Costs**

Expenditures		Amount
Salaries		\$60,321
Overtime		\$0
Goods and Services		\$0
• Professional services contracts	\$0	
• Other	\$0	
Total		\$60,321

12.2 Human Resources

Resources	Person Years Dedicated to Privacy Activities
Full-time employees	0.590
Part-time and casual employees	0.000
Regional staff	0.000
Consultants and agency personnel	0.000
Students	0.000
Total	0.590

Note: Enter values to three decimal places.

APPENDIX C - SUPPLEMENTAL STATISTICAL REPORT 2022 - 2023



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

Name of institution: FinDev Canada

Reporting period: 2022-04-01 to 2023-03-31

Section 1: Capacity to Receive Requests under the *Access to Information Act* and the *Privacy Act*

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	0

Section 2: Capacity to Process Records under the *Access to Information Act* and the *Privacy Act*

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	0	0	52	52
Protected B Paper Records	0	0	52	52
Secret and Top Secret Paper Records	0	0	52	52

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

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

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

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

Fiscal Year Open Requests Were Received	Open Requests that are <i>Within</i> Legislated Timelines as of March 31, 2023	Open Requests that are <i>Beyond</i> Legislated Timelines as of March 31, 2023	Total
Received in 2022-2023	0	0	0
Received in 2021-2022	0	1	1
Received in 2020-2021	0	0	0
Received in 2019-2020	0	1	1
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
Received in 2013-2014 or earlier	0	0	0
Total	0	2	2

Row 11, Col. 3 of Section 3.1 must equal Row 7, Col. 1 of Section 1.1 of the 2022-2023 Statistical Report on the *Access to Information Act*

3.2 Enter the number of open complaints with the Information Commissioner of Canada that are outstanding from previous reporting periods.

Fiscal Year Open Complaints Were Received by Institution	Number of Open Complaints
Received in 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	0
Received in 2013-2014 or earlier	0
Total	0

Section 4: Open Requests and Complaints Under the Privacy Act

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

Fiscal Year Open Requests Were Received	Open Requests that are <i>Within</i> Legislated Timelines as of March 31, 2023	Open Requests that are <i>Beyond</i> Legislated Timelines as of March 31, 2023	Total
Received in 2022-2023	0	0	0
Received in 2021-2022	0	0	0
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
Received in 2013-2014 or earlier	0	0	0
Total	0	0	0

Row 11, Col. 3 of Section 4.1 must equal Row 7, Col. 1 of Section 1.1 of the 2022-2023 Statistical Report on the *Privacy Act*

4.2 Enter the number of open complaints with the Privacy Commissioner of Canada that are outstanding from previous reporting periods.

Fiscal Year Open Complaints Were Received by Institution	Number of Open Complaints
Received in 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	0
Received in 2013-2014 or earlier	0
Total	0

Section 5: Social Insurance Number

Has your institution begun a new collection or a new consistent use of the SIN in 2022-2023?	No
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Section 6: Universal Access under the Privacy Act

How many requests were received from confirmed foreign nationals outside of Canada in 2022-2023?	0
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Row 1, Col. 1 of Section 6 must be equal to or less than Row 1, Col. 1 of Section 1.1 of the 2022-2023 Statistical Report on the *Privacy Act*

Canada