

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



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

1 APRIL 2023 – 31 MARCH 2024

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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.

Development Finance Institute Canada (DFIC) Inc. (“FinDev Canada”) is a crown corporation and wholly owned subsidiary of Export Development Canada (EDC). FinDev Canada is Canada’s bilateral Development Finance Institution (DFI), supporting development through the private sector. FinDev Canada provides financing, investment, and blended finance solutions, as well as technical assistance and knowledge, to promote sustainable and inclusive growth in Latin America and the Caribbean, Sub-Saharan Africa and the Indo-Pacific region, aligned with the Sustainable Development Goals (SDGs) and Paris Agreement commitments. FinDev Canada targets development objectives in three impact areas: climate and nature action, gender equality and market development. FinDev Canada’s services are directed towards three sectors: the financial industry; 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. The P&IR Team is part of the Compliance and Ethics Group. The P&IR Team has, among other responsibilities, primary responsibility for administering the *Privacy Act* and the *Access to Information Act* and is responsible for responding to requests submitted to EDC and FinDev Canada under these Acts. Throughout the reporting period, the team was comprised of 6 full-time employees, with 2 employees dedicated to Privacy. The team was overseen by the Director, Ethics, Privacy and Information Risk, who reported to the 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 EDC.

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 2023-2024

FinDev Canada did not receive any requests for personal information during the reporting period, nor has it received any such requests since it was established.

TRAINING AND AWARENESS PROGRAM

During the reporting period, all new employees were subject to mandatory privacy and access to information awareness training, for a total of 32 employees for the reporting period.

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.

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

No privacy impact assessments were completed 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 (disclosures considered to be in the public interest) 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

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	11(2) notification that correction to personal information has been made
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)	11(4) notification that correction to personal information has been refused
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)	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 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	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
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	

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