DEVELOPMENT FINANCE INSTITUTE CANADA (DFIC) INC.

ANNUAL REPORT ON THE ADMINISTRATION OF THE *PRIVACY ACT*

1 APRIL 2025 – 31 MARCH 2026

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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. FinDev Canada does not have any subsidiaries, operational or non-operational.

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, under delegation of authority from the CEO 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 2025-2026

During the reporting period, FinDev Canada received no requests for access to personal information under the Act. One request carried over from the previous reporting period was closed within the legislative timeline, with no records identified. As this remains the only request received by FinDev Canada to date, no meaningful performance metrics are available.

No complaints were active as of the end of the reporting period, and no consultations were received or completed for other institutions.

TRAINING AND AWARENESS

FinDev Canada maintained its commitment to mandatory privacy and access to information training during the year. This training is delivered through structured e-learning modules that include narrated content, interactive slides, and assessment questions to reinforce learning outcomes.

New employees must complete training upon commencement of their employment. Completion is tracked automatically in the learning management system. Leaders are responsible for ensuring that employees fulfill the mandatory privacy and access training requirements and for promoting privacy and access awareness within their teams.

A privacy and access refresher training was also launched for the first time during the reporting period. This mandatory e-learning module was delivered to all employees. Completion was tracked through the learning management system. Going forward, annual recurrent training will be updated and delivered to employees on a mandatory basis each year.

Members of the P&IR Team with functional responsibility for the administration of the Act continued to receive in-depth training required to uphold their duties under the Act. During the reporting period, team members participated in several events organized by Treasury Board Secretariat (e.g., ATIP Communities meetings, Deep Dive Series, Info Blitz, “Ask me Anything” Sessions). Some of the members also attended conferences organized by leading information privacy associations.

FinDev Canada also promoted privacy awareness through other informal and organization-wide initiatives, including the publication of privacy-related guidance and providing updates during staff-wide meetings.

POLICIES, GUIDELINES AND PROCEDURES

During the reporting period, the P&IR Team made a series of updates to a range of privacy procedures. Some changes apply to internal privacy team operations, and others apply organization-wide. These updates were primarily intended to enhance alignment with Treasury Board Secretariat policies and directives. They introduced more refined triggers for privacy impact assessments and privacy protocols, as well as the required use of Treasury Board Secretariat-prescribed forms and documentation.

The following procedures were updated during the reporting period:

- Managing Privacy Impact Procedure
- Access to Personal Information Procedure
- Correction of Personal Information Procedure
- Privacy Complaints Handling Procedure
- Personal Information Index Procedure

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

Contractual Safeguards
To ensure the protection of personal information in contractual arrangements and information sharing agreements, FinDev Canada's standard contractual templates, particularly those used for vendors and service providers, set out clear obligations regarding the handling of personal information. These agreements generally include the following standard protections:

- Acknowledgement that FinDev Canada is the controller of the personal information;
- Limits on the collection, use and disclosure of personal information to what is necessary for the performance of contractual obligations;
- Requirements to notify FinDev Canada of unauthorised access to personal information;
- Requirements to implement appropriate technical and organizational safeguards;
- Limits on retention, and requirements for the return or secure disposal of personal information; and
- Requirements to obtain FinDev Canada approval for subcontractors and ensure they are bound by equivalent privacy protections.

INITIATIVES AND PROJECTS TO IMPROVE PRIVACY

During the reporting period, no significant initiatives or projects were implemented to improve access to personal information or privacy beyond those mentioned above.

SUMMARY OF KEY ISSUES AND ACTIONS TAKEN ON COMPLAINTS

No complaints under the Act were received or concluded during the reporting period. As such, no issues or corrective actions were identified.

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

During the reporting period, no privacy impact assessments were completed for new or substantially modified programs or activities, as defined in the Treasury Board Secretariat's *Standard on Privacy Impact Assessment*.

PUBLIC INTEREST DISCLOSURES

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

MONITORING COMPLIANCE

AccessPro Suite, developed by CSDC Systems Inc., is used to manage requests for personal information received under the Act. The software has a dashboard that enables ongoing monitoring of request status and processing timelines. These metrics are reviewed through regular team oversight, including daily meetings and weekly reviews with the Director, Ethics, Privacy and Information Risk.

APPENDIX A – DELEGATION ORDER

Delegation Order for the *Access to Information Act* and *Privacy Act*

FinDev Canada

The Chief Executive Officer of FinDev Canada, in accordance with section 95 of the *Access to Information Act* and section 73 of the *Privacy Act*, hereby delegates the powers, duties and functions of the head of the institution under those Acts to the persons holding the positions set out in the table below (or equivalent positions under future designations), including those occupying these positions on an acting basis. A description of the powers, duties and functions is set out in Schedule A. This delegation supersedes all previous delegations.

Delegation of Authority Table: Powers, Duties, and Functions

Position	***Access to Information Act* & Regulations**	***Privacy Act* & Regulations**
Chief Compliance & Ethics Officer (EDC)	Full authority, except: Sections 41(2), 52(2)(b), 52(3), 94(4)	Full authority, except: Section 72(4)
Director, Ethics, Privacy & Information Risk (EDC)[1]	Full authority, except: Sections 41(2), 52(2)(b), 52(3), 94(4)	Full authority, except: Section 72(4)

Chief Executive Officer

Name: LORI KERR

Signature: _____ **Date:** 04-02-2025

[1] The Delegation Order also serves to appoint the Director, Ethics, Privacy & Information Risk to the role of Access to Information & Privacy (ATIP) Coordinator for Treasury Board compliance purposes.

Schedule A – Description of Powers, Duties, and Functions

Access to Information Act

4(2.1)	Responsibility of government institutions
6.1(1)	Reasons for declining to act on request
6.1(1.3)	Notice of suspension
6.1(1.4)	Notice of end of suspension
6.1(2)	Notice of decision to decline to act on request
7	Notice where access requested
8(1)	Transfer of request
9(1)	Extension of time limits
9(2)	Notice of extension to Information Commissioner
10(1)	Where access is refused
10(2)	Existence of a record not required to be disclosed
11(2)	Waiver of fee
12(3)(b)	Access to record in alternative format
13	Exemption - Information obtained in confidence
14	Exemption - Federal-provincial affairs
15	Exemption - International affairs and defense
16	Exemption - Law enforcement and investigations
16.5	Exemption - Public Servants Disclosure Protection Act
17	Exemption - Safety of individuals
18	Exemption - Economic interests of Canada
18.1	Exemption - Economic interests of certain government institutions
19	Exemption - Personal information
20	Exemption - Third party information
21	Exemption - Operations of government
22	Exemption - Testing procedures, tests and audits
22.1	Exemption - Internal audits
23	Exemption - Protected information - solicitors, advocates and notaries
23.1	Exemption - Protected information - patents and trademarks
24(1)	Exemption - Statutory prohibitions against disclosure
25	Severability
26	Refusal of access if information is to be published
27	Notice to third parties
28(1)(b)	Representation of third party and decision
28(4)	Disclosure of record
35(2)(b)	Right to make representations
37(4)	Access to be given
41(2)	Review by Federal Court - government institution
43(2)	Service or notice
44(2)	Notice to person who requested record
52(2)(b)	Special rules for hearings
52(3)	*Ex parte* representations

94(1)	Prepare a report on the administration of the Act
94(4)	Provide a copy of the report to the designated Minister

Access to Information Regulations

5	Procedures
6(1)	Transfer of request
7(2)	Fees
7(3)	Fees
8	Access
8.1	Limitation in Respect of Format

Privacy Act

8(2)(j)	Disclosure for research purposes
8(2)(m)	Disclosure in public interest or in interest of the individual
8(4)	Copies of requests under paragraph 8(2)(e) to be retained
8(5)	Notice of disclosure under paragraph 8(2)(m)
9(1)	Record of disclosures to be retained
9(4)	Consistent uses
10	Personal information to be included in personal information banks
14	Notice where access requested
15	Extension of time limits
16(1)	Notice where access is refused
16(2)	Notice where personal information does not exist
17(2)(b)	Language of access
17(3)(b)	Access to personal information in alternative format
18(2)	Exemption (exempt bank) – Disclosure may be refused
19(1)	Exemption - Personal information obtained in confidence
19(2)	Exemption – Where authorized to disclose
20	Exemption - Federal-provincial affairs
21	Exemption - International affairs and defence
22	Exemption - Law enforcement and investigation
22.3	Exemption – *Public Servants Disclosure Protection Act*
23	Exemption - Security clearances
24	Exemption - Individuals sentenced for an offence
25	Exemption - Safety of individuals
26	Exemption - Information about another individual
27	Exemption - Solicitor-client privilege
27.1	Exemption – Patents and trademarks
28	Exemption - Medical record
31	Notice of intention to investigate
33(2)	Right to make representation
35(1)	Findings and recommendations of the Privacy Commissioner (complaints)

35(4)	Access to be given
36(3)	Report of findings and recommendations (exempt banks)
37(3)	Report of findings and recommendations (compliance review)
51(2)(b)	Special rules for hearings
51(3)	*Ex parte* representations
72(1)	Prepare report on administration of the Act
72(1)(4)	Provide a copy of the report to the designated Minister

Privacy Regulations

7	Retention for two years
9	Reasonable facilities and time provided to examine personal information
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