



Privacy Annual Report 2023-24

April 2023-March 2024



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1 Introduction

The *Privacy Act* (the Act) governs the privacy practices of federal government institutions including Canada Post Corporation (Canada Post or the Corporation). The Act regulates these institutions' collection, use and disclosure of personal information of individuals, including employees, and gives anyone in Canada the right to seek access to their personal information held by these institutions. Among other things, the Act requires that government institutions protect personal 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 of Canada Secretariat (TBS), this report covers the period from April 1, 2023, to March 31, 2024.

1.1 Canada Post's responsibility

During the reporting period, the Canada Post Group of Companies consisted of the Canada Post segment and subsidiaries Purolator Holdings Ltd., SCI Group Inc. (up to March 1, 2024) and Innovapost Inc. The Group of Companies employed more than 84,000 people (paid full-time and part-time employees, including temporary, casual and term employees) in 2023, including over 68,000 in the Canada Post segment. The Group of Companies delivered over 6.6 billion pieces of mail, parcels and messages in 2023 to nearly 17.4 million addresses across Canada. The Canada Post segment operates the largest retail network in Canada with close to 5,800 retail post offices across the country. It has a responsibility to securely serve every Canadian address and have regard for the need to conduct its operations on a self-sustaining financial basis.

In 2023, digital communications continued to replace our traditional Lettermail™ service in this eroding line of business. Lettermail volumes have declined significantly and steadily for more than 16 years. Canada Post delivered 66% fewer pieces of mail per address in 2023 than in the peak year of 2006.

Although we expect the Canadian ecommerce market to double over the next decade, our Parcels revenue continued to decline in 2023 compared to 2022 in this incredibly competitive market. To capture additional market share, we are actively addressing competitive pressures with a focus on improving service performance, meeting rising consumer expectations, capitalizing on the growing returns business and aligning our services with customer demands for environmental sustainability.

Canada Post's revenue is generated in a highly competitive market; its Parcels line of business earned 50% (nearly \$3.5 billion) of Canada Post's revenue in 2023, compared to 22% in 2012. We are obligated to fund our operations through the revenue generated from the sale of products and services – rather than relying on taxpayer funding.

1.2 Canada Post and the *Privacy Act*

Every day, Canada Post interacts 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*. 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.

At Canada Post, privacy is considered proactively, and privacy principles are built into the design and development of products, services and programs, including the use of innovative technologies by the lines of business and functional areas.

This commitment to privacy plays a critical role in Canada Post's ability to achieve its business and human resources objectives and maintain the high level of trust Canadians have in the Canada Post brand.

2. Organizational Structure

The Access to Information and Privacy Directorate (the Directorate) is led by the ATI and Privacy Director, who also acts as the ATIP Coordinator. It is one of the portfolios under the responsibility of the General Manager of Corporate Compliance and Regulatory Affairs (CCRA), who is also Canada Post's Chief Privacy Officer. The CCRA team is within the Environment, Social and Governance (ESG) portfolio.

The Directorate is responsible for the administration of the *Access to Information Act* and the *Privacy Act*, the operational accountability for the programs, the administration and processing of access requests received by Canada Post under both acts and the response to complaints from the Office of the Privacy Commissioner of Canada (OPC) and the Office of the Information Commissioner of Canada (OIC). The Directorate's portfolio is divided among three managers.

The Privacy Policy Manager is responsible for the administration of the *Privacy Act* and operational accountability for the privacy management program. The Privacy Office is the centre of excellence for privacy, data protection and anti-spam matters across the Corporation. It works with the lines of business and functional areas to proactively ensure that privacy is built into the design, development and implementation of products, services and programs. During the reporting period, the Privacy Office included two Privacy officers reporting to the Privacy Policy Manager.

The ATI and Privacy Manager, Operations, oversees the processing of active access requests (under both acts), the performance of the program, and acts as the first level of approval of access to information requests and access to personal information request. In 2023-24, four ATI and Privacy officers and one intake officer were reporting

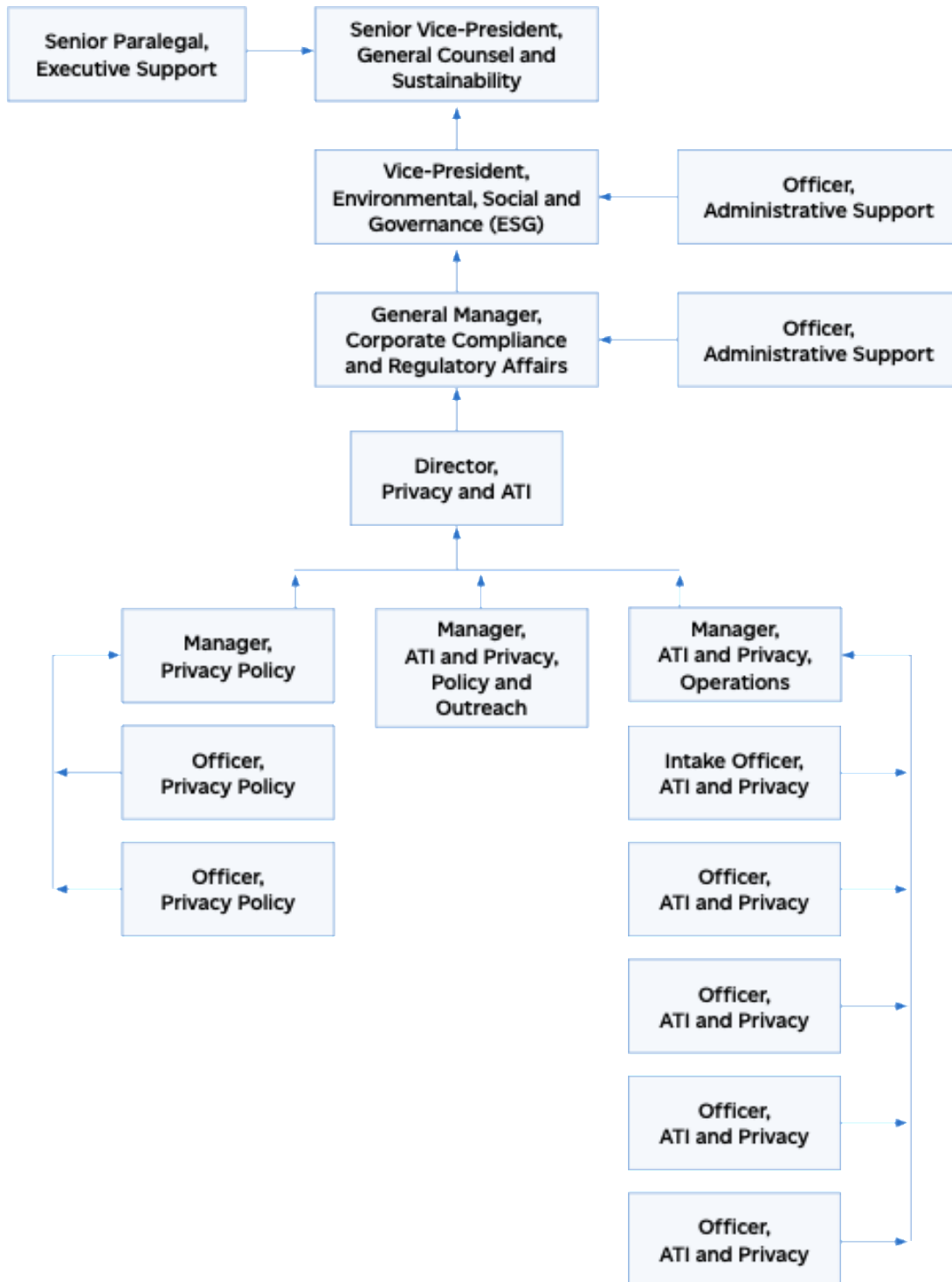
to the ATI and Privacy Manager, Operations. A consultant also completed their mandate during the first months of the reporting period.

The responsibilities of the ATI and Privacy Manager, Policy and Outreach, include the oversight of access policies compliance, the development, implementation and maintenance of internal processes, the development and implementation of the ATI and Privacy Awareness Strategy as well as the delivery of training and awareness sessions throughout the Corporation.

In 2023-24, Canada Post was not a party to any agreements under section 73.1 of the *Privacy Act*.

The chart below outlines our organizational structure as of March 31, 2024.

Corporate Compliance and Regulatory Affairs organizational chart



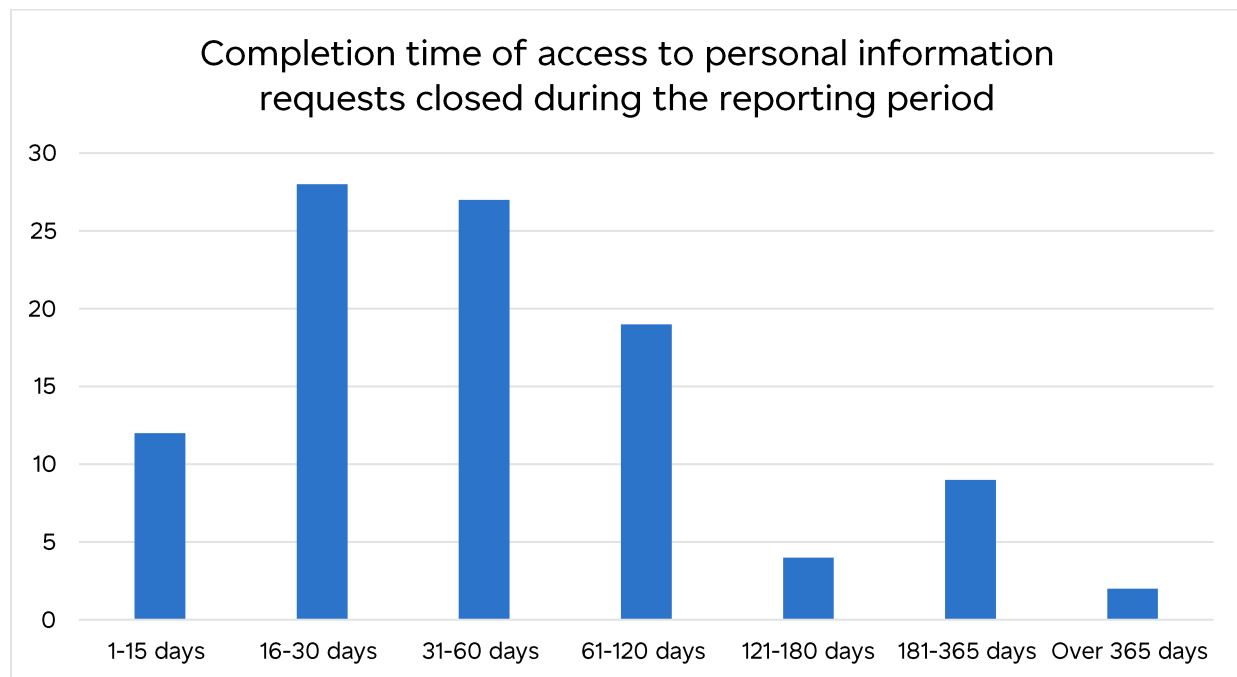
3. Delegation Order

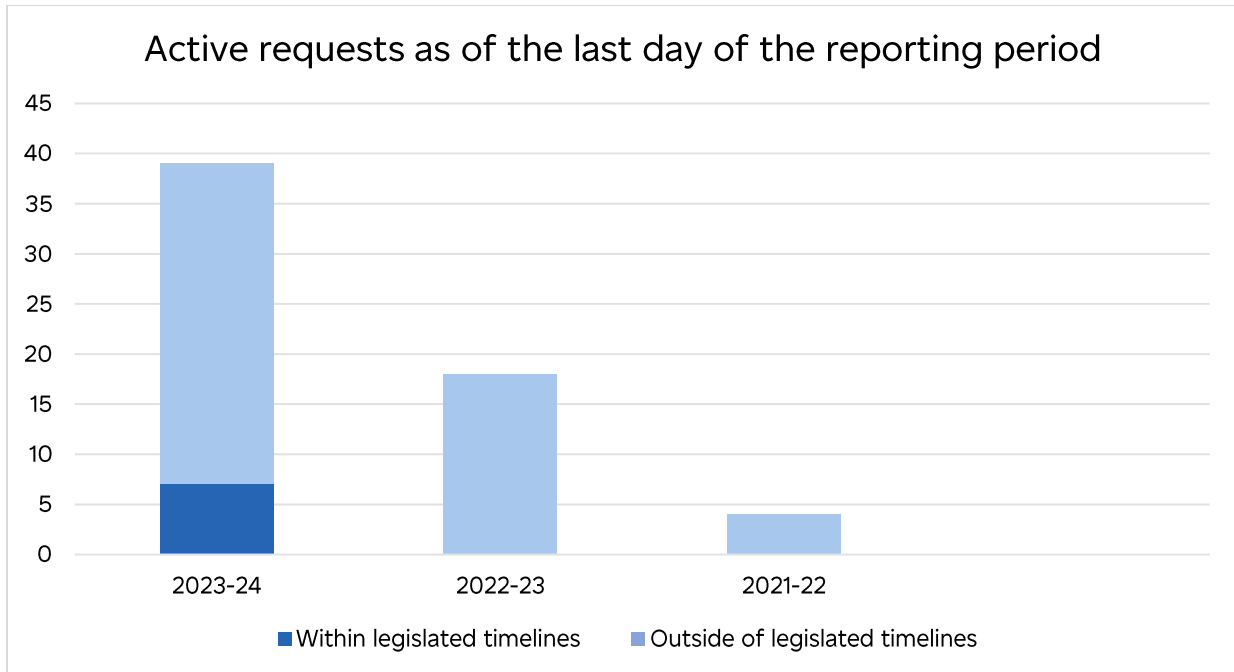
Pursuant to section 73 of the *Privacy Act*, the CEO’s authority has been delegated for the Corporation to meet key legislative requirements, while enabling efficiencies and managing risk at the appropriate levels in the Corporation. As required by the TBS, the delegation order is included in Appendix A.

4. Performance of the Privacy Program in 2023-24

4.1 Volume of requests

In 2023-24, Canada Post received 127 and closed 101 formal access requests under the *Privacy Act*. As of March 31, 2024, 66% of these requests were closed within legislated timelines. This represents a 6% decrease, compared to the last reporting period.

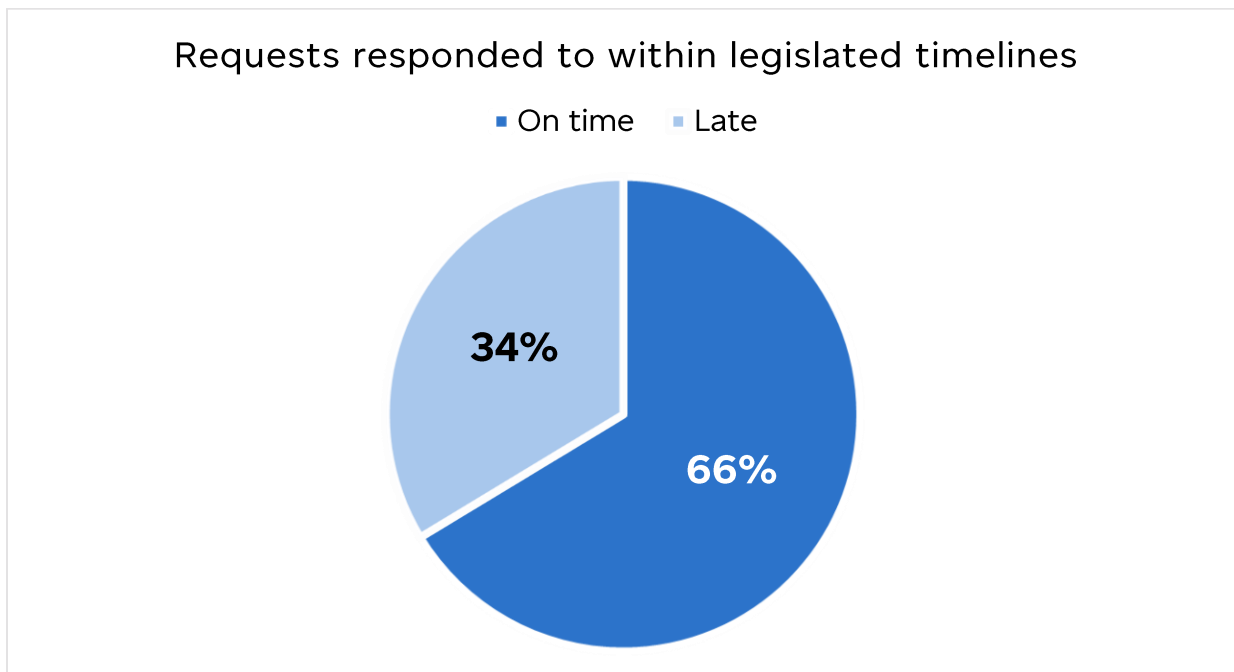




Many of the requests that were processed beyond the legislative timelines involved requests for a voluminous number of records involving several offices of primary interest.

The vast majority of the access to personal information requests received during the reporting period pertained to Canada Post employees seeking access to their employee file.

4.2 Time limits

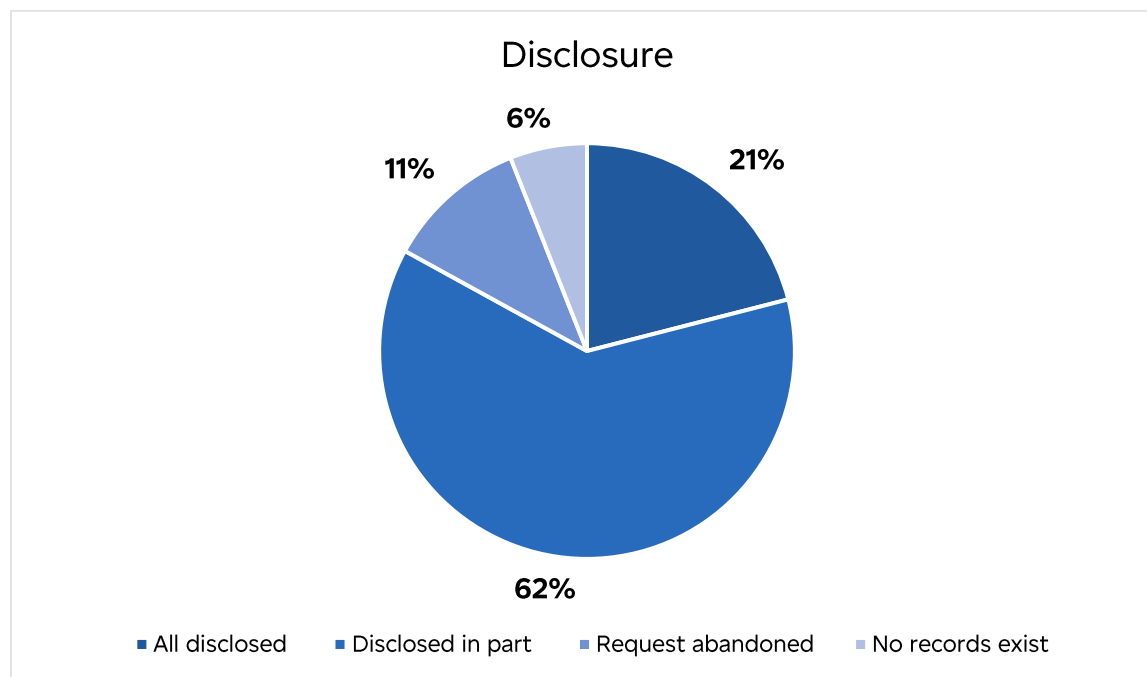


4.3 Extensions

In 2023-24, among the total of 127 requests received by the ATI and Privacy Directorate, 31% required a 30-day extension.

The vast majority (98%) of the extensions were required under section 15(a)(i) of the *Privacy Act*, which allows institutions to extend the initial time limit in instances where processing the request would unreasonably interfere with their operations. More than 85% of the extensions were taken because the Directorate received and processed a large volume of requests concurrently with the same legislative deadlines to meet. At Canada Post, ATI and Privacy officers are responsible for processing formal and informal requests under the *Privacy Act* and the *Access to Information Act*, in addition to consultations from other government institutions and requests from law enforcement.

4.4 Disclosure



The following three exemptions were most frequently applied for partially disclosed records:

- Section 26, protecting personal information about another individual (invoked in 48 access requests).
- Section 22(1)(b), protecting information the disclosure of which could be injurious to the enforcement of any Canadian law or the conduct of lawful investigations (invoked in 17 access requests).
- Section 27, protecting information subject to solicitor-client privilege or litigation privilege (invoked in eight access requests).

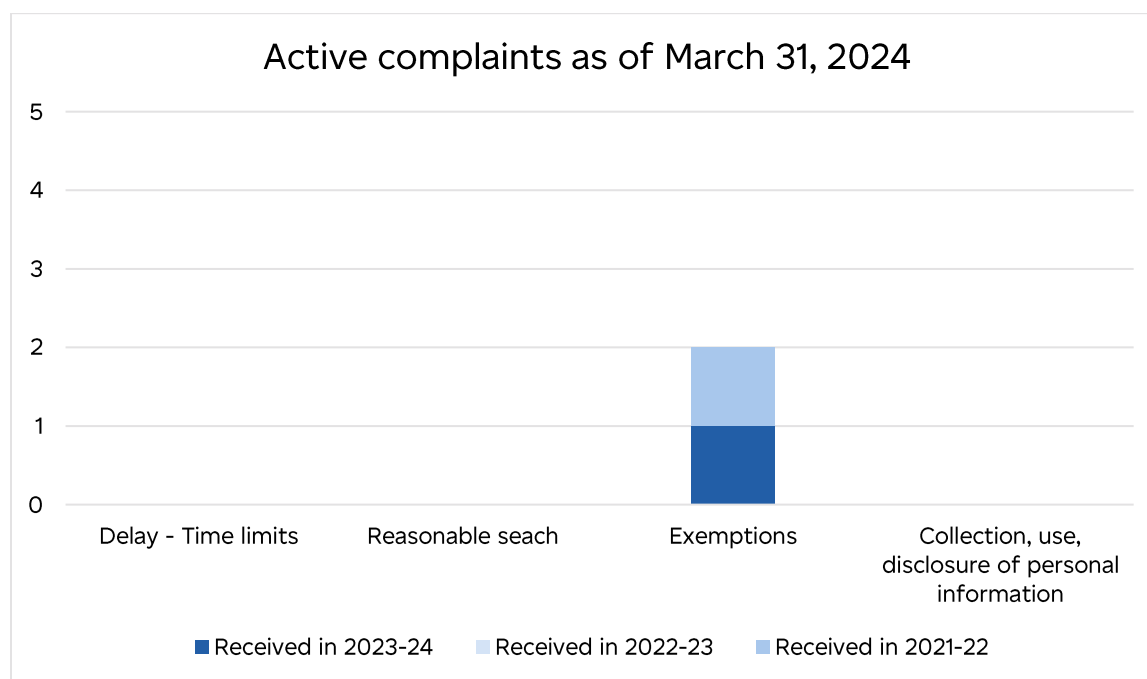
In addition to formal access to personal information requests, Canada Post also received 69 requests from investigative bodies, seeking the disclosure of personal information without the consent of the individual to whom it relates, as authorized under section 8(2)(e) of the *Privacy Act*. This represents a decrease of 54%, compared to the previous reporting period.

For each of the requests received, a comprehensive privacy risk assessment was conducted including an exercise of discretion to decide whether to proceed with the disclosure of the requested information.

4.5 Complaints

In 2023-24, the Office of the Privacy Commissioner of Canada (OPC) forwarded a total of 28 privacy complaints to Canada Post – more than twice as many as those received during the last reporting period.

- 15 were about the processing of access requests;
- 13 were related to the protection of privacy in the collection, use and disclosure of personal information.



4.6 Personal information banks

The right of individuals to access and correct their personal information held in Canada Post’s personal information banks is included in the Corporation’s customer and employee privacy policies that are posted on the intranet site (Intrapost) and on the website at [canadapost.ca](https://www.canadapost.ca).

In 2023-24, 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
- worker's compensation board records

5. Training and Awareness

The Privacy Office is committed to raising awareness and building knowledge of privacy throughout the Corporation. In 2023-24, the following training and awareness initiatives took place:

- The mandatory privacy e-learning training with a two-year refresher cycle for all management employees was launched.
- Additional targeted training was delivered to employee groups:
 - Six privacy awareness and education sessions were delivered to the Peer Network (approximately 500 postal clerks who act as mentors for their more junior and less experienced colleagues).
 - One privacy awareness session was delivered to the AccessHR group, a functional area responsible for processing and responding to employee and supervisor inquiries in relation to employee information matters. New employees within this group must undergo privacy training prior to starting in their role.
- The Chief Privacy Officer (CPO) delivered privacy briefings to the Canada Post Board of Directors and senior executive team as part of onboarding new executives on their accountabilities under the *Privacy Act* and targeted, proactive risk management and mitigation. The focus was on trends in regulatory reform, key privacy complaints and impacts on Canada Post's business and workplace.
- The CPO also delivered the keynote address at Innovapost's Cyber Safe Security event in September.
- The Privacy Office has continued to collaborate with other areas of Corporate Compliance and Regulatory Affairs, including the ATI and Privacy team and Information and Records Management to ensure that the training and awareness strategy is comprehensive. These joint efforts positively contribute to increase awareness of the importance of privacy as well as the need to manage records appropriately.

6. Policies, Guidelines and Procedures

In 2023-24, the following policies and procedures were reviewed:

- A review and update of internal privacy policies to ensure their currency, relevancy and alignment with the TBS 2022 amendments to the TBS suite of privacy policy instruments. The revised Privacy Policy is in its final stages of approval which will be presented to the Board in this current reporting period.
- A review and update of data privacy and security provisions for Canada Post's agreements with its vendors that handle personal information under Canada Post's control or in its custody.
- Collaboration with Security and Investigation Services to review their procedures and protocols pertaining to social media as well as to law enforcement requests for personal information under the control of Canada Post.

7. Initiatives and Projects to Improve Privacy

In 2023-24, the Privacy Office initiated a comprehensive review of the existing privacy risk assessment tools and approaches and a plan for a new streamlined process for privacy risk assessments, which includes the integration into existing corporate project management tools and other automated tools, and the engagement of specialized consultants and additional resources. The goal is to streamline the process for conducting privacy risk assessments and decentralize the approach so that the business areas gain greater accountability for privacy risks as they plan, develop and implement their initiatives.

We continued to collaborate with internal stakeholders to implement a longstanding project to improve customer experience and further let Canadians choose their preferences in the handling of their personal information by Canada Post. A third-party tool had been previously procured to assist in the management of cookies and other tracking preferences of its website visitors. In this reporting period, it was configured, tested and deployed on the corporate website.

In addition, we implemented a tool to assist in the automation of a multi-year project to develop a comprehensive inventory of the Corporation's personal information holdings. This is work that will continue into 2024-25 and become an evergreen enterprise project.

During the reporting period, the Directorate also initiated the acquisition of a major upgrade to the case management software which provides the technology to process and manage access requests. This technological improvement will include, among other things, the automation of certain key actions that are currently done manually by the ATI and Privacy officers. This is expected to have a noticeably positive impact

on the time required to process a request. The newest version of the software should be fully implemented before the end of the next reporting period.

8. Summary of Key Issues and Actions Taken on Complaints

8.1 Access to personal information complaints

Canada Post has received a total of 15 access to personal information complaints during the reporting period. Ninety-three per cent of these complaints were closed during the same reporting period. Furthermore, 40% were resolved at the early resolution stage.

Almost half of the complaints received in 2023-24 (40%) pertained to delays in providing the requested records. Some of those delays were caused by challenges in locating the records, the high volume (on average between 200 and 600 pages) and complexity of requests. In all cases, Canada Post has worked closely with investigators of the Office of the Privacy Commissioner of Canada (OPC) and has made efforts to prioritize the processing of requests for which the time limits were exceeded. With respect to insufficient search complaints, additional searches were extensively conducted with an aim to collect additional records and release further information, as appropriate.

8.2 Collection, use and disclosure complaints

Twelve complaints were successfully resolved through the OPC's early resolution process. The issues included erroneous disclosure of employee information to other employees and customer complaints related to Canada Post's direct marketing activities, mail delivery and concerns regarding the handling of customer information.

In a "well-founded" complaint, a service provider that processes short-term disability claims on behalf of Canada Post, accidentally disclosed an employee's medical information to their colleagues who should not have had access to this information.

Another "well-founded" complaint arose when an employee shared details of an internal investigation involving one of their former reports with a local police department. The OPC was satisfied with the corrective action taken by Canada Post and, therefore, considered the complaint resolved.

In this reporting period, the Office of the OPC completed its investigation, initiated in 2019, of the Canada Post Smartmail Marketing™ (SMM) program and raised some concerns about the use of its operational data (name and address information on the outside of mail) in support of the SMM program. While Canada Post maintains that the SMM program has always operated within the requirements of the *Privacy Act*, we respect the work of the OPC and the expectations Canadians have when it comes to

their personal information. We therefore conducted an internal review of our SMM products and, in the end, implemented changes to the SMM program. Subsequently, the OPC formally confirmed that these changes addressed their specific concerns.

9. Material Privacy Breaches

In 2023-24, Canada Post experienced one material privacy breach.

A Canada Post employee took photos of a piece of mail during processing. The photo contained the sender's name and address, and because of the way the sender had mailed the item, the contents of the sender's message, which was of a political nature. The employee shared the photo on social media.

The Privacy Office worked with internal stakeholders to have the photo removed. The employee was disciplined and provided additional coaching that focused on their obligations under Canada Post's *Customer Privacy Policy*, *Code of Conduct* and *Workplace Security Practice*.

10. Privacy Impact Assessments and Risk Assessments

The Canada Post Privacy Office conducts risk assessments and formal privacy impact assessments (PIAs) 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 throughout the development of Canada Post products and services.

During the reporting period, no formal PIAs were completed.

11. Public Interest Disclosures

No disclosures under paragraph 8(2)(m) were made during the reporting period.

12. Monitoring Compliance

In accordance with the requirements stated in the *Policy on Privacy Protection*, the Directorate continued to closely monitor and evaluate Canada Post's performance in responding to access requests under the *Privacy Act*. For example:

- Active access to personal information requests are monitored on a weekly basis by the ATI and Privacy Manager, Operations, and the ATI and Privacy Director. This ensures that there is a strategic view on all files and an adequate prioritization and assignment of files in order to minimize the risks of deemed refusals.
- A monthly scorecard containing statistics in order to measure the following criteria against objectives set for the year:
 - the number of requests received during the month;

- the percentage of privacy requests completed on time;
- the number of extensions taken;
- the deemed refusal rate.

The monthly scorecard is provided to the ATI and Privacy Director and to the Chief Privacy Officer. On a quarterly basis, metrics, key strategic files and areas of risk, and regulatory updates raised with the executive team. Briefings on key strategic files are given to senior executives and the Board of Directors, as required.

The Canada Post Privacy Office equally monitors the Corporation's compliance with its statutory and regulatory obligations regarding the collection, use and disclosure of customer and employee information. The monitoring mechanisms include:

- Reviewing corporate projects and initiatives that involve personal information to identify potential privacy risks and recommend mitigation.
- Fielding employee and customer inquiries about Canada Post's privacy practices.
- Investigating customer and employee privacy concerns.
- Providing privacy awareness and education to Canada Post's business units and program areas responsible for managing customer or employee information.
- Managing privacy incidents and breaches.
- Reviewing privacy posture of all potential vendors that may be required to manage customer or employee information on behalf of Canada Post; ensuring strict data privacy and security requirements are included in agreements with such vendors.

13. Conclusion

In 2023-24, Canada Post remained committed to the transformation of the business to better meet the needs of Canadians. Canada Post dedicated significant resources and attention to moving record-high ecommerce parcel volumes through its network, while striving to meet the needs of its commercial customers and consumers.

The Corporation continues to explore the growth and expansion of its financial services portfolio to improve their access for all Canadians, particularly in rural, remote and Indigenous communities.

This transformation requires increasingly complex business models, strategic partnerships with other government institutions and private-sector organizations, and greater use of new technologies to deliver services. The success of these innovations and initiatives quite often depends on the ability to use employee and customer data along with new technologies. Privacy will continue to be a key consideration for business in supporting our transformative goals, while ensuring that we achieve them without compromising the privacy interests of the people we proudly serve.

Canada Post is committed to ensuring transparency in how data is collected and used responsibly to protect the privacy interests of all Canadians.

Appendix A – Delegation Order

Canada Post Corporation Delegation Order

The President and Chief Executive Officer of the Canada Post Corporation, Doug Ettinger, on this 23 day of Sept. 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 and 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	

		Delegation Order					
Section	Power, Duties or Functions	Chief Executive Officer	Senior Vice President, Corporate Affairs and Sustainability	General Manager and Chief Privacy Officer (CPO)	Director, Access to Information and Privacy	Manager, Access to Information and Privacy	Officer, Access to Information and Privacy
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*

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

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

¹ In consultation with Legal

² In consultation with a qualified medical professional

Other Provisions of the Privacy Act

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

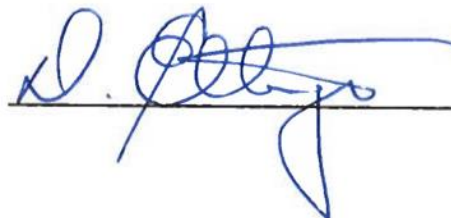
Delegation of Powers, Duties or Functions Pursuant to the Privacy Act Regulations

		Delegation Order					
Section	Power, Duties or Functions	Chief Executive Officer	Senior Vice President, Corporate Affairs and Sustainability	General Manager and 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 Ottawa, this 23 day of Sept., 2021



– Doug Ettinger, President and CEO, Canada Post Corporation

Appendix B – Canada Post Corporation’s 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, 2023, to March 31, 2024.

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 of Canada Secretariat Statistical Report



Government of Canada
Gouvernement du Canada

Statistical Report on the *Privacy Act*

Name of institution: Canada Post Corporation

Reporting period: 2023-04-01 to 2024-03-31

Section 1: Requests Under the *Privacy Act*

1.1 Number of requests

		Number of Requests
Received during reporting period		127
Outstanding from previous reporting period		64
• Outstanding from previous reporting period	56	
• Outstanding from more than one reporting period	8	
Total		191
Closed during reporting period		101
Carried over to next reporting period		90
• Carried over within legislated timeline	11	
• Carried over beyond legislated timeline	79	

1.2 Channels of requests

Source	Number of Requests
Online	27
E-mail	80
Mail	16
In person	0
Phone	0
Fax	4
Total	127



Section 2: Informal requests

2.1 Number of informal requests

	Number of Requests
Received during reporting period	425
Outstanding from previous reporting periods	150

		Number of Requests
• Outstanding from previous reporting period	115	
• Outstanding from more than one reporting period	35	
Total		575
Closed during reporting period		345
Carried over to next reporting period		230

2.2 Channels of informal requests

Source	Number of Requests
Online	3
E-mail	400
Mail	7
In person	0
Phone	0
Fax	15
Total	425

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
69	72	66	45	24	17	52	345

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
296	2,980	38	8,702	10	7,011	1	1,032	0	0

Section 3: Requests Closed During the Reporting Period

3.1 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	1	7	7	5	0	1	0	21
Disclosed in part	5	19	18	10	2	6	2	62
All exempted	0	0	0	0	0	0	0	0
All excluded	0	0	0	0	0	0	0	0
No records exist	0	1	2	4	0	0	0	7
Request abandoned	6	1	0	0	2	2	0	11

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	
Neither confirmed nor denied	0	0	0	0	0	0	0	0
Total	12	28	27	19	4	9	2	101

3.2 Exemptions

Section	Number of Requests	Section	Number of Requests	Section	Number of Requests
18(2)	0	22(1)(a)(i)	1	23(a)	0
19(1)(a)	0	22(1)(a)(ii)	0	23(b)	0
19(1)(b)	0	22(1)(a)(iii)	1	24(a)	0
19(1)(c)	0	22(1)(b)	17	24(b)	0
19(1)(d)	0	22(1)(c)	0	25	0
19(1)(e)	0	22(2)	0	26	48
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	83	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
15,582	13,481	94

3.5.2 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	21	130	0	0	0	0	0	0	0	0
Disclosed in part	33	942	19	6,003	6	3,345	4	5,162		
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	11	0			0	0	0	0	0	0
Neither confirmed nor denied	0	0	0	0	0	0	0	0	0	0
Total	65	1,072	19	6,003	6	3,345	4	5,162	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	48	0	48
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	48	0	48

3.6 Closed requests

3.6.1 Number of requests closed within legislated timelines

	Requests closed within legislated timelines
Number of requests closed within legislated timelines	67
Percentage of requests closed within legislated timelines (%)	66.33663366

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
34	34	0	0	0

3.7.2 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	2	3	5
16 to 30 days	1	2	3
31 to 60 days	5	2	7
61 to 120 days	6	2	8
121 to 180 days	0	1	1
181 to 365 days	5	4	9
More than 365 days	1	0	1
Total	20	14	34

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
74	0	0	74

Section 5: Requests for Correction of Personal Information and Notations

Disposition for Correction Requests Received	Number
Notations attached	0
Requests for correction accepted	0
Total	0

Section 6: Extensions

6.1 Reasons for extensions

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	
40	1	12	25	1	0	0	1	0

6.2 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	1	12	25	1	0	0	1	0
31 days or greater								0
Total	1	12	25	1	0	0	1	0

Section 7: Consultations Received from Other Institutions and Organizations

7.1 Consultations received from other Government of Canada institutions and other organizations

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

7.2 Recommendations and completion time for consultations received from other Government of Canada 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
Total	0	0	0	0	0	0	0	0

7.3 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
Total	0	0	0	0	0	0	0	0

Section 8: Completion Time of Consultations on Cabinet Confidences

8.1 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

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
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

8.2 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
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
15	3	16	0	34

Section 10: Privacy Impact Assessments (PIA) and Personal Information Banks (PIB)

10.1 Privacy Impact Assessments

Number of PIA(s) 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	36	0	0	0

Personal Information Banks	Active	Created	Terminated	Modified
Central	15	0	0	0
Total	51	0	0	0

Section 11: Privacy Breaches

11.1 Material Privacy Breaches reported

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

11.2 Non-Material Privacy Breaches

Number of non-material privacy breaches	31
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Section 12: Resources Related to the Privacy Act

12.1 Allocated Costs

Expenditures	Amount
Salaries	\$568,456
Overtime	\$0
Goods and Services	\$67,770
• Professional services contracts	\$66,573
• Other	\$1,197
Total	\$636,226

12.2 Human Resources

Resources	Person Years Dedicated to Privacy Activities
Full-time employees	6.953
Part-time and casual employees	0.000
Regional staff	0.000
Consultants and agency personnel	0.150
Students	0.000
Total	7.103

Note: Enter values to three decimal places.

Appendix D – Supplemental Statistical Report on the Access to Information Act and Privacy Act



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

Name of institution: Canada Post Corporation

Reporting period: 2023-04-01 to 2024-03-31



Section 1: Open Requests and Complaints Under the Access to Information Act

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

Fiscal Year Open Requests Were Received	Open Requests that are Within Legislated Timelines as of March 31, 2024	Open Requests that are Beyond Legislated Timelines as of March 31, 2024	Total
Received in 2023-24	8	4	12
Received in 2022-23	0	10	10
Received in 2021-22	0	0	0
Received in 2020-21	0	0	0
Received in 2019-20	0	1	1
Received in 2018-19	0	0	0
Received in 2017-18	0	0	0
Received in 2016-17	0	0	0
Received in 2015-16	0	0	0
Received in 2014-15 or earlier	0	0	0
Total	8	15	23

1.2 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 2023-24	11
Received in 2022-23	5
Received in 2021-22	2

Fiscal Year Open Complaints Were Received by Institution	Number of Open Complaints
Received in 2020-21	1
Received in 2019-20	1
Received in 2018-19	0
Received in 2017-18	0
Received in 2016-17	0
Received in 2015-16	0
Received in 2014-15 or earlier	0
Total	20

Section 2: Open Requests and Complaints Under the *Privacy Act*

2.1 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, 2022	Open Requests that are <i>Beyond</i> Legislated Timelines as of March 31, 2022	Total
Received in 2023-24	7	38	45
Received in 2022-23	0	38	38
Received in 2021-22	0	7	7
Received in 2020-21	0	0	0
Received in 2019-20	0	0	0
Received in 2018-19	0	0	0
Received in 2017-18	0	0	0
Received in 2016-17	0	0	0
Received in 2015-16	0	0	0
Received in 2014-15	0	0	0
Total	7	83	90

2.2 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 2023-24	1
Received in 2022-23	1
Received in 2021-22	0

Fiscal Year Open Complaints Were Received by Institution	Number of Open Complaints
Received in 2020-21	0
Received in 2019-20	0
Received in 2018-19	0
Received in 2017-18	0
Received in 2016-17	0
Received in 2015-16	0
Received in 2014-15 or earlier	0
Total	2

Section 3: Social Insurance Number (SIN)

Did your institution receive authority for a new collection or new consistent use of the SIN in 2021-2022?	No
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Section 4: 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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