

CANADA DEPOSIT INSURANCE CORPORATION

PRIVACY ACT

ANNUAL REPORT 2024-2025

Prepared as at March 31, 2025

Table of Contents

CDIC Privacy Act 2024-2025 Annual Report

CDIC Narrative Report for 2024-2025	Tab A
CDIC <i>Privacy Act</i> Delegation Order (October 17, 2022)	Tab B

TAB A

Introduction

The *Privacy Act* (the “Act”) provides everyone has the right to access personal information held by government institutions and protection of that information against unauthorized use and disclosure. This annual report, covering the period from April 1, 2024, to the end of the financial year, March 31, 2025, is prepared by Canada Deposit Insurance Corporation (“CDIC”) for tabling in Parliament in accordance with section 72 of the *Privacy Act*.

Mandate and Governance

CDIC was established in 1967 by the *Canada Deposit Insurance Corporation Act*. The objects of the Corporation are:

- a) to provide insurance against the loss of part or all of deposits;
- b) to promote and otherwise contribute to the stability of the financial system in Canada;
- c) to pursue the objects set out in paragraphs (a) and (b) for the benefit of persons having deposits with member institutions and in such manner as will minimize the exposure of the Corporation to loss; and
- d) to act as the resolution authority for its members.

CDIC is administered by a Board of Directors headed by the Chairperson, who is appointed by the Governor in Council. There are six *ex officio* Directors (the President and Chief Executive Officer of CDIC, the Governor of the Bank of Canada, the Deputy Minister of Finance, the Superintendent of Financial Institutions, a Deputy Superintendent of Financial Institutions or an officer of the Office of the Superintendent of Financial Institutions appointed by the Minister, and the Commissioner of the Financial Consumer Agency of Canada), as well as up to six private sector Directors appointed by the Governor in Council. For more information about CDIC, please refer to www.cdic.ca.

CDIC does not have any non-operational subsidiaries during this reporting period.

Organizational Structure/Administration of the Act

CDIC is a relatively small Crown corporation that typically receives very few requests for personal information in any given year. As a result, CDIC does not have a formalized Access to Information and Privacy (“ATIP”) office with staff dedicated to ATIP matters on a full-time basis. Rather, the Chief Legal Officer, Corporate Secretary and Head, Policy Integration assumes the role of ATIP Coordinator and is supported in this capacity by the Director, Legal Services as primary contact. The Advisor, ATIP & Legal Services in conjunction with Senior Legal Counsel supports the Director, Legal Services in reviewing requests for access to information (collectively referred to as the “ATIP Office”). The Advisor, ATIP & Legal Services is responsible for processing requests and consultations under the Act and supporting all other ATIP responsibilities.

To ensure timely and accurate responses to ATIP requests, CDIC has one standby agreement with an external ATIP consultant who is available to assist as needed.

CDIC did not enter into any new service agreements for ATIP services nor have any pre-existing services agreements for and from other government institutions as described under section 73.1 of the Act during the reporting period.

Delegation Order

The Delegation Order dated October 17, 2022 (the “2022 Delegation Order”) designates the President & CEO, Chief Legal Officer, Corporate Secretary and Head, Policy Integration / Access to Information and Privacy Coordinator and Director, Legal Services to exercise certain powers and perform certain duties and functions of the Chairperson under the Act and is attached and forms part of this annual report (Tab B).

Privacy Act

Performance 2024-2025

Please see the five-year trend table below. During this reporting period, CDIC received a total of five formal requests. This represents a 14% decrease when compared to the seven requests received the previous year.

Five-Year Trend

	2020-2021	2021-2022	2022-2023	2023-2024	2024-2025
No. of Formal Requests Received	2	4	12	7	5
No. of Formal Requests Closed	2	4	12	7	5

In terms of requests received during this reporting period, three were received electronically, and two by email under the provisions of the Act. CDIC responded to the requesters within the 30 day legislative timeframe indicating that no records existed and 100% of formal requests were responded to within the legislated timelines. Four requests were responded to 1-15 days, and one request was responded to 16-30 days.

In addition to the formal requests, CDIC received six additional requests during this reporting period. These requests were either missing sufficiently specific information on the location of the personal information and/or proof of identity. CDIC requested further information from the requesters, but the requesters did not respond. As a result, these incomplete requests were deemed abandoned.

CDIC did not receive any complaints during the reporting period. As of March 31, 2025, there are no active requests and no active complaints.

No requests were carried forward from the previous reporting period. No consultations were received.

Training and Awareness

During fiscal year 2024-2025, all current and new CDIC employees received training regarding their responsibilities under the Act. This training, both in person and online, is provided on an annual basis to all employees and to new employees shortly after they join. For the fiscal year 2024-2025, all CDIC employees were trained on the new requirements in the Treasury Board Secretariat's Directive on Privacy Practices that came into force in October 2024. Employees who have functional or delegated responsibility for the administration of the *Privacy Act* and *Privacy Regulations* attended additional deep-dive training which is offered by external providers, including the Access to Information and Privacy Communities Development Office. In fiscal year 2024-2025, all 218 CDIC employees completed annual declarations of compliance with CDIC policies, including CDIC's Access to Information and Privacy Policy.

Policies, Guidelines and Procedures

CDIC did not have any new or revised policies, guidelines and/or privacy procedures during the 2024-2025 reporting period.

Initiatives and Projects to Improve Privacy

CDIC is a participant of the ATIP Online Request Service ("AORS"), which provides requesters with an easy platform to quickly and efficiently submit new Personal Information requests.

- **Technology Improvements:** In this reporting period, CDIC's use of the ATIP Request Service (AORS) was upgraded to version 6.2.0 which allows for CDIC users to opt to view only completed or only active access to information and personal information requests.

Frequently Requested Information: Due to the nature of personal information requests and the moderate number of such requests received by CDIC there are limited, if any, requests for the same information and the information would not generally be made publicly available for privacy reasons.

Summary of Key Issues and Actions Taken on Complaints

As at March 31, 2025, no complaint, investigation, or appeal was brought to the attention of CDIC in relation to the processing and outcome of privacy requests.

Material Privacy Breaches

During this reporting period covered by this report, no material privacy breaches occurred at CDIC.

Privacy Impact Assessments (PIA)

During the period 2023-2024, CDIC completed one PIA, which was submitted to the Office of the Privacy Commissioner. CDIC inadvertently failed to provide TBS' Information and Privacy Policy Division with a copy of the PIA until January 9, 2025. As a result, this is noted in CDIC's Statistical Report as one PIA completed during the reporting period 2024-2025. This PIA is related to an initiative which aimed to enhance CDIC's ability to provide insured depositors with access to funds in the event of the resolution of a member institution. For further information on the PIA, please refer to the [Summary of Payout Modernization Initiative – Privacy Impact Assessment – 2023 \(cdic.ca\)](#)

Public Interest Disclosures

During this reporting period covered by this report, CDIC did not disclose personal information pursuant to paragraph 8(2)(m) of the Act.

Monitoring Processing Time of Privacy Requests

Processing Time: CDIC has established procedures to monitor the time to process personal information requests by completing an internal tracking log spreadsheet, which is updated monthly to reflect key dates and activities for all requests, including deadlines, and automated reminders are set. The ATIP Coordinator oversees the ATIP program at CDIC, and receives reports from the Director, Legal Services as the status of any requests change.

Measures Supporting Right of Public Access: To further ensure the right of public access to personal information, the majority of CDIC's contracts, agreements and arrangements contain language regarding the potential disclosure of information pursuant to personal information requests (subject to any applicable exemptions under the Act).

TAB B



Access to Information Act and Privacy Act Delegation Order

The Chairperson of Canada Deposit Insurance Corporation, pursuant to section 95(1) of the Access to Information Act and section 73(1) of the Privacy Act, hereby delegates to the persons holding the positions set out below, or the persons occupying on an acting basis those positions, the exercise of the powers, duties and functions of the Chairperson of Canada Deposit Insurance Corporation as the head of Canada Deposit Insurance Corporation, under the provisions of the Access to Information Act and Privacy Act and their related regulations. This delegation replaces all previous Access to Information Act and Privacy Act delegation orders.

Position	Access to Information Act and Regulations	Privacy Act and Regulations
President & Chief Executive Officer	Full Authority	Full Authority
Chief Legal Officer, Corporate Secretary and Head, Policy Integration / Access to Information and Privacy Coordinator	Full Authority	Full Authority
Director, Legal Services	Full Authority	Full Authority

Dated, at the City of Toronto, this 17th day of October, 2022

DocuSigned by:

Robert Sanderson

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Robert Sanderson
Chairperson of Canada Deposit Insurance Corporation