

Canada TMP Finance Ltd.

Privacy Act

Annual Report to Parliament

April 1, 2023 to March 31, 2024

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Introduction

The *Privacy Act* (Revised Statutes of Canada, Chapter A-1, 1985) was proclaimed on July 1, 1983. The *Privacy Act* (the “*Act*”) extends to individuals the right of access to information about themselves held by federal institutions, again subject to specific and limited exceptions. The law also protects the individual’s privacy by preventing others from having access to personal information and gives individuals substantial control over its collection and use.

This Annual Report to Parliament on the *Privacy Act* is prepared and tabled in Parliament in accordance with section 72 of the *Act* and covers the period from April 1, 2023 to March 31, 2024.

Canada TMP Finance Ltd. (“TMP Finance” or “the Company”), formerly known as Project Deliver I, became subject to the *Privacy Act* upon incorporation on May 28, 2018.

TMP Finance’s primary responsibility is to provide financing to its subsidiary, Trans Mountain Corporation (“TMC”). TMC has a mandate to operate the Trans Mountain Pipeline.

TMP Finance is a wholly-owned subsidiary of the Canada Development Investment Corporation (“CDEV”) and has no employees. Day to day operations are administered by CDEV employees in Toronto, Ontario.

CDEV doesn’t have any non-operational subsidiaries during this reporting period.

Organizational Structure

TMP Finance is the parent company of TMC and reports to Parliament through the Minister of Finance. TMC has a corporate structure with approximately 700 employees led by a seasoned executive team.

Two full-time CDEV employees are dedicated part-time to Access to Information and Privacy (“ATIP”) activities for CDEV and its subsidiaries, excluding TMC which has its own ATIP Coordinator and staff. The ATIP department consists of the ATIP Coordinator and one analyst. CDEV retains advice from external legal counsel and independent consultants as needed. CDEV currently has one independent ATIP consultant working approximately 0.25 FTEs.

The Corporation is party to management service agreements with CDEV under section 73.1 of the *Privacy Act*

Delegation Order

The Delegation of Authority Order (Appendix A) is reviewed annually by the head of the organization. The authority to approve or deny the release of departmental information requested under the *Act* is shared by the Chief Executive Officer and the ATIP Coordinator of CDEV.

Performance and Highlights of the 2023-2024 Statistical Report

Appendices B and C provide a summarized statistical report on the requests for personal information received under the *Privacy Act* from April 1, 2023 to March 31, 2024.

No new requests were received in the period, and none were carried over from the previous fiscal year.

No active requests are outstanding from previous reporting periods.

No active complaints are outstanding from previous reporting periods, and none were received during the current reporting period.

No consultations for other institutions were completed during this reporting period.

A Supplementary Statistical Report is included in this report.

Training and Awareness

CDEV management meets regularly with the ATIP office to discuss specific requests and consultations as required. Management is briefed on the status of files and reporting requirements on a regular basis. Summaries of formal and informal ATIP requests as well as consultations and any complaints if any for CDEV and its subsidiaries are presented to the board of directors at least annually.

ATIP training was provided to all new staff and directors of CDEV and some subsidiaries in January and June 2024. The sessions consisted of two parts, the first being a general information session and the second being an in-depth briefing targeted dominantly at the offices of primary interest.

Informal briefings, and one-on-ones, are scheduled as needed. The executive team is informed by email as soon as a new request is received.

Policies, Guidelines, Procedures and Initiatives

CDEV's privacy policy, which applies to TMP Finance, is reviewed by the board of directors regularly and amended as required. The privacy policy was last reviewed and updated in May 2024.

There were no new and/or revised institution-specific privacy related policies, guidelines, procedures or initiatives implemented in the institution during the reporting period.

Initiatives and Projects to Improve Privacy

In addition to traditional methods of receiving requests such as mail and electronic mail, CDEV uses ATIP Online Management Tools ("AOMT") to receive requests from the public.

CDEV utilizes Access Pro Case Management Redaction software as needed to process requests and apply relevant redactions if and when necessary.

CDEV's website contains a section dedicated to Access to Information and Privacy, where individuals can learn about CDEV's activities and make a request for information. CDEV's website has been upgraded to meet accessibility requirements.

Summary of Key Issues and Actions Taken on Complaints

No complaints were filed with the Information Commissioner of Canada against the Corporation in 2023-2024 and there are no active complaints outstanding from previous reporting periods.

Material Privacy Breaches

There were no material privacy breaches during the reporting period, and none were reported to the Office of the Privacy Commissioner or the Treasury Board of Canada Secretariat.

Privacy Impact Assessments

During the reporting period, no required privacy impact assessments have been identified by the Corporation.

Public Interest Disclosures

No public interest disclosure was made under paragraph 8 (2)(m) of the *Privacy Act* in this reporting period.

Monitoring Compliance

No monitoring was necessary this period, however, AOMT is accessed every Monday and Friday by the ATIP department to make sure that all new requests have been noted and accounted for

Appendix A – *Privacy Act* Designation Order

DESIGNATION/ DÉLÉGATION

*PRIVACY ACT /
LOI SUR LA PROTECTION DES RENSEIGNEMENTS PERSONNELS*

Privacy Act Designation Order

By this order made pursuant to section 73 of the *Privacy Act*, I hereby authorize those officers and employees of the Canada Development Investment Corporation and subsidiaries (excluding Trans Mountain Corporation) occupying, on an acting basis or otherwise, the positions identified within the attached schedule to perform on my behalf any of the powers, duties, or functions specified therein.

This designation replaces and repeals all previous orders.

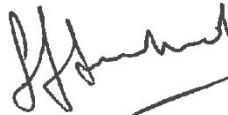
Dated in Vancouver on this 6 day of September 2021

Arrêté sur la délégation en vertu de la Loi sur la protection des renseignements personnels

Par le présent arrêté pris en vertu de l'article 73 de la *Loi sur la protection des renseignements personnels*, j'autorise les agents et les employés du Corporation de développement des investissements du Canada et les filiales (sauf la Corporation Trans Mountain) occupant, par intérim ou autrement, les postes identifiés dans l'annexe ci-jointe à exercer en mon nom, les attributions, les fonctions et les pouvoirs qui y sont spécifiés.

Le présent document remplace et annule tous les arrêtés antérieurs.

Fait à Vancouver en ce 6 jour en septembre 2021



Stephen Swaffield

Chairperson - Canada Development Investments Corporation /
Le Président - Corporation de développement des investissements du Canada

Schedule 1Designation Order- *Privacy Act*

Powers, Duties or Functions	Section	CEO
To disclose personal information to an investigative body specified in the regulations, on the written request of the body, for the purpose of enforcing any law of Canada or a province or carrying out a lawful investigation, if the request specifies the purpose and describes the information to be disclosed	8(2)(e)	yes
To disclose personal information when public interest outweighs invasion of privacy or when disclosure benefits the individual	8(2)(m)	yes

Schedule 2Designation Order- *Privacy Act*

	Section	CEO	ATIP Coordinator
To disclose personal information when satisfied that the purpose for which the information is disclosed cannot reasonably be accomplished unless the information is provided in a form that identifies the person to whom it relates and to obtain a written undertaking that no subsequent disclosure of the information will be made in a form that could reasonably be expected to identify the individual to whom it relates	8(2)(j)	yes	yes
To keep copies of requests made under 8(2)(e), keep records of information disclosed pursuant to such requests and make those copies and records available to the Privacy Commissioner	8(4)	yes	yes
To notify the Privacy Commissioner in writing of disclosure under paragraph 8(2)(m)	8(5)	yes	yes
To retain a record of use of personal information	9(1)	yes	yes
To notify the Privacy Commissioner of consistent use of personal information and update index accordingly	9(4)	yes	yes
To include personal information in personal information banks	10	yes	yes
To give written notice as to whether or not access will be given	14(a)	yes	yes
To give access to requester	14(b)	yes	yes
To extend time limit and give notice of extension	15	yes	yes

To determine the necessity for a translation or interpretation of a record	17(2)(b)	yes	yes
To determine whether a record should be provided in an alternative format	17(3)	yes	yes
To refuse to disclose personal information referred to in that section	18(2)	yes	yes
To refuse to disclose personal information referred to in that section	19(1)	yes	yes
To disclose, with consent, personal information referred to in that subsection	19(2)	yes	yes
To refuse to disclose personal information referred to in that section	20	yes	yes
To refuse to disclose personal information referred to in that section	21	yes	yes
To refuse to disclose personal information referred to in that section	22	yes	yes
To refuse to disclose personal information referred to in that section	22.3	yes	yes
To refuse to disclose personal information referred to in that section	23	yes	yes
To refuse to disclose personal information under that section	24	yes	yes
To refuse to disclose personal information under that section	25	yes	yes
To refuse to disclose personal information under that section	26	yes	yes
To refuse to disclose personal information under that section	27	yes	yes
To refuse to disclose personal information under that section	27.1	yes	yes
To refuse to disclose personal information under that section	28	yes	yes
To receive notice of investigation by the Privacy Commissioner	31	yes	yes
To make representations to the Privacy Commissioner	33(2)	yes	yes
To receive the report of findings of the investigation	35(1)	yes	yes

and give notice of action taken or proposed to be taken or reasons why no action has been or is proposed to be taken			
To provide access to personal information	35(4)	yes	yes
To receive the report of findings of the investigation of files in exempt banks	36(3)	yes	yes
To receive the report of findings after investigation in respect of personal information	37(3)	yes	yes
To request that the matter be heard and determined in the National Capital Region	51(2)(b)	yes	yes
To request the opportunity to make representations <i>ex parte</i>	51(3)	yes	yes
To prepare annual report for submission to Parliament	72	yes	yes
Provision of privacy services	73.1	yes	yes
To carry out responsibilities conferred on the head of the institution by regulations made under section 77, not included above	77	yes	yes

Appendix B – Statistical Report on the *Privacy Act*

Statistical Report on the *Privacy Act*

Name of institution: Canada TMP Finance Ltd.

Reporting period: 4/1/2023 to 3/31/2024

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 3: Requests Closed During the Reporting Period

3.1 Disposition and completion time

Disposition of Requests	Completion Time							Total
	0 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
No records exist	0	0	0	0	0	0	0	0
Request abandoned	0	0	0	0	0	0	0	0
Neither confirmed nor denied	0	0	0	0	0	0	0	0
Total	0	0	0	0	0	0	0	0

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, e-record and dataset formats

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

3.5.2 Relevant pages processed per request disposition for paper, e-record and dataset 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 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	0	0	0
Central	0	0	0	0
Total	0	0	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	\$428
Overtime	\$0
Goods and Services	\$231
• Professional services contracts	\$231
• Other	\$0
Total	\$659

12.2 Human Resources

Resources	Person Years Dedicated to Privacy Activities
Full-time employees	0.004
Part-time and casual employees	0.000
Regional staff	0.000
Consultants and agency personnel	0.001
Students	0.000
Total	0.005

Note: Enter values to three decimal places.

Appendix C – Supplementary Statistical Report on the *Access to Information Act* and *Privacy Act*



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

Name of institution: Canada TMP Finance Ltd.

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 <i>Within</i> Legislated Timelines as of March 31, 2024	Open Requests that are <i>Beyond</i> Legislated Timelines as of March 31, 2024	Total
Received in 2023-24	0	0	0
Received in 2022-23	0	0	0
Received in 2021-22	0	0	0
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 or earlier	0	0	0
Total	0	0	0

Row 11, Col. 3 of Section 1.1 must equal Row 7, Col. 1 of Section 1.1 of the 2023-24 Statistical Report on the Access to Information Act

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	0
Received in 2022-23	0
Received in 2021-22	0
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	0

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, 2024	Open Requests that are <i>Beyond</i> Legislated Timelines as of March 31, 2024	Total
Received in 2023-24	0	0	0
Received in 2022-23	0	0	0
Received in 2021-22	0	0	0
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 or earlier	0	0	0
Total	0	0	0

Row 11, Col. 3 of Section 2.1 must equal Row 7, Col. 1 of Section 1.1 of the 2023-24 Statistical Report on the *Privacy Act*

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	0
Received in 2022-23	0
Received in 2021-22	0
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	0

Section 3: Social Insurance Number

Has your institution begun a new collection or a new consistent use of the SIN in 2023-24?	No
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Section 4: Universal Access under the Privacy Act

How many requests were received from foreign nationals outside of Canada in 2023-24?	0
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Row 1, Col. 1 of Section 4 must be equal to or less than Row 1, Col. 1 of Section 1.1 of the 2023-24 Statistical Report on the *Privacy Act*

