

# **Canada Hibernia Holding Corporation**

*Privacy Act*

Annual Report to Parliament

April 1, 2024 – March 31, 2025

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Appendix A – *Privacy Act* Designation Order

## 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, 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.

Canada Hibernia Holding Corporation (“CHHC” or the “Corporation”) became subject to the *Privacy Act* on September 1, 2007.

This Annual Report to Parliament on the administration of the *Privacy Act* is prepared and tabled in Parliament in accordance with section 72 of the *Act* and covers the period from April 1, 2024 to March 31, 2025.

Canada Hibernia Holding Corporation (“CHHC”) was established in 1993 under the *Canada Business Corporations Act* and holds and manages the federal government’s minority ownership interests of 8.5% and 5.67% in the Hibernia Development Project (“HDP”) and Hibernia Southern Extension Unit (“HSE Unit”) respectively (collectively “Hibernia”), which is an oilfield offshore Newfoundland and Labrador. Hibernia is operated by Hibernia Management and Development Company Ltd. Incorporated in 1993, CHHC has a management team which is, led by a President based in Calgary, who is experienced in the oil industry, providing expertise in technical operations, marketing, transportation and finance.

## Organizational Structure

CHHC reports to Parliament through its parent company, CDEV, and is managed in Calgary, AB by a small group of professionals which is experienced in the oil industry and provides expertise in technical operations, marketing, transportation, and finance.

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 General Counsel and Corporate Secretary and the ATIP Coordinator as delegated by the President and Chief Executive Officer of CDEV.

## Performance and Highlights of the 2024-2025 Statistical Report

During April 1, 2024 to March 31, 2025, no new formal requests were received during the reporting 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.

### **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 quarterly.

General ATIP training is provided to all new staff and directors of CDEV and subsidiaries. The sessions are structured into 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 CHHC, 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 or Audits**

No complaints were filed with the Privacy Commissioner of Canada against the Corporation in 2024-2025 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**

At March 31, 2025, no required privacy impact assessments have been identified by the Corporation. No privacy impact assessments were completed during the reporting period.

### **Public Interest Disclosures**

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

reporting period.

### **Monitoring Compliance**

Outstanding requests are reviewed regularly to ensure the file is current and processing times are met. The ATIP department holds weekly meetings to ensure that all files are being processed efficiently, timely and in accordance with the Act.

The ATIP office uses file trackers and calendar reminders; files are kept and updated to ensure that all requests and their deadlines, as well as any extensions, are being accurately tracked and respected. Requests are reviewed to determine whether consultations are necessary and are taken only when required for the proper exercise of discretion or if there is an intention to disclose. Where information is requested and similar requests have been made, we will refer the requestor to these previous releases as well.

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 Toronto on this 18 day of June 2024

#### **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 arrêts antérieurs.

Fait à Toronto en ce 18 jour en juin 2024



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Elizabeth A. Wademan

President and CEO - Canada Development Investments Corporation  
Présidente et cheffe de la direction- Corporation de développement des investissements du Canada

**Schedule 1**Designation Order- *Privacy Act*

| <b>Powers, Duties or Functions</b>                                                                                                                                                                                                                                                                                  | <b>Section</b> | <b>General Counsel and Corporate Secretary</b> |
|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------|------------------------------------------------|
| 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 2**Designation Order- *Privacy Act*

|                                                                                                                                                                                                                                                                                                                                                                                                                                  | <b>Section</b> | <b>General Counsel and Corporate Secretary</b> | <b>ATIP Coordinator</b> |
|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------|------------------------------------------------|-------------------------|
| 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)(f)        | 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 and give notice of action taken or proposed to be taken or reasons why no action has been or is proposed to be taken | 35(1)    | yes | yes |
| 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 |