TELEFILM CANADA

Annual Report on the *Privacy Act*

2025/2026

July 3, 2026

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Presentation of the 2025/2026 Annual Report

In compliance with section 72 of the *Privacy Act* (hereinafter also referred to as the "Act"), this annual report is prepared by Telefilm Canada (hereinafter also referred to as the "Corporation") and tabled in Parliament by the Minister of Canadian Identity and Culture and Minister responsible for Official Languages.

Purpose of the *Privacy Act*

The Act gives everyone the right to access their personal information held by government institutions that are subject to the Act, and protects that information against unauthorized collection, use, retention and disclosure. This right is subject to exceptions specified in the Act. Also, decisions made by federal institutions on the use and disclosure of personal information are subject to independent review by the Office of the Privacy Commissioner of Canada (the "Commissioner") as well as by the federal courts.

Mandate of the Institution

Telefilm Canada is a federal cultural institution dedicated to the development and promotion of the Canadian audiovisual industry. Telefilm Canada provides financial support to the private sector to create distinctively Canadian productions that appeal to domestic and international audiences. The Corporation also administers the funding programs of the Canada Media Fund.

Non-operational Subsidiaries

The Corporation did not have any non-operational ("paper") subsidiaries during this reporting period.

1 Organization

The Vice President, Legal Services, Information Technologies and Corporate Secretary is the designated Access to Information and Privacy Coordinator (the "Coordinator") for the Corporation. Requests filed under the Act are normally referred to designated Legal Services staff, consisting of 4 legal counsels and a paralegal, who ensure the coordination of filed requests as well as all aspects of their processing, including final decisions issued to requesters (the "designated staff"). Furthermore, the designated staff are also responsible for dealing with issues related to privacy within the Corporation. Monitoring of the time required to process requests filed under the Act is conducted periodically, including in the course of ad hoc meetings with the Coordinator. The designated staff, as well as the Coordinator, are based in the Quebec region where the Corporation's head office is located.

Telefilm Canada did not use the services of ATIP[1] consultants, and was not a party to any services agreements within the meaning of section 73.1 of the Act during fiscal 2025/2026.

[1] ATIP: Access to Information and Privacy

2 Findings

In 2025/2026, the number of requests for access to personal information increased compared to the previous fiscal year. Telefilm Canada received 4 requests under the Act during the 2025/2026 reporting period, 3 more than in the previous fiscal year (2024/2025). These figures reflect a trend that appears to fluctuate over time, with only one request received in each of 2024/2025 and 2023/2024, compared to 4 requests received in 2022/2023.

All four requests (100%) closed during the 2025/2026 reporting period were processed within the time limits prescribed by the Act. Processing times ranged from 1 to 15 days (2 requests or 50%) and 16 to 30 days (2 requests or 50%). For 3 of these requests (75%), no records existed. The fourth request (25%) was abandoned.

As in the 2022/2023 to 2024/2025 periods, the Corporation made no disclosures pursuant to section 8(2)(m) of the Act during fiscal 2025/2026. Moreover, the Corporation did not complete any privacy impact assessments during that financial year.

During the 2025/2026 period, the Corporation did not process any consultation requests from other government institutions. As well, no new or revised institution-specific policies, guidelines or procedures related to privacy have been implemented by the Corporation. Furthermore, no new systematic collection or consistent use of social insurance numbers began during the same period.

No material privacy breaches were reported in fiscal 2025/2026 to the Commissioner and to the Privacy and Responsible Data Division at the Treasury Board Secretariat. During that same fiscal year, only one complaint was still being processed by the Commissioner, in connection with a notice of complaint received in 2020/2021, and no further developments occurred in connection with this complaint during the period covered by this report. This complaint alleges that Telefilm Canada contravened section 12(1) of the Act (right of access) while processing the request. Aside from this complaint opened in 2020/2021, no other privacy-related complaints were sent to the Corporation by the Commissioner during fiscal 2025/2026.

Aside from the ad hoc meetings previously mentioned in the “Organization” section of this report, no additional monitoring measures were required during the 2025/2026 period with respect to the time needed to process requests filed under the Act.

3 Activities in Support of Access to Personal Information, Privacy Protection and Compliance Monitoring

Telefilm Canada maintains practices aimed at providing any individual wishing to access their personal information with as much material and documents as can be made available legally while respecting the Corporation’s confidentiality guidelines, without requiring a formal access request under the Act or, whenever possible, without even opening an informal request file.

In addition to the above, Telefilm Canada also carries out other activities to monitor compliance with the Act and related directives issued by the Treasury Board Secretariat. These include, among others:

- Using technological tools, including the ATIP Online Management Tool made available by the Treasury Board Secretariat, to help track the processing of requests made under the Act and responses issued thereto.

- Monitoring of the time required to process requests made under the Act, conducted periodically, including through ad hoc meetings attended by the Coordinator and designated Legal Services staff who handle access requests.

- Systematically consulting designated Legal Services staff when developing templates as well as reviewing, on a timely basis, draft contracts, agreements and arrangements, thereby ensuring the inclusion of appropriate privacy protections. The Coordinator is informed of these consultations in the course of regular meetings with his staff.

    - As a general practice, the Corporation's contracts include provisions governing the limited use of personal information, confidentiality, data security, privacy breach notification, restrictions on disclosure and retention, as well as the return or secure destruction of personal information upon completion of the mandate.

4 Training and Awareness

During the 2025/2026 reporting period, Legal Services delivered live virtual training sessions to 22 new employees, among other things to raise awareness of key privacy principles, Telefilm's legal obligations in this area, and the responsibilities arising therefrom. Also, Legal Services responded on a regular basis to questions and requests for guidance from the Corporation's employees and managers regarding privacy.

In addition, designated Legal Services staff who have functional or delegated responsibilities for the administration of the Act[2] receive individualized support, including in the context of request processing or analysis of questions related to privacy. This support takes the form of focused discussions and ad hoc peer exchanges aimed at deepening their understanding of certain aspects of the Act, including, among others, extensions, exemptions and exclusions, reporting obligations to Parliament, and the role of Agents of Parliament, including the Commissioner. Designated staff also have access to additional tools made available to ATIP practitioners by the Treasury Board Secretariat.

[2] See the "Organization" section of this report.

Schedule “A”

Copy of the Delegation Order

TELEFILM CANADA PARTNER OF CHOICE

Canada

MEMO

TO:	Sébastien Pigeon, Vice President, Legal Services and Corporate Secretary
FROM:	Julie Roy, Executive Director and CEO
DATE:	May 27, 2025
SUBJECT:	Delegation of Powers, Duties and Functions under the *Access to Information Act* and the *Privacy Act*.

This is to confirm in writing that effective March 10, 2025 I designated, pursuant to sections 95(1) of the *Access to Information Act* (the "**ATIA**") and 73(1) of the *Privacy Act*, the person holding the position of Vice President, Legal Services and Corporate Secretary (the "**ATIP Coordinator**"), to exercise and perform all the powers, duties and functions of the Executive Director and CEO as head of a federal institution, namely Telefilm Canada, under the ATIA and the *Privacy Act*, except with regards to access to information requests and requests for personal information pertaining to a vice-president of Telefilm Canada's Management Committee. These latter requests are the exclusive responsibility of the Executive Director and CEO and must therefore be sent to her, without delay, for processing and decision.

In addition, as of March 10, 2025, I have delegated to the persons holding the positions of Associate Director, Legal Services and Information Management, Legal Counsels, as well as Paralegal assigned to handling matters related to the application of the ATIA and the *Privacy Act*, the powers, duties and functions required to assist the ATIP Coordinator in exercising the powers, duties and functions of the Executive Director and CEO under these Acts. This includes, among other things, the processing of access to information requests and personal information requests, subject to the same exception set out in the preceding paragraph.

This revokes the delegation of powers, duties and functions under the ATIA and the *Privacy Act* dated January 17, 2025.

Any proposed changes to the authority and procedure hereby granted shall require my prior written authorization.

Signed this 27th day of May, 2025.

Telefilm Canada



Julie Roy
Executive Director and CEO

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