

ANNUAL REPORT ON THE PRIVACY ACT

2019/2020

July 31, 2020



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Presentation of the 2019/2020 Annual Report

In compliance with section 72 of the *Privacy Act* (the “**Act**”), this annual report is prepared by Telefilm Canada (hereinafter also referred to as the “**Corporation**”) and tabled on its behalf in Parliament by the Minister of Canadian Heritage.

Purpose of the *Privacy Act*

The Act provides Canadian citizens with the right to access personal information held by the government and protection of that information against unauthorized use 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.

Organization

The Director of Legal Services is the designated Access to Information and Privacy Coordinator (the “**Coordinator**”) for the Corporation. Requests filed under the Act are automatically referred to Legal Services staff, who ensure their coordination as well as all aspects of their processing, including final decisions issued to applicants. Furthermore, Legal Services staff are also responsible for addressing and processing issues related to privacy within the Corporation. Monitoring of the time required to process requests filed under the Act is performed on a timely basis in the course of weekly meetings with the Coordinator.

Telefilm Canada was not a party to any service agreements within the meaning of section 73.1 of the Act during fiscal 2019/2020.

Findings

As in the 2016/2017 to 2018/2019 periods, Telefilm Canada did not receive any requests under the Act during fiscal 2019/2020. Consequently, no compliance-related monitoring activities with respect to processing times were conducted during the reporting period.

Moreover, as in the 2016/2017 to 2018/2019 periods, the Corporation made no disclosures pursuant to section 8(2)(m) of the Act during fiscal 2019/2020.

Furthermore, since fiscal 2016/2017 until the current financial year, Telefilm Canada undertook no new data matching and sharing activities.

The Corporation completed 3 Privacy Impact Assessments (the “**PIAs**”) during the 2019/2020 period.

The first PIA was in relation to the use of the Grenadine platform as a new event management tool.¹ Employees working in the Event Management sector use the Grenadine cloud platform as part of event preparation and management. This platform also enables Telefilm Canada's clients to apply for participation in events and to manage the processing of such applications. Clients may access the platform with a Grenadine user account. This PIA enabled Telefilm Canada to address the risks potentially tied to the Grenadine platform, including as regards the partner of the activity, the implementation of new technological systems and the transmission of personal information using wireless technology, among others. This PIA also established the adequacy of the service provider's risk mitigation measures, including the hosting of data in Canada, as well as the availability of a secured mobile application. Finally, this PIA enabled Telefilm Canada to determine that the planned measures in relation to the implementation of Grenadine, including, among other things, the inclusion in invitation emails (to an event or an activity) of a hyperlink to the personal information collection statement published on Telefilm Canada's website, as well as limiting collection to personal information that is directly related to the processing of registrations and participations to events, are in accordance with the Act.

The second PIA was in relation to the use of the Tradogram platform as a new purchase order management tool.² Employees working in the Finance department use the Tradogram platform to process and manage purchase orders related to the procurement of goods and services. This PIA enabled Telefilm Canada to address the risks potentially tied to the Tradogram platform, including as regards the processing of data in the United States, the extent of the population targeted by the program, the long-term duration of the program, the implementation of new technological systems and the transmission of personal information using wireless technology, among others. This PIA has also established the adequacy of risk mitigation measures put in place by the service provider and its subcontractors, including a program ensuring the platform's security management based on recognized certification standards, as well as the verification of controls implemented in accordance with recognized audit standards related to the security, availability, processing integrity, confidentiality and protection of personal information. Finally, this PIA enabled Telefilm Canada to determine that the planned measures in relation to the implementation of Tradogram, including, among other things, the publication of a privacy statement on Telefilm Canada's website, as well as limiting collection to personal information that is directly connected to the processing of purchase orders and payment requests, are in accordance with the Act.

The third PIA was in relation to the use of the Terranova platform as a new information security training tool.³ All Telefilm Canada employees use the Terranova platform to participate in training and evaluation activities. This PIA enabled Telefilm Canada to address the risks potentially tied to the Terranova platform, including as regards the partner of the activity, the implementation of new technological systems and the transmission of personal information using wireless technology, among others. This PIA has also established the adequacy of the service provider's risk mitigation measures, including data hosting in Canada, a program ensuring the platform's security management based on recognized certification standards, as well as the secured environment provided by the Azure Cloud hosting provider. Finally, this PIA enabled Telefilm Canada to determine that the planned measures in relation to the implementation of Terranova, including, among other things, limiting collection to personal information that is directly related to training and knowledge assessment, as well as the absence of sharing and/or disclosure of personal information outside our institution, are in accordance with the Act.

¹ The PIA summary for the Grenadine platform is available at the following link:

<https://telefilm.ca/wp-content/uploads/pia-summary-event-management-on-grenadine-en.pdf>

² The PIA summary for the Tradogram platform is available at the following link:

<https://telefilm.ca/wp-content/uploads/pia-summary-purchase-order-management-tradogram-en-1.pdf>

³ The PIA summary for the Terranova platform is available at the following link:

<https://telefilm.ca/wp-content/uploads/pia-summary-information-security-training-terranova-en.pdf>

Following our filing of the PIAs with the Commissioner, the latter raised no issue or preoccupation relative to the PIAs or the project as proposed. The summaries of those PIAs are available in the *Privacy*⁴ section of Telefilm Canada's website.

During the 2019/2020 period, Legal Services provided 1 training session to the staff of Telefilm Canada to raise awareness on the part of employees and managers about important aspects related to privacy. As in previous financial years, this training was delivered by way of an interactive online platform and included a questionnaire. Total participation for all offices was estimated at 176 individuals.

During the same period, Legal Services also delivered to new employees 3 individual in-person training sessions at the head office in Montréal to raise awareness among these 3 new employees about, among other things, important aspects related to privacy.

In addition to the foregoing, Legal Services continued, on a punctual basis, to respond to questions and the needs of the Corporation's employees and managers regarding privacy.

During the 2019/2020 period, the Corporation did not implement any new or revised privacy-related policies, guidelines or procedures.

No material privacy breaches were reported during fiscal 2019/2020 to the Commissioner and to the Information and Privacy Policy Division at the Treasury Board of Canada Secretariat. Also, no privacy-related complaints were received by the Corporation and no investigations or audits of the Corporation were conducted during the same period.

Finally, the arrival of the COVID-19 pandemic at the end of the 2019/2020 period had no impact on the Corporation's ability to fulfill its responsibilities under the Act and did not require adopting specific measures in connection with privacy or the Act.

⁴ <https://telefilm.ca/en/transparency/privacy>

Schedule "A"

Copy of the Delegation Order

TO: Stéphane Odesse, Director, Legal Services and ATIP Coordinator
Pierre-Yves Marchand, Paralegal
Khadidja Kedir, Legal Counsel

FROM: Christa Dickenson, Executive Director

DATE: September 16, 2019

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 September 9, 2019 I designated, pursuant to sections 95(1) of the *Access to Information Act* ("ATIA") and 73(1) of the *Privacy Act*, Stéphane Odesse, Director, Legal Services and Access to Information and Privacy ("ATIP") Coordinator for Telefilm Canada, to exercise and perform all the powers, duties and functions of the Executive Director as head of Telefilm Canada under the ATIA and the *Privacy Act*.

In addition, effective September 9, 2019 I delegated these same powers, duties and functions to Pierre-Yves Marchand, Paralegal and Khadidja Kedir, Legal Counsel, for the administration and carrying out of all and any of Telefilm Canada's responsibilities and activities pursuant to and under the ATIA and the *Privacy Act*.

The Paralegal and Legal Counsel listed above shall report directly to the Director, Legal Services and ATIP Coordinator and to no other person within Telefilm Canada for ATIA and *Privacy Act* purposes.

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

Signed this 16th day of September, 2019.

Telefilm Canada



Christa Dickenson
Executive Director

Schedule “B”

Statistical Report



Statistical Report on the *Privacy Act*

Name of institution: _____

Reporting period: _____ 2019-04-01 _____ to _____ 2020-03-31 _____

Section 1: Requests Under the *Privacy Act*

1.1 Number of requests

	Number of Requests
Received during reporting period	0
Outstanding from previous reporting period	0
Total	0
Closed during reporting period	0
Carried over to next reporting period	0

Section 2: Requests Closed During the Reporting Period

2.1 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	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

2.2 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		

2.3 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

2.4 Format of information released

Paper	Electronic	Other
0	0	0

2.5 Complexity

2.5.1 Relevant pages processed and disclosed

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

2.5.2 Relevant pages processed and disclosed by size of requests

[illegible]

2.5.3 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

2.6 Closed requests

2.6.1 Number of requests closed within legislated timelines

	Requests closed within legislated timelines
Number of requests closed within legislated timelines	0
Percentage of requests closed within legislated timelines (%)	0

2.7 Deemed refusals

2.7.1 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

2.7.2 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	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

2.8 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 3: Disclosures Under Subsections 8(2) and 8(5)

Paragraph 8(2)(e)	Paragraph 8(2)(m)	Subsection 8(5)	Total
0	0	0	0

Section 4: 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 5: Extensions

5.1 Reasons for extensions and disposition of requests

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	
0	0	0	0	0	0	0	0	0

5.2 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	0	0	0	0	0	0	0	0
31 days or greater								0
Total	0	0	0	0	0	0	0	0

Section 6: Consultations Received From Other Institutions and Organizations

6.1 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

6.2 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	
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

6.3 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 7: Completion Time of Consultations on Cabinet Confidences

7.1 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
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

7.2 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 8: Complaints and Investigations Notices Received

Section 31	Section 33	Section 35	Court action	Total
0	0	0	0	0

Section 9: Privacy Impact Assessments (PIA) and Personal Information Banks (PIB)

9.1 Privacy Impact Assessments

Number of PIA(s) completed	3
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9.2 Personal Information Banks

Personal Information Banks	Active	Created	Terminated	Modified
	0	0	0	0

Section 10: Material Privacy Breaches

Number of material privacy breaches reported to TBS	0
Number of material privacy breaches reported to OPC	0

Section 11: Resources Related to the *Privacy Act*

11.1 Costs

Expenditures		Amount
Salaries		\$17 553
Overtime		\$0
Goods and Services		\$0
• Professional services contracts	\$0	
• Other	\$0	
Total		\$17 553

11.2 Human Resources

Resources	Person Years Dedicated to Privacy Activities
Full-time employees	0,20
Part-time and casual employees	0,00
Regional staff	0,00
Consultants and agency personnel	0,00
Students	0,00
Total	0,20

Note: Enter values to two decimal places.