

Annual Report on the Administration of the *Privacy Act*

April 1, 2025 – March 31, 2026

BANK OF CANADA
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Legislative and Institutional Context

The *Privacy Act* (PA) provides individuals the right to access their own personal information held by federal government institutions, and protects that information against unauthorized collection, use, retention, and disclosure.

This report, prepared pursuant to **Section 72** of the PA, summarizes the Bank of Canada's privacy activities for 2025–26.

As Canada's central bank, the Bank supports a strong and resilient economy through **five core functions**: monetary policy, financial system, currency, funds management, and regulatory oversight.



Monetary policy



Financial system



Currency



Funds management



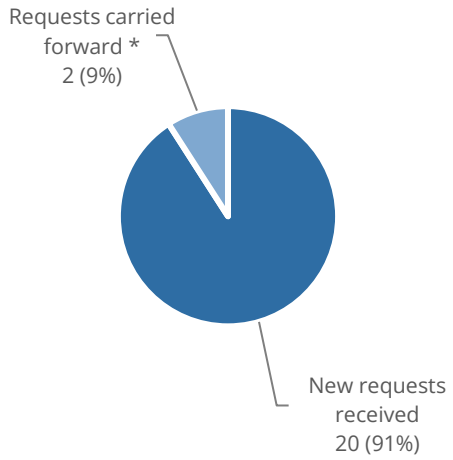
Regulatory oversight

The Bank is not reporting on behalf of any wholly owned subsidiaries or non-operational institutions and does not provide any services related to privacy to other institutions under section 73.1 of the PA.

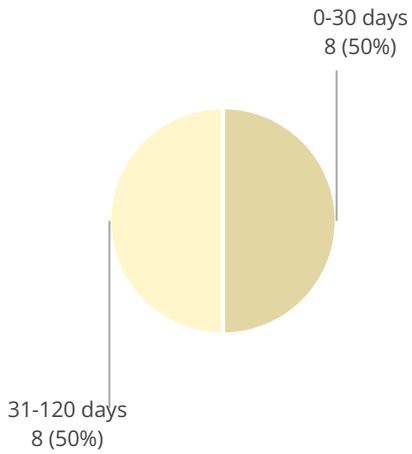
- The Executive and Legal Services Department, through the Privacy and Access Centre of Expertise **(PACE)**, administers the Bank's responsibilities under the *Privacy Act*.
- PACE is supported by eight dedicated staff and a network of departmental contacts.
- Pursuant to **section 73(1)** of the PA, the Governor of the Bank of Canada is accountable for the administration of the Bank's Access to Information and Privacy (ATIP) program.
- Specific authorities have been delegated to designated officials in accordance with the PA; the Bank's Delegation Order is provided in **Annex A**.

Formal Privacy Requests

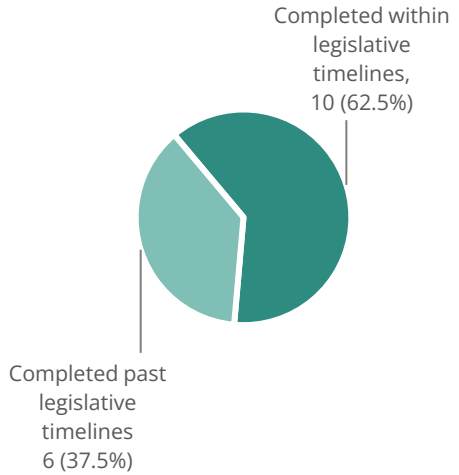
Active Requests
22 total formal requests



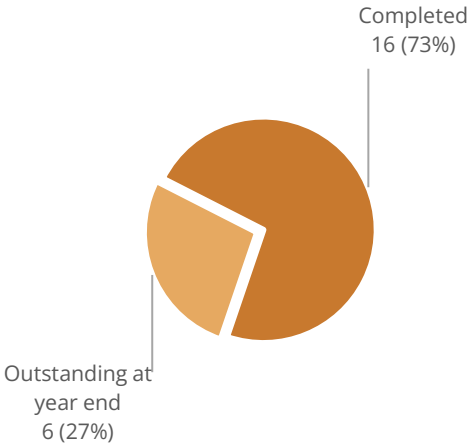
Completion Time
16 total formal requests



Compliance Rate
16 completed requests



Processing Outcomes
22 total formal requests

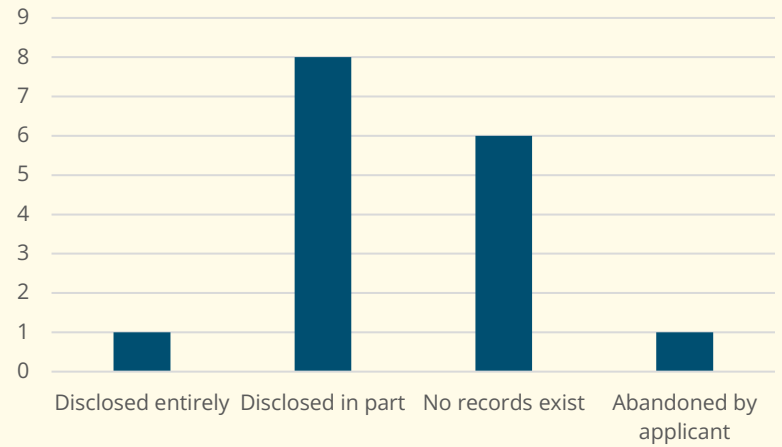


**from 2024–25*

The Bank took **6 extensions** in relation to the 16 completed formal privacy requests as meeting the original 30-day time limit would have unreasonably interfered with operations.

The Bank received **no consultations** from other institutions during the 2025–26 reporting period. In addition, no consultations were carried forward from previous reporting periods.

16 requests were completed, representing a total output of **9,388 pages** processed



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Complaints

The Bank of Canada received **6 formal notices of complaint** from the Office of the Privacy Commissioner of Canada (OPC) under section 31 of the PA in 2025–26.

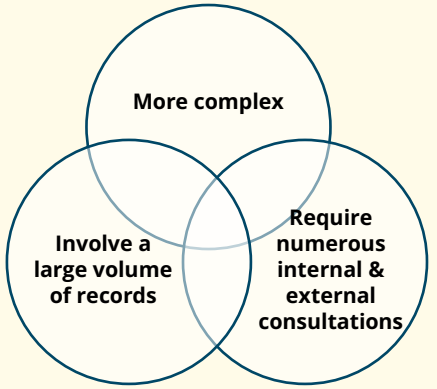
In addition, **1 complaint** was carried forward from the 2023-24 reporting period.

Of the **6 complaints** received in 2025-26,
- **1** was closed through early resolution, and
- **5** were carried over into the next reporting period.

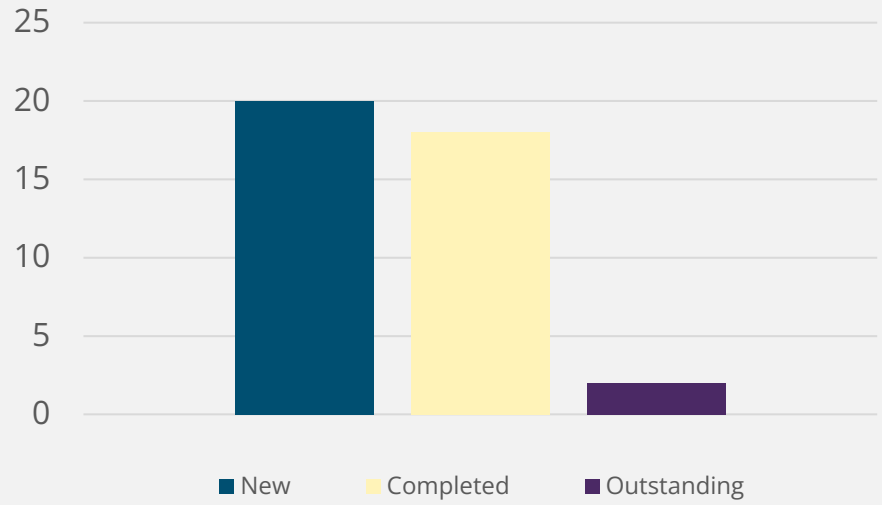
The **1 complaint** carried forward from 2023-24, concerning a third-party breach, was closed as well-founded this reporting period.

The Bank endeavors to respect deadlines and routinely keeps requesters informed of the status of their requests.

Requests that are completed **beyond the legislated timelines** are typically:



Informal Privacy Requests



Disclosure under section 8(2)

In 2025-26, the Bank notified the OPC of **1** public interest disclosure made under section 8(2)(m) of the PA in relation to the Bank's unclaimed properties program.

Privacy Impact Assessments (PIAs)

The Bank did not undertake any new formal PIAs this reporting period; modifications were made to an existing PIA.

Training and Awareness

PACE continued to strengthen **privacy awareness and compliance** through training, outreach, and guidance. Key activities included:

- **324 new employees** completed a virtual ATIP training module covering the *Privacy Act* and the Bank's privacy obligations and processes.
- **337 employees** completed privacy-focused e-learning modules on privacy awareness, personal information handling, privacy breaches, and privacy practices.
- **138 employees** participated in targeted awareness sessions on privacy and contract management, privacy breaches, privacy risks associated with artificial intelligence, and the handling of personal information. Senior management also received briefings on key privacy matters.
- Content on the **PACE Hub advice library** was expanded to include topics covering privacy impact assessments, inherent data sensitivity, and the use of employee personal information. Existing privacy guidance was updated to reflect the use of AI at the Bank.

Policies, Guidelines, and Procedures

In 2025–26, PACE strengthened the Bank's privacy framework through the development and enhancement of policies, guidelines, procedures, and support tools, including:

- Development of **AI-related policies, governance frameworks, and scalable privacy risk assessment tools** to support the responsible adoption of emerging technologies.
- **Guidance** supporting the **responsible use of personal information** in digital transformation initiatives.
- Enhanced privacy requirements within **vendor risk assessment and outsourcing oversight** processes**.**
- Strengthened **integrated incident management procedures** to improve the identification, assessment, and management of privacy risks.
- Integration of privacy requirements into the **Open-Source Intelligence (OSINT) framework and procedures.**

Improve Access to/ Management of Personal Information

Process Improvements & Modernization

Completed major ATIP modernization initiatives, including enhancements to case management, workflow automation, and reporting processes, improving timeliness and operational capacity.

Monitoring Compliance

Monitored ATIP risks and legislative changes.
Oversaw program performance.
Reported to senior management and the Board.
Embedded ATIP requirements in contracts

Info Source

Maintained the Bank's public inventory of information holdings, programs, records, and personal information banks (PIBs).
Modified **19 PIBs** in 2025-26.

Privacy by Design

Completed **241 privacy reviews** and provided risk-based privacy advice, helping to mitigate risk, strengthen compliance, and enable the responsible implementation of business processes and technology solutions

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2025–2026 Highlights

22 **Requests**
Total workload of formal privacy requests.

16 **Formal Requests Completed**
9,388 pages processed.

241 **Privacy Reviews** Completed

19 **Personal Information Banks (PIBs)**
Modified

324 **Employees Trained in ATIP Principles**
Plus 337 via data and privacy e-learning.

0 **Material Breaches**
None reported to the OPC.

Annex A: Delegation of Authority

September 13, 2023

To: Steve Thomas
General Counsel & Corporate Secretary

Lesley Ryan
Deputy Corporate Secretary and Senior Director, Compliance
Access to Information and Privacy Coordinator

From: Tiff Macklem
Governor

Subject: Delegation of Authority under the *Access to Information Act* and the *Privacy Act*

The Governor of the Bank of Canada, pursuant to section 95(1) of the *Access to Information Act* and section 73(1) of the *Privacy Act*, hereby designates the persons holding the positions set out on the schedule hereto, or the persons occupying on an acting basis those positions, to exercise the powers and functions of the Governor as the head of a government institution, under the section of the *Act* set out in the schedule opposite each position.

Schedule

Position	*Access to Information Act* and regulations	*Privacy Act* and regulations
General Counsel & Corporate Secretary	Full authority	Full authority
Deputy Corporate Secretary and Senior Director, Compliance/ Access to Information and Privacy Coordinator	Full authority	Full authority
Director ATIP	As set out in Appendix A	As set out in Appendix B

Governor Tiff Macklem

Oct 31, 2023
(Date)