

ANNUAL REPORT TO PARLIAMENT

PRIVACY ACT



APRIL 1, 2024, TO MARCH 31, 2025

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Annex A: Delegation Order

1. INTRODUCTION

The *Privacy Act* (PA) grants a right of access to Canadian citizens and permanent residents present in Canada as well as any individual abroad who does not already benefit from this right to personal information about them held by government institutions subject to the PA. In addition, the PA protects that information against unauthorized collection, use, retention and disclosure.

The Jacques Cartier and Champlain Bridges Incorporated ("JCCBI") is a parent Crown Corporation listed under part I, Schedule III of the *Financial Administration Act*.

As a manager of important infrastructure, JCCBI is responsible for the Jacques Cartier Bridge, the structure of the Québec Bridge, the Estacade, the federal section of the Bonaventure Expressway, the federal section of the Honoré Mercier Bridge, as well as the Melocheville Tunnel. With the exception of the Québec Bridge, JCCBI is also responsible for the land comprising the right-of-way for these infrastructure, including the land in the original Champlain Bridge corridor and the future developments planned thereon. JCCBI ensures, on a daily basis, a safe drive for thousands of users by managing, maintaining and repairing this important Greater Montreal infrastructure. JCCBI also ensures that these critical structures remain safe, fully functional and aesthetically pleasing both today and in the future. It conducts construction, rehabilitation and reinforcement projects on the infrastructure under its responsibility and oversees the operation and maintenance of these structures.

This report is prepared and tabled in Parliament in accordance with Section 72 of the PA. It covers the period from April 1, 2024, to March 31, 2025.

2. ORGANIZATIONAL STRUCTURE

JCCBI resources in charge of the administration of the PA work thereon on a part-time basis. Requests received under the PA are processed by the Access to Information and Privacy (ATIP) Coordinator who is also Director, Legal Affairs at JCCBI. Procedures are put in place for directing all formal privacy requests to the ATIP Coordinator for them to be processed in accordance with the provisions of the PA. A lawyer provides support to the ATIP Coordinator. The paralegal of the Legal Affairs Department assists, as required, the ATIP Coordinator and the lawyer in processing requests. When it receives a request for complex or voluminous documents, JCCBI occasionally retains the services of a consultant, a law firm, to provide assistance in processing the request. JCCBI does not provide any services related to privacy to another government institution as defined in Section 73.1 of the PA.

3. DELEGATION ORDER

The head of JCCBI, Mrs. Sandra Martel, Chief Executive Officer, delegated her powers, duties and functions under the *PA* to the ATIP Coordinator, Mrs. Véronic Meunier, Director, Legal Affairs. A copy of the Delegation Order is included in Annex A.

4. PERFORMANCE 2024-2025

4.1 REQUESTS RECEIVED AND COMPLETED

During this reporting period, JCCBI received one (1) formal request for access to personal information and no active requests were pending at the end of the reporting period. This represents an increase of one (1) request (100%) from last year's reporting period, which had none.

During this reporting period, there were no active complaints pending from previous reporting periods.

In 2024-2025, JCCBI processed and released 1029 pages, which is 1029 pages more than the previous reporting period, representing an increase of 100%.

4.2 DISPOSITION OF COMPLETED REQUESTS

During this reporting period, one (1) request was received and completed, and the records were disclosed in part.

4.3 EXEMPTIONS INVOKED

During this reporting period, JCCBI invoked two (2) exemptions pursuant to the *PA*, namely:

- Section 26: Information about another individual;
- Section 27: Protected information (solicitors, advocates and notaries).

4.4 EXCLUSIONS INVOKED

During this reporting period, JCCBI did not invoke any exclusion provided in the *PA*.

4.5 COMPLETION TIME AND EXTENSIONS

The *PA* sets the time limits for responding to a request for access to personal information and allows extensions, particularly when compliance with the timeline would seriously interfere with the operations of the government institution.

During this reporting period, the only request received was extended from 16 to 30 days due to the large volume of pages to be processed, which is in line with the time limits set out in the *PA*.

4.6 CONSULTATION REQUESTS

During this reporting period, no consultation requests from other government institutions pursuant to the *PA* were received.

4.7 OTHER REQUESTS

During this reporting period, no informal requests were received.

4.8 OPERATIONAL COSTS

During this reporting period, salary costs incurred for the administration of the *PA* totalled \$5,083. Costs for professional services contracts of external resources totalled \$28,833.

5. TRAINING AND AWARENESS

During the reporting period, the lawyer and the paralegal attended, through videoconference, several technical briefing, orientation and awareness sessions provided by the Treasury Board of Canada Secretariat in connection with the *PA*.

When a new employee who will participate in the application of the *PA* is hired, the ATIP Coordinator trains this employee in accordance with the *Directive on Personal Information Requests and Correction of Personal Information*. In addition, as part of completing a request for access to personal information, the lawyer meets with any employee called upon to collaborate in the completion of the request (for example, to conduct a document search) and reminds them of confidentiality obligations.

6. POLICIES, GUIDELINES AND PROCEDURES

JCCBI continues to implement its internal policy approved by its Board of Directors on June 19, 2019. This policy was revised on May 30, 2022, but no modification was made thereto.

JCCBI did not receive authorization for any new collection(s) or consistent use(s) of Social Insurance Numbers during this reporting period.

7. INITIATIVES AND PROJECTS TO IMPROVE PRIVACY

During this reporting period, no initiatives or projects were implemented. JCCBI is currently taking the necessary steps to join the ATIP Online Platform. The purpose of this platform is to modernize JCCBI's service delivery in connection with the receipt of requests for access to personal information.

8. SUMMARY OF KEY ISSUES AND ACTIONS TAKEN ON COMPLAINTS

During this reporting period, no complaints were received or resolved, and no audits or investigations were conducted. In addition, during this reporting period, there were no active complaints.

9. MATERIAL PRIVACY BREACHES

During this reporting period, no material privacy breaches were reported to the Office of the Privacy Commissioner and to the Information and Privacy Policy Division, Treasury Board of Canada Secretariat.

10. PRIVACY IMPACT ASSESSMENTS

During this reporting period, JCCBI did not complete any Privacy Impact Assessment (PIA) and has no PIA on its website.

11. PUBLIC INTEREST DISCLOSURES

During this reporting period, no disclosures were made under Subsection 8(2)(m) of the *PA*.

12. MONITORING COMPLIANCE

When JCCBI receives a request under the *PA*, an internal follow-up process is immediately put in place with the relevant employees for the purpose of collecting the records, which is coupled with fixed deadlines. The ATIP Coordinator, who reports to the Senior Director, Legal Affairs and Human Resources (SDLAHR), is responsible for processing requests under the *PA*, as well as for ensuring that timeframes are respected. The SDLAHR, who is also Corporate Secretary, informs the Chief Executive Officer, other Senior Directors and Board members of the reception of a request, but without disclosing any personal information.

JCCBI ensures that the appropriate privacy protection measures are included in its contracts, notably its standard contract documents which are validated by the Legal Affairs Department, as well as in the various agreements in which confidentiality clauses are added. These agreements are reviewed by the Legal Affairs Department before being signed by the authorized signatories.

JCCBI also adapts its contracts to include all relevant clauses pertaining to information security, particularly with respect to data hosting. For the use of Cloud solutions, JCCBI documents a detailed risk sheet as well as a lifecycle management process. For all internal systems, JCCBI carries out annual intrusion tests and corrects identified weaknesses, if any.

During this reporting period, the Treasury Board of Canada did not conduct any monitoring asking for JCCBI to report on an exception or a breach.

ANNEX A

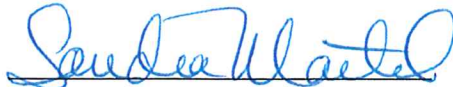
DELEGATION ORDER

PRIVACY ACT

DESIGNATION ORDER

Pursuant to Section 73 of the *Privacy Act**, the Chief Executive Officer of the government institution The Jacques Cartier and Champlain Bridges Incorporated, hereby designates the person holding the position of Director, Legal Affairs of The Jacques Cartier and Champlain Bridges Incorporated, to exercise or perform the powers, duties and functions of the head of the institution under the Act.

Signed at Longueuil, July 31st, 2023



Chief Executive Officer of
The Jacques Cartier and Champlain
Bridges Incorporated

*R.S.C., 1985, c. P-21

