CIB BIC

PRIVACY ACT

2025-2026 Annual Report to Parliament



Canada Infrastructure Bank

Banque de l'infrastructure du Canada

www.cib-bic.ca

CIB BIC

La BIC s'engage à créer une expérience sans obstacle pour tous les membres de son personnel, les personnes en recherche d'un emploi, la clientèle, les fournisseurs et d'autres parties prenantes. Pour toute question sur l'accessibilité ou pour demander des accommodements, veuillez contacter votre personne-ressource à la BIC ou envoyer un courriel à accessible@cib-bic.ca.

The CIB is committed to creating a barrier-free experience for all employees, job-seekers, clients, suppliers and other stakeholders. For any questions about accessibility or to request any accommodations, please contact your CIB representative or email accessible@cib-bic.ca.

CIB BIC

TABLE OF CONTENTS

PRIVACY ACT 1

1. INTRODUCTION 4

1.1 Purpose of the *Privacy Act* 4

The CIB did not have any wholly-owned subsidiaries during the Reporting Period. Accordingly, the CIB does not have any non-operational ("paper") subsidiaries and is not required to report on behalf of any such entity. 4

1.2 Mandate of the Canada Infrastructure Bank 4

2. ORGANIZATIONAL STRUCTURE 5

3. DELEGATION ORDER 6

4. PERFORMANCE FOR 2025-2026 6

4.1 Requests Received 6

4.2 Consultations and Active Complaints 7

5. TRAINING AND AWARENESS 7

6. POLICIES, GUIDELINES, AND PROCEDURES 8

6.1 Institution-Specific Policies and Procedures 8

7. INITIATIVES AND PROJECTS TO IMPROVE PRIVACY 9

8. SUMMARY OF KEY ISSUES AND ACTIONS TAKEN ON COMPLAINTS 10

9. MATERIAL PRIVACY BREACHES 10

10. PRIVACY IMPACT ASSESSMENTS 10

11. PUBLIC INTEREST DISCLOSURES 11

12. MONITORING COMPLIANCE 11

ANNEX A: DELEGATION ORDER 13

1. INTRODUCTION

1.1 Purpose of the *Privacy Act*

The purpose of the *Privacy Act* ("**Act**") is to extend the present laws of Canada that protect the privacy of individuals with respect to personal information about themselves held by a government institution and that provide individuals with a right of access to that information.

This report is prepared in accordance with subsection 72(1) of the Act and is hereby submitted for tabling in Parliament under subsection 72(2) of the Act. It presents an overview of how the Canada Infrastructure Bank ("**CIB**") carried out its responsibilities under the Act during the reporting period from April 1, 2025 to March 31, 2026 (the "**Reporting Period**"). Once tabled in Parliament, this report, along with previous such reports, is publicly available within the "Reports & Transparency" section of the CIB's website: Transparency and Reports | Canada Infrastructure Bank (CIB).

The CIB did not have any wholly-owned subsidiaries during the Reporting Period. Accordingly, the CIB does not have any non-operational ("paper") subsidiaries and is not required to report on behalf of any such entity.

1.2 Mandate of the Canada Infrastructure Bank

The CIB is a Crown corporation established under the *Canada Infrastructure Bank Act* on June 22, 2017. The purpose of the Bank is to invest, and seek to attract investment from private sector investors and institutional investors, in infrastructure projects in Canada or partly in Canada that will generate revenue and that will be in the public interest by, for example, supporting conditions that foster economic growth or by contributing to the sustainability of infrastructure in Canada.

The CIB develops infrastructure projects in partnership with federal, provincial, territorial, municipal, and Indigenous government sponsors and the private sector. As set out in the Minister's Statement of Priorities and Accountabilities ("**SPA**"), the CIB invests in four priority sectors: clean power, enabling infrastructure for transport and trade, enabling infrastructure that supports housing supply, artificial intelligence (AI) and digital infrastructure.

The CIB invests in Indigenous infrastructure across our four priority sectors with initiatives that are tailored to address unique challenges faced by Indigenous communities. The latest SPA is available on the CIB's website https://cib-bic.ca/en/about-us/governance/.

The CIB also is a centre of expertise, providing advisory services to project sponsors to maximize the potential impact and outcome of infrastructure development. This may involve offering project acceleration funding for initial planning and design stages, where such investment could expedite the project's progress towards becoming investable.

As an impact investor, the CIB is focused on achieving outcomes through its investments to providing clean and reliable electricity to Canadians, increasing economic growth, connecting communities, and building partnerships with Indigenous Peoples to reduce their infrastructure gap and promote economic participation.

2. ORGANIZATIONAL STRUCTURE

The powers, duties and functions of the administration of the Act have been delegated by the Chief Executive Officer ("**CEO**") to the General Counsel & Corporate Secretary, who also serves as the organization's ATIP Coordinator.

The General Counsel & Corporate Secretary is a senior officer of the CIB and reports directly to the CEO. Two employees within the CIB's Corporate Secretariat, the Assistant Corporate Secretary, and the Corporate Governance Associate provide support to the ATIP Coordinator in managing day-to-day activities under the *Access to Information Act* and the *Privacy Act*. This includes coordinating the processing of ATIP requests, consultations and complaints. In total, three employees, representing approximately 0.95 full-time equivalents, contributed to the administration of the Act during the Reporting Period. The cost of administering the CIB's responsibilities under the Act for the Reporting Period is estimated at $123,500 in salary costs. However, this expenditure does not include the resources required by other areas of the CIB to search for responsive records. No external consulting resources were required for the administration of the Act during the Reporting Period.

The CIB has adopted the Privacy Protection Procedure to implement the CIB's obligations under the *Privacy Act*, including the general principles and practices followed in processing requests for personal information. The responsibilities of the ATIP Coordinator under the *Privacy Act* are as follows:

- processing privacy requests and the resolution of complaints pursuant to the Act and exercising discretion under the Act in a fair, reasonable and impartial manner with respect to decisions associated with such processing;
- preparing the annual report on the administration of the Act that is tabled in each House of Parliament;
- preparing the statistical report on the administration of the Act within the CIB;
- preparing new or modified Personal Information Bank descriptions;
- updating the CIB's chapter in Info Source: Sources of Federal Government and Employee Information, including proposed new or modified Personal Information Banks;
- providing training, ongoing advice and guidance to senior management and staff on matters related to privacy;
- regularly reviewing the effectiveness of the CIB's procedure and, where required, initiating actions to correct any deficiencies.
- staying current on, and promulgate within the CIB, any changes to administrative requirements for the Act from the Treasury Board of Canada Secretariat, or guidance prepared by the Office of the Privacy Commissioner; and
- participating in ATIP community activities and ATIP community meetings.

The CIB was not a party to any service agreement under section 73.1 of the Act during the Reporting Period.

3. DELEGATION ORDER

For the purposes of section 3 of the Act, the CEO of the CIB is designated as the "head" of the government institution. In accordance with section 73 of the Act, the CEO's authority has been delegated to the General Counsel & Corporate Secretary to enable the CIB to meet its statutory requirements.

A copy of the signed Delegation Order dated March 10, 2021, in effect at the end of the Reporting Period is provided in **Annex A**. The delegation order was updated at the beginning of the 2026–2027 period and will be attached to the annual report for that period.

4. PERFORMANCE FOR 2025-2026

4.1 Requests Received

The CIB received two (2) new formal requests for personal information under the Act during the Reporting Period. One (1) request was submitted and received online through the ATIP Online Request Service and one (1) request was received by email. The two (2) requests were completed within the 30-day legislative timeline and no extension of time limits was required. The responses provided to the two (2) requests indicated that no records existed.

The CIB did not receive any informal requests for personal information during the Reporting Period. As of March 31, 2026, no requests for personal information remained active. No requests received during the 2025-2026 fiscal year or any previous fiscal year were being processed at the end of the Reporting Period.

This level of activity is generally consistent with the CIB's performance over the last five years. Since its establishment in June 2017, the CIB has received a very small number of formal requests for personal information under the Act. The only other year of activity was the 2023-2024 reporting period where the CIB received three (3) formal requests for personal information, which were also responded to within statutory timelines.

The tables below describe the CIB's performance over the last five reporting periods.

Table 1: Overview of Personal Information Requests Received and Completed, 2021-2022 to 2025-2026

Reporting Period	Personal Information Requests Received	Percentage Completed Within Statutory Timelines	Requests Completed Within 0-15 days	Requests Completed Within 16-30 days
2025-2026	**2**	**(100%)**	**2**	**0**
2024-2025	1	(100%)	1	0
2023-2024	3	(100%)	1	2
2022-2023	0	(0%)	0	0
2021-2022	0	(0%)	0	0

Table 2: Disposition of Personal Information Requests Closed, 2023-2024 to 2025-2026

Reporting Period	Personal Information Requests Received	Percentage "All disclosed"	Percentage "Disclosed in part"	Percentage "No records exist"
2025-2026	**2**	**(0%)**	**(0%)**	**2 (100%)**
2024-2025	1	(0%)	(0%)	1 (100%)
2023-2024	3	(0%)	2 (67%)	1 (33%)

4.2 Consultations and Active Complaints

During the Reporting Period, the CIB did not receive any consultation requests from another federal institution, and no consultation requests remained active as of March 31, 2026. No complaints received during the 2025-2026 fiscal year or any previous fiscal year remained active as of that date.

5. TRAINING AND AWARENESS

During the Reporting Period, the ATIP Coordinator continued to promote awareness of the CIB's obligations under the Act through a variety of training approaches.

- **Compliance with the *Access to Information Act* and the *Privacy Act* (Roles and Responsibilities):** The CIB requires all employees to complete the mandatory privacy training required under the *Directive on Personal Information Requests and Correction of Personal Information*. This session is part of the orientation process and provides new employees who have joined the CIB with an overview of the CIB's legal responsibilities under the *Access to Information Act* and the *Privacy Act*. Topics covered include the mandatory procedures set out in Annex B of the Directive on *Personal Information Requests and Correction of Personal Information*. During the Reporting Period, one (1) employee awareness session was held, with 108 employees participating, including all new employees.
- **Code of Conduct for Personnel:** During the Reporting Period, updates to the Code of Conduct for Personnel were approved by the Board of Directors and communicated to employees. The Code of Conduct is publicly available on the CIB's website and includes specific guidance and expectations regarding the CIB's responsibilities under the *Access to Information Act* and the *Privacy Act*. Two training sessions were offered to enable all employees to participate, in accordance with CIB's practice of offering multiple training sessions to promote accessibility. All employees completed their annual attestation of compliance with the Code of Conduct in March 2026.

Employees with privacy responsibilities, including members of the ATIP team, also receive in-depth training required for their roles. This training is provided through operational supervision, mentoring and participation in professional development activities, including community meetings and specialized sessions organized by the Treasury Board of Canada Secretariat.

In addition, the ATIP Coordinator is also able to offer one-on-one or small group training and guidance in both official languages as the need arises.

For example, during the Reporting Period, a specific deep dive awareness session was held with the CIB's human resources team to review the CIB's responsibilities under the *Privacy Act* and discuss best practices of government institutions in protecting and managing personal information.

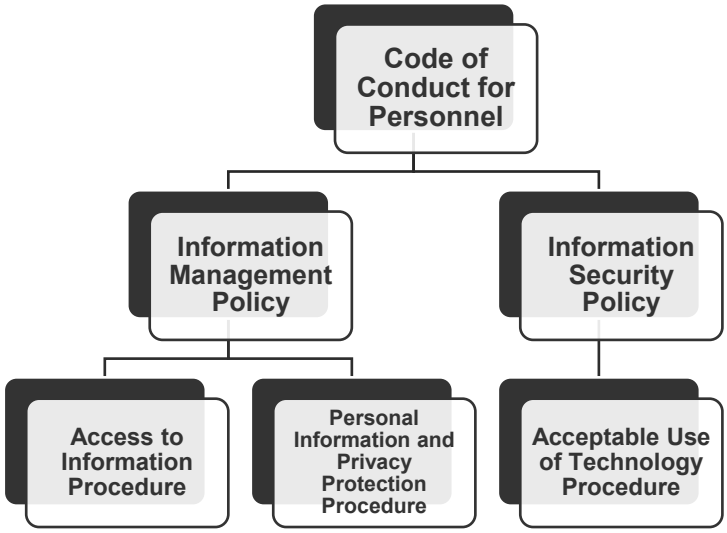
The ATIP coordinator reports annually on the administration of the *Access to Information Act* and the *Privacy Act* to the Human Resources and Governance Committee of the CIB Board of Directors.

6. POLICIES, GUIDELINES, AND PROCEDURES

6.1 Institution-Specific Policies and Procedures

During the Reporting Period, the CIB did not implement any new or revised institutional policies, guidelines or procedures specifically related to personal information protection. The activities described below related to the ongoing implementation or review of existing instruments and did not constitute the adoption of a new ATIP-specific instrument.

The institution's policies and procedures that incorporate CIB's obligations under the *Access to Information Act* and the *Privacy Act* are listed below.



The CIB regularly reviews its internal policies and procedures to ensure they remain up-to-date and aligned with the Treasury Board of Canada Secretariat's Access to Information and Privacy Policy instruments. A review of the CIB's Privacy Protection Procedure will be completed during the 2026-2027 reporting period to confirm continued alignment with the *Directive on Privacy Practices*, which came into effect on October 9, 2024.

During the Reporting Period, the CIB reviewed its business continuity plan. This review included an update to the privacy breach response procedure to confirm that the roles, response mechanisms and reporting requirements applicable to material privacy breaches remained current and appropriate.

CIB's chapter in *Info Source*: Sources of Federal Government and Employee Information is posted within the "Reports & Transparency" section of the CIB's Web site. Info Source provides individuals and employees of the government (current and former) with relevant information to access personal information about themselves held by government institutions subject to the *Access to Information Act* and the *Privacy Act* and to exercise their rights under the *Privacy Act*.

The CIB did not have any new collection(s) or new consistent use(s) of Social Insurance Numbers that began during the Reporting Period.

The CIB requires that contracts, agreements and other arrangements involving the collection, use, disclosure, retention or disposal of personal information include safeguards proportionate to the nature and sensitivity of the information involved. Depending on the context, these measures include confidentiality and security obligations, specific limitations on the use and disclosure of information, restrictions on the use of subcontractors, requirements relating to the retention, return and secure destruction of information, as well as an obligation to notify the CIB without delay of any actual or suspected privacy breach. The agreements also require suppliers to cooperate with the CIB so that it can meet its legal obligations, investigate incidents and implement the required corrective measures.

7. INITIATIVES AND PROJECTS TO IMPROVE PRIVACY

During the Reporting Period, the CIB completed a data governance initiative aimed at improving the quality, security and management of information, as well as supporting collaboration and decision-making. This initiative, carried out in collaboration with the various sectors of the CIB, included the development of policies, the implementation of technologies, and the strengthening of information management and protection practices.

The key activities carried out during the Reporting Period included:

- Data Classification and Retention: The CIB completed data classification and the application of metadata across all of its services. The CIB also implemented the retention schedule for the data classified in accordance with disposition authorization from Library and Archives Canada to ensure the retention and protection of records of operational, historical or archival value.
- Stakeholder Outreach: The CIB consulted the relevant sectors to analyze data use and establish the information classification structure, as well as responsibilities relating to information ownership, management and accountability.
- Protection of Personal Information and Security Measures: The CIB strengthened its data protection measures, including through the implementation of controls relating to the encryption, access and retention of personal information and other sensitive information.

The data governance initiative was completed during the Reporting Period. The remaining phases of the data governance project, including employee training on their role in maintaining data integrity, are expected to be completed during the 2026-2027 financial year.

The CIB did not undertake or complete any other initiative or project specifically aimed at improving the management and protection of personal information during this period.

8. SUMMARY OF KEY ISSUES AND ACTIONS TAKEN ON COMPLAINTS

The CIB did not receive any privacy complaints under the *Privacy Act*, nor were any privacy audits or investigations conducted against the CIB during the Reporting Period.

9. MATERIAL PRIVACY BREACHES

In accordance with the *Guidelines for Privacy Breaches* issued by the Treasury Board of Canada Secretariat, a privacy breach is deemed "material" if the breach involves sensitive personal information and could reasonably be expected to cause serious injury or harm to the individual and/or involves a large number of affected individuals.

During the Reporting Period, there were no material privacy breaches that occurred and were reported to the Office of the Privacy Commissioner and to the Treasury Board of Canada Secretariat (Privacy and Responsible Data Division)

10. PRIVACY IMPACT ASSESSMENTS

A privacy impact assessment ("**PIA**") is a formal tool used to identify and mitigate privacy risks for new or modified programs, services or initiatives in an effort to heighten compliance with the Act. PIAs provides a framework to ensure that the protection of personal information is considered throughout the design or re-design of a program or service and they assist decision-makers to avoid or mitigate privacy risks.

The CIB did not initiate any formal PIAs for any new or modified programs, as defined in the *Directive on Privacy Practices (Appendix C; Standard on Privacy Impact Assessment)*, and no PIAs were submitted to the Treasury Board of Canada Secretariat and the Office of the Privacy Commissioner during the Reporting Period. Consequently, no PIA summary was published on the CIB's website during this period. The ATIP Coordinator provides advice to the other corporate areas within the CIB concerning the appropriate management of personal information and privacy risks with respect to the conduct of their programs and activities.

The CIB did not initiate any privacy impact assessments during the Reporting Period. The institution's webpage dedicated to privacy impact assessments, on which applicable summaries will be published, can be accessed at the following address: https://cib-bic.ca/en/regulatory-reports/

11. PUBLIC INTEREST DISCLOSURES

Paragraph 8(2)(m) allows for disclosure of personal information where the public interest clearly outweighs any invasion of privacy that could result from the disclosure of the information or where disclosure clearly benefit the individual to whom the information relates. There was no disclosure of personal information made pursuant to paragraph 8(2)(m) during the Reporting Period.

12. MONITORING COMPLIANCE

The following practices describe the CIB's approach to monitoring compliance with the Act during the Reporting Period:

- Due to the limited and manageable number of files processed, the CIB applies oversight measures that are proportionate to the volume and complexity of the requests it receives. As discussed in section 2 of this report, two employees provide support to the ATIP Coordinator in processing requests and managing the CIB's day-to-day activities under the *Access to Information Act* and the *Privacy Act*. The progress and applicable deadlines for each request are continuously monitored. The ATIP Coordinator reviews and signs all outgoing correspondence relating to the processing of files, thereby ensuring direct oversight of their status and compliance with the statutory timelines. The ATIP Coordinator also prepares quarterly reports for the CEO and the Finance and Audit Committee of the Board of Directors. These reports identify the files closed during the quarter, the number of active files at the end of the quarter, as well as the status, progress and processing time for each file.

- Standard CIB template agreements and contracts (including non-disclosure agreements, consulting services agreements and memoranda of understanding) include representations regarding the CIB's responsibilities under the Act and acknowledgment of the counterparty's obligations to assist the CIB in discharging its responsibilities under the Act. The following provisions are generally included in CIB's agreements with third parties for consulting services:

  Personal Information. *The Consultant acknowledges and agrees that the CIB has informed the Consultant that the CIB is the custodian of personal information which the CIB is required by law to protect. In light of that disclosure, the Consultant acknowledges and agrees to execute and abide by the terms of the Privacy Undertaking [attached as an appendix to the agreement].*

  Federal Acts. *The Consultant acknowledges that the CIB is subject to the Access to Information Act, R.S.C. 1985, c. A-1, the Privacy Act, R.S.C. 1985, c. P-21, the Financial Administration Act, R.S.C. 1985, c. F-11, and the Canada Infrastructure Bank Act, S.C. 2017, c. 20, s. 403 (collectively, the "Federal Acts") and that information provided to or from the CIB in connection with this Agreement may be subject to the provisions of the Federal Acts. If a request is made under any of*

the Federal Acts, the Consultant will cooperate with the CIB and make reasonable efforts to assist the CIB in complying with its duties and obligations as set out in and which arise from the Federal Acts as it may relate to this Agreement. Nothing in this Agreement shall prohibit the CIB's disclosure, following the signing of the Agreement, of the following information: the name of the Consultant, the amount of the total remuneration paid and payable by CIB to the Consultant under the Agreement, and a general description of the Services performed.

The CIB is not subject to any exception granted by the Treasury Board of Canada Secretariat to a requirement in the Privacy policy suite.

CIB BIC

ANNEX A: DELEGATION ORDER

DELEGATION OF AUTHORITY

ACCESS TO INFORMATION ACT
PRIVACY ACT

I, the undersigned, Chief Executive Officer of the Canada Infrastructure Bank, pursuant to section 95 of the *Access to Information Act* and section 73 of the *Privacy Act*, hereby

i) designates the General Counsel & Corporate Secretary as the CIB's Access to Information and Privacy Coordinator; and

ii) delegates to the persons of the Canada Infrastructure Bank holding the positions set out below, or the persons occupying on an acting basis those positions, the authority to exercise the powers, duties and functions of the Chief Executive Officer as the head of the Canada Infrastructure Bank, under the provisions of the *Access to Information Act* and *Privacy Act* and their related regulations.

This designation replaces all previous delegation orders.

Signed at the City of Toronto, this 10th day of March, 2021.

DÉLÉGATION DE POUVOIRS

LOI SUR L'ACCÈS À L'INFORMATION
LOI SUR LA PROTECTION DES RENSEIGNEMENTS PERSONNELS

Je, soussigné, Président-directeur général de la Banque de l'Infrastructure du Canada, conformément à l'article 95 de la *Loi sur l'accès à l'information* et de l'article 73 de la *Loi sur la protection des renseignements personnels*,

i) désigne l'Avocat général et secrétaire de la Banque de l'infrastructure du Canada à titre de Coordonnateur de l'accès à l'information et de la protection des renseignements personnels; et

ii) délègue par la présente aux titulaires de postes indiqués ci-après, ou aux personnes occupant ces postes par intérim, les pouvoirs et fonctions dont il est investi en tant que Président-directeur général et responsable de la Banque de l'Infrastructure du Canada aux termes de la *Loi sur l'accès à l'information*, de la *Loi sur la protection des renseignements personnels* et des réglementations afférentes.

Le présent document remplace et annule tout arrêté de délégation antérieur.

Signé à la ville de Toronto, le 10e jour de mars, 2021

Ehren Cory
Chief Executive Officer / Président-directeur général

CIB BIC

APPENDIX / ANNEXE

Delegation of powers, duties and functions under section 95 of the *Access to Information Act* and section 73 of the *Privacy Act*

Délégation de pouvoirs en vertu de l'article 95 de la *Loi sur l'accès à l'information* et l'article 73 de la *Loi sur la protection des renseignements personnels*

Position / Poste	*Access to Information Act* and Regulations / *Loi sur l'accès à l'information* et réglementation afférente	*Privacy Act* and Regulations / *Loi sur la protection des renseignements personnels* et réglementation afférente
Chief Financial Officer & Chief Administrative Officer / Directrice principale et chef des directions financière et administrative	Full authority / Autorité absolue	Full authority / Autorité absolue
General Counsel & Corporate Secretary / Avocat général et secrétaire de la Société	Full authority / Autorité absolue	Full authority / Autorité absolue