



Report on the Administration of the *Privacy Act*

2018-2019 Annual Report



Royal Canadian Mint

Privacy Act

2018-2019 Annual Report to Parliament

Table of Contents

	Page
I. Introduction	2
II. Organizational Structure	3
III. Delegation Orders	3
IV. Highlights of the Statistical Report	4
V. Training and Awareness	8
VI. Policies, Guidelines, Procedures and Initiatives	9
VII. Key Issues and Actions Taken on Complaints or Audits	10
VIII. Monitoring Compliance	10
IX. Material Privacy Breaches	10
X. Privacy Impact Assessments	11
XI. Public Interest Disclosures	11

Attachments

1 ~ Delegation Order, RCM	12
2 ~ Delegation Order, RCMH-MRCF Inc.	17
3 ~ Statistical Report: RCM	19
4 ~ Statistical Report: RCMH-MRCF Inc.	28

I. Introduction

The purpose of the *Privacy Act* (the *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. The *Act* also puts forward the provisions for the collection, use, disclosure and retention of personal information by government institutions. The protection and promotion of Canadians' privacy rights and the safeguarding of personal information is a priority for, and taken seriously by, the Royal Canadian Mint (the Mint).

As a federal Crown corporation, the Mint is subject to the *Act*. This Annual Report provides an account of the Mint's administration of the *Act* during the period of April 1, 2018 to March 31, 2019. The Annual Report is prepared and tabled in Parliament in accordance with section 72 of the *Act*.

A. *Royal Canadian Mint*

The Mint, originally a branch of Britain's Royal Mint, struck the Dominion's first domestically produced coin in 1908, and became a wholly Canadian institution in 1931. A fully commercial Crown corporation since 1969, the Mint operates for profit and its scope of activities extends throughout the world. It is classified as a Schedule III-II Corporation under the *Financial Administration Act*, the category reserved for organizations that conduct commercial operations and are self-sufficient. The Mint reports to Parliament through the Minister of Finance.

Subsection 3(2) of the *Royal Canadian Mint Act* establishes the mandate of the Mint "*to mint coins in anticipation of profit and to carry out other related activities.*" The Mint produces and arranges for the production and supply of coins of the currency of Canada. It also produces circulation and non-circulation coins for foreign countries, produces and markets bullion coins, operates gold and silver refineries as well as conducts coin-related manufacturing and commercial activities that generate profit.

The Mint markets its goods and services throughout Canada and in many countries around the world. Its continued success and vitality as a corporation depend upon its ability to respond quickly to market demands, and compete and position itself in international and domestic markets. As a self-financing commercial Crown corporation, the Mint operates like a business while serving a public policy purpose, which is the production and distribution of Canadian circulation coins.

B. *RCMH-MRCF Inc.*

As part of its business development initiative, the Mint set up a wholly-owned subsidiary, RCMH-MRCF Inc., which was incorporated under the *Canada Business Corporations Act* in June 2002. This

holding company was formed to help the Mint improve efficiency, manage the cost of products and increase profitability.

RCMH-MRCF Inc. is a holding company and does not employ staff but has nominated a President, a Corporate Secretary, and a Treasurer as the Corporation's Officers, all of whom are employees of the Mint. As a wholly-owned subsidiary, RCMH-MRCF Inc. is subject to the Act.

II. Organizational Structure

The Access to Information and Privacy (ATIP) Office is part of the Corporate Affairs Section within the Corporate and Legal Affairs Division of the Mint. The Director, Regulatory Affairs (Compliance), who is also the designated ATIP Coordinator, oversees the implementation of the Act and ensures compliance with the legislation within the Mint and its wholly-owned subsidiary, RCMH-MRCF Inc.

In addition to the Coordinator, the ATIP Office is composed of the ATIP Generalist and the Senior Program Manager, Privacy. Both the Director, Regulatory Affairs (Compliance) & ATIP Coordinator and the ATIP Generalist have duties pertaining to files other than ATIP and are therefore recorded as dedicating a certain proportion of their time on the administration of the Act. The Senior Program Manager, Privacy is a newly created position in the reporting year with responsibility for the day-to-day management of privacy-related programs throughout the Mint. The incumbent fosters a culture of privacy by leading and supporting the horizontal coordination and integration of privacy policies and requirements in organizational activities, initiatives and decisions, developing and promoting user-friendly tools and resources, and delivering employee training and building awareness. The incumbent also provides technical and professional advisory services on all aspects of privacy compliance and privacy-related queries and issues for the organization, including Privacy Impact Assessments (PIAs) and privacy breach management. The creation of this position represents a move to strengthen the management of privacy and enhance the profile of the privacy program at the Mint.

III. Delegation Orders

The President and CEO of the Mint and the President of RCMH-MRCF Inc. have officially delegated the powers, duties and functions for the administration of the Act to certain positions per the organizations' respective Delegation Orders (see Attachments 1 and 2).

IV. Highlights of the Statistical Report

The Statistical Report in Attachment 3 presents data on the processing of formal requests for personal information under the *Act* closed by the Mint as well as other privacy policy and compliance activities in 2018-19. This section provides a narrative summary and interpretation of that data. Where possible, a trend analysis of the three previous years is provided. As detailed later in the report, there is no statistical information to report for RCMH-MRCF Inc. (Attachment 4). Note that the Mint also processes informal privacy requests from employees and customers as requested and as appropriate.

The following table presents an overview of the key data for the Mint (subsequent charts below provide more information).

Privacy Act - Overview of Key Data

	2018- 2019	2017- 2018	2016- 2017	2015- 2016
Formal requests received under the <i>Privacy Act</i>	7	11	114	157
Requests outstanding from previous reporting period	2	2	11	2
Requests completed during the reporting period	6	11	123	148
Requests completed within 30 calendar days	5	8	115	127
Requests completed within 31-60 calendar days	1	1	5	14
Requests completed within 61 or more calendar days	0	2	3	7
Public interest disclosures	0	0	0	0
Complaints to the Office of the Privacy Commissioner	2	0	0	0
Material privacy breaches	0	1	0	0

A. Royal Canadian Mint

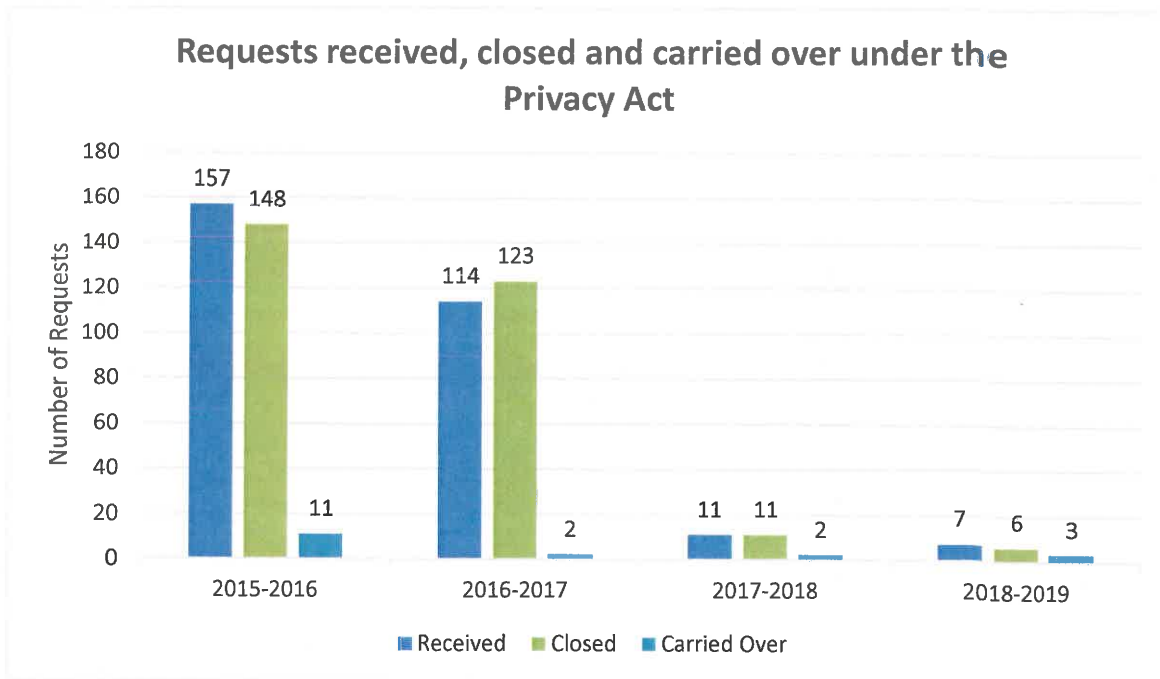
During the 2018-19 reporting period, the Mint processed 9 requests, of which 7 were new requests and 2 were carried over from the previous reporting period. Of these 9 requests, 6 were closed and 3 were carried over to the 2019-20 reporting period. No request (0 in 2018-19) was closed past the statutory deadline in this reporting period; this achievement is due to the hard work of, and diligent monitoring of timelines by, ATIP office staff who handle multiple priorities and significant workload without case management software¹. In the previous three reporting periods, the comparable data (requests closed past the deadline) is as follows: 2 (18%) in 2017-18; 7 (6%) in 2016-17; and 18 (12% in 2015-16).

¹ Acquisition and implementation of ATIP software in the next reporting period is a strategic priority for the Mint with allocated funds. The Mint expects to align this procurement with the broader process undertaken by TBS.

The higher number of requests received in 2016-17 (114) and 2015-16 (157) compared to this period and the prior year was the result of customer requests for their purchase order history being treated and processed as formal requests under the Act. The process was changed in the latter half of the 2016-17 reporting period such that these requests are now handled on an informal basis by the Mint’s Customer Solutions Centre. As a result and as intended, formal request numbers were significantly reduced starting in 2017-18 (in which 11 new requests were received) and continuing in 2018-19. This procedural change continues to alleviate some of the request-processing burden on the ATIP office and reduce administrative wait times for customers seeking access to copies of their order histories.

Of the 2 requests outstanding from the previous reporting period, one was closed and one remained open at the end of the current reporting period. This latter request is comprised of thousands of pages of responsive records and is an extremely complex file with a high degree of sensitivity and a significant amount of other persons’ personal information intertwined with that of the requester. Extremely diligent review and extensive internal consultations are required. The ATIP office has devoted a significant amount of resources to making progress on this request (see Part C of this report), as evidenced by the release of two interim disclosure packages to the requester constituting 2467 pages. Further releases are anticipated in the following year with the goal of closing the file in 2019-20.

Figure 2: Requests received, closed and carried over



Disposition of Closed Requests

Of the 6 requests closed during this reporting period, 4 were disclosed in part and 2 were abandoned.

Exemptions Used

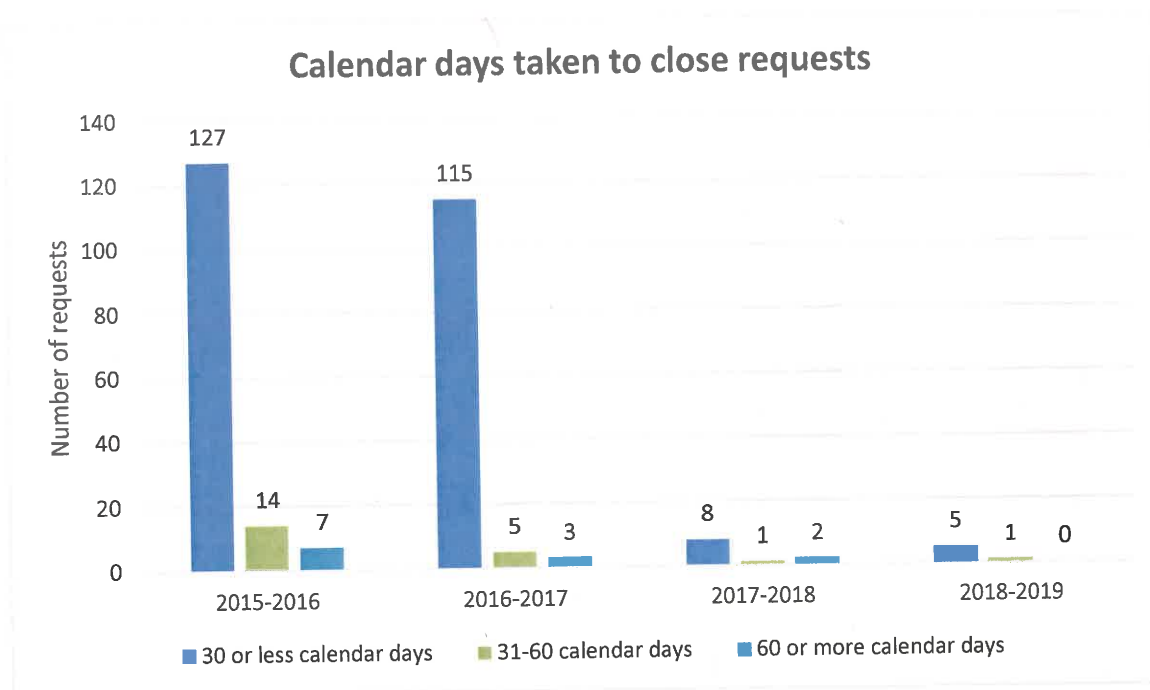
The Mint invoked Section 26 in 3 requests (personal information about another individual) under the *Act*. The most commonly used exemptions are Sections 26 and 27 (solicitor client privilege), with the former being the most frequently cited. In the last three reporting periods combined, Section 26 was applied in 9 requests and Section 27 in 5 requests.

Information contained in requested records that was not the personal information of the applicant and not subject to other exemptions was withheld where warranted in accordance with subsection 12(1) of the *Act* and, while not counted as an exemption in the statistical report, represents a request for which the disposition is categorized as “disclosed in part”.

Completion Time and Extensions

Of the 6 requests that were closed during the reporting year, 5 (83%) were closed within the original 30-day statutory limit. The remaining request incurred a 30-day extension due to interference with operations and was completed within the extended deadline.

Figure 3: Calendar days taken to close requests



Size and Complexity

In 2018-19, the Mint processed 725 pages of which 670 were disclosed. In comparison, the Mint processed 1727 pages in 2017-18 and disclosed 1349. The significantly lower number of processed and disclosed pages recorded in this reporting year is not fully representative of the number of pages processed and disclosed as part of two large interim releases for a request that remained open at the end of the period (see explanation in Part A above). Because the request was not closed, the associated page volume is not accounted for in the period's statistics but nevertheless represents a sustained effort and significant amount of work to respond to the individual's right of access.

Correction of Personal Information

No request for correction of personal information was received during the current and previous three reporting periods.

Consultations from Other Institutions

No consultation from another government institution or organization was received during the current and previous three reporting periods.

Consultations on Cabinet Confidences

The Mint did not need to consult with the Privy Council Office on Section 70 of the *Act* during the current and previous three reporting periods.

B. RCMH-MRCF Inc.

The Mint's subsidiary RCMH-MRCF Inc. did not receive a request in 2018-19 or in the previous three reporting periods. No request for consultation was received from another government institution or organization in the current or previous three reporting periods.

C. Resources Related to the Privacy Act

The cost of administering the Mint's program for this reporting period was estimated at \$179,160, which includes both salaries and professional services contracts as well as employee training and travel. It should be noted that these costs do not include the resources required by other areas of the Mint to search and provide disclosure recommendations for responsive records.

In addition to salaries, contract costs in the amount of \$52,653 were incurred, which is more than double for the category than the previous year. This increase in expenditure is accounted for by the necessity of securing a senior privacy consultant to assist with privacy operations (personal information request processing) and policy compliance. Other costs were incurred for ATIP Office employees to attend privacy-related training.

In terms of resources, the number of person years dedicated to privacy activities was 2.05, which is somewhat higher than the number of the previous reporting period (1.23) and represents the additional consultant time dedicated to both the ongoing development of a privacy management framework and to request processing.

V. Training and Awareness

In this reporting period, the Senior Program Manager, Privacy delivered three training and education sessions pertaining to the Act and personal information, employee roles and responsibilities and privacy breaches. A total of approximately 25 staff persons from the Mint's Customer Solutions Centre attended. Training on privacy matters also occurs throughout the year via meetings and informal briefings with employees working on projects and initiatives that have privacy components and impacts (e.g. privacy notice requirements and development; personal information banks; procurement files).

In October of 2018, the Mint held its annual Cyber Security Days campaign at both its Winnipeg and Ottawa locations as part of Cyber Security Awareness month. The interactive activities held as part of this event engaged staff about how to stay cyber safe at work and at home and included raising awareness about recognizing and reporting phishing incidents. For the first time, the ATIP office (specifically the Senior Program Manager, Privacy) was invited to assist in leading the event with a focus on demonstrating the connections between privacy and cyber security and providing resources for protecting personal information online. The event was very successful and reached a large number of staff. Privacy will become more fully integrated in the following year with specific rebranding efforts to highlight both cyber and privacy together. More generally, the ATIP office seeks to build synergy and partner with the Information Security group on matters of shared interest and in areas of mutual responsibility. On January 28, 2019, Data Privacy Day was also recognized and promoted with an all-staff message delivered in the Mint's weekly internal e-newsletter.

VI. Policies, Guidelines, Procedures and Initiatives

1. Provision of Advice and Guidance: Over the course of the reporting period, the ATIP office provided advice and undertook privacy compliance reviews for internal programs and initiatives from different business lines across the organization. The ATIP office responded to 38 requests for privacy-related advice and guidance from internal stakeholders such as Marketing & Communications, Procurement, and Corporate Health, Safety & Environment on various materials such as surveys and questionnaires, forms, privacy notice statements, public procurement documents and contract clauses. The ATIP office's systematic tracking of these files permitted for better consistency in responses, improved reporting and more fulsome trend analysis capabilities.

The ATIP office also developed detailed privacy policy feedback and advice in response to a consultation call from the Treasury Board Secretariat (TBS) on a draft *Guide to Protecting Privacy When Releasing Information about Small Numbers of Individuals*. The Mint recognizes that it is imperative to ensure that privacy continues to be considered and protected when releasing data concerning individuals or small groups with unique characteristics that could reveal personal information or enable re-identification. The ATIP office strives to respond to calls for consultation from the privacy community and to provide input on important topics and initiatives where possible.

2. Info Source: The Mint maintains an inventory of its record groupings and personal information holdings, aligned with its business lines and related programs, known as Info Source. This publication assists individuals to exercise their rights under the Act by documenting both institution-specific and standard personal information banks. An updated 2018 Info Source chapter was published in the current reporting period, which responded directly to Treasury Board feedback including formal TBS registration of the standard PIB "Lobbying Act requirements". The Mint will continue to make changes and updates as required over the course of the next reporting period.

3. General Data Protection Regulation (GDPR): Over the course of the reporting period, the ATIP office continued to assess the Mint's business and its data collection points and processing activities in light of the European Union (EU) GDPR, in effect as of May 25, 2018. Having led a variety of data scanning and mapping activities in the previous year, the ATIP office focused attention both on the Mint's Business-to-Consumer (B2C) and Business-to-Business (B2B) models. Proactive changes were effected on the Mint's website and in the Customer Solutions Centre and other measures will be implemented in the following year. The ATIP office regularly monitors GDPR developments and the evolving guidance material from the EU, and provides briefings to senior executives and other affected internal stakeholders as required to respond to GDPR-related issues.

4. Privacy governance & compliance review: In this reporting period, the ATIP office completed a comprehensive privacy gap analysis (work which had been carried over from the previous reporting period). Using the principles of a Privacy Management Accountability Framework, TBS privacy policies requirements were mapped against existing Mint controls (e.g. policies, processes, documentary material, standard operating procedures etc.) to identify gaps in privacy policy governance. The comprehensive document will inform the Mint's privacy policy updates, assist in the

prioritization of work, and identify policy requirements that may be in need of operationalizing. A priority for the following year will be to produce an updated version of the corporate Privacy Policy and a revision of the Privacy Breach Policy into a Directive.

5. Response to new TBS requirements: On October 1, 2018, new requirements under *the Directive on Personal Information Requests and Correction of Personal Information* came into effect. As of this date, the Mint is required to provide a written explanation to the requester when a request for access to personal information takes more than 30 days to fulfill. In order to operationally support the new requirement, a new ATIP office guideline was produced leveraging the How-To Guide prepared by TBS. This guideline is a reference tool used consistently by operations staff when drafting extension letters to requesters and facilitates standardization and accuracy of reporting.

VII. Key Issues and Actions Taken on Complaints or Audits

Two “Use & Disclosure” complaints were made against the Mint and submitted to the Office of the Privacy Commissioner (OPC) within the reporting period. Following internal investigations into the claims made by the individuals and the provision of representations to the OPC, both complaint files were closed at the early resolution phase and within a timely manner. There was no privacy-related audit activity in the reporting period. No complaints were received, and no audits were initiated or concluded, in the previous three reporting periods.

VIII. Monitoring Compliance

ATIP Office staff meets formally on a weekly basis for a fulsome discussion of all ATIP-related matters including request-processing time, action items and ongoing monitoring. Informal discussions often occur daily. The ATIP Coordinator normally provides briefings to the VP, General Counsel and Corporate Secretary on a weekly basis, or as required. In 2018-19, a new ATIP office reporting tool was developed, which will be adopted for use in the following year to provide the President & CEO with an overview of all ATIP files on a monthly basis.

IX. Material Privacy Breaches

No material privacy breach occurred in the reporting period. In comparison, one material breach occurred and was reported on in the previous year, but none in the two prior years.

X. Privacy Impact Assessments

In accordance with the Treasury Board's Directive on PIAs, the Mint is required to conduct a PIA before proceeding with a new or substantially modified program or activity that involves personal information for administrative use(s). By identifying and assessing risks, PIAs ensure that the Mint's programs and activities are compliant with privacy requirements in accordance with the Act, are aligned with best practices for privacy protection and are subject to the appropriate privacy risk mitigation plans. No PIAs were completed in the reporting period but the Mint has 4 open PIA files and initiated one new PIA for which work is ongoing. Two of the open PIAs will be leveraged in the following year to inform a key transformation initiative and will be reviewed and updated as required. The new PIA started in early 2019 will be closed in the next reporting period.

XI. Public Interest Disclosures

No disclosure of personal information was made pursuant to paragraph 8(2)(m) of the Act for both the Mint and its subsidiary RCMH-MRCF Inc. during the current and previous three reporting periods.

Attachment 1

**DELEGATION ORDER,
RCM**

Privacy Act



Delegation Order – *Privacy Act and Privacy Regulations*

Arrêté de délégation en vertu de la *Loi sur la protection des renseignements personnels* et du *Règlement sur la protection des renseignements personnels*

The President and CEO of the Royal Canadian Mint, pursuant to section 73 of the *Privacy Act*^{*}, hereby designates the persons holding the positions set out below, or the persons occupying on an acting basis those positions, to exercise the powers and perform the duties and functions of the President and CEO as the head of the Royal Canadian Mint, under the provisions of the Act and related regulations set out in the schedule opposite each position. This document replaces and repeals all previous delegation orders.

En vertu de l'article 73 de la *Loi sur la protection des renseignements personnels*^{*}, le président de la Monnaie royale canadienne délègue aux titulaires des postes sous mentionnés, ainsi qu'aux personnes occupant à titre intérimaire lesdits postes, les attributions, les fonctions et les pouvoirs dont il est, en qualité de responsable de la Monnaie royale canadienne, investi par les dispositions de la Loi ou de son règlement mentionnées en regard de chaque poste. Le présent document remplace et annule tout arrêté antérieur.

* S.C. 1980-81-82-83, c. 111, Sch. I "73"

* S.C. 1980-81-82-83, ch. III, ann. I « 73 »

<i>Privacy Act</i> <i>Loi sur la protection des renseignements personnels</i>				
Provision Disposition	Description	Vice-President, Corporate and Legal Affairs; ATIP Coordinator Vice-président, Affaires générales et juridiques; Coordonnatrice, AIPRP	Senior Program Manager, Privacy Chef principale de programme, protection des renseignements personnels	ATIP Generalist Généraliste, AIPRP
8(2)(l)	Disclosure for research or statistical purposes Communication pour des travaux de recherche ou de statistique	•	•	
8(2)(m)	Disclosure in the public interest or in the interest of the individual Communication dans l'intérêt public ou de l'individu	•	•	


8(4)	Copies of requests under paragraph 8(2)(e) Copies des demandes faites en vertu de l'alinéa 8(2)e	•	•	
8(5)	Notice of disclosure under paragraph 8(2)(m) Avis de communication en vertu de l'alinéa 8(2)m	•	•	
9(1)	Record of disclosures Relevé des cas d'usage	•	•	
9(4)	Consistent uses Usages compatibles	•	•	
10	Personal information banks Fichiers de renseignements personnels	•	•	
14(a)	Notice where access requested Notification de l'auteur de la demande	•		•
14(b)	Giving access to the record or part thereof Donner communication totale ou partielle du document	•		•
15	Extension of time limits Prorogation du délai	•		•
17(2)(b)	Language of access Version de la communication	•		•
17(3)(b)	Access in an alternative format Communication sur support de substitution	•		•
Exemption Provisions of the Privacy Act Dispositions d'exception de la Loi sur la protection des renseignements personnels				
Provision Disposition	Description	Vice-President, Corporate and Legal Affairs; ATIP Coordinator Vice-président, Affaires générales et juridiques; Coordonnatrice, AIPRP	Senior Program Manager, Privacy Chef principale de programme, protection des renseignements personnels	ATIP Generalist Généraliste, AIPRP
18(2)	Exempt banks Fichiers inconsultables	•		
19	Personal information obtained in confidence Renseignements personnels obtenus à titre confidentiel	•		
20	Federal-provincial affairs Affaires fédéro-provinciales	•		
21	International affairs and defence Affaires internationales et défense	•		
22	Law enforcement and investigations Application de la loi et enquêtes	•		

22.3	Public Servants Disclosure Protection Act Loi sur la protection des fonctionnaires divulgateurs d'actes répréhensibles	•		
23	Security clearances Enquêtes de sécurité	•		
24	Individuals sentenced for an offence Individus condamnés pour une infraction	•		
25	Safety of individuals Sécurité des individus	•		
26	Information about another individual Renseignements concernant un autre individu	•		
27	Solicitor-client privilege Secret professionnel des avocats	•		
27.1	Protected information — patents and trade-marks Renseignements protégés : brevets et marques de commerce	•		
28	Medical records Dossiers médicaux	•		
Other Provisions of the Privacy Act Autres dispositions de la Loi sur la protection des renseignements personnels				
Provision Disposition	Description	Vice-President, Corporate and Legal Affairs; ATIP Coordinator Vice-président, Affaires générales et juridiques; Coordonnatrice, AIPRP	Senior Program Manager, Privacy Chef principale de programme, protection des renseignements personnels	ATIP Generalist Généraliste, AIPRP
33(2)	Right to make representations Droit de présenter des observations	•	•	
35(1)(b)	Notice of actions to implement recommendations of Privacy Commissioner Avis des mesures pour la mise en œuvre des recommandations du Commissaire à la protection de la vie privée	•	•	
35(4)	Access to be given to complainant Communication accordée au plaignant	•		
36(3)(b)	Notice of actions to implement recommendations of Privacy Commissioner concerning exempt banks Avis des mesures pour la mise en œuvre des recommandations du Commissaire à la protection de la vie privée au sujet des fichiers inconsultables	•	•	
51(2)(b), 51(3)	Special rules for hearings Règles spéciales pour les auditions	•		
72	Annual report to Parliament Rapport annuel au Parlement	•		

Privacy Regulations Règlement sur la protection des renseignements personnels				
Provision Disposition	Description	Vice-President, Corporate and Legal Affairs; ATIP Coordinator Vice-président, Affaires générales et juridiques; Coordonnatrice, AIPRP	Senior Program Manager, Privacy Chef principale de programme, protection des renseignements personnels	ATIP Generalist Généraliste, AIPRP
7	Retention of personal information requested under paragraph 8(2)(e) Conservation des renseignements personnels demandés en vertu de l'alinéa 8(2)e)	•	•	
9	Examination of information Consultation sur place	•		
11(2), 11(4)	Notification concerning corrections Avis concernant les corrections	•	•	
13(1)	Disclosure of personal information relating to physical or mental health Communication des renseignements personnels concernant l'état physique ou mental	•		
14	Examination in presence of medical practitioner or psychologist	•		

Dated at Ottawa, Canada on June 12 2019

Daté à Ottawa, Canada, le 12 Juin 2019



 Marie Lemay
 President and CEO / Présidente de la Monnaie

Attachment 2

**DELEGATION ORDER,
RCMH-MRCF Inc.**

Privacy Act

PRIVACY ACT DELEGATION ORDER

**ARRÊTÉ SUR LA DÉLÉGATION EN VERTU DE LA
LOI SUR LA PROTECTION
DES RENSEIGNEMENTS PERSONNELS**

The President of RCMH-MRCF Inc., pursuant to section 73 of the *Privacy Act**, hereby designates the person holding the position of ATIP Coordinator at the Royal Canadian Mint to exercise the powers and perform the duties and functions of the President as the head of a government institution under the Act.


En vertu de l'article 73 de la *Loi sur la protection des renseignements personnels**, le président de RCMH-MRCF Inc. délègue au titulaire du poste de Coordinatrice, AIPRP à la Monnaie royale canadienne les attributions dont il est, en qualité de responsable d'une institution fédérale, investie par la Loi.

* S.C. 1980-81-82-83, c. 111, Sch. I "73"

* S.C. 1980-81-82-83, ch. III, ann. I « 73 »

Dated at Ottawa, Canada on June 12 2018

Daté à Ottawa, Canada, le 12, juin 2018



Jennifer Camelon
President, RCMH-MRCF Inc. /
Présidente de MRCH-MRCF Inc.



Simon Kamel
Chairperson of the Board, RCMH-MRCF Inc. /
Président, Conseil d'administration de MRCH-MRCF Inc.

Attachment 3

**STATISTICAL REPORT,
RCM**

Privacy Act



Statistical Report on the *Privacy Act*

Name of institution: Royal Canadian Mint

Reporting period: 2018-04-01 to 2019-03-31

Part 1: Requests Under the *Privacy Act*

	Number of Requests
Received during reporting period	7
Outstanding from previous reporting period	2
Total	9
Closed during reporting period	6
Carried over to next reporting period	3

Part 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	3	1	0	0	0	0	4
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	1	1	0	0	0	0	0	2
Neither confirmed nor denied	0	0	0	0	0	0	0	0
Total	1	4	1	0	0	0	0	6

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	3
19(1)(f)	0	22.1	0	27	0
20	0	22.2	0	28	0
21	0	22.3	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

Disposition	Paper	Electronic	Other formats
All disclosed	0	0	0
Disclosed in part	4	0	0
Total	4	0	0

2.5 Complexity

2.5.1 Relevant pages processed and disclosed

Disposition of Requests	Number of Pages Processed	Number of Pages Disclosed	Number of Requests
All disclosed	0	0	0
Disclosed in part	725	670	4
All exempted	0	0	0
All excluded	0	0	0
Request abandoned	0	0	2
Neither confirmed nor denied	0	0	0
Total	725	670	6

2.5.2 Relevant pages processed and disclosed by size of requests

Disposition	Less 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
All disclosed	0	0	0	0	0	0	0	0	0	0
Disclosed in part	1	1	3	669	0	0	0	0	0	0
All exempted	0	0	0	0	0	0	0	0	0	0
All excluded	0	0	0	0	0	0	0	0	0	0
Request abandoned	2	0	0	0	0	0	0	0	0	0
Neither confirmed nor denied	0	0	0	0	0	0	0	0	0	0
Total	3	1	3	669	0	0	0	0	0	0

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 Deemed refusals

2.6.1 Reasons for not meeting statutory deadline

Number of Requests Closed Past the Statutory Deadline	Principal Reason			
	Workload	External Consultation	Internal Consultation	Other
0	0	0	0	0

2.6.2 Number of days past deadline

Number of Days Past Deadline	Number of Requests Past Deadline Where No Extension Was Taken	Number of Requests Past Deadline 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

2.7 Requests for translation

Translation Requests	Accepted	Refused	Total
English to French	0	0	0
French to English	0	0	0
Total	0	0	0

Part 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

Part 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

Part 5: Extensions

5.1 Reasons for extensions and disposition of requests

Disposition of Requests Where an Extension Was Taken	15(a)(i) Interference With Operations	15(a)(ii) Consultation		15(b) Translation or Conversion
		Section 70	Other	
All disclosed	0	0	0	0
Disclosed in part	1	0	0	0
All exempted	0	0	0	0
All excluded	0	0	0	0
No records exist	0	0	0	0
Request abandoned	1	0	0	0
Total	2	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
		Section 70	Other	
1 to 15 days	0	0	0	0
16 to 30 days	2	0	0	0
Total	2	0	0	0

Part 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
Pending at the end of the 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

Part 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

Part 8: Complaints and Investigations Notices Received

Section 31	Section 33	Section 35	Court action	Total
2	2	2	0	6

Part 9: Privacy Impact Assessments (PIAs)

Number of PIA(s) completed	0
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Part 10: Resources Related to the *Privacy Act*

10.1 Costs

Expenditures		Amount
Salaries		\$122,500
Overtime		\$0
Goods and Services		\$56,660
• Professional services contracts	\$52,653	
• Other	\$4,007	
Total		\$179,160

10.2 Human Resources

Resources	Person Years Dedicated to Privacy Activities
Full-time employees	1.15
Part-time and casual employees	0.00
Regional staff	0.00
Consultants and agency personnel	0.90
Students	0.00
Total	2.05

Note: Enter values to two decimal places.

New Exemptions Table

Privacy Act	
Section	Number of requests
22.4 National Security and Intelligence Committee	0
27.1 Patent or Trademark privilege	0

Attachment 4

**STATISTICAL REPORT,
RCMH**

Privacy Act



Statistical Report on the *Privacy Act*

Name of institution: RCMH-MRCF Inc.

Reporting period: 2018-04-01 to 2019-03-31

Part 1: Requests Under the *Privacy Act*

	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

Part 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	28	0
21	0	22.3	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

Disposition	Paper	Electronic	Other formats
All disclosed	0	0	0
Disclosed in part	0	0	0
Total	0	0	0

2.5 Complexity

2.5.1 Relevant pages processed and disclosed

Disposition of Requests	Number of Pages Processed	Number of Pages Disclosed	Number of Requests
All disclosed	0	0	0
Disclosed in part	0	0	0
All exempted	0	0	0
All excluded	0	0	0
Request abandoned	0	0	0
Neither confirmed nor denied	0	0	0
Total	0	0	0

2.5.2 Relevant pages processed and disclosed by size of requests

Disposition	Less 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
All disclosed	0	0	0	0	0	0	0	0	0	0
Disclosed in part	0	0	0	0	0	0	0	0	0	0
All exempted	0	0	0	0	0	0	0	0	0	0
All excluded	0	0	0	0	0	0	0	0	0	0
Request abandoned	0	0	0	0	0	0	0	0	0	0
Neither confirmed nor denied	0	0	0	0	0	0	0	0	0	0
Total	0	0	0	0	0	0	0	0	0	0

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 Deemed refusals

2.6.1 Reasons for not meeting statutory deadline

Number of Requests Closed Past the Statutory Deadline	Principal Reason			
	Workload	External Consultation	Internal Consultation	Other
0	0	0	0	0

2.6.2 Number of days past deadline

Number of Days Past Deadline	Number of Requests Past Deadline Where No Extension Was Taken	Number of Requests Past Deadline 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

2.7 Requests for translation

Translation Requests	Accepted	Refused	Total
English to French	0	0	0
French to English	0	0	0
Total	0	0	0

Part 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

Part 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

Part 5: Extensions

5.1 Reasons for extensions and disposition of requests

Disposition of Requests Where an Extension Was Taken	15(a)(i) Interference With Operations	15(a)(ii) Consultation		15(b) Translation or Conversion
		Section 70	Other	
All disclosed	0	0	0	0
Disclosed in part	0	0	0	0
All exempted	0	0	0	0
All excluded	0	0	0	0
No records exist	0	0	0	0
Request abandoned	0	0	0	0
Total	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
		Section 70	Other	
1 to 15 days	0	0	0	0
16 to 30 days	0	0	0	0
Total	0	0	0	0

Part 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
Pending at the end of the 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

Part 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

Part 8: Complaints and Investigations Notices Received

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

Part 9: Privacy Impact Assessments (PIAs)

Number of PIA(s) completed	0
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Part 10: Resources Related to the *Privacy Act*

10.1 Costs

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

10.2 Human Resources

Resources	Person Years Dedicated to Privacy Activities
Full-time employees	0.00
Part-time and casual employees	0.00
Regional staff	0.00
Consultants and agency personnel	0.00
Students	0.00
Total	0.00

Note: Enter values to two decimal places.

New Exemptions Table

Privacy Act	
Section	Number of requests
22.4 National Security and Intelligence Committee	0
27.1 Patent or Trademark privilege	0