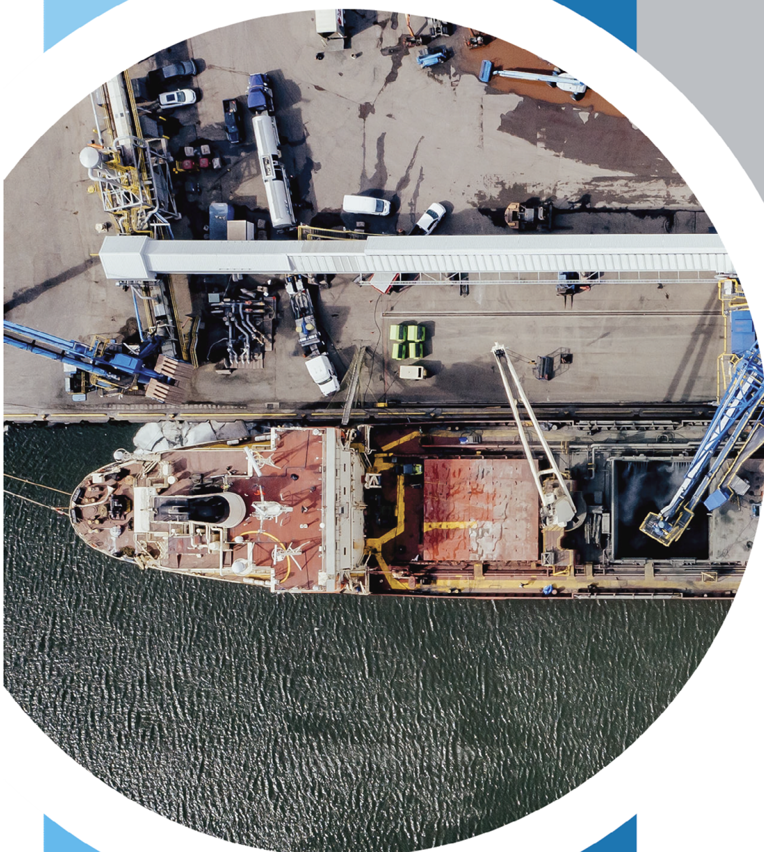

ANNUAL REPORT TO PARLIAMENT ON THE *PRIVACY ACT*

For the reporting period of
April 1, 2025 to March 31, 2026

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Introduction

The *Privacy Act* (R.S.C. 1985, c. A-1) came into force on July 1, 1983. It governs the collection of personal information by the federal government, restricts the use and disclosure of such information and grants individuals the right to access and correct personal information about themselves. Section 72 of the *Privacy Act* requires the head of each federal institution to submit an annual report to Parliament on the administration of the Act within their institution during the fiscal year.

1. Description of the report

This report is submitted pursuant to section 72 of the *Privacy Act*. It provides an overview of the activities carried out by the Quebec Port Authority (hereinafter referred to as "the Authority") in relation to the protection of personal information during the reference period from April 1, 2025 to March 31, 2026.

The Authority, a not-for-profit shared governance organization, was established on May 1, 1999, following the adoption of the *Canada Marine Act*.

This report also aims to meet the reporting requirements, where applicable, of the Authority's non-operational subsidiary (15854997 CANADA INC.).

2. Mission

The mission of the Authority is to promote and develop maritime trade, to serve the economic interests of the Québec City region and of Canada, and to ensure its profitability in a way that respects both the community and the environment.

3. Organisational structure

From April 1, 2025 to March 31, 2026, the Head of Legal Services and Corporate Secretary acted as the *Privacy Act* coordinator for the Authority and held the delegated authority for this role (see the delegation of authority attached as Appendix "A").

She was supported in tasks related to access to information by a legal counsel responsible for the protection of personal information, as well as by an administrative assistant, both of whom work more broadly within the Authority's legal services.

As per established practices, all formal requests to access personal information are submitted via the email address demande-acces@portquebec.ca, which is monitored daily by the person responsible for access to information and personal information at the Authority. In collaboration with the Coordinator, this person ensures that all requests are processed diligently and in accordance with the provisions of the Act. This team operates within a secure digital environment, and a separate file is opened for each request to ensure confidentiality.

With respect to the description of any service contract required under section 73.1 of the *Privacy Act*, the Authority declares that it did not provide any services related to the *Privacy Act* during the current reporting period.

4. Delegation of Authority

For the period covered, the *Privacy Act* coordinator was Me Sarah-Ève Pelletier, Head of Legal Services and Corporate Secretary. She was responsible for decision-making regarding the application of the various provisions of the *Privacy Act* (see the delegation of authority attached as Appendix "A").

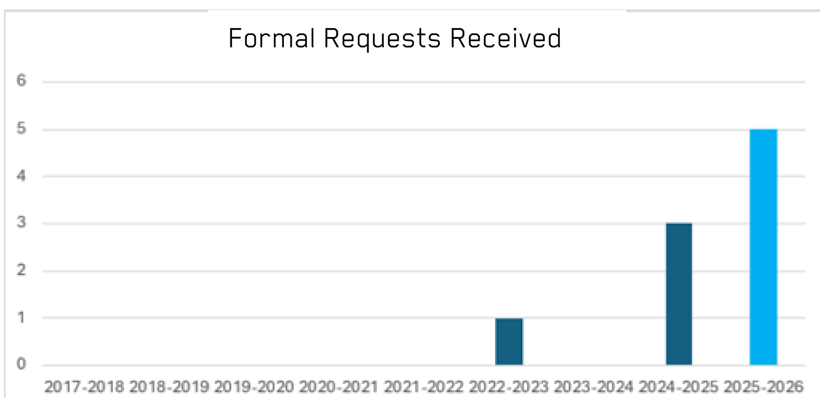
5. 2025-2026 Findings

Sections 12 and onward of the *Privacy Act* deal with formal requests for access to personal information received by federal institutions, which must be processed in accordance with the prescribed rules. In spring 2026, the Authority submitted its statistical reports in both official languages, covering both the *Access to Information Act* and the *Privacy Act*.

5.1 Number of requests received

Between April 1, 2025, and March 31, 2026, the Administration received five formal requests for access to personal information.

Compared to the previous year, from April 1, 2024, to March 31, 2025, this represents an increase of 66 %.



At the end of the 2025–2026 reporting period, all five requests had been processed, and none were carried forward to the 2026–2027 reporting period.

5.2 Processing time

During the reporting period, five requests were processed within 0 to 15 days. Accordingly, 100 % of requests were responded to within the initial time limit prescribed by the Act.

5.3 Deadline extension

During the 2025-2026 period, no request was subject to an extension of the time limit.

5.4 Number of pages processed and disclosed

As part of two requests, 15 pages were processed and disclosed.

For the other three requests, no documents matching the requests were found.

5.5 Exceptions and exclusions

The *Privacy Act* provides for several exemptions and exclusions under which an institution may refuse or is required to refuse the disclosure of certain information.

The Authority invoked paragraph 19(1)(a) of the Act because personal information relating to third parties was intermingled with that of the applicants.

5.6 Corrections

Paragraph 12(2) of the *Privacy Act* grants every individual the right to request the correction of personal information about them that is held by a federal institution. No corrections were requested or made during the 2025-2026 period.

5.7 Costs

The total estimated cost of implementing the *Privacy Act* for the Authority for the reporting period was $21,316, primarily for the processing of complaints and the production of the required annual reports.

5.8 Percentage of requests for which the disposition of records was "full disclosure" and the percentage for which the disposition was "partial disclosure"

Disclosure Type	%
Full disclosure	0 %
Partial disclosure	40 %
No document found responding to the request	60 %

5.9 Active complaints at the end of the reporting period

No complaint related to the application of the *Privacy Act* was active at the end of the previous reporting period (2024-2025) or the period covered by this report.

6. Training, Awareness and Capacity Building

The Authority remains committed to training and maintaining a workforce with specialized expertise, capable of continuing to provide the highest quality service to both internal and external clients. To that end, the individual holding the position of Coordinator for *the Access to Information Act* and the *Privacy Act*, along with the person responsible for access to information and personal information, are both members of the Barreau du Québec. They regularly participate in training sessions on the protection of personal information offered through the government platform GCCollab. In addition, the new person responsible for access to information and personal information is currently completing training in Information Technology Law, which covers the requirements outlined in Annex B of the Directive on Privacy Requests and Correction of Personal Information, issued by the Treasury Board Secretariat.

It is important to note that each new employee of the Authority is met individually to be informed of the requirements and applicability of the *Access to Information Act* and the *Privacy Act*. During the 2025-2026 reporting period, 25 new employees received training on the requirements of the *Access to Information Act* and the *Privacy Act*.

Finally, the Authority's Information Technology Department raises awareness among all employees at various times throughout the year by conducting simulated "phishing" attempts followed by brief training sessions and reminders.

7. Framework regarding Access and Protection of Personal Information

7.1 Accessibility measures to ensure public access to personal information

During the 2025-2026 reporting period, the Authority published its annual Info Source page, which outlines its activities and the information holdings it maintains. This information is compiled for submission to the Treasury Board Secretariat. Info Source is intended to help the public access government information and exercise the rights granted under the *Access to Information Act* and the *Privacy Act*.

7.2 Policies, directives and procedures

During the reference period, the Authority maintained its policies and directives related to the protection of personal information, in accordance with the requirements of the Treasury Board Secretariat.

The Authority notably developed a new privacy notice for all of its operations and recreational tourism activities. This notice was published online at the beginning of 2026. The Authority also initiated research work to update its Privacy Policy by incorporating its obligations related to Personal Information Banks (PIBs) and Privacy Impact Assessments (PIAs). It complied with the Act by producing PIBs and PIAs corresponding to its activities and submitting them to the Treasury Board Secretariat and the Office of the Privacy Commissioner.

The Authority also completed an in-depth contractual overhaul in 2025-2026. This overhaul was intended, among other things, to strengthen the Authority's legislative obligations, including the protection of personal information. Going forward, contracts with subcontractors and partners include, in particular, clauses strictly governing the collection, retention and sharing of personal information and requiring immediate notification in the event of a privacy incident.

Finally, the Authority's IT Department systematically reviews data security and personal information protection measures when acquiring any software, computer equipment or connected device.

8. Initiatives and projects to improve the protection of personal information

During the 2024-2025 period, the Authority's Information Technology sector completed a comprehensive inventory of the information held by the Authority. Part of the work was carried out jointly with a representative from Legal Services to identify files containing personal information. This exercise enabled the development of PIBs and PIAs corresponding to the Authority's current activities.

The Authority plans to publish summaries of its PIBs on its public website during the 2026-2027 fiscal year, once each corresponding PIA has been definitively approved by the Treasury Board Secretariat.

9. Summary of key issues and measures taken on complaints or audits

During the current reporting period, the Authority received no complaints related to the protection of personal information.

No application for judicial review was filed with the Federal Court, and no appeal was made to the Federal Court of Appeal.

Furthermore, no complaint investigation by the Office of the Privacy Commissioner was ongoing at the end of the reporting period.

10. Material privacy breaches

A significant privacy breach involves the improper or unauthorized collection, use, disclosure, retention or disposal of sensitive personal information where it would be reasonable to believe that it could cause serious harm or injury to the individual concerned.

No cases of substantial privacy breaches occurred during the period covered by this report.

11. Privacy Impact Assessments (PIAs)

To fulfill its mandate, the Authority must carry out certain responsibilities that require the collection, use and disclosure of personal information. As the custodian of this information, the Authority uses Privacy Impact Assessments (PIAs) as a risk management tool, in accordance with Treasury Board policy.

During the 2025-2026 fiscal year, the Authority completed three PIAs corresponding to programs already in operation within the organization (see sections 12.1 to 12.3) that had not previously been subject to this type of assessment.

The summaries of the PIBs associated with the three PIAs will be published on the Authority's public website during the 2026-2027 fiscal year (see section 9).

11.1 Marina operations

The collection of personal information carried out as part of the Port of Québec marina operations concerns the contents of each marina client's file, namely their name (first name, last name), contact information (telephone number, civic address, email address) and vessel registration (which contains the same personal information and the associated registration number).

11.2 Legal services

The Authority's Legal Services collect, use and retain personal information in the course of their advisory, analytical and legal file management mandates, including providing legal opinions, managing litigation, handling complaints, conducting internal investigations or supporting organizational decision-making.

Depending on the nature of the files, the personal information collected may include, in particular:

- name and identification information (first name, last name, date of birth);
- contact information (address, telephone number, email address);
- financial information (where applicable, in certain files);
- information relating to disputes or complaints (alleged facts, statements, testimony);
- any other relevant information necessary for the analysis and processing of the file.

11.3 Public file on cruise ship calls and advance passenger information

This file contains information on persons wishing to enter Canada aboard a commercial vessel or through the Port of Québec's marine facilities. In accordance with the *Marine Transportation Security Regulations*, vessel operators or their agents are required to provide advance information on all passengers and crew members aboard a cruise ship (name, date of birth, sex, citizenship or nationality, information relating to travel documents) in order to confirm the identity of individuals entering and leaving Canadian territory. This information is provided by marine agents representing each vessel through a Port Management Integrated System (or "PMIS") owned by the Authority.

The PIA for this file is undergoing additional review at the time of preparation of this report.

12. Public interest disclosures

Paragraphs 8(2)(e) and (m) of the *Privacy Act* authorize the disclosure of personal information to various investigative or regulatory bodies, to federal parliamentarians, or for reasons of public interest.

The Authority did not disclose any personal information under the aforementioned provisions, specifically paragraphs 8(2)(e) and (m) of the Act, during the 2025-2026 reporting period.

13. Compliance monitoring

The Authority's Legal Services continuously monitor tasks related to the protection of and access to personal information. In terms of processing time, each new request is recorded in its own secure file and then tracked using a planning and monitoring tool. This tool provides a clear overview of all requests and open investigations.

Each stakeholder involved in responding adequately to requests is subject to regular follow-ups and correspondence to ensure that they provide their contribution in a timely manner, so that requests are processed without delay and responses are sent within the prescribed timeframes.

APPENDIX "A"

Instrument of Delegation of Authorities – *Access to Information Act* and *Privacy Act*

In effect since April 29, 2024

Instrument of Delegation of Authorities

Notes regarding delegation

The purpose of this section is to establish the management framework for the *Access to Information Act* and the *Privacy Act*. In accordance with section 73 of the *Privacy Act* and section 73 of the *Access to Information Act*, I, the undersigned, Olga Farman, President and CEO of the Québec Port Authority, delegate to its Chief, Legal Services and Corporate Secretary, Ms. Sarah-Ève Pelletier, the power to perform the duties of Access to Information and Privacy Coordinator under the provisions of the aforementioned statutes.

This delegation of authority has been in effect since April 29, 2024, as initially authorized by Mr. Mario Girard, former President and CEO of the Québec Port Authority. It was renewed by Ms. Olga Farman, current President and CEO.

Privacy Act

8(2)*j*)	Disclose personal information for research purposes.
8(2)*m*)	Disclose personal information in the interest of the public or a person.
8(4)	Retain a copy of requests received under paragraph 8(2)(e) and the documents that were transmitted.
8(5)	Notify the Privacy Commissioner of any disclosure of personal information under paragraph 8(2)(m).
9(1)	Retain a record of use.
9(4)	Notify the Privacy Commissioner of consistent uses and update the index accordingly.
10	Include personal information in personal information banks.
14	Respond to requests for access to personal information within 30 days of receiving them, and give access to the information or notify the applicant otherwise.
15	Extend the time limit permitted to respond to a request for access.
17(2)*b*)	Determine whether it is necessary to have the requested information translated.
17(3)b)	Alternative format.
18(2)	As necessary, refuse to disclose personal information contained in an exempt bank.

19(1)	Refuse to disclose personal information that was obtained in confidence from another government.
19(2)	As necessary, disclose personal information requested under subsection 19(1) if the government from which the information was obtained consents to the disclosure or makes the information public.
20	As necessary, refuse to disclose information the disclosure of which could reasonably be expected to be injurious to the conduct of federal-provincial affairs.
21	As necessary, refuse to disclose information the disclosure of which could reasonably be expected to be injurious to the conduct of international affairs or defence.
22	As necessary, refuse to disclose information prepared by an investigative body or information the disclosure of which could reasonably be expected to be injurious to the enforcement of any law or the security of penal institutions.
22.1(1)	The Privacy Commissioner shall refuse to disclose any personal information requested that was obtained or created by the Commissioner or on the Commissioner's behalf in the course of an investigation. [Applies only to the Privacy Commissioner.]
22.2	The Public Sector Integrity Commissioner shall refuse to disclose any personal information requested that was obtained or created by the Commissioner or on the Commissioner's behalf in the course of an investigation into a disclosure made under the *Public Servants Disclosure Protection Act* or an investigation commenced under section 33 of that Act. [Applies only to the Public Sector Integrity Commissioner.]
22.3	Refuse to disclose personal information requested that was created for the purpose of making a disclosure under the *Public Servants Disclosure Protection Act* or in the course of an investigation into a disclosure under that Act.
23	As necessary, refuse to disclose information prepared by an investigative body for the purpose of determining whether to grant security clearances.
24	As necessary, refuse to disclose information that was collected by the Correctional Service of Canada or the Parole Board of Canada while the individual who made the request was under sentence for an offence, if the situation corresponds to what is provided for in this section.
25	As necessary, refuse to disclose information the disclosure of which could reasonably be expected to threaten the safety of individuals.
26	As necessary, refuse to disclose information about an individual other than the individual who made the request, and refuse to disclose such information where the disclosure is prohibited under section 8.

27	As necessary, refuse to disclose information that is subject to solicitor-client privilege.
28	As necessary, refuse to disclose information that relates to the physical or mental health of the individual who requested it where the examination of the information by the individual would be contrary to the best interests of the individual.
31	Receive notice from the Privacy Commissioner of the intention to carry out an investigation.
33(2)	In the course of an investigation, have an opportunity to make representations to the Privacy Commissioner.
35(1)	Receive a report from the Privacy Commissioner containing the findings of the investigation, and give notice to the Commissioner of any action taken.
35(4)	Give a complainant access to personal information after giving notice to the Privacy Commissioner that access will be given, in accordance with paragraph 35(1)(b).
36(3)	Receive the Privacy Commissioner's report containing the findings of an investigation of an exempt bank.
37(3)	Receive the Privacy Commissioner's report presenting the findings of the audit of an observation.
51(2)*b*)	Request that hearings pertaining to the cases described in section 51 be heard and determined in the National Capital Region.
51(3)	Request and have the opportunity to make representations during hearings pertaining to the cases described in section 51.
72(1)	Prepare an annual report to Parliament.
77	Fulfill the responsibilities that are conferred upon the head of an institution under section 77 of the Act and are not mentioned above.

Privacy Regulations

9	Provide reasonable facilities and set a time for the examination of personal information.
11(2)	Provide notification that the requested corrections have been made.

11(4)	Provide notification that the requested corrections were refused.
13(1)	As necessary, authorize the disclosure of an individual's personal information relating to their physical or mental health to a duly qualified medical practitioner or psychologist in order that the practitioner may provide an opinion as to whether disclosure of the information would be contrary to the best interests of the individual.
14	As necessary, disclose to an individual personal information relating to their physical or mental health in the presence of a duly qualified medical practitioner or psychologist.

Access to Information Act

4(2.1)	Make every reasonable effort to assist people making requests for access to information, respond to their questions accurately and completely, and provide timely access to documents in the format requested.
7*a*)	Notify the person who made the request for access.
7*b*)	Authorize access to the record.
8(1)	Transfer the request to another institution.
9	Extend the time limit.
11(2), (3), (4), (5), (6)	Additional fees.
12(2)	Language of access to information.
12(3)	Access to information in an alternative format.
13	Exemptions – Information obtained in confidence.
14	Exemptions – Federal-provincial affairs.
15	Exemptions – International affairs and defence.
16	Exemptions – Law enforcement and investigations.
16.1	Exemptions – Records relating to investigations, examinations and audits conducted by the Auditor General, the Commissioner of Official Languages, the Information Commissioner and the Privacy Commissioner.

16.2	Exemptions – Records relating to investigations conducted by the Commissioner of Lobbying.
16.3	Exemptions – Records relating to investigations and examinations conducted in accordance with the *Canada Elections Act.*
16.4	Exemptions – Records relating to investigations conducted by Public Sector Integrity Commissioner.
16.5	Exemptions – Records relating to the disclosure of information under the *Public Servants Disclosure Protection Act.*
17	Exemptions – Safety of individuals.
18	Exemptions – Economic interests of Canada.
18.1	Exemptions – Economic interests of the Canada Post Corporation, Export Development Canada, the Public Sector Pension Investment Board, and VIA Rail Canada Inc.
19	Exemptions – Personal information.
20	Exemptions – Third party information.
20.1	Exemptions – Third party information obtained by the Public Sector Pension Investment Board.
20.2	Exemptions – Third party information obtained by the Canada Pension Plan Investment Board.
20.4	Exemptions – Contracts of performing artists or the identity of anonymous donors of the National Arts Centre Corporation.
21	Exemptions – Operations of government.
22	Exemptions – Auditing procedures.
22.1	Exemptions – Audit working papers and draft audit reports.
23	Exemptions – Solicitor-client privilege.
24	Exemptions – Statutory prohibitions.

25	Severability.
26	Exemptions – Information to be published.
27(1), (4)	Notice to third parties.
28(1), (2), (4)	Notice to third parties.
29(1)	Disclosure of information on the recommendation of the Information Commissioner.
33	Advise the Information Commissioner of the involvement of a third party.
35(2)	Right to make representations.
37(4)	Access to be given to a complainant.
43(1)	Notice to third parties (application for review by the Federal Court).
44(2)	Notice to the person who requested the record (application for review by the Federal Court, presented by a third party).
52(2), (3)	Special rules for hearings.
71(1) (2)	Exclusion of exempt information from manuals.
72	Prepare an annual report to Parliament.
77	Responsibilities that are conferred upon the head of an institution under section 77 of the Act and are not mentioned above.

Access to Information Regulations

6(1)	Transfer a request.
7(2)	Fees relating to search and preparation.
7(3)	Fees relating to production and programming.
8	Give access to records.
8.1	Limitations in respect of format.

Signed in Québec, Province of Québec, on this 29th day of April 2024.

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Mario Girard

President and CEO

Signed in Québec, Province of Québec, on this 13th day of August 2026.

Olga Farman

President and CEO