



# ANNUAL REPORT

To Parliament  
2024-2025

*Privacy Act*



Administration  
de pilotage  
des Laurentides

Laurentian  
Pilotage  
Authority



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## Annual Report under the *Privacy Act*, 2024-2025 prepared by Laurentian Pilotage Authority

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### 1. Introduction

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The *Privacy Act* (Revised Statute of Canada 1985, Chapter P-21) was proclaimed on July 1, 1983. The *Privacy Act* extends to individual Canadian citizens and permanent residents, the right of access to information about themselves held by the government, subject to specific and limited exceptions. The *Privacy Act* also protects the individual's right to privacy by preventing others from having access to personal information and gives individuals substantial control over its collection and use.

Section 72 of the *Privacy Act* requires that the head of every government institution prepare an annual report on the administration of the Act within the institution during each financial year for submission to Parliament.

This annual report is submitted by the Laurentian Pilotage Authority in accordance with the *Privacy Act*. It describes how the Laurentian Pilotage Authority fulfilled its responsibilities under this Act during the reporting period from April 1st, 2024, to March 31, 2025.

#### > Purpose of the Act

The *Privacy Act* protects the privacy of individuals with respect to their personal information. The *Privacy Act* sets out provisions that govern the collection, use, retention, disposition and disclosure of personal information by federal government institutions. It also provides individuals with the right of access to their personal information held within government institutions.

For more information:

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**Laurentian Pilotage Authority**  
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Montreal (Quebec) H3A 3L4

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## > Laurentian Pilotage Authority Mandate

The Laurentian Pilotage Authority (« **Authority** ») is a Crown Corporation listed in Schedule III, Part 1 of the *Financial Administration Act*. It was constituted on February 1, 1972, pursuant to the *Pilotage Act*.

The Authority is financially self-sufficient and reports to the Minister of Transport Canada.

It is directly responsible for the implementation and administration of the *Privacy Act* in compliance with Section 72 of the said Act.

As the gateway for marine pilotage services on its territory, the Authority is responsible for all aspects related to pilotage, making it a turnkey organization. Its legislative mandate also gives it the responsibility to set the pilotage charges, which must remain reasonable and fair to its customers while allowing it to operate on a self-financing basis.

In this regard, its legislative mandate is based on the following principles and objectives<sup>1</sup>:

- That pilotage services be provided in a manner that promotes and contributes to the safety of navigation, including the safety of the public and marine personnel, and that protects human health, property and the environment;
- That pilotage services be provided in an efficient and cost-effective manner;
- That risk management tools be used effectively and that evolving technologies be taken into consideration;
- That an Authority's pilotage charges be set at levels that allow the Authority to be financially self-sufficient.

## 2. Organizational Structure

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The Chief Legal Officer and Corporate Secretary serves as the Access to Information and Privacy (« **ATIP** ») Coordinator for the Authority. She has delegated authority for all ATIP matters. An assistant assists the ATIP Coordinator in processing requests under the Act. The Authority's ATIP Office is responsible for all activities related to the administration, application and promotion of the Access to Information Act and the Privacy Act. It advises management and staff on the implementation of these Acts and prepares reports for Parliament and the Treasury Board

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<sup>1</sup> *Pilotage Act* R.S.C., (1985), c. P-14), section 2

Secretariat. He works on complaints filed with the Information Commissioner of Canada and the Privacy Commissioner of Canada, on investigations conducted by those commissioners, and on all ATIP applications to the Federal Court.

The Access to Information and Privacy Communities Development Office (« **APCDO** ») was established to address capacity issues in the Access to Information and Privacy communities across Government of Canada institutions subject to the Acts. In 2024-2025, the Authority's ATIP staff were active participants in several training sessions offered by the APCDO.

The Authority has not entered into any agreements with any other government institution to provide services under the *Privacy Act* pursuant to section 73.1 of that Act during the period covered by this Report.

### 3. Delegation Order

Decision-making responsibility for the application of the various provisions of the *Access to Information Act* and the *Privacy Act* have been formally established and are outlined in the Authority Delegation Order.

The Delegation Order signed, dated and approved by the Chairman of the Board of Directors in effect at the end of the reporting period, a copy of which is available in **Appendix A**.

### 4. Performance 2024–2025

This section provides an overview of key data on the institution's performance for the year, as reflected in the institution's 2024-2025 Statistical Reports. ("Requests" here refers to formal requests under the *Privacy Act*.)

- > Percentage of requests responded to within legislated timelines: 0% (An extension has been requested).
- > Number of completed requests, broken down by completion times:
  - 1 processed within 31 to 60 days
- > Number of active requests as of the last day of the reporting period: 0
- > Number of active complaints as of the end of the reporting period: 0

- > Information on the reasons for extensions:
  - 1 for external consultation under 15 a) (ii), total 16 to 30 days
- > Consultations completed for other institutions:
  - 1 request completed within 4 days
- > Percentage of completed requests for which records were disclosed:
  - 100% all disclosed

During the reporting period, the Authority received one formal online request under the Act through the secure ATIP online application service. This request was all disclosed within 58 days and 64 pages were transmitted. However, the Authority was unable to complete processing within the legislated timelines, so an extension of 30 days was taken under section 15 a) (ii). None of the requests received during this and previous reporting periods remain active; they have all been answered and closed.

The Authority has not received any requests for translation during the current and the previous reporting period.

In addition, the Authority did not receive any complaints from the Office of the Privacy Commissioner regarding the Privacy Act in the 2024-2025, and none remain pending from previous periods.

Based on multi-year trends, the Authority processes a low volume of requests, usually remains able to respond to all requests it receives within the prescribed legislated timelines and without any extensions.

## 5. Training and Awareness

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On January 30, 2025, Data Privacy Theme Day, the Authority highlighted the importance of taking control of your data. An awareness statement was emailed to all Authority employees. See **Appendix B** for a copy of this awareness statement.

Moreover, the ATIP Coordinator provides individual ATIP counseling and assistance to any employee who wishes to better understand the Authority's expectations regarding the application of the Act.

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## 6. Policies, Guidelines and Procedures

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There are no other institutional policies, guidelines or procedures were implemented other than complying with the requirements of the Act as set out in the Regulations.

Authority's website provides comprehensive information about its policies and organizational structure and publishes Info Source to help the public access government information and exercise their rights or make a request for access to information or personal data.

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## 7. Initiatives and Projects to Improve Privacy

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The Authority did not implement or undertake any specific initiatives or projects to improve access to personal information and privacy during the reporting period covered.

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## 8. Summary of Key Issues and Actions Taken on Complaints

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There have been no significant issues to report for the current year. No complaints, audits or investigations were filed during the reporting period.

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## 9. Material Privacy Breaches

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No material privacy breaches were reported to the Office of the Privacy Commissioner and to Treasury Board of Canada Secretariat (Privacy and Responsible Data Division) during the reporting period, please include a statement to that effect. However, during the reporting period, the Authority had one non-material privacy breaches. The Treasury Board of Canada Secretariat was consulted in the assessment of this achievement.

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## 10. Privacy Impact Assessments (« PIA »)

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The Authority did not complete any PIAs during the reporting period.

Only a few corrections have been made:

- > 4 specific files have been terminated as they are no longer relevant and the information they contained is included in standard files.

- > 1 file has been modified to clarify its title

	Active	Created	Terminated	Modified
Institution-specific	1	0	4	1

## 11. Public Interest Disclosures

No disclosures were made under section 8(2)(m) of the *Privacy Act* during the reporting period.

## 12. Monitoring Compliance

Given the small number of requests received and processed by the Authority, no official monitoring compliance was conducted during the reporting period. Such monitoring will normally be conducted by the ATIP Coordinator, as appropriate. The Authority will make every reasonable effort to process all requests received in accordance with the requirements of the Act.

## 13. Attachments

- **Appendix A:** Delegation Order
- **Appendix B:** January 30, 2025, Awareness Release

## ANNEXE - APPENDIX A



Administration  
de pilotage  
des Laurentides

Laurentian  
Pilotage  
Authority

### ARRÊTÉ SUR LA DÉLÉGATION EN VERTU DE LA LOI SUR L'ACCÈS À L'INFORMATION ET DE LA PROTECTION DES RENSEIGNEMENTS PERSONNELS

**PAR LE PRÉSENT ARRÊTÉ** pris en vertu de l'article 95(1) de la *Loi sur l'accès à l'information* et de l'article 73 de la *Loi sur la protection des renseignements personnels*, je délègue, selon l'annexe ci-jointe, depuis le 21<sup>er</sup> juin 2024, l'Avocate générale et Secrétaire générale, ainsi qu'à la personne occupant ce poste à titre intérimaire le cas échéant, les pouvoirs et les fonctions se rapportant à l'Administration de pilotage des Laurentides qui me sont confiés aux termes des *Décrets sur la désignation des responsables d'institutions fédérales* de ces lois en ma qualité de responsable d'une institution fédérale.

Daté, en la ville de Montréal, ce 10<sup>e</sup> jour de septembre 2024.

**Marie-Claude Cardin**  
Présidente du Conseil d'administration

### ACCESS TO INFORMATION AND PRIVACY ACT DELEGATION ORDER

**BY THIS ORDER** made pursuant to section 95(1) of the *Access to Information Act* and section 73 of the *Privacy Act*, I hereby designate the person holding the position of General Counsel and Corporate Secretary, as well as to the person occupying this position on an acting basis if necessary, to exercise or perform the powers, duties and functions of the head of a government institution under the *Acts' Designation Order of Government Institutions*, as specified in the attachment, insofar as they may be exercised or performed in relation to the Laurentian Pilotage Authority, effective since June 21, 2024.

Dated, at the City of Montreal, this 10<sup>th</sup> day of September 2024.

**Marie-Claude Cardin**  
Chairman



**ANNEXE A - DELEGATION DE POUVOIRS ET D'ATTRIBUTIONS EN VERTU DE L'ARTICLE 73  
DE LA LOI SUR L'ACCES A L'INFORMATION ET DE LA PROTECTION DES  
RENSEIGNEMENTS PERSONNELS**

**SCHEDULE A - DELEGATION OF POWERS, DUTIES AND FUNCTIONS PURSUANT TO  
SECTION 73 OF THE ACCESS TO INFORMATION ACT AND PRIVACY ACT**

***Loi sur l'accès à l'information et ses règlements :*** autorité absolue

***Access to Information Act and Regulations:*** absolute authority

***Loi sur la protection des renseignements personnels et ses règlements :*** autorité absolue

***Privacy Act and Regulations:*** absolute authority



## Data Privacy Week from January 27 to 31, 2025

### Put Privacy First

This year, the Office of the Privacy Commissioner of Canada and the Laurentian Pilotage Authority are highlighting the importance to Put Privacy First during Data Protection Week.

Considering privacy at the beginning of an initiative is a key to future-proofing programs, services, and systems. It can also help organizations to reduce the risk of issues arising at the eleventh hour or once a program has been launched.

Putting privacy first supports compliance with privacy law and ultimately helps organizations to build trust with Canadians.

For individuals, putting privacy first means being empowered to protect your fundamental right to privacy. For example, by knowing how to select strong passwords, recognizing phishing and other scams, and considering what information to share in online interactions.

Why should we put privacy first? And what do we protect when we protect privacy and ensure data protection? We invite you to read the [Privacy and data protection as fundamental rights: A narrative](#), prepared by the Global Privacy Assembly's Data Protection and Other Rights and Freedoms Working



Group. The narrative takes stock of the proliferation of data protection laws and instruments and reinforces a case for adopting a fundamental rights-based approach to data protection and privacy globally.

***Don't hesitate to report a possible breach of privacy, and don't wait to do so. The sooner a breach of privacy is reported, the more damage can be limited or prevented.***

Thanks for your constant vigilance.

***Protecting personal information is everyone's responsibility!***

Anaïs de Lausnay