

**BUSINESS DEVELOPMENT BANK OF CANADA (“BDC”)
and BDC CAPITAL INC. (“BDC Capital”)**

ANNUAL REPORT on the PRIVACY ACT

Reporting period: April 1, 2019 to March 31, 2020

1. Purpose of the Act

The purpose of the *Privacy Act* (R.S.C., 1985, c. P-21) (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.

2. Annual report

This report is prepared and tabled in Parliament in accordance with section 72 of the Act.

3. BDC’s mandate

BDC’s mandate, as set out in the *Business Development Bank of Canada Act* (S.C. 1995, c. 28), is to support Canadian entrepreneurship by providing financial and management services and by issuing securities or otherwise raising funds or capital in support of those services. BDC’s investments may be held in the name of BDC Capital, a wholly owned subsidiary of BDC. All administration of such investments is performed by BDC employees, using BDC resources and facilities. All relevant records relating to BDC Capital are under the control of BDC.

4. Organization of Privacy activities, policies and procedures

Delegated by the President & CEO, the Assistant Vice President, Compliance and Information Management (the Coordinator), the Assistant Vice President, Legal Affairs, the Counsel and Assistant Corporate Secretary and the Senior Vice President, Legal Affairs and Corporate Secretary are currently exercising the powers, duties and functions under the Act and report to BDC’s President & CEO on privacy matters.

Procedures are in place for directing formal privacy requests to the Privacy Coordinator who ensures that they are processed in accordance with the provisions of the Act. The Coordinator is normally occupied part-time at BDC’s Montreal Head Office in carrying out her responsibilities pursuant to the Act, although she is available together with her team, to process requests as the volume of the activity may warrant.

BDC may receive requests for personal information from various classes of individuals: employees, retirees and clients.

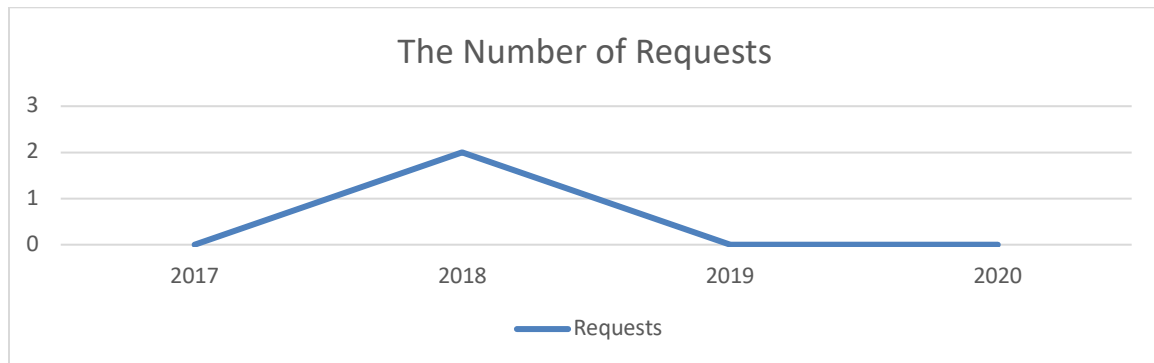
BDC is not party to any service agreement under section 73.1 of the Act.

5. Delegation

A copy of the Delegation Order is attached.

6. Statistical Report

As outlined in the attached statistical report, BDC did not receive any privacy requests in this reporting period. It should be noted that the number of requests for this reporting period is low in absolute terms. It is consistent with the trend for the past few years.



BDC's ability to fulfil its responsibilities under the Act was unaffected by COVID-19 pandemic.

7. Training

During the reporting period, BDC conducted 75 training and awareness sessions on the Act to approximately 1,049 BDC employees.

8. Policies, Directives, Procedures and Initiatives

During the reporting period, BDC adopted and implemented two new directives that are related to the Privacy Act but also extends to client information and corporate information:

- *Management of BDC's Critical Information Directive;*
- *Protection of BDC's Critical Information Directive.*

9. Complaints and Investigation

During the reporting period, BDC did not receive any notice of complaint from the Office of the Privacy Commissioner and does not have any open investigation.

10. Monitoring of the time to process privacy requests

As BDC does not receive a large number of privacy requests it does not conduct a formal monitoring of the processing time.

11. Material Privacy Breaches

During the reporting period, no material privacy breach occurred at the BDC.

12. Privacy Impact Assessments

During the reporting period, BDC did not complete any Privacy Impact Assessments.

13. Disclosure under Subsection 8 (2) (m) of the Act

During the reporting period, BDC did not disclose personal information under the paragraph 8 (2) (m) of the Act.

Delegation Order - *Privacy Act* and *Privacy Regulations*

The President and Chief Executive Officer of the Business Development Bank of Canada (the "BDC"), pursuant to section 73 of the *Privacy Act* (the "Act") as the head of a government institution for the purpose of the Act, hereby:

- i. designates the BDC Director, Corporate Compliance as BDC's Privacy Coordinator;
- ii. delegates the persons holding the positions set out in Schedule A hereto, to exercise the powers, duties and functions, under the provisions of the Act and related regulations as set out in schedule A in relation to BDC.

This designation and delegation replace all previous delegation orders.

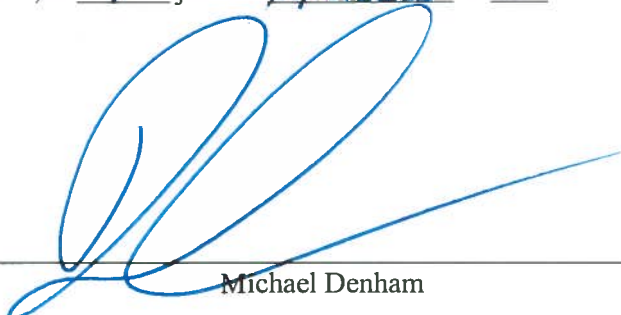
Dated, at the City of Montreal, this _____ day of _____ 20____.

En vertu de l'article 73 de la *Loi sur la protection des renseignements personnels* (la « Loi »), le Président et chef de la direction de la Banque de Développement du Canada (la « BDC ») à titre de responsable d'une institution fédérale selon la Loi :

- i. désigne la Directrice, Conformité de l'entreprise, à titre de Coordonnateur de la protection des renseignements personnels pour la BDC (le « Coordonnateur ») ;
- ii. délègue aux titulaires des postes mentionnés à l'annexe A, les pouvoirs, tâches et fonctions concernant la BDC, selon les dispositions de la Loi et de ses règlements tel que décrits à l'annexe A.

Le présent document remplace et annule tout arrêté antérieur.

Daté, en la ville de Montréal, le 9 jour de Septembre 2015.



Michael Denham

President and Chief Executive Officer, Business Development Bank of Canada
Président et chef de la direction de la Banque de développement du Canada

Delegation under Privacy Act and Regulations Schedule A

Délégation en vertu de la Loi sur les renseignements personnels et ses Règlements Annexe A

Legend / Légende

<p>DCC / DCE: CACS / ASGA : AVP Legal / VPA Légal: SVP Legal / PVP Légal:</p>	<p>Director, Corporate Compliance / Directrice, Conformité de l'entreprise. Counsel and Assistant Corporate Secretary / Avocate et Secrétaire générale adjointe. Assistant Vice-President, Legal Affairs / Vice-President adjoint, Affaires juridiques. Senior Vice President, Legal Affairs and Corporate Secretary / Première vice-présidente, Affaires juridiques et secrétaire générale.</p>
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All of the above titles include their equivalent under any future renaming of such titles.
Tous les titres des postes susmentionnés incluent leurs équivalents en vertu de nouvelles désignations.

(*) Subject to obtain proper approvals from the BDC legal department, when required.
Sous réserve d'obtenir, si requis, les approbations des services juridiques de la BDC.

Provision / Article	Description	Positions / Postes			
		1 ⁿ / 1 ^{er}	2 ^d / 2 ^e	3 ^d / 3 ^e	4 th / 4 ^e
Act / Loi					
8(2)(j)	Disclosure for research or statistical purposes Communication pour des travaux de recherche ou de statistique	DCC* DCE	AVP Legal VPA Légal	CACS ASGA	SVP Legal PVP Légal
8(2)(m)	Disclosure in the public interest or in the interest of the individual Communication dans l'intérêt public ou de l'individu	DCC* DCE	AVP Legal VPA Légal	CACS ASGA	SVP Legal PVP Légal
8(4)	Copies of requests under paragraph 8(2)(e) Copies des demandes faites en vertu de l'alinéa 8(2)e)	DCC* DCE	AVP Legal VPA Légal	CACS ASGA	SVP Legal PVP Légal
8(5)	Notice of disclosure under paragraph 8(2)(m) Avis de communication en vertu de l'alinéa 8(2)m)	DCC* DCE	AVP Legal VPA Légal	CACS ASGA	SVP Legal PVP Légal
9(1)	Record of disclosures Relevé des cas d'usage	DCC* DCE	AVP Legal VPA Légal	CACS ASGA	SVP Legal PVP Légal
9(4)	Consistent uses Usages compatibles	DCC* DCE	AVP Legal VPA Légal	CACS ASGA	SVP Legal PVP Légal
10	Personal information banks Fichiers de renseignements personnels	DCC* DCE	AVP Legal VPA Légal	CACS ASGA	SVP Legal PVP Légal
14(a)	Notice when access requested Notification de l'auteur de la demande	DCC* DCE	AVP Legal VPA Légal	CACS ASGA	SVP Legal PVP Légal
14(b)	Giving access to the record Communication du document	DCC* DCE	AVP Legal VPA Légal	CACS ASGA	SVP Legal PVP Légal
15	Extension of time limits Prorogation du délai	DCC* DCE	AVP Legal VPA Légal	CACS ASGA	SVP Legal PVP Légal
17(2)(b)	Language of access Version de la communication	DCC* DCE	AVP Legal VPA Légal	CACS ASGA	SVP Legal PVP Légal
17(3)(b)	Access in an alternative format Communication sur support de substitution	DCC* DCE	AVP Legal VPA Légal	CACS ASGA	SVP Legal PVP Légal
18(2)	Exempt banks	AVP Legal	CACS	SVP Legal	

	Fichiers inconsultables	VPA Légal	ASGA	PVP Légal	
19	Information obtained in confidence Renseignements obtenus à titre confidentiel	AVP Légal VPA Légal	CACS ASGA	SVP Légal PVP Légal	
20	Federal-provincial affairs Affaires fédéro-provinciales	AVP Légal VPA Légal	CACS ASGA	SVP Légal PVP Légal	
21	International affairs and defence Affaires internationales et défense	AVP Légal VPA Légal	CACS ASGA	SVP Légal PVP Légal	
22	Law enforcement and investigations Application de la loi et enquêtes	AVP Légal VPA Légal	CACS ASGA	SVP Légal PVP Légal	
22.3	Public Servants Disclosure Protection Act Loi sur la protection des fonctionnaires divulgateurs d'actes répréhensibles	AVP Légal VPA Légal	CACS ASGA	SVP Légal PVP Légal	
23	Security clearances Enquêtes de sécurité	AVP Légal VPA Légal	CACS ASGA	SVP Légal PVP Légal	
24	Individuals sentenced for an offence Individus condamnés pour une infraction	AVP Légal VPA Légal	CACS ASGA	SVP Légal PVP Légal	
25	Safety of individuals Sécurité des individus	AVP Légal VPA Légal	CACS ASGA	SVP Légal PVP Légal	
26	Information about another individual Renseignements concernant un autre individu	AVP Légal VPA Légal	CACS ASGA	SVP Légal PVP Légal	
27	Solicitor-client privilege Secret professionnel des avocats	AVP Légal VPA Légal	CACS ASGA	SVP Légal PVP Légal	
28	Medical records Dossiers médicaux	AVP Légal VPA Légal	CACS ASGA	SVP Légal PVP Légal	
33(2)	Right to make representations Droit de présenter des observations	AVP Légal VPA Légal	CACS ASGA	SVP Légal PVP Légal	
35(1)(b)	Notice of actions to implement recommendations of Commissioner Avis des mesures pour la mise en œuvre des recommandations du Commissaire	DCC * DCE	AVP Légal VPA Légal	CACS ASGA	SVP Légal PVP Légal
35(4)	Access to be given to complainant Communication accordée au plaignant	DCC * DCE	AVP Légal VPA Légal	CACS ASGA	SVP Légal PVP Légal
36(3)(b)	Notice of actions to implement recommendations of Commissioner concerning exempt banks Avis des mesures pour la mise en œuvre des recommandations du Commissaire au sujet des fichiers inconsultables	DCC * DCE	AVP Légal VPA Légal	CACS ASGA	SVP Légal PVP Légal
51(2), 51(3)	Special rules for hearings Règles spéciales pour les auditions	AVP Légal VPA Légal	CACS ASGA	SVP Légal PVP Légal	
72	Annual report to Parliament Rapport annuel au Parlement	DCC * DCE	AVP Légal VPA Légal	CACS ASGA	SVP Légal PVP Légal
Regulations / Règlement					
7	Retention of personal information requested under paragraph 8(2)(e) Conservation des renseignements personnels demandés en vertu de l'alinéa 8(2)e)	DCC * DCE	AVP Légal VPA Légal	CACS ASGA	SVP Légal PVP Légal
9	Examination of information Consultation sur place	DCC * DCE	AVP Légal VPA Légal	CACS ASGA	SVP Légal PVP Légal
11(2), 11(4)	Notification concerning corrections Avis concernant les corrections	DCC * DCE	AVP Légal VPA Légal	CACS ASGA	SVP Légal PVP Légal
13(1)	Disclosure of personal information relating to physical or mental health Communication des renseignements personnels concernant l'état physique ou mental	DCC * DCE	AVP Légal VPA Légal	CACS ASGA	SVP Légal PVP Légal
14	Examination in presence of medical practitioner or psychologist Consultation en présence d'un médecin ou d'un psychologue	DCC * DCE	AVP Légal VPA Légal	CACS ASGA	SVP Légal PVP Légal

Statistical Report on the Privacy Act

Name of institution: Business Development Bank of Canada

Reporting period: 2019-04-01 to 2020-03-31

Section 1: Requests Under the Privacy Act

1.1 Number of requests

	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

Section 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	120 Days	121 to 180 Days	365 Days	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

TBS/SCT 350-63

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	27.1	0
21	0	22.3	0	28	0
		22.4	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

Paper	Electronic	Other
0	0	0

2.5 Complexity

2.5.1 Relevant pages processed and disclosed

Number of Pages Processed	Number of Pages Disclosed	Number of Requests
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 Closed requests

2.6.1 Number of requests closed within legislated timelines

	Requests closed within legislated timelines
Number of requests closed within legislated timelines	0
Percentage of requests closed within legislated timelines (%)	0

2.7 Deemed refusals

2.7.1 Reasons for not meeting legislated timelines

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

Section 8: Complaints and Investigations Notices Received

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

Section 9: Privacy Impact Assessments (PIA) and Personal Information Banks (PIB)

9.1 Privacy Impact Assessments

Number of PIA(s) completed	0
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9.2 Personal Information Banks

Personal Information Banks	Active	Created	Terminated	Modified
	0	0	0	0

Section 10: Material Privacy Breaches

Number of material privacy breaches reported to TBS	0
Number of material privacy breaches reported to OPC	0

Section 11: Resources Related to the Privacy Act

11.1 Costs

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

11.2 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.