

CANADIAN MUSEUM OF HISTORY - MUSÉE CANADIEN DE L'HISTOIRE

CANADIAN WAR MUSEUM - MUSÉE CANADIEN DE LA GUERRE

Annual Report on the Administration of the *Privacy Act*

April 1, 2025 to March 31, 2026

Canada

Annual Report on the Administration of the *Privacy Act*
2025–2026
Canadian Museum of History

Introduction

The Canadian Museum of History ("the Museum" or "the corporation") submits an Annual Report on its administration of the *Privacy Act* ("the *Act*") to Parliament each year for tabling in accordance with section 72 of the *Act*. This report covers the 2025–2026 fiscal year, with a reporting period of April 1, 2025 to March 31, 2026.

The purpose of the *Act* is to protect the privacy of individuals with respect to personal information held about them by government institutions, and to provide individuals with the right of access to that information.

In accordance with Treasury Board of Canada Secretariat (TBS) requirements, this report provides an overview of Museum activities in the administration of its responsibilities under the *Act*.

Mandate

The Canadian Museum of History is a federal Crown corporation responsible for two national museums: the Canadian Museum of History and the Canadian War Museum. The corporation is also responsible for administering Digital Museums Canada and presenting the Virtual Museum of New France. The corporation's mandate is to enhance Canadians' knowledge, understanding and appreciation of events, experiences, people and objects that reflect and have shaped Canada's history and identity, while also enhancing their awareness of world history and cultures.

The corporation did not have any wholly owned subsidiaries during the reporting period in question.

Access to Information and Privacy Office

The Access to Information and Privacy (ATIP) Office is the dedicated unit within the Museum responsible for coordinating compliance activities under the *Privacy Act*. The ATIP Office is found within the Reconciliation, Engagement and Government Affairs Portfolio.

The ATIP Office is responsible for processing all requests for personal information submitted to the Museum. It provides privacy advice to senior management and prepares reports to Parliament, the TBS, and senior management. The ATIP Office is accountable for developing and implementing effective policies, procedures and processes to ensure that the corporation fulfills its obligations under the *Act*. The ATIP Office represents the Museum in complaints and investigations conducted by the Information Commissioner and Privacy Commissioner of Canada, and in any Federal Court applications arising from ATIP matters.

The ATIP Office consists of the Director, Evaluation, Audit and Regulatory Affairs and the ATIP and Integrity Officer. Three part-time consultants were retained during the reporting period to support the continuity of ATIP Office operations and conduct specific privacy risk assessments.

The corporation is responsible for exercising powers, duties and functions under the *Act*. The corporation has not entered into any service agreements with another federal institution under section 73.1 of the *Act*.

Delegation Order

In accordance with section 73(1) of the *Act*, the President and Chief Executive Officer (CEO), as head of the Museum, has delegated the powers, duties and functions for the administration of the *Act* to the Chief Strategy Officer and Vice-President, Reconciliation, Engagement and Government Affairs and to the Director, Evaluation, Audit and Regulatory Affairs. The signed and dated Delegation Order is provided as Appendix A of this report.

Highlights of the *Privacy Act Statistical Report*

Table 1: Details of privacy requests closed during 2025–2026

Privacy request	Number of days to complete	Status	Number of pages disclosed
P-2025-01	30	No records found	0
PI-2025-01	30	Disclosed in part	41

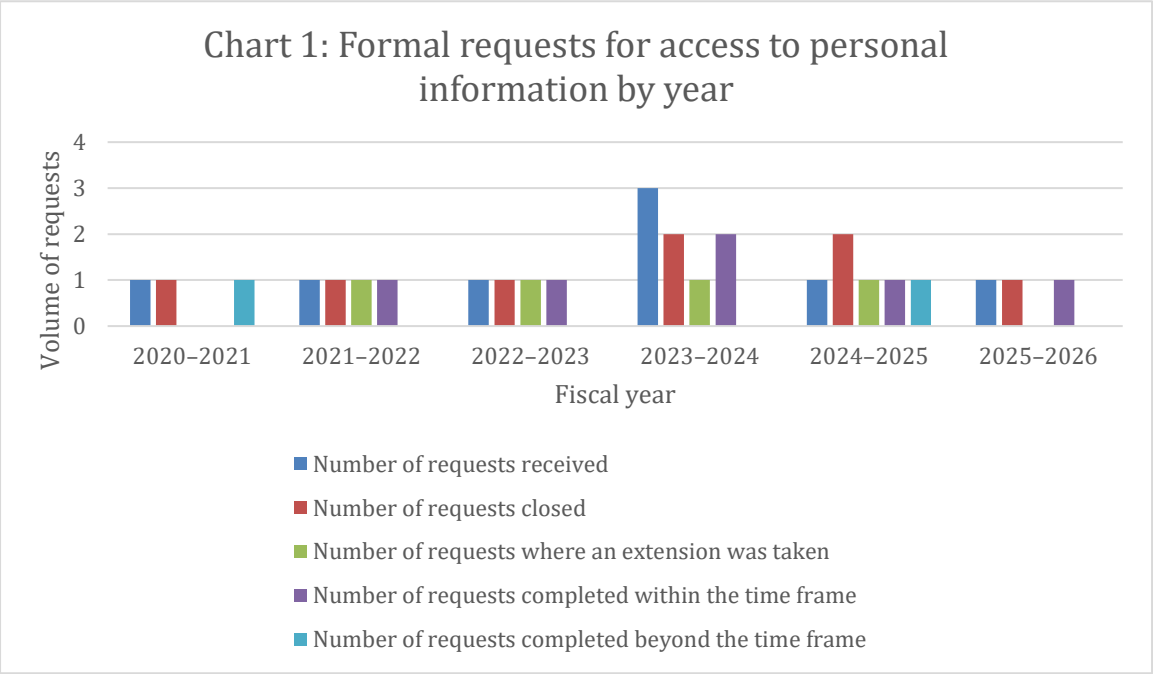
As indicated in Table 1, the Museum received one formal request (P-2025-01) for personal information during the 2025–2026 fiscal year. The request was closed within 30 calendar days of receipt for an on-time completion rate of 100 per cent. The Museum did not apply any time extensions. No requests (0 per cent) had a status of all disclosed or disclosed in part.

The Museum also processed an informal request for personal information with details included in Table 1 above.

The Museum closed both the formal and the informal request for personal information within the 2025–2026 fiscal year, and there were no requests for personal information open as at March 31, 2026.

As noted in Chart 1 below, the low volume of formal requests received is consistent with data from previous reporting periods.

Chart 1: Formal requests for access to personal information by year



No consultations or requests for corrections to personal information were received during the reporting period.

More information about the process of making a request for personal information is available on the Museum's website.

Training and awareness

The requirements for general privacy training for Government of Canada employees is outlined in Appendix B of the *Directive on Personal Information Requests and Correction of Personal Information* (the Directive). To fulfill this requirement, the Museum has directed employees to complete the Canada School of Public Service training offering *Access to Information and Privacy Fundamentals*. During the 2025–2026 reporting period, 193 employees successfully completed the course.

As a follow-up to the general training sessions, the ATIP Office conducted three awareness sessions to further address the needs of specific teams within the Museum. Collectively, these sessions were attended by 28 employees.

The Directive sets out additional training requirements for Museum employees with functional or delegated responsibility for the administration of the *Privacy Act* and *Privacy Act* Regulations. The ATIP Office delivered a training session for the Museum's senior management emphasizing the importance of the privacy impact assessment.

The ATIP Office remains responsible for providing education and training activities, and provides ongoing advice to employees and senior management, to ensure the fulfillment of the Museum's obligations under the *Act*.

Policies, guidelines, procedures and initiatives

The Museum's ATIP Office replaced its existing Privacy Impact Assessment (PIA) Procedures with new a Privacy Risk Assessment Procedure to better reflect the TBS's *Directive on Privacy Practices*. In support of this policy instrument, the ATIP Office finalized a privacy protocol template. The Museum's *Privacy Breach Procedures* were updated to better reflect the TBS's policy and lessons learned from Museum experience.

The Museum implemented *Heightened Safeguards for Access to Information and Privacy Files with Special Considerations*. This policy instrument outlines steps to follow to maintain confidentiality for ATIP Office files, including requests for personal information and privacy breach reports requiring additional security measures.

The document *General Conditions for Services* forms the basis of contracting agreements between the Museum and its goods and service providers. This document includes two sections with specific privacy protections included in Museum contracts involving personal information: *Confidentiality and Confidential Information* and *Confidential Information Protection and Security*. They identify specific contractor responsibilities, including those for breach notification, use and disclosure of personal information, and safeguards.

The Museum did not initiate any new collections or consistent uses of Social Insurance Numbers during fiscal year 2025–2026.

Initiatives and projects to improve privacy

The Museum consolidated its stand-alone online privacy notices into one central website privacy notice.

Complaints, investigations and audits

The *Act* provides a system of review to help ensure that government institutions comply with their obligations. Under this system of review, an individual has the right to file a complaint with the Privacy Commissioner of Canada concerning a government institution's privacy practices. The Commissioner will investigate the matter on behalf of the individual. After the complaint has been investigated, the Commissioner will issue a finding on the matter.

The Museum carried over one privacy complaint initiated in the 2024–2025 fiscal year to the 2025–2026 fiscal year. In July 2025, the Office of the Privacy Commissioner closed the complaint with a status of not well-founded. As at March 31, 2026, the Museum did not have any active privacy complaints outstanding.

No audits regarding Museum obligations under the *Act* were undertaken during the reporting period.

Material privacy breaches

The TBS defines a material privacy breach as one that "could reasonably be expected to create a real risk of significant harm to an individual." The TBS requires government institutions to report material privacy breaches to both the TBS and the Privacy Commissioner of Canada.

There were no material privacy breaches during the reporting period and, accordingly, no reports were submitted to the TBS or the Privacy Commissioner of Canada.

Privacy impact assessments

A privacy impact assessment (PIA) is a tool used to determine whether privacy risks may be present in new or existing initiatives that involve the collecting of personal information for administrative purposes.

The Museum completed a PIA for Freedom Pay and payment processing. Under sections 9(1)(n) and 9(1)(p) of the *Museums Act*, the Museum allows the public to purchase Museum goods and services using payment cards (for example, credit cards, debit cards). The Museum has a process in place to validate these transactions involving third-party payment solutions that meet Payment Card Industry standards.

Freedom Pay is one of these solutions. The PIA evaluated the risk to personal information for all orders and transactions involving Freedom Pay, including purchases of admission tickets and memberships made online; purchases of Boutique items, admission tickets, and memberships made in person or over the phone; and financial donations made in person or over the phone.

The Canadian Museum of History completed a second privacy impact assessment of Raiser's Edge, a software application designed to support the fundraising and donor relations activities of the Museum. The PIA was triggered by a transition from the on-premises version to a new one hosted on cloud-based servers.

A more detailed summary for each of the two completed PIAs can be found on the Museum's Access to Information and Privacy webpage.

Public interest disclosures

At the discretion of the head of the institution, section 8(2)(m) of the *Act* permits the disclosure of personal information without consent if, upon careful examination, such disclosure is deemed to be in the public interest.

The Museum did not make any public interest disclosures under section 8(2)(m) of the *Act* during the reporting period.

Monitoring timelines for requests for personal information

The ATIP and Integrity Officer provides weekly written status reports to the Director, Evaluation, Audit and Regulatory Affairs and the Chief Strategy Officer and Vice-President, Reconciliation, Engagement and Government Affairs about ongoing requests for personal information. This reporting identifies the due date for each request and identifies any extensions taken.

The ATIP and Integrity Officer sends record retrieval emails to program areas who may have records. Should the program area not respond, the ATIP and Integrity Officer follows up.

The approval process for requests for personal information involves the Director, Evaluation, Audit and Regulatory Affairs and the Chief Strategy Officer and Vice-President, Reconciliation,

Engagement and Government Affairs. The ATIP and Integrity Officer sets the time frame for the approval process and tracks the progress of each individual file. Follow-up is done as needed.

The right of public access and information sharing

On an ongoing basis, the Chief Strategy Officer and Vice-President, Reconciliation, Engagement and Government Affairs reviews all information sharing agreements and arrangements prior to being finalized. This person ensures that these instruments include appropriate privacy protections.

APPENDIX A:
DELEGATION ORDER

Privacy Act – Delegation Order

Pursuant to section 73 of the *Privacy Act*, I, as head of the Canadian Museum of History, hereby designate the persons holding the positions set out in the schedule hereto, or persons occupying on an acting basis those positions, to exercise the powers and functions conferred on me under certain Acts, which are specified in relation to each position.

This Delegation Order supersedes all previous *Privacy Act* Delegation Orders.



Caroline Dromaguet
President and CEO, Canadian Museum of History
Date: 2024-08-02

PRIVACY ACT[1]

Delegation of Authority

The *Privacy Act* grants certain powers, duties and functions to the President and CEO of the Canadian Museum of History as the head of a government institution. However, under section 73(1) of the *Act*, the head can delegate any of the powers, duties or functions to one or more officers or employees of the institution. Delegates are accountable to the head for any decisions they make; however, ultimate responsibility rests with the head of the institution.

The below table lists sections of the *Act* that may be delegated by the President and CEO. To provide clarity, a description accompanied by a brief explanation of the relevant section of the *Act* is provided. The furthest three columns to the right indicate the appropriate level of responsibility for each section that may be delegated.

Section and subsection of the *Privacy Act*	Description	Explanation	President and CEO	Chief Strategy Officer and Vice President, Reconciliation, Engagement, and Government Affairs	Director, Evaluation, Audit and Regulatory Affairs
		Privacy Act			
8(2)(j)	Disclosure for research purposes	The head of a government institution may decide to disclose personal information without the consent of the individual for research or statistical purposes. The head must be satisfied that the purpose for which the information is disclosed cannot be reasonably accomplished unless the information is in an identifiable form and a written undertaking is received attesting that no subsequent disclosure of identifiable information will occur.	**Yes**	**Yes**	**Yes**
8(2)(m)*	Disclosure in the public interest or in the interest of the individual	The head of a government institution may decide to disclose personal information without the consent of the individual if: (i) the public interest in disclosure clearly outweighs the invasion of privacy; or (ii) disclosure would clearly benefit the individual concerned.	**Yes**	**Yes**	**No**
8(4)	Copies of requests under 8(2)(e) to be	Section 8(4) requires the head of a government institution to keep a record of requests received and	**Yes**	**Yes**	**Yes**

[1] *In the *Privacy Act* delegation table, some sections of the *Act* are marked with a *. This symbol identifies sections of the *Act* where responsibility is delegated solely to the Chief Strategy Officer and Vice-President, Reconciliation, Engagement and Government Affairs. In the absence of the Chief Strategy Officer and Vice-President, Reconciliation, Engagement and Government Affairs, responsibility for these sections of the *Act* rests with the President and CEO.

Section and subsection of the *Privacy Act*	Description	Explanation	President and CEO	Chief Strategy Officer and Vice President, Reconciliation, Engagement, and Government Affairs	Director, Evaluation, Audit and Regulatory Affairs
	retained	personal information disclosed under section 8(2)(e). Upon request, these details must be shared with the Office of the Privacy Commissioner of Canada.[2]			
8(5)*	Notice of disclosure under 8(2)(m)	The head of a government institution must notify the Privacy Commissioner of Canada in writing before disclosing any personal information without consent of the individual if doing so is deemed by the institution to be in the public interest or in the interest of the individual.	**Yes**	**Yes**	**No**
9(1)	Record of disclosure to be retained	Under section 9(1) of the *Privacy Act*, the head of a government institution must keep a record of any use or disclosure of personal information not recorded in a registered personal information bank. In these cases, the head must attach the record to the personal information in question.[3]	**Yes**	**Yes**	**Yes**
9(4)*	Consistent uses	A government institution may use or disclose personal information for a purpose that is consistent with the purpose for which the information was originally obtained (a consistent use) but is not recorded in a registered personal information bank. In such cases, the head of the government institution must inform the Privacy Commissioner of Canada and include the new consistent use in the next update to the personal information bank.	**Yes**	**Yes**	**No**
10	Personal information to be included in personal information banks	The head of a government institution must include all personal information under its control in personal information banks in the following circumstances: (a) Where personal information is used for making decisions about an individual (an administrative	**Yes**	**Yes**	**Yes**

[2] Under section 8(2)(e) of the *Privacy Act*, personal information may be disclosed without the consent of the individual to an investigative body upon its written request for the purpose of law enforcement or lawful investigation.

[3] A personal information bank (PIB) describes personal information contained in records that is collected, used, or disclosed by the institution in relation to a particular function, program or activity. PIBs are registered with the TBS.

Section and subsection of the *Privacy Act*	Description	Explanation	President and CEO	Chief Strategy Officer and Vice President, Reconciliation, Engagement, and Government Affairs	Director, Evaluation, Audit and Regulatory Affairs
		use). (b) Where personal information is organized or intended to be retrieved by the individual's name, or other identifier.			
14*	Notice where access requested	Under section 12 of the *Privacy Act*, an individual may request access to their own personal information held by a government institution. Within 30 days, the head of the government institution must inform the individual in writing whether access to the personal information will be given. If yes, then the head of the government institution will provide the individual with access to their personal information in whole or in part (i.e., response letter).	**Yes**	**Yes**	**No**
15	Extension of time limits	The head of a government institution may extend the 30-day time limit for a request for personal information for an additional 30 days if additional time is necessary due to: (a) interference with government operations; (b) extra time needed for consultations; or (c) extra time needed for translation or conversion to an alternative format.	**Yes**	**Yes**	**Yes**
16*	Where access is refused	The head of a government institution may refuse an individual's request for access to their own personal information. Under section 16 of the *Privacy Act*, the head of the institution will inform the individual that the requested records do not exist or will cite to the individual the specific section(s) of the *Act* upon which refusal is based.	**Yes**	**Yes**	**No**
17(2)(b)*	Language of access	The head of a government institution will cause the content of a personal information request to be translated if translation is necessary for the requester to understand the records in question.	**Yes**	**Yes**	**No**
17(3)(b)*	Access to personal information in alternative	The head of a government institution will cause the content of a personal information request to be released in an alternative	**Yes**	**Yes**	**No**

Section and subsection of the *Privacy Act*	Description	Explanation	President and CEO	Chief Strategy Officer and Vice President, Reconciliation, Engagement, and Government Affairs	Director, Evaluation, Audit and Regulatory Affairs
	format	format (Braille, audio recording) if necessary and as feasible.			
18(2)	Exemption (exempt bank) – Disclosure may be refused	The Governor in Council may order a personal information bank classified as exempt if it contains personal information primarily obtained for either international affairs and defence or law enforcement and investigation purposes. Under section 18(2), the head of a government institution may refuse to disclose personal information contained in an exempt bank.	**Yes**	**Yes**	**Yes**
19(1)	Exemption – Personal information obtained in confidence	The head of a government institution will withhold from release personal information received in confidence from another government body (foreign state, international organization of states, province, municipal or regional government, or Indigenous government).	**Yes**	**Yes**	**Yes**
19(2)	Exemption – Where authorized to disclose	The head of a government institution may release personal information obtained in confidence if the sending organization agrees to disclosure or makes the information public.	**Yes**	**Yes**	**Yes**
20	Exemption – Federal-provincial affairs	The head of a government institution may withhold personal information from release if disclosure would harm federal-provincial affairs.	**Yes**	**Yes**	**Yes**
21	Exemption – International affairs and defence	The head of a government institution may withhold personal information from release if disclosure is harmful to the conduct of international affairs and defence.	**Yes**	**Yes**	**Yes**
22(1)	Exemption – Law enforcement and investigation	The head of a government institution may withhold personal information from release if disclosure is harmful to law enforcement, investigation, or security.	**Yes**	**Yes**	**Yes**
22(2)	Policing services for provinces or municipalities	The head of a government institution must withhold personal information obtained or prepared by the Royal Canadian Mounted Police while performing policing services for a province or municipality where the	**Yes**	**Yes**	**Yes**

Section and subsection of the *Privacy Act*	Description	Explanation	President and CEO	Chief Strategy Officer and Vice President, Reconciliation, Engagement, and Government Affairs	Director, Evaluation, Audit and Regulatory Affairs
		Government of Canada agrees not to disclose such personal information as per an arrangement under section 20 of the *Royal Canadian Mounted Police Act*.			
22.3*	Exemption – *Public Servants Disclosure Protection Act*	The *Public Servants Disclosure Protection Act* enables public servants to make a disclosure of workplace wrongdoing. Under section 22.3 of the *Privacy Act*, the head of a government institution will refuse to disclose personal information revealed as part of the disclosure of wrongdoing and investigation of wrongdoing processes.	**Yes**	**Yes**	**No**
23	Exemption – Security clearances	The head of a government institution may withhold personal information that was obtained or prepared by an investigative body for the purpose of determining whether to grant security clearances, if such disclosure would reveal the identity (source) of the individual who provided the investigative body with the information.	**Yes**	**Yes**	**Yes**
24	Exemption – Individuals sentenced for an offence	The head of a government institution may refuse to release personal information collected or obtained by the Correctional Service of Canada or the Parole Board of Canada if it would disrupt offender rehabilitation or if it was obtained in confidence.	**Yes**	**Yes**	**Yes**
25	Exemption – Safety of individuals	The head of a government institution may refuse to release personal information that would reasonably be expected to threaten the safety of individuals.	**Yes**	**Yes**	**Yes**
26	Exemption – Information about another individual	The head of a government institution may refuse to release personal information about another individual than the requester. The head of a government institution must refuse to disclose such information if prohibited under section 8.	**Yes**	**Yes**	**Yes**
27	Exemption – Protected information: solicitors, advocates and	The head of a government institution may refuse to disclose personal information subject to solicitor-client privilege or the professional secrecy of	**Yes**	**Yes**	**Yes**

Section and subsection of the *Privacy Act*	Description	Explanation	President and CEO	Chief Strategy Officer and Vice President, Reconciliation, Engagement, and Government Affairs	Director, Evaluation, Audit and Regulatory Affairs
	notaries	advocates or notaries.			
27.1	Exemption – Protected information: patents and trademarks	The head of a government institution may withhold from release confidential patent or trademark discussions. Cross-reference section 16.1 of the *Patent Act* or section 51.13 of the *Trademarks Act*.	**Yes**	**Yes**	**Yes**
28*	Exemption – Medical records	The head of a government institution may withhold from release personal information related to physical and mental health if doing so would be in the best interest of the individual.	**Yes**	**Yes**	**No**
33(2)*	Right to make representation	During the course of an investigation by the Office of the Privacy Commissioner, the head of the government institution involved will be given an opportunity to represent their institution.	**Yes**	**Yes**	**No**
35(4)*	Access to be given	As a result of an investigation, the Office of the Privacy Commissioner may issue a finding asking the head of a government institution to release personal information, in part or in whole, to the requester.	**Yes**	**Yes**	**No**
51(2)(b)*	Special rules for hearings	In the event that a refusal to disclose records is reviewed in Federal Court, the head of a government institution or their delegate may request that proceedings take place in the National Capital Region.	**Yes**	**Yes**	**No**
72(1)	Report to Parliament	At the end of each fiscal year, the head of a government institution or their delegate must prepare an annual report to Parliament about institutional activities undertaken during the previous 12 months under the *Privacy Act*.	**Yes**	**Yes**	**Yes**
***Privacy Regulations*[4]**					
9	Reasonable facilities and time provided to examine personal information	An individual may request on-site access to their own personal information. In this case, the head of the institution will provide reasonable facilities for on-site examination at a time that is convenient for both the institution and the individual.	**Yes**	**Yes**	**Yes**
11(2)	Notification that	Under section 11 of the *Privacy*	**Yes**	**Yes**	**Yes**

[4] https://laws-lois.justice.gc.ca/eng/Regulations/SOR-83-508/index.html

Section and subsection of the *Privacy Act*	Description	Explanation	President and CEO	Chief Strategy Officer and Vice President, Reconciliation, Engagement, and Government Affairs	Director, Evaluation, Audit and Regulatory Affairs
	correction to personal information has been made	*Act* Regulations, an individual may request correction to their own personal information. Where the institution agrees to the correction, the head of the institution will notify the individual as well as any third party or government institution to whom the government institution has disclosed the personal information.			
11(4)	Notification that correction to personal information has been refused	Under section 11 of the *Privacy Act* Regulations, an individual may request correction to their own personal information. Where the institution refuses to make the correction either in whole or in part, the head of the institution will attach a notation to the personal information indicating that correction was requested but not made. As per section 11(4), the head of the institution will then notify the individual as well as any third party or government institution to whom the government institution has disclosed the personal information that correction has been refused and that notation has been added.	**Yes**	**Yes**	**Yes**
13(1)	Disclosure of personal information related to physical or mental health may be made to a qualified medical practitioner or psychologist	Where an individual has requested personal information relating to their own physical or mental health, the head of the government institution that has control of the information may authorize the disclosure of the information to a qualified doctor or psychologist in order for them to provide an opinion as to whether disclosure of the information would go against the best interests of the individual.	**Yes**	**No**	**No**
14	Disclosure of personal information related to physical or mental health may be made to a requester in the presence of a qualified medical	An individual who is given access to personal information related to their own physical or mental health may be required by the head of the government institution that has control of the information to examine the information in person and in the presence of a qualified medical doctor or psychologist, so that they may explain or clarify the	**Yes**	**No**	**No**

Section and subsection of the *Privacy Act*	Description	Explanation	President and CEO	Chief Strategy Officer and Vice President, Reconciliation, Engagement, and Government Affairs	Director, Evaluation, Audit and Regulatory Affairs
	practitioner or psychologist	information to the individual.			