



Marine Atlantic
Marine Atlantique

Canada

Privacy Act

Marine Atlantic Inc.
Annual Report to Parliament
April 1, 2024 – March 31, 2025



Marine Atlantic
Marine Atlantique

Canada

Approvals

Corporate Counsel:
ATIP Coordinator
(Delegate)

Jackie Penney

03/07/2025
Date

Manager of Information
Management:
ATIP Coordinator
(Delegate)

Ryan Kelly

03/07/2025
Date

Chief Information Officer:

Colin Tibbo

03/07/2025
Date

Table of Contents

<i>B-1 Introduction.....</i>	<i>4</i>
<i>B-2 Organizational Structure.....</i>	<i>5</i>
<i>B –3 Privacy Delegation Order.....</i>	<i>6</i>
<i>B-4 Performance 2024-2025.....</i>	<i>6</i>
<i>B-5 Training and Awareness.....</i>	<i>7</i>
<i>B-6 Policies, Guidelines, Procedures and Initiatives.....</i>	<i>7</i>
<i>B-7 Initiatives and Projects to Improve Privacy.....</i>	<i>7</i>
<i>B-8 Summary of Key Issues and Actions Taken on Complaints.....</i>	<i>8</i>
<i>B-9 Material Privacy Breaches</i>	<i>7</i>
<i>B-10 Privacy Impact Assessments.....</i>	<i>8</i>
<i>B-11 Public Interest Disclosures.....</i>	<i>8</i>
<i>B-12 Monitoring Compliance</i>	<i>8</i>
<i>Annex A – Statistical Report.....</i>	<i>9</i>
<i>Annex B - Access to Information and Privacy Delegation Order.....</i>	<i>10</i>

B-1 Introduction

The *Privacy Act* gives Canadian citizens and people present in Canada the right to have access to information about them that is held by the Federal Government. It also protects against unauthorized disclosure of that personal information. In addition, it strictly controls how the government will collect, use, store, disclose and dispose of any personal information.

Marine Atlantic Inc. is a Crown Corporation that reports to the Parliament of Canada through the Minister of Transport. The Corporation provides a constitutionally mandated passenger and commercial marine transportation service between the Island of Newfoundland and the Province of Nova Scotia.

The Corporation provides ferry services on two routes. The first is a year-round 96 nautical mile daily ferry service between Port aux Basques, Newfoundland and Labrador and North Sydney, Nova Scotia. The second is a 280 nautical mile tri-weekly ferry service between Argentia, Newfoundland and Labrador and North Sydney, Nova Scotia. This second service operates from mid-June to late September.

For the 2024-2024 legislative-timeline, the Corporation owned three vessels and chartered one additional vessel to meet the traffic demands on the ferry service routes. These vessels are the MV *Leif Ericson*, the *Ala'suinu*, the MV *Blue Puttees* and the MV *Highlanders*.

Marine Atlantic Inc. operates terminals located in the ports of Port aux Basques, NL, Argentia, NL, and North Sydney, NS. The Corporation's head office is located in St. John's, NL.

Marine Atlantic Inc. is not reporting on behalf of wholly owned subsidiaries or non-operational institutions.

Additional copies of this report may be obtained from:

Access to Information and Privacy Coordinator
Marine Atlantic Inc.
10 Fort Williams Place, Suite 302
Baine Johnston Centre
St. John's, NL A1C 1K4

Privacy Act Statement

In accordance with section 72 of the *Privacy Act*, the Annual Report is prepared and tabled in Parliament.

B-2 Organizational Structure

For the purposes of the *Privacy Act*, the President/CEO of Marine Atlantic has formally delegated all responsibilities to the Corporate Counsel and Manager of Information Management (see Annex B – Delegation Order). The Corporate Counsel and Manager of Information Management hold joint responsibility as Access to Information and Privacy Coordinators. The Coordinators are responsible for oversight of the *Privacy Act* at Marine Atlantic, and to ensure compliance with legislation.

The Manager of Information Management is responsible for the day to day administration of the Access to Information and Privacy functions at Marine Atlantic. It should be noted that serving as ATIP Coordinator is one of numerous portfolios for which the Manager of Information Management is responsible, and as such, this is not a full time position.

The Corporate Counsel is responsible for management and oversight of the Access to Information and Privacy functions at Marine Atlantic. It should be noted that serving as ATIP Coordinator is one of numerous portfolios for which the Corporate Counsel is responsible, and as such, this is not a full time position.

Marine Atlantic has one ATIP officer, one regional ATIP staff and one ATIP consultant.

Marine Atlantic has one ATIP officer, one regional ATIP staff and one ATIP consultant. The ATIP officer and regional ATIP staff member act as the local representative when retrieving records relating to ATIP requests at each of the Marine Atlantic Terminals and Head Office. The Manager of Information Management receives additional support when required from the regional ATIP representative.

Proactive publications are the responsibility of the Digital Product Team (Joint IT/Marketing Group); with the primary being the Marketing Officer, and the backup the Lead Solution Architect.

Marine Atlantic did not have any new or pre-existing service agreements under section 73.1 of the Privacy Act during the reporting period.

The activities of Marine Atlantic's ATIP Office include:

- processing requests under the *Act*;
- representing Marine Atlantic in dealings with the Treasury Board of Canada Secretariat, the Information Commissioner and other government departments and agencies regarding the application of the *Act* as it relates to Marine Atlantic;
- responding to consultations submitted by other federal institutions on Marine Atlantic documents under consideration for release;
- preparing statistical and annual reports to Parliament and other statutory reporting requirements;
- developing and maintaining Marine Atlantic's policies, procedures and guidelines to ensure the *Act* is respected by Marine Atlantic staff; and

- promoting awareness of the *Act* within the Corporation to ensure responsiveness to the obligations imposed on the government.

B – 3 Delegation Order

The President and CEO of Marine Atlantic has delegated all powers and responsibilities bestowed upon him under the *Access to Information Act* to the Corporate Counsel and The Manager of Information Management (see Annex B – Delegation Order).

B-4 Performance 2024-2025

Requests Received Under the Privacy Act

Between April 1, 2024, and March 31, 2025, Marine Atlantic received 1 requests for information under the *Privacy Act*. No requests were responded to within legislative timelines. Zero requests have been carried over into the 2024-2025 fiscal year.

- 0% of all requests were responded to within legislative timelines.
- One request was completed within 31-60 days.
- There were no active requests as of the last day of reporting for the fiscal year.
- There were no active complaints as of the end of the fiscal year.
- The extension was made due to page volume of the request.
- During the reporting period, Marine Atlantic did not receive any request for consultation from another Government of Canada institution.
- 100% of all requests were “disclosed in part”.
- The exemption was under section 26.

B-5 Training and Awareness

During 2024-2025 Marine Atlantic continued to provide considerable training on cyber security including privacy training for the protection of personal information throughout the organization, ensuring all employees are aware of policies, procedures, and legal responsibilities under the Privacy Act. One-on-one info sessions were conducted as well as sessions with groups online and in person.

Additionally, on board the vessels there were in person refreshers provided on current standards for privacy within the organisation, as well as information regarding what we see for the future – these refreshers were provided to employees of all levels of the organisation.

Employees who have functional or delegated responsibility for the administration of the Privacy Act and Privacy Regulations have taken additional training and attended any info sessions offered through GCcollab in the *ATIP Professionals* group.

B-6 Policies, Guidelines, Procedures and Initiatives

During 2024-2025 Marine Atlantic did not implement any new policies, guidelines, procedures and initiatives related to the Access to Information Act.

Marine Atlantic did not request or receive any authorities for new collections or new uses of social insurance numbers.

B-7 Initiatives and Projects to Improve Privacy

Marine Atlantic added many technical improvements and modernized its services during the reporting period by adding more usage of two factor authentication through Duo Mobile. Marine Atlantic tested and implemented the AMANDA software from Granicus to handle our Privacy requests.

B-8 Summary of Key Issues and Actions Taken on Complaints

There were no complaints received or concluded concerning the administration of the *Privacy Act* for Marine Atlantic in 2024-2025.

B-9 Material Privacy Breaches

There were no material privacy breaches reported by Marine Atlantic in 2024-2025.

B-10 Privacy Impact Assessments

Marine Atlantic completed zero privacy impact assessments in 2024-2025.

B-11 Public Interest Disclosures

Marine Atlantic did not make any disclosures under paragraph 8(2)(m) of the Privacy Act in 2024-2025.

B-12 Monitoring Compliance

Marine Atlantic's *Access to Information and Privacy Act* Coordinators discuss an information request as soon as it is received by the organization. The coordinators will then analyze the projected time needed to respond to the request, based on discussions with applicable information holders throughout the Corporation.

At Marine Atlantic we review requests and make every effort to make non-exemption information available, for example, traffic reports are now available on the website.

To ensure appropriate privacy protections are included in contracts Marine Atlantic now has a standard clause included in all contracts.

With Marine Atlantic's implementation of the AMANDA software from Granicus, we monitor the requests through it's time tracking in the software. In addition to this, the ATIP Online Management Tools (AOMT) monitors the days spent on a request.

Marine Atlantic monitors the time taken to process personal information requests daily. The regional ATIP staff member reviews the current requests and what steps are remaining and monitors any new requests, and further updates the ATIP officer twice weekly, and if there are any new requests the ATIP officer is notified immediately.

Annex B - Access to Information and Privacy Delegation Order

Access to Information and Privacy Delegation Order

The President and CEO of Marine Atlantic Incorporated, pursuant to section 73 of the *Access to Information Act* and the *Privacy Act*, hereby designates the person holding the position set out in the schedule hereto, or the person occupying on an acting basis the position, to exercise the powers and functions of the President and CEO as the head of a government institution, under the section of the Act set out in the schedule opposite each position. This Designation Order supersedes all previous Designation Orders.

Schedule

Position	Access to Information Act and Regulations	Privacy Act and Regulations
Corporate Counsel	Full Authority	Full Authority
Manager of Information Management	Full Authority	Full Authority

Dated: May 10 - 2019



Murray Hupman
President and CEO

10 Fort William Place
Suite 302
Baine Johnston Centre
St. John's, NL
Canada A1C 1K4

10, Place Fort William
Suite 302
Centre Baine Johnston
St. John's, T.-N.-L.
Canada A1C 1K4

709.772-8957 (Tel.)
709.772-8956 (Fax)

**Delegation of powers, duties and functions
Delegated pursuant to Section 73 of the Privacy Act
Marine Atlantic Incorporated**

<i>Section</i>	<i>Description</i>	<i>Corporate Counsel</i>	<i>Manager of Information Management</i>
8(2)(j)	Disclose personal information for research purposes	X	X
8(2)(m)	Disclose personal information in the public interest or in the interest of the individual	X	X
8(4)	Retain copy of 8(2)(e) requests and disclosed records	X	X
8(5)	Notify Privacy Commissioner of 8(2)(m) disclosures	X	X
9(1)	Retain record of use	X	X
9(4)	Notify Privacy Commissioner of consistent use and amend index	X	X
10	Include personal information in personal information banks	X	X
14	Notice where access is requested	X	X
15	Extension of time limits	X	X
17(2)(b)	Language of access	X	X
17(3)(b)	Access to personal information in alternative format	X	X
18(2)	Exemption – Exempt bank – disclosure may be refused	X	X
19(1)	Exemption – Information obtained in confidence from another government	X	X
19(2)	Exemption – Where disclosure of information as described in subsection 19(1) is authorized	X	X
20	Exemption – Federal-provincial affairs	X	X
21	Exemption – International affairs and defense	X	X
22	Exemption – Law enforcement and investigations	X	X
22.3	Exemption – <i>Public Servants Disclosure Protection Act</i>	X	X
22.4	National Security and Intelligence Committee	X	X
23	Exemption – Security clearances	X	X
24	Exemption – Individuals sentenced for an offence	X	X
25	Exemption – Safety of individuals	X	X
26	Exemption – Personal information about other individuals	X	X
27	Exemption – Solicitor-client privilege	X	X
27.1	Patent or Trademark Privilege	X	X
28	Exemption – Medical record	X	X
31	Notice of intention to investigate	X	X
33(2)	Right to make representations to Privacy Commissioner	X	X
35(1)	Findings and recommendations of the Privacy Commissioner (complaints)	X	X
35(4)	Give applicant access to information	X	X
36(3)	Follow-up on recommendation by the Privacy Commissioner – Exempt banks	X	X
37(3)	Follow-up on recommendation by the Privacy Commissioner – Compliance	X	X
51(2)(b)	Special rule for hearings	X	X
51(3)	Submit ex parte representations	X	X
70	Exemption – Cabinet confidences	X	X
72(1)	Report to Parliament	X	X
77	Responsibilities conferred on the head of the institution by the Regulations made under section 77 which are not included above	X	X

**Delegation of powers, duties and functions
Delegated pursuant to Section 73 of the *Access to Information Act*
Marine Atlantic Incorporated**

<i>Section</i>	<i>Description</i>	<i>Corporate Counsel</i>	<i>Manager of Information Management</i>
4(2.1)	Responsibility of head of government institution	X	X
7(a)	Notice where access is requested	X	X
7(b)	Giving access to record	X	X
8(1)	Transfer to and transfer from institution	X	X
9	Extension of time limits	X	X
11(2), (3), (4), (5) and (6)	Additional fees	X	X
12(2)(b)	Language of access	X	X
12(3)(b)	Access to record in alternative format	X	X
13	Exemption – Information obtained in confidence	X	X
14	Exemption – Federal-Provincial Affairs	X	X
15	Exemption – International Affairs and Defense	X	X
16	Exemption – Law enforcement and investigation	X	X
16.31	Exemption - Investigations under the Elections Act	X	X
16.5	Exemption – <i>Public Servants Disclosure Act</i>	X	X
16.6	Exemption – National Security and Intelligence Committee	X	X
17	Exemption – Safety of Individuals	X	X
18	Exemption – Economic interests of Canada	X	X
18.1	Exemption – Economic interest of the Canada Post Corporation, Export Development Canada, the Public Sector Pension Investment Board and VIA Rail Canada Inc.	X	X
19	Exemption – Personal Information	X	X
20	Exemption – Third party information	X	X
21	Exemption – Operations of government	X	X
22	Exemption – Testing procedures, tests and audits	X	X
22.1	Exemption – Audit working papers and draft audit reports	X	X
23	Exemption – Solicitor-client privilege	X	X
23.1	Exemption – Patent or Trademark privilege	X	X
24	Exemption – Statutory prohibitions	X	X
25	Severability	X	X
26	Exception – Information to be published	X	X
27(1) and (4)	Third party notification	X	X
28(1)(b), (2) and (4)	Third party notification	X	X
29(1)	Disclosure on recommendation of Information Commissioner	X	X
33	Advise Information Commissioner of third party involvement	X	X
35(2)(b)	Right to make representations	X	X
37(4)	Access to be given to complainant	X	X
43(1)	Notice to third party of application to Federal Court for review	X	X
44(2)	Notice to applicant of application to Federal Court by third party	X	X
52(2)(b) and (3)	Special rules for hearings	X	X
71(1)	Facilities for inspection of manuals	X	X
72	Annual Report to Parliament	X	X