



ANNUAL REPORT TO PARLIAMENT

Privacy Act

**For the period from
April 1, 2019 to March 31, 2020**

REVERA INC.

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TABLE OF CONTENTS

FOREWORD	1
MANDATORY REPORTING REQUIREMENTS	2
1. INTRODUCTION	2
1.1 SUMMARY	2
1.2 MANDATE.....	2
2. STRUCTURE OF THE INSTITUTION TO FULFILL ITS RESPONSIBILITIES	2
3. DELEGATION ORDER	3
4. INTERPRETATION OF THE STATISTICAL REPORT	5
5. PRIVACY-RELATED EDUCATION AND TRAINING ACTIVITIES UNDERTAKEN BY PRIVACY STAFF AND PROVIDED TO INSTITUTION’S EMPLOYEES	5
6. OVERVIEW OF NEW AND/OR REVISED INSTITUTIONAL <i>PRIVACY ACT</i> RELATED POLICIES AND PROCEDURES IMPLEMENTED DURING THE REPORTING PERIOD	5
7. COMPLAINTS AND/OR INVESTIGATIONS	5
8. MONITORING	5
9. MATERIAL PRIVACY BREACHES	6
10. PRIVACY IMPACT ASSESSMENT	6
11. DISCLOSURE OF PERSONAL INFORMATION	6

ANNUAL REPORT TO PARLIAMENT

PRIVACY ACT

(APRIL 1, 2019 TO MARCH 31, 2020)

FOREWORD

This Annual Report to Parliament has been prepared in accordance with Section 72 of the *Privacy Act* (the “Act”). It is intended to describe how Revera Inc. (“Revera”) administered its responsibilities in relation to the Act for the reporting period from April 1, 2019 to March 31, 2020.

Annual Reports are to be tabled in Parliament in accordance with section 72 of the *Privacy Act*.

MANDATORY REPORTING REQUIREMENTS

1. INTRODUCTION

1.1 SUMMARY

The purpose of the Act is to extend the present laws of Canada that protect the privacy of individuals with respect to their personal information held by a government institution and to provide individuals with a right of access to that information.

1.2 MANDATE

Revera is a leading owner, operator, investor in, and developer of the senior living sector. Through its portfolio of partnerships, Revera owns or operates more than 500 properties across Canada, the United States and the United Kingdom, serving more than 55,000 seniors. Revera offers seniors' apartments, independent living, assisted living, memory care, and long-term care. With approximately 50,000 employees dedicated to providing exceptional care and service, Revera provides seniors with choices that help them do more of the things that bring joy to their lives. Through Revera's Age is More program, Revera is committed to challenging ageism, Revera's social cause of choice.

2. STRUCTURE OF THE INSTITUTION TO FULFILL ITS RESPONSIBILITIES

Revera is a wholly-owned subsidiary of the Public Sector Pension Investment Board ("PSP Investments"). The Privacy Office at Revera consists of an Access to Information and Privacy Coordinator, who is also Revera's Privacy Officer, and an Assistant Privacy Officer (Canadian Operations). There are no service agreements under section 73.1 of the Act to which Revera was party during the reporting period.

3. DELEGATION ORDER

Revera Inc., a wholly-owned subsidiary of
Public Sector Pension Investment Board,
and its Wholly-Owned Subsidiaries

Delegation Order ("Order")
(Section 73, *Access to Information Act*,
R.S.C. 1985, c. A-1, as amended and section 73, *Privacy Act*, R.S.C. 1985, c. P-21, as amended)

1. This Order may be cited as the "Revera Inc. and wholly-owned subsidiaries of Revera Inc. Head of Institution Delegation Order pursuant to the *Access to Information Act* and *Privacy Act*".
2. Pursuant to section 73 of the *Access to Information Act* and section 73 of the *Privacy Act*, the undersigned, acting in his capacity as head of Revera Inc. and its Wholly-Owned Subsidiaries in the existence as of the date of this Order as well as those which may hereafter be established (the "Government Institutions"), hereby designates the person holding the position set out in the schedule set forth in Section 4 below, or the person occupying on an acting basis this position, to exercise his powers, duties and functions, under the provisions of the Acts and related regulations set out in the schedule opposite the position. This Delegation Order replaces all previous delegation orders for the Government Institutions.
3. For the purposes of this Order, "Wholly-Owned Subsidiaries" shall include all Canadian wholly-owned subsidiaries of Revera Inc. which are corporations, with the exception of those subsidiaries with their own heads.
4. Schedule

Position	<i>Access to Information Act</i> and Regulations	<i>Privacy Act</i> and Regulations
Access to Information And Privacy Coordinator	Full authority	Full authority

This Delegation Order has been made at Mississauga, on the 16th day of May, 2016.



Thomas G. Wellner
President and Chief Executive Officer

**Revera Inc., a wholly-owned subsidiary of
Public Sector Pension Investment Board,
and its Wholly-Owned Subsidiaries**

**Delegation Order (“Order”)
(section 95(1), *Access to Information Act*,**

R.S.C. 1985, c. A-1, as amended and section 73, *Privacy Act*, R.S.C. 1985, c. P-21, as amended)

1. This Order may be cited as the “Revera Inc. and wholly-owned subsidiaries of Revera Inc. Head of Institution Delegation Order pursuant to the *Access to Information Act* and *Privacy Act*”.
2. Pursuant Section 95(1) of the *Access to Information Act* and Section 73 of the *Privacy Act*, the undersigned, acting in his capacity of head of Revera Inc. and its Wholly-Owned Subsidiaries in existence as of the date of this Order as well as those which may hereafter be established (the “Government Institutions”), hereby designates the person holding the position set out in the schedule set forth in Section 4 below, or the person occupying on an acting basis this position, to exercise his powers, duties and functions, under the provisions of the Acts and related regulations set out in the schedule opposite the position. This Delegation Order replaces all previous delegation orders for the Government Institutions.
3. For the purposes of this Order, “Wholly-Owned Subsidiaries” shall include all Canadian wholly-owned subsidiaries of Revera Inc. which are corporations, with the exception of those subsidiaries with their own heads.
4. Schedule

Position	<i>Access to Information Act</i> and Regulations	<i>Privacy Act</i> and Regulations
Access to Information and Privacy Coordinator	Full authority	Full authority

This Delegation Order has been made at Mississauga, on the 21st day of June, 2019.



Thomas G. Wellner
President and Chief Executive Officer

4. INTERPRETATION OF THE STATISTICAL REPORT

No privacy requests were received during the reporting period. This is consistent with the previous year. Due to the limited number of privacy requests received, no meaningful trends can be identified.

There were no requests carried over from a previous year.

No consultations were received or completed during this reporting period.

The completed statistical report is attached.

COVID-19 did not have an impact on Revera's ability to fulfill its responsibilities under the Act.

5. PRIVACY-RELATED EDUCATION AND TRAINING ACTIVITIES UNDERTAKEN BY PRIVACY STAFF AND PROVIDED TO INSTITUTION'S EMPLOYEES

During the reporting period, Revera's online privacy training module was completed by 232 individuals at Revera's corporate support office. It was also completed at 22 long-term care homes and 34 retirement residences managed by Revera.

6. OVERVIEW OF NEW AND/OR REVISED INSTITUTIONAL *PRIVACY ACT* RELATED POLICIES AND PROCEDURES IMPLEMENTED DURING THE REPORTING PERIOD

Revera did not implement any new privacy policies, guidelines, procedures, or initiatives during the reporting period. Minor revisions were made to certain privacy-related policies and procedures to correct minor errors and provide additional clarity on certain matters.

PSP Investments developed an internal procedure for handling Privacy requests in September 2007 upon becoming subject to the Act. As part of an annual revision process, the procedure was revised on January 15, 2013. The same procedure is also applied for any privacy requests that may be received by Revera.

7. COMPLAINTS AND/OR INVESTIGATIONS

Revera has not received any complaints during this reporting period, and no audits or investigations were concluded.

8. MONITORING

Revera very rarely receives privacy requests or requests for the correction of personal information under the Act. As a result, there is no procedure in place to monitor the time to process these requests and the level of officials advised. Generally, when privacy requests or requests for the correction of

personal information are received, the Privacy Officer or Assistant Privacy Officer monitors time manually. The time taken to process these requests is then recorded in tracking charts maintained by the Privacy Office.

9. MATERIAL PRIVACY BREACHES

No material privacy breaches were reported to the Office of the Privacy Commissioner and to the Information and to the Treasury Board of Canada Secretariat (Information and Privacy Policy Division) during the reporting period.

10. PRIVACY IMPACT ASSESSMENT

No Privacy Impact Assessments were completed during the reporting period.

11. DISCLOSURE OF PERSONAL INFORMATION

During the reporting period, Revera did not make any disclosures of personal information pursuant to paragraph 8(2)(m) of the Act.