



## ANNUAL REPORT TO PARLIAMENT

### *Privacy Act*

**For the period from  
April 1, 2020 to March 31, 2021**

**REVERA INC.**

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# ANNUAL REPORT TO PARLIAMENT

## *PRIVACY ACT*

(APRIL 1, 2020 TO MARCH 31, 2021)

### 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, 2020 to March 31, 2021 (the “reporting period”).

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 Access to Information and Privacy (ATIP) 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 regional ATIP staff. There are no service agreements under section 73.1 of the Act to which Revera was party during the reporting period.

### 3. DELEGATION ORDER

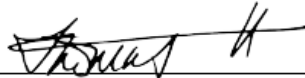
Revera Inc., a wholly-owned subsidiary of  
Public Sector Pension Investment Board,  
and its Wholly-Owned Subsidiaries

Delegation Order ("Order")  
(section 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 21<sup>st</sup> day of June, 2019.



Thomas G. Wellner  
President and Chief Executive Officer

### 4. INTERPRETATION OF THE STATISTICAL REPORT

Revera did not receive any privacy requests 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 on the *Privacy Act* for 2020-2021 is attached.

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

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

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During the reporting period, Revera's online privacy training module was completed by 14 individuals at Revera's corporate support office. It was also completed at 5 long-term care homes and 12 retirement residences managed by Revera.

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

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During the reporting period, Revera implemented a new institutional privacy policy procedure and tool, related to the electronic communication of personal information (including personal health information), and when this is permitted.

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.

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## **7. COMPLAINTS AND/OR INVESTIGATIONS**

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

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## **8. MONITORING**

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Revera very rarely receives privacy requests or requests for the correction of personal information under the Act. As a result, there is no formal procedure in place to monitor the time taken 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 the time taken to process these requests manually. The time taken to process these requests is then recorded in tracking charts maintained by the ATIP Office.

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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 the Information and to the Treasury Board of Canada Secretariat (Information and Privacy Policy Division) during the reporting period.

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**10. PRIVACY IMPACT ASSESSMENT**

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No Privacy Impact Assessments were completed during the reporting period.

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**11. DISCLOSURE OF PERSONAL INFORMATION**

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



## Statistical Report on the *Privacy Act*

Name of institution: Revera Inc.

Reporting period: 4/1/2020 to 3/31/2021

### 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
<b>Total</b>	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	61 to 120 Days	121 to 180 Days	181 to 365 Days	More 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
<b>Total</b>	0	0	0	0	0	0	0	0



## 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
<b>Total</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>

### 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
<b>Total</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>

## 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

Number of Requests Closed Past the Legislated Timelines	Principal Reason			
	Interference with Operations / Workload	External Consultation	Internal Consultation	Other
0	0	0	0	0

### 2.7.2 Requests closed beyond legislated timelines (including any extension taken)

Number of Days Past Legislated Timelines	Number of Requests Past Legislated Timeline Where No Extension Was Taken	Number of Requests Past Legislated Timelines Where an Extension Was Taken	Total
1 to 15 days	0	0	0
16 to 30 days	0	0	0
31 to 60 days	0	0	0
61 to 120 days	0	0	0
121 to 180 days	0	0	0
181 to 365 days	0	0	0
More than 365 days	0	0	0
<b>Total</b>	0	0	0



## 5.2 Length of extensions

Length of Extensions	15(a)(i) Interference with operations				15 (a)(ii) Consultation			15(b) Translation purposes or conversion
	Further review required to determine exemptions	Large volume of pages	Large volume of requests	Documents are difficult to obtain	Cabinet Confidence Section (Section 70)	External	Internal	
1 to 15 days	0	0	0	0	0	0	0	0
16 to 30 days	0	0	0	0	0	0	0	0
31 days or greater								0
<b>Total</b>	0	0	0	0	0	0	0	0

## Section 6: Consultations Received From Other Institutions and Organizations

### 6.1 Consultations received from other Government of Canada institutions and other organizations

Consultations	Other Government of Canada Institutions	Number of Pages to Review	Other Organizations	Number of Pages to Review
Received during the reporting period	0	0	0	0
Outstanding from the previous reporting period	0	0	0	0
<b>Total</b>	0	0	0	0
Closed during the reporting period	0	0	0	0
Carried over to the next reporting period	0	0	0	0



## Section 7: Completion Time of Consultations on Cabinet Confidences

### 7.1 Requests with Legal Services

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
<b>Total</b>	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
<b>Total</b>	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	\$15,000
Overtime	\$0
Goods and Services	\$0
• Professional services contracts	\$0
• Other	\$0
<b>Total</b>	<b>\$15,000</b>

**11.2 Human Resources**

Resources	Person Years Dedicated to Privacy Activities
Full-time employees	0.100
Part-time and casual employees	0.000
Regional staff	0.000
Consultants and agency personnel	0.000
Students	0.000
<b>Total</b>	<b>0.100</b>

**Note:** Enter values to three decimal places.





## Supplemental Statistical Report on the *Access to Information Act* and *Privacy Act*

Name of institution: Revera Inc.

Reporting period: 2020-04-01 to 2021-03-31

### Section 1: Capacity to Receive Requests

Enter the number of weeks your institution was able to receive ATIP requests through the different channels.

	Number of Weeks
Able to receive requests by mail	0
Able to receive requests by email	52
Able to receive requests through the digital request service	52

### Section 2: Capacity to Process Records

2.1 Enter the number of weeks your institution was able to process paper records in different classification levels.

	No Capacity	Partial Capacity	Full Capacity	Total
<b>Unclassified Paper Records</b>	0	52	0	<b>52</b>
<b>Protected B Paper Records</b>	0	52	0	<b>52</b>
<b>Secret and Top Secret Paper Records</b>	0	52	0	<b>52</b>

2.2 Enter the number of weeks your institution was able to process electronic records in different classification levels.

	No Capacity	Partial Capacity	Full Capacity	Total
<b>Unclassified Electronic Records</b>	0	52	0	<b>52</b>
<b>Protected B Electronic Records</b>	0	52	0	<b>52</b>
<b>Secret and Top Secret Electronic Records</b>	0	52	0	<b>52</b>