

revera®

ANNUAL REPORT TO PARLIAMENT

Privacy Act

For the period from
April 1st, 2023 to March 31st, 2024

REVERA INC.

Head Office:

5015 Spectrum Way, Suite 600

Mississauga, Ontario

L4W 0E4

☎ 289-360-1200

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	4
5. PRIVACY-RELATED EDUCATION AND TRAINING ACTIVITIES UNDERTAKEN BY PRIVACY STAFF AND PROVIDED TO INSTITUTION'S EMPLOYEES	4
6. OVERVIEW OF NEW AND/OR REVISED INSTITUTIONAL <i>PRIVACY ACT</i> RELATED POLICIES AND PROCEDURES IMPLEMENTED DURING THE REPORTING PERIOD	4
7. COMPLAINTS AND/OR INVESTIGATIONS	4
8. MONITORING	4
9. MATERIAL PRIVACY BREACHES	5
10. PRIVACY IMPACT ASSESSMENT	5
11. DISCLOSURE OF PERSONAL INFORMATION	5

ANNUAL REPORT TO PARLIAMENT

PRIVACY ACT

(APRIL 1ST, 2023 TO MARCH 31ST, 2024)

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, 2023 to March 31, 2024 (the “reporting period”).

Annual Reports are to be tabled in Parliament in accordance with section 72 of the 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 Inc. specializes in managing high-quality senior living real estate assets in Canada, the United States and the United Kingdom. With deep roots in this evolving sector, we understand seniors' unique needs and preferences. We're driven to enrich their residential experience through strategic investments in vibrant senior living communities.

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. 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 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 Section 73 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 13th day of June, 2024.



 Andrew Higgs
 President

4. INTERPRETATION OF THE STATISTICAL REPORT

Revera did not receive any privacy requests under the Act during this reporting period. This is consistent with the previous reporting period. Due to the limited number of privacy requests received, no meaningful trends can be identified.

No active requests are outstanding from previous reporting periods.

No active complaints are outstanding from previous reporting periods.

No consultations were received or completed during this reporting period.

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

The completed Statistical Report and Supplemental Statistical Report on the Privacy Act for 2022-2023 are attached.

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 on Revera's institutional privacy policy was completed by 281 individuals at Revera's corporate support offices.

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 or revised privacy policies, guidelines, procedures, or initiatives during the reporting period.

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 did not receive any complaints and no audits or investigations were concluded under the Act during the reporting period.

8. MONITORING

In the ordinary course of its business, 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.

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.



Statistical Report on the *Privacy Act*

Name of institution: Revera Inc.

Reporting period: 2023-04-01 to 2024-03-31

Section 1: Requests Under the *Privacy Act*

1.1 Number of requests received

		Number of Requests
Received during reporting period		0
Outstanding from previous reporting periods		0
• Outstanding from previous reporting period	0	
• Outstanding from more than one reporting period	0	
Total		0
Closed during reporting period		0
Carried over to next reporting period		0
• Carried over within legislated timeline	0	
• Carried over beyond legislated timeline	0	

1.2 Channels of requests

Source	Number of Requests
Online	0
E-mail	0
Mail	0
In person	0
Phone	0
Fax	0
Total	0

Section 2: Informal requests

2.1 Number of informal requests

		Number of Requests
Received during reporting period		0
Outstanding from previous reporting periods		0
• Outstanding from previous reporting period	0	
• Outstanding from more than one reporting period	0	
Total		0
Closed during reporting period		0
Carried over to next reporting period		0

2.2 Channels of informal requests

Source	Number of Requests
Online	0
E-mail	0
Mail	0
In person	0
Phone	0
Fax	0
Total	0

2.3 Completion time of informal requests

Completion Time							
0 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	Total
0	0	0	0	0	0	0	0

2.4 Pages released informally

3.2 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		

3.3 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

3.4 Format of information released

Paper	Electronic				Other
	E-record	Data set	Video	Audio	
0	0	0	0	0	0

3.5 Complexity

3.5.1 Relevant pages processed and disclosed for paper, e-record and dataset formats

Number of Pages Processed	Number of Pages Disclosed	Number of Requests
0	0	0

3.5.2 Relevant pages processed per request disposition for paper, e-record and dataset formats by size of requests

Disposition	Less Than 100 Pages Processed		100-500 Pages Processed		501-1000 Pages Processed		1001-5000 Pages Processed		More Than 5000 Pages Processed	
	Number of Requests	Pages Processed	Number of Requests	Pages Processed	Number of Requests	Pages Processed	Number of Requests	Pages Processed	Number of Requests	Pages Processed
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

3.5.3 Relevant minutes processed and disclosed for audio formats

Number of Minutes Processed	Number of Minutes Disclosed	Number of Requests
0	0	0

3.5.4 Relevant minutes processed per request disposition for audio formats by size of requests

Disposition	Less than 60 Minutes processed		60-120 Minutes processed		More than 120 Minutes processed	
	Number of requests	Minutes Processed	Number of requests	Minutes Processed	Number of requests	Minutes Processed
All disclosed	0	0	0	0	0	0
Disclosed in part	0	0	0	0	0	0
All exempted	0	0	0	0	0	0
All excluded	0	0	0	0	0	0
Request abandoned	0	0	0	0	0	0
Neither confirmed nor denied	0	0	0	0	0	0
Total	0	0	0	0	0	0

3.5.5 Relevant minutes processed and disclosed for video formats

Number of Minutes Processed	Number of Minutes Disclosed	Number of Requests
0	0	0

3.5.6 Relevant minutes processed per request disposition for video formats by size of requests

Disposition	Less than 60 Minutes processed		60-120 Minutes processed		More than 120 Minutes processed	
	Number of requests	Minutes Processed	Number of requests	Minutes Processed	Number of requests	Minutes Processed
All disclosed	0	0	0	0	0	0
Disclosed in part	0	0	0	0	0	0
All exempted	0	0	0	0	0	0
All excluded	0	0	0	0	0	0

Request abandoned	0	0	0	0	0	0
Neither confirmed nor denied	0	0	0	0	0	0
Total	0	0	0	0	0	0

3.5.7 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

3.6 Closed requests

3.6.1 Number of requests closed within legislated timelines

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

3.7 Deemed refusals

3.7.1 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

3.7.2 Request 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 timeline 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
Total	0	0	0

3.8 Requests for translation

Translation Requests	Accepted	Refused	Total
English to French	0	0	0
French to English	0	0	0
Total	0	0	0

Section 4: Disclosures Under Subsections 8(2) and 8(5)

Paragraph 8(2)(e)	Paragraph 8(2)(m)	Subsection 8(5)	Total
0	0	0	0

8.2 Requests with Privy Council Office

Number of Days	Fewer Than 100 Pages Processed		100–500 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 9: Complaints and Investigations Notices Received

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

Section 10: Privacy Impact Assessments (PIAs) and Personal Information Banks (PIBs)

10.1 Privacy Impact Assessments

Number of PIAs completed	0
Number of PIAs modified	0

10.2 Institution-specific and Central Personal Information Banks

Personal Information Banks	Active	Created	Terminated	Modified
Institution-specific	0	0	0	0
Central	0	0	0	0
Total	0	0	0	0

Section 11: Privacy Breaches

11.1 Material Privacy Breaches reported

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

11.2 Non-Material Privacy Breaches

Number of non-material privacy breaches	0
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Section 12: Resources Related to the Privacy Act

12.1 Allocated Costs

Expenditures		Amount
Salaries		\$7,500
Overtime		\$0
Goods and Services		\$0
• Professional services contracts	\$0	
• Other	\$0	
Total		\$7,500

12.2 Human Resources

Resources	Person Years Dedicated to Privacy Activities
Full-time employees	0.050
Part-time and casual employees	0.000
Regional staff	0.000
Consultants and agency personnel	0.000
Students	0.000
Total	0.050

Note: Enter values to three decimal places.

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

Name of institution: Revera Inc.

Reporting period: 2023-04-01 to 2024-03-31

Section 1: Open Requests and Complaints Under the Access to Information Act

1.1 Enter the number of open requests that are outstanding from previous reporting periods.

Fiscal Year Open Requests Were Received	Open Requests that are <i>Within</i> Legislated Timelines as of March 31, 2024	Open Requests that are <i>Beyond</i> Legislated Timelines as of March 31, 2024	Total
Received in 2023-24	0	0	0
Received in 2022-23	0	0	0
Received in 2021-22	0	0	0
Received in 2020-21	0	0	0
Received in 2019-20	0	0	0
Received in 2018-19	0	0	0
Received in 2017-18	0	0	0
Received in 2016-17	0	0	0
Received in 2015-16	0	0	0
Received in 2014-15 or earlier	0	0	0
Total	0	0	0

Row 11, Col. 3 of Section 1.1 must equal Row 7, Col. 1 of Section 1.1 of the 2023-24 Statistical Report on the Access to Information Act

1.2 Enter the number of open complaints with the Information Commissioner of Canada that are outstanding from previous reporting periods.

Fiscal Year Open Complaints Were Received by Institution	Number of Open Complaints
Received in 2023-24	0
Received in 2022-23	0
Received in 2021-22	0
Received in 2020-21	0
Received in 2019-20	0
Received in 2018-19	0
Received in 2017-18	0
Received in 2016-17	0
Received in 2015-16	0
Received in 2014-15 or earlier	0
Total	0

Section 2: Open Requests and Complaints Under the Privacy Act

2.1 Enter the number of open requests that are outstanding from previous reporting periods.

Fiscal Year Open Requests Were Received	Open Requests that are <i>Within</i> Legislated Timelines as of March 31, 2024	Open Requests that are <i>Beyond</i> Legislated Timelines as of March 31, 2024	Total
Received in 2023-24	0	0	0
Received in 2022-23	0	0	0
Received in 2021-22	0	0	0
Received in 2020-21	0	0	0
Received in 2019-20	0	0	0
Received in 2018-19	0	0	0
Received in 2017-18	0	0	0

Received in 2016-17	0	0	0
Received in 2015-16	0	0	0
Received in 2014-15 or earlier	0	0	0
Total	0	0	0

Row 11, Col. 3 of Section 2.1 must equal Row 7, Col. 1 of Section 1.1 of the 2023-24 Statistical Report on the *Privacy Act*

2.2 Enter the number of open complaints with the Privacy Commissioner of Canada that are outstanding from previous reporting periods.

Fiscal Year Open Complaints Were Received by Institution	Number of Open Complaints
Received in 2023-24	0
Received in 2022-23	0
Received in 2021-22	0
Received in 2020-21	0
Received in 2019-20	0
Received in 2018-19	0
Received in 2017-18	0
Received in 2016-17	0
Received in 2015-16	0
Received in 2014-15 or earlier	0
Total	0

Section 3: Social Insurance Number

Has your institution begun a new collection or a new consistent use of the SIN in 2023-24?	No
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Section 4: Universal Access under the Privacy Act

How many requests were received from foreign nationals outside of Canada in 2023-24?	0
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Row 1, Col. 1 of Section 4 must be equal to or less than Row 1, Col. 1 of Section 1.1 of the 2023-24 Statistical Report on the *Privacy Act*

