

**Report on the
administration of the
*Privacy Act***

**2024–25
Annual Report**

ALTO 

High-Speed Train

Annual Report 2024-25

Privacy Act

VIA HFR – VIA TGF Inc.

1. INTRODUCTION

The *Privacy Act* protects the privacy of individuals with respect to their personal information held by federal government institutions, including any parent Crown corporation and any wholly owned subsidiary of such a corporation within the meaning of subsection 83(1) of the *Financial Administration Act*. The *Privacy Act* gives individuals a right of access to their personal information and governs the way government institutions collect, use, retain, disclose and dispose of that information.

This Annual Report 2024-25, prepared by VIA HFR – VIA TGF Inc. (operating under the name Alto) (the “**Institution**”) and covering the period from April 1, 2024 to March 31, 2025 (the “**reporting period**”), is tabled in Parliament pursuant to section 72 of the *Privacy Act*. This is the Institution’s second report.

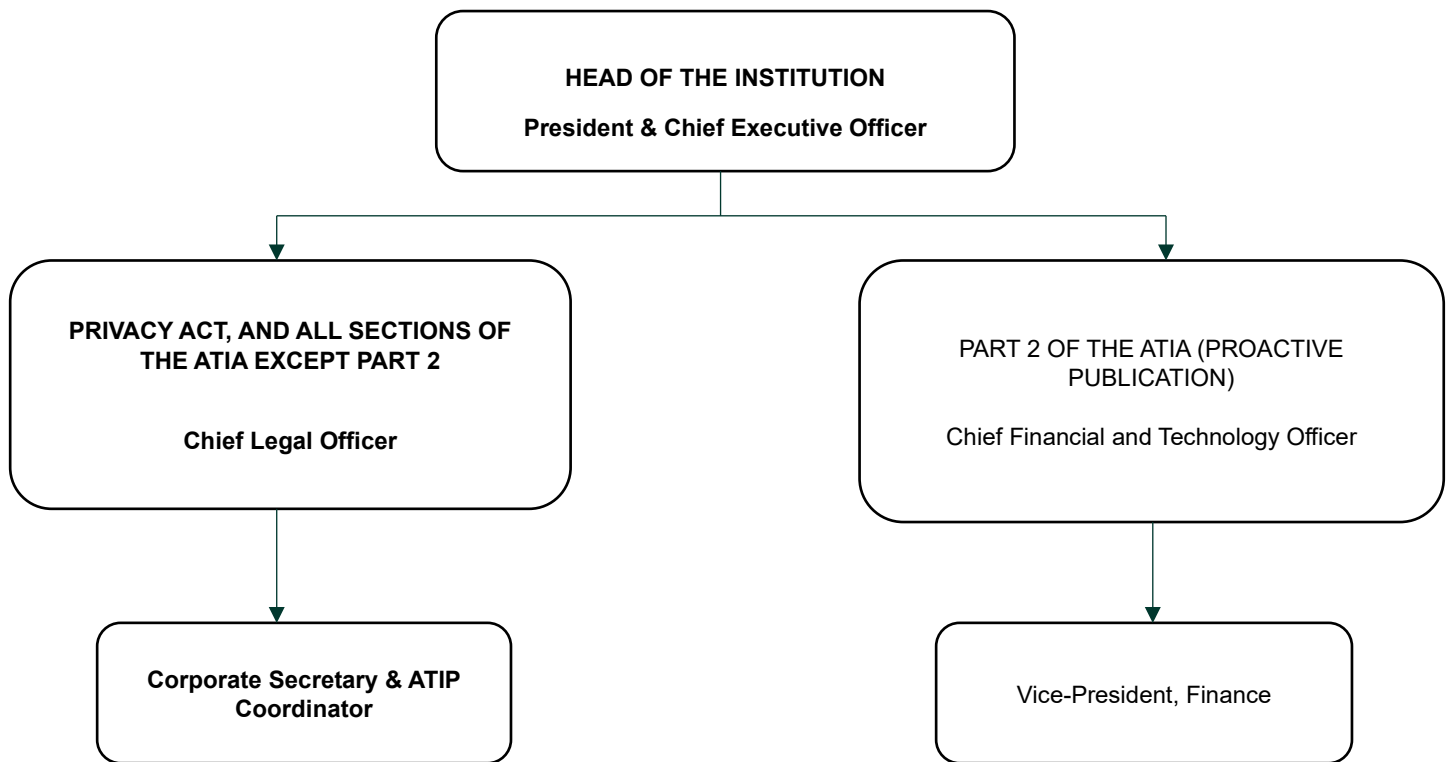
The Institution is a federal Crown corporation whose mandate, per Order in Council P.C. 2022-0259, is to “develop and implement the High Frequency Rail project, including the design, construction, financing, operation and maintenance of passenger rail services in Ontario and Quebec through one or more agreements with the private sector, in cooperation with the Minister of Transport”. In February 2025, the Institution received additional direction from the Government of Canada to develop a high-speed rail service, partnering with Cadence, the private developer partner.

The Institution had no non-operating subsidiaries during the reporting period.

2. ORGANIZATIONAL STRUCTURE

The Institution is a wholly-owned subsidiary of VIA Rail Canada Inc. but operates at arm’s length from it and acts as a parent Crown corporation under the *Financial Administration Act*, with certain exceptions, pursuant to Order in Council P.C. 2022-0260. The Institution was incorporated on November 29, 2022 under the *Canada Business Corporations Act*, and became operational in 2023. It reports directly to Parliament through the Minister of Transport and Internal Trade.

The following is the organizational structure of the Institution’s Access to Information and Privacy Office as of March 31, 2025. Privacy responsibilities are highlighted.



The Institution was not party to any service agreement under section 73.1 of the *Privacy Act* during the reporting period.

3. DELEGATION ORDER

A delegation of all powers and responsibilities of the head of the Institution under the *Privacy Act* was formalized and documented at the beginning of the reporting period and updated most recently on October 15, 2024. This delegation remained in effect throughout the reporting period and is attached hereto as **Schedule A**.

4. PERFORMANCE

During the reporting period, the Institution received no requests or complaints relating to its obligations under the *Privacy Act*.

As of March 31, 2025, the Institution had no pending requests or complaints under the *Privacy Act*.

5. TRAINING AND AWARENESS-RAISING

During the reporting period, the Institution did not conduct any formal training or awareness-raising activities related to the protection of personal information.

6. POLICIES, GUIDELINES AND PROCEDURES

During the reporting period, the Institution reviewed and implemented a new version of its public website privacy policy.

In addition, the Institution prepared and implemented a specific consent form aimed at obtaining employees' consent to specific communications of personal information to third-party government institutions and contractors.

7. INITIATIVES AND PROJECTS TO IMPROVE PRIVACY

During the reporting period, the Institution did not implement significant initiatives or projects to improve privacy.

The Institution plans to develop additional tools to promote best practices in the protection and management of personal information.

8. SUMMARY OF KEY ISSUES AND ACTIONS TAKEN ON COMPLAINTS

No complaints were received during the reporting period and there were no pending complaints as of the end of such period.

9. MATERIAL PRIVACY BREACHES

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

10. PRIVACY IMPACT ASSESSMENTS

The Institution did not carry out Privacy Impact Assessments during the reporting period.

11. PUBLIC INTEREST DISCLOSURES

No disclosures were made under paragraph 8(2)(m) of the *Privacy Act* during the reporting period.

12. MONITORING COMPLIANCE

No monitoring exercises were carried out during the reporting period.

The Institution is currently developing an internal review process to ensure that the collection, use and disclosure of personal information under the *Privacy Act* are accurate, complete and proportional to the Institution's purposes for processing.

SCHEDULE A
DELEGATION ORDER

(appended)

DELEGATION ORDER

ACCESS TO INFORMATION ACT PRIVACY ACT

I, the undersigned, Chief Executive Officer of VIA HFR – VIA TGF INC., pursuant to section 95 of the *Access to Information Act* and section 73 of the *Privacy Act*, hereby delegate to the persons holding the positions set out in the appendix, or the persons occupying those positions on an acting basis, the authority to exercise the powers, duties and functions vested in the Chief Executive Officer as the head of VIA HFR – VIA TGF INC. under the provisions of the *Access to Information Act* and *Privacy Act* and their related regulations.

This delegation order replaces and repeals all previous delegation orders.

Signed in the City of Montreal,
this 15th day of October, 2024

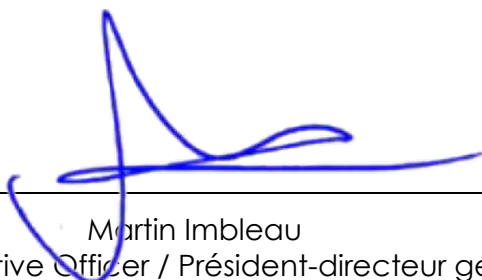
ARRÊTÉ DE DÉLÉGATION

LOI SUR L'ACCÈS À L'INFORMATION LOI SUR LA PROTECTION DES RENSEIGNEMENTS PERSONNELS

Je, soussigné, président-directeur général de VIA HFR – VIA TGF INC., conformément à l'article 95 de la *Loi sur l'accès à l'information* et à l'article 73 de la *Loi sur la protection des renseignements personnels*, délègue par les présentes aux titulaires des postes indiqués en annexe, ou aux personnes occupant ces postes par intérim, les attributions, les fonctions et les pouvoirs dont le président-directeur général est investi en tant que responsable de VIA HFR – VIA TGF INC. aux termes de la *Loi sur l'accès à l'information*, de la *Loi sur la protection des renseignements personnels* et des règlements afférents.

Le présent document remplace et annule tout arrêté de délégation antérieur.

Signé dans la ville de Montréal,
le 15^e jour d'octobre 2024



Martin Imbleau
Chief Executive Officer / Président-directeur général

APPENDIX / ANNEXE

Delegation of powers, duties and functions under section 95 of the Access to Information Act and section 73 of the Privacy Act

Délégation d'attributions, fonctions et pouvoirs en vertu de l'article 95 de la Loi sur l'accès à l'information et de l'article 73 de la Loi sur la protection des renseignements personnels

Position / Poste	Access to Information Act and Regulations / Loi sur l'accès à l'information et réglementation afférente	Privacy Act and Regulations / Loi sur la protection des renseignements personnels et réglementation afférente
Chief Legal Officer / Chef de la direction des affaires juridiques	Full authority / Pleine autorité	Full authority / Pleine autorité
Corporate Secretary and Access to Information and Privacy Coordinator / Secrétaire corporatif et Coordonnatrice de l'accès à l'information et de la protection des renseignements personnels	Full authority / Pleine autorité	Full authority / Pleine autorité