

Privacy Impact Assessment

Royal Canadian Mint Prestige Account Program

In 2010, a privacy impact assessment (PIA) was conducted in relation to the Royal Canadian Mint Prestige Account (RCMPA) Program. The Program, which has presently been rolled out to a select group of customers and will soon be expanding, aims to enable global customers to purchase and own unallocated precious metals held and safeguarded exclusively on their behalf at the Mint's high security facility in Ottawa. The Mint is working to administer the RCMPA program in collaboration with Kitco Metals Inc., a private sector company that specializes in the retail of precious metals and the first authorized RCMPA Dealer to offer the program to its customers. Its implementation will require the collection, use and sharing of certain types of personal information about the participating customers, thus bringing it under the realm of the *Privacy Act*.

The PIA entailed a review of the contractual arrangement between the Mint and the Mint's authorized RCMPA Dealer, Kitco, which is located in Montreal, Québec, as well as a review of the processes in place within both organizations to determine compliance with:

- the requirements of the *Privacy Act*, as this is the *Act* that applies to the Mint;
- to the extent to which this was relevant to the Mint, with the Québec's "*An Act Respecting the Protection of Personal Information in the Private Sector*", as this is the *Act* that sets out the privacy related obligations that apply to Kitco; and
- the generally accepted privacy principles.

The review covered the information management systems as well as the activities that support the RCMPA Program that involve the collection, use and disclosure of personal information, and analyzed the privacy related risks that are associated with those activities. Also examined were the measures that have been implemented to protect the personal information under the control of the Mint and Kitco from unauthorized access (protecting its confidentiality), unauthorized modification (protecting its integrity) and unauthorized destruction (ensuring its full availability for the administration of RCMPA Program).

The PIA confirmed that the RCMPA Program is designed and operated in full compliance with the requirements of the *Privacy Act* and the generally accepted privacy principles. The PIA identified a few minor gaps related to policies, and these are being implemented.

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