



IAPP Canada Symposium 2026

Privacy | AI governance | Cybersecurity law

Conference 4-5 May

Workshops 6 May

Training 6-7 May

TORONTO

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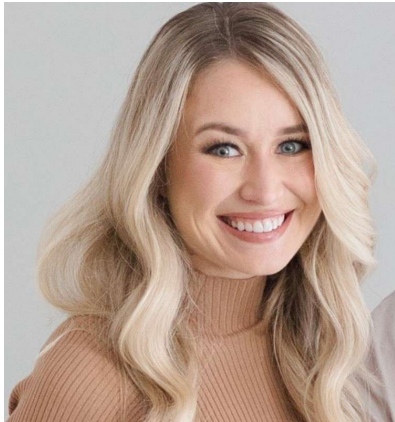
DSAR GROUP THERAPY

Implementing Request Processes in Canada

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WELCOME AND INTRODUCTIONS



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AGENDA OUTLINE

- I. Introductions
- II. Emerging Issues for Canadian Privacy Professionals
- III. Discussion Exploring Practical Solutions:
 - a. Harmonization with International Frameworks
 - b. Securing Buy-in from Senior Leaders and Management
 - c. Implementing AI Driven Solutions
 - d. Managing Horizon Scanning
- IV. Audience Q&A



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Historic Rights under Privacy Laws

- Access to personal information held by an organization
- Correction of inaccurate or incomplete information
- Information about use and disclosure of personal information
- Withdraw consent
- Challenge compliance
- Complain

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Modern Rights under Privacy Laws

- Data portability
- Deletion / de-indexing
- Automated decision-making transparency
- Private rights of action



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DSARs as Persistent Operational Risk

Rising Request Volumes

Increases related to public awareness and digital tools for exercising rights

Complexity of Requests

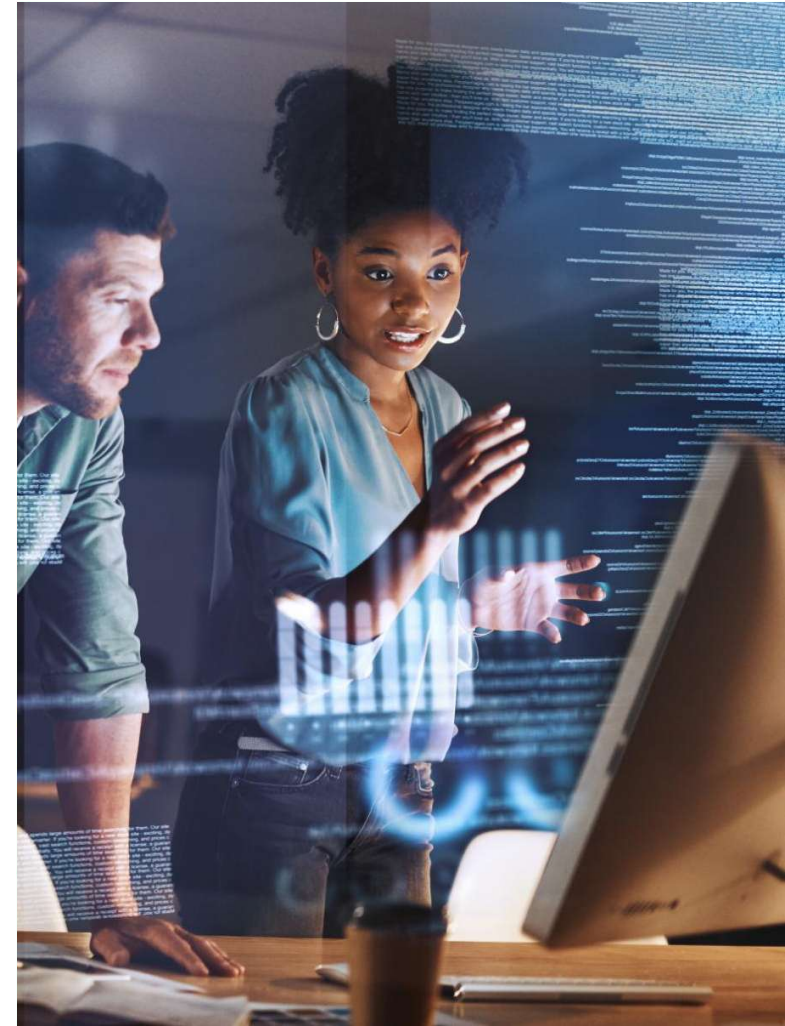
Broad, legally complicated requests requiring careful interpretation and consistent application of limits

Fragmented Legal Landscape

Navigating multiple privacy or consumer protection laws with different obligations and exceptions

Operational and Governance Challenges

Cross-team coordination, documenting processes, and AI adoption programs driving internal frictions



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Explosive Growth in Request Volume since 2016



Impact of GDPR

Rights similar to PIPEDA rights existing in some EU national laws, however EU GDPR standardized and created serious enforcement risk.



Higher Public Awareness

Individuals more aware of their privacy rights and more willing to assert them, particularly in contexts involving employment disputes, customer complaints, or perceived unfair treatment.

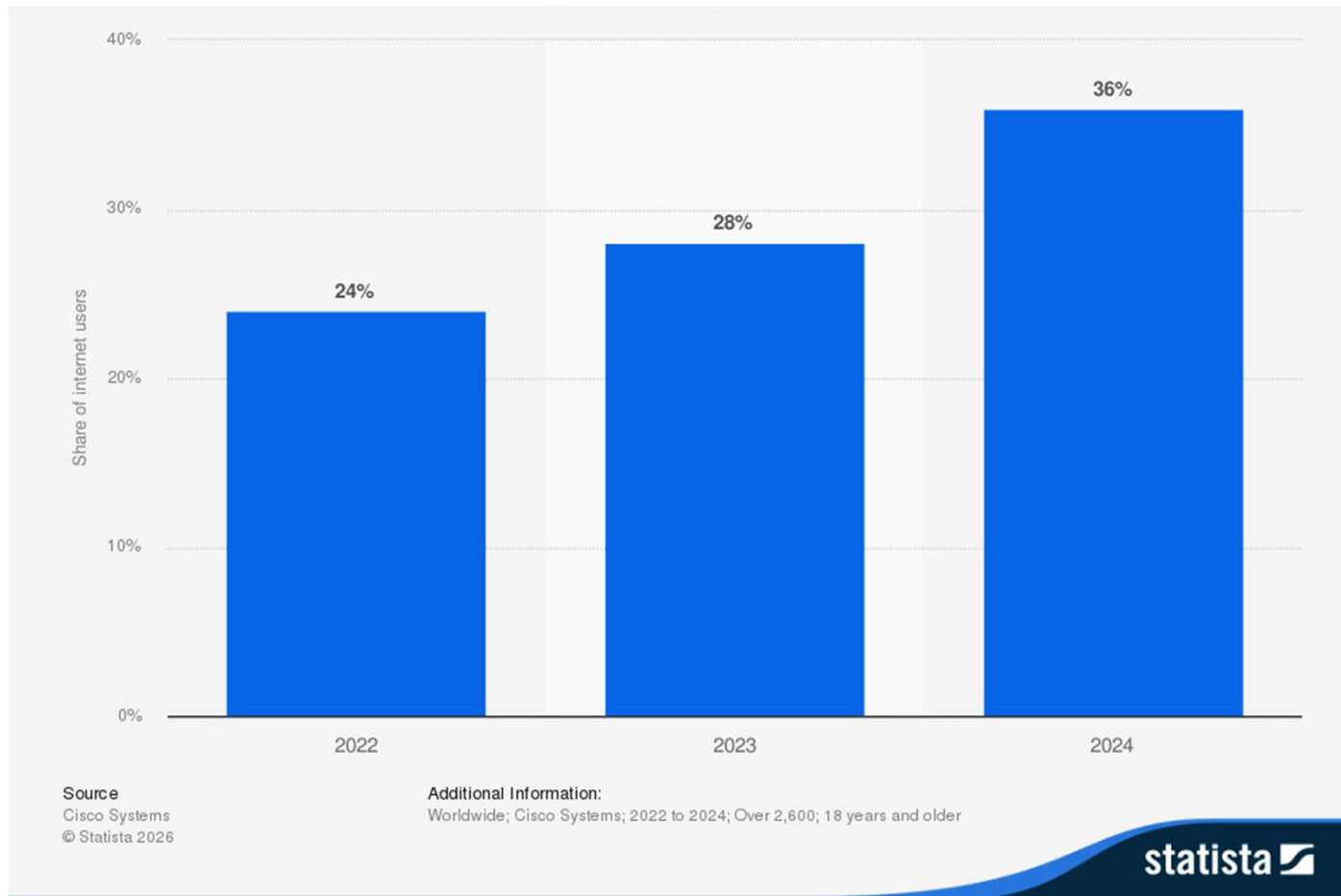


AI Supported Requests

AI-assisted drafting tools enable individuals to generate requests that cite statutory language, anticipate exemptions, or demand expansive categories of records with minimal effort.

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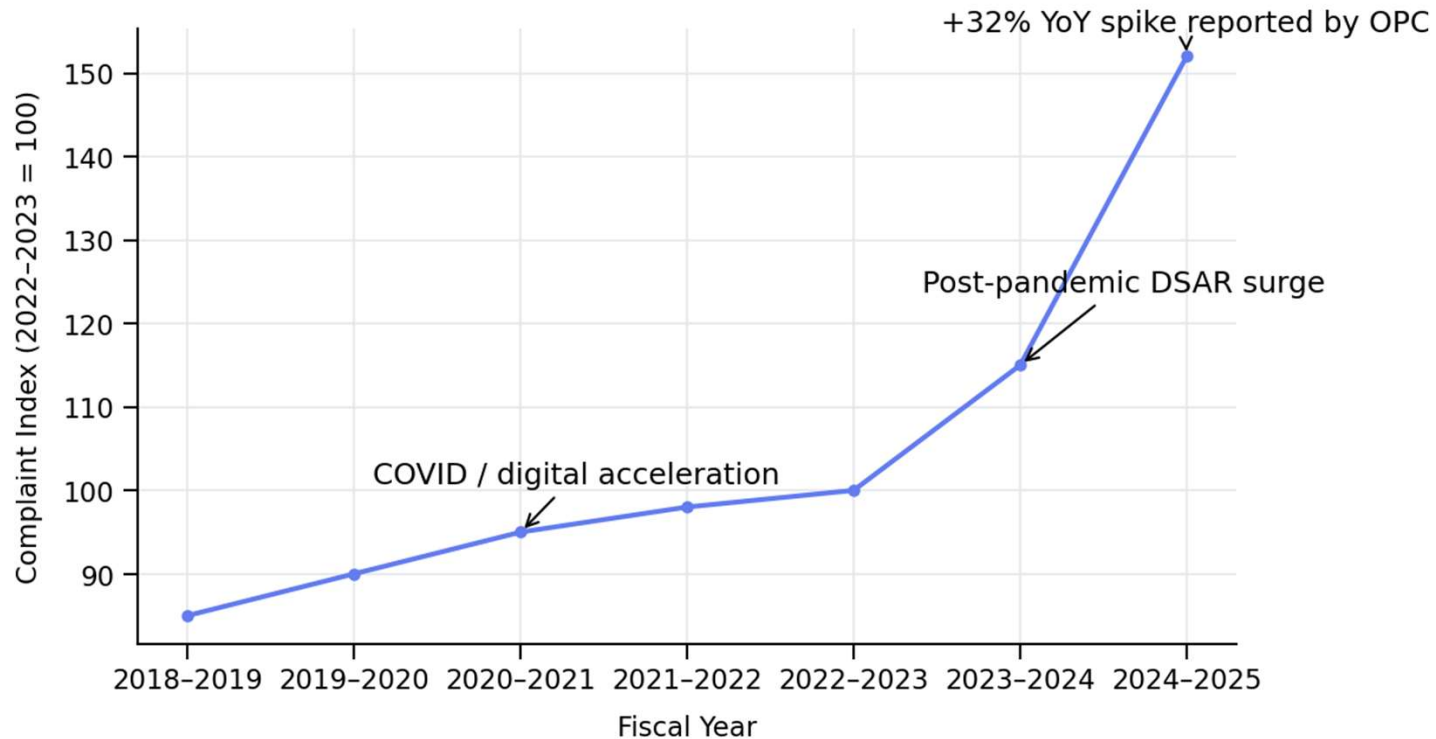
Share of internet users worldwide who have exercised their rights from 2022 to 2024



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Canadian Trendline

Indexed Growth in OPC PIPEDA Complaints



Note: Only the OPC publishes year-over-year private-sector complaint growth suitable for trend visualization. Provincial regulators report similar pressure qualitatively but not in comparable time-series form.

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Examples of Complex DSARs

- Employment / pre-litigation

"Please provide all personal information about me, including emails, Teams chats, Slack messages, manager notes, performance reviews, investigation materials, drafts, and internal commentary referring to me, whether stored in HR systems, individual inboxes, or collaboration tools."

- Data intensive

"I am requesting access to all personal data your organization holds about me, including inferred data, profiles, metadata, logs, tracking information, purchase history, customer service interactions, and internal analytics."

- Cross-Jurisdictional

"I'm located in Toronto but I'm a US citizen and please include data held by your E.U. affiliates when responding to my PIPEDA request."

Examples of Complex DSARs

- Complaints or demands

"Failure to fully respond to this request will be raised with the Privacy Commissioner and relied upon in future proceedings."

- Deceased subjects

"My father died in September, and I would like to request all the information you have about him on file."

- Novel Requests

"Please confirm whether automated decision-making was used in assessing my application and provide information about the logic involved, data sources, and the consequences of the decision."



Why DSARS are Challenging

Distributed Data

Personal information may be across multiple systems, even when the same information is also in one view in a customer portal

Judgment Required

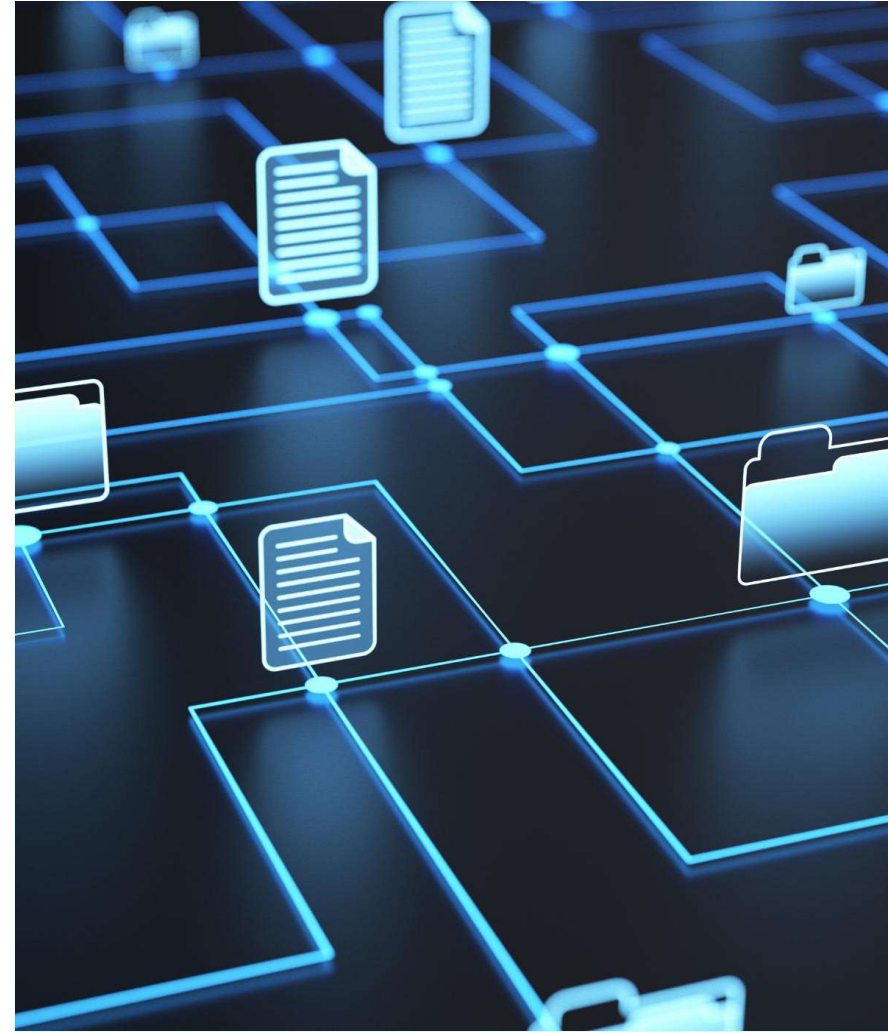
Responses require interpretation, exclusion of irrelevant, duplicative or out-of-control information

Legal and Business Risks

Personal information often intermingled with privileged or commercially sensitive information

Time-Sensitive Compliance

Short statutory timelines and pressure from customers



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Operational Consequences for Businesses

- Missed Deadlines
- Inconsistent Scoping Decisions
- Inadequate Explanations for Refusals
- Sustained Increase in Workloads
- Need for Structured Triage, Prioritization, and Escalation Mechanisms
- Increased Regulator Exposure
- Rising Costs

AI on Both Sides of Requests

AI is empowering DSAR Requests

AI helps individuals draft requests with enhanced strategic positioning

AI improves organizations efficiency

Automating data discovery, tagging and redactions

AI creates new risks for DSAR process

Over-collection, missed context, inconsistency, American bias

AI requires cross-team collaboration

AI is not free and needs to be supplemented by humans



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Coordinating International Responses

Standardize the DSAR intake process globally

Common intake enables jurisdictional triage while continuing to support the requester

Align on universal definition of “personal information”

Narrow internal definitions create risks of under-disclosure

Global data-mapping and discovery

A shared discovery model reduces duplication and response inconsistency

Consistent “DSAR” playbook and timelines

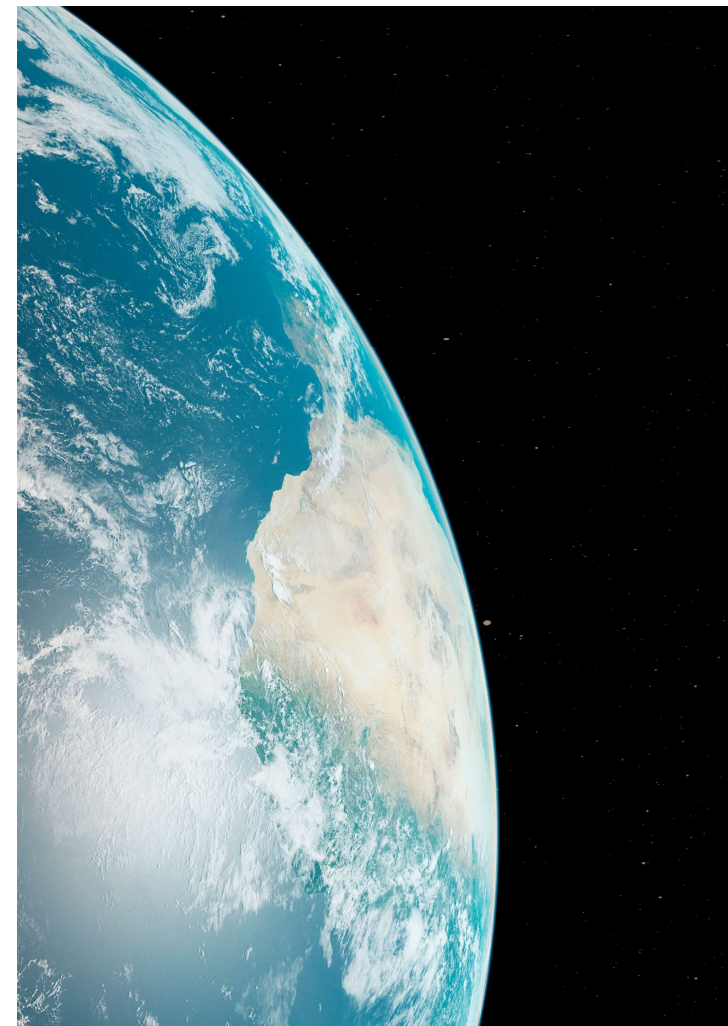
Mature data privacy programs have documented processes that work for all applicable jurisdictions

Centralized decision-making with local legal input

Ensure adequate application of exemptions without administrative duplication

Align on legal responsibility and approach

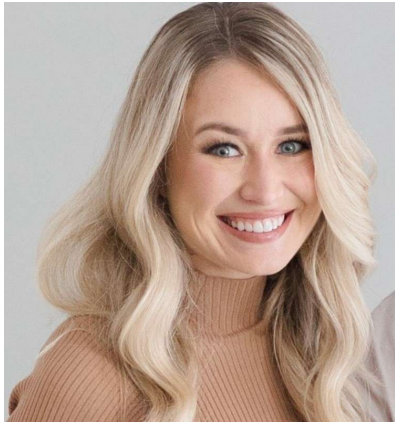
Determine whether all requests will be treated the same and whether the business will honor requests from inapplicable jurisdictions.



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PANEL DISCUSSION



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How Did Things Go? (We Really Want To Know)

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Thank you!

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