

March 13, 2026

Philippe Dufresne
Privacy Commissioner of Canada
Office of the Privacy Commissioner of Canada
30 Victoria Street
Gatineau, Quebec
K1A 1H3

RE: *ACT | The App Association comments in response to the Office of the Privacy Commissioner of Canada's consultation on OPC Guidance Processes.*

Dear Commissioner Dufresne,

ACT | The App Association (ACT) respectfully submits its views to the Office of the Privacy Commissioner of Canada (OPC) in response to its request for public comment on OPC regulatory guidance processes.¹ ACT appreciates the OPC's efforts to evaluate and develop effective guidance to support compliance with privacy requirements under the *Personal Information Protection and Electronic Documents Act* (PIPEDA).

ACT is a global trade association for small and medium-sized technology companies. Our members are entrepreneurs, innovators, and independent developers within the global app ecosystem that engage with verticals across every industry. We work with and for our members to promote a policy environment that rewards and inspires innovation while providing resources that help them raise capital, create jobs, and continue to build incredible technology.

Trust and safety are integral to the success of innovators in the mobile app economy, especially for smaller tech companies that may not have substantial name recognition. Strong privacy and cybersecurity protections help our members compete and better serve their customers. As the OPC develops new guidance, we encourage consideration of the operational challenges small businesses face when complying with complex legal frameworks. Clear, practical, and accessible guidance can help enable compliance while supporting continued technological innovation.

We commend the OPC's ongoing efforts to engage with stakeholders during the development of this guidance and encourage continued engagement to ensure future privacy guidance is practical, effective, and reflective of operational realities. In particular, the OPC should continue outreach to small businesses through roundtables and targeted

¹ <https://www.priv.gc.ca/en/about-the-opc/what-we-do/consultations/consultation-guidance-process/>.

stakeholder meetings to ensure that guidance accounts for the operational and resource constraints many small businesses face when implementing privacy obligations.

Further, OPC guidance should include comprehensive examples, hypothetical scenarios, plain language summaries, and case studies or examples from OPC investigation findings to help clarify expectations and demonstrate effective compliance outcomes. Guidance should also clearly distinguish between legal requirements and best practices to provide greater certainty about the steps small businesses must take to comply with applicable privacy obligations.

Finally, given the rapid evolution of technology and business practices, the OPC should continue to regularly review its privacy guidance to ensure it remains current and reflects the dynamic technological landscape. Regular updates can help ensure that small businesses can rely on guidance to meet current regulatory expectations.

We thank OPC for the opportunity to comment and hope the information we provided will assist in the continued development of effective privacy guidance.

Sincerely,

A handwritten signature in black ink that reads "Morgan Reed". The signature is written in a cursive style with a light grey background behind it.

Morgan Reed
President

ACT | The App Association
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