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**VIA EMAIL**

August 25, 2021

**[applicant information]**

Re: Request for Records: BCLC File 21-033

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British Columbia Lottery Corporation (BCLC) writes further to your August 17, 2021, request under B.C.'s *Freedom of Information and Protection of Privacy Act* (FIPPA) and BCLC's letter of same date.

You requested:

"A list of data products purchased by your corporation, either identified or de-identified, from Jan. 2017 to [August 17, 2021]."

To clarify the request, by "data products," I meant any "bulk data" purchased from a data broker, another lottery corporation, a marketing company, a direct mail marketing service, etc. It could also include "test data" purchased to test databases or train IT systems using artificial intelligence/automated decision-making. The datasets may or may not include personal information (PI)."

BCLC has no records responsive to your request.

To assist your understanding of BCLC's response, BCLC does not have the list you have requested because it does not have a business purpose for creating or maintaining it. BCLC has carefully considered the possibility of creating such a list pursuant to section 6(2) of FIPPA and has concluded it is not obligated to do so.

The information required to create this record is held in multiple electronic databases at BCLC. While it is possible to retrieve such information, BCLC does not have the computer hardware or software necessary to automate this process. As such, compiling this record would require substantial manual processing.

Further, because BCLC does not have an organizational unit dedicated to the purchase of data products, BCLC would have to contact a minimum of 20 separate employees working in 20 distinct organizational units. Each of those employees would be required to undertake a search of their organizational unit's records in order to determine what data products they may have purchased in the time period requested. This process would cause an unreasonable disruption to BCLC's operations.

BCLC also notes that, in the event it undertook the process described above, the number of hours involved would likely attract a fee pursuant to section 75 of FIPPA. BCLC has not comprehensively prepared this fee estimate, but an initial assessment shows that a minimum of 20 separate employees from 20 distinct organizational units would each have to spend several hours locating and retrieving the information sought and compiling it into a record.

The full text of sections 6 and 75 can be found at:

[http://www.bclaws.ca/Recon/document/ID/freeside/96165\\_00](http://www.bclaws.ca/Recon/document/ID/freeside/96165_00)

This response will be published a minimum of five business days after release at:  
<https://corporate.bcl.com/who-we-are/corporate-reports/reports-disclosures.html>

If you have any questions or concerns regarding BCLC's processing of your request, please contact me at CPenkert@bcl.com, via mail or at (250) 852-5370.

Additionally, under section 52 of FIPPA, you may ask the Information and Privacy Commissioner to review this reply to your request for information. You have 30 business days from the receipt of this notice to request a review by writing to:

Office of the Information and Privacy Commissioner for British Columbia  
P.O. Box 9038, Station Provincial Government  
Victoria, BC V8W 9A4

T (250) 387-5629 F (250) 387-1696  
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Sincerely,

**[original signed by]**

Christian Penkert  
Senior Freedom of Information Analyst