

Canada's Protecting Privacy and Consumer Data Act (Bill C-36): BLG's guide

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On June 15, 2026, the federal government introduced Bill C-36, *An Act to enact the Protecting Privacy and Consumer Data Act* (PPCDA). If enacted, this long-awaited legislation would mark the most significant reform of Canada's federal private-sector privacy regime in more than two decades.

Most critically, the PPCDA would replace the privacy provisions found in the *Personal Information Protection and Electronic Documents Act* (PIPEDA) with a modernized and strengthened framework, introducing new individual rights, new consent rules, a new enforcement regime and a new privacy regulator for private-sector obligations: the Data Protection Commission of Canada.

The PPCDA reflects the federal government's broader digital policy agenda, complementing the AI for All national strategy and the Safe Social Media Act (Bill C-34). BLG prepared this guide to explain the proposed PPCDA, help organizations understand what may be coming, and offer comparative insights with PIPEDA, Québec's Private Sector Act and the GDPR; our handy table highlights key differences between Bill C-36 and the Private Sector Act.

This guide will be updated as Bill C-36 progresses through the legislative process.

What the guide covers

- **Enforcement:** the proposed Digital Safety and Data Protection Commission, administrative penalties of up to \$10 million or 3 per cent of global revenue, and fines of up to \$25 million or 5 per cent for indictable offences;
- **Accountability and governance:** proposed obligations for privacy management programs, the role of the privacy officer, and record-keeping requirements;
- **Consent:** proposed new consent exceptions and validity requirements;
- **New individual rights:** the proposed right to disposal, data mobility, and the right to explanation of automated decisions;
- **Children:** new heightened standards for children's personal information;
- **Artificial intelligence:** proposed rules for de-identification, anonymization, and transparency requirements for automated decision systems;

- **Outsourcing and cross-border transfers:** new obligations directly imposed on service providers and PIA requirement for cross-border transfers;
- **Safeguards and incident response;** and
- **Retention and disposal.**

The authors would like to thank [Marianne Bellavance](#), articling student, for her contributions to the guide.

By

[Élisabeth Lesage-Bigras](#), [Claire Feltrin](#), [Candice Hévin](#), [Krystin Chung](#), [Frédéric Wilson](#)

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BLG Offices

Calgary

Centennial Place, East Tower
520 3rd Avenue S.W.
Calgary, AB, Canada
T2P 0R3

T 403.232.9500
F 403.266.1395

Ottawa

World Exchange Plaza
100 Queen Street
Ottawa, ON, Canada
K1P 1J9

T 613.237.5160
F 613.230.8842

Vancouver

1200 Waterfront Centre
200 Burrard Street
Vancouver, BC, Canada
V7X 1T2

T 604.687.5744
F 604.687.1415

Montréal

1000 De La Gauchetière Street West
Suite 900
Montréal, QC, Canada
H3B 5H4

T 514.954.2555
F 514.879.9015

Toronto

Bay Adelaide Centre, East Tower
22 Adelaide Street West
Toronto, ON, Canada
M5H 4E3

T 416.367.6000
F 416.367.6749

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