



CAPILANO UNIVERSITY

Privacy Impact Assessment Template

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PART 1: GENERAL INFORMATION

Initiative Title:	Unibuddy student ambassador web platform
Academic / Administrative Unit:	Centre for International Experience
Initiative Sponsor or Lead	Chris Bottrill, AVP International
Initiative Project Manager	Jesse Yang, International Recruitment Manager,

1.1 Describe the initiative
<p><i>Unibuddy is a web-based platform that enable perspective students to message and interact with selected current students (student ambassadors). The platform also captures the contact information of perspective students and will be used for student recruitment purpose.</i></p> <p><i>Unibuddy is a recruitment tool that create connection between students. This initiative requires platform and interface to be simple and user-friendly to encourage potential student to engage with ambassadors. The platform also requires a dedicated page or landing page to display the variety of ambassador profiles. It is a purchased service so needs to be launched as soon as we can.</i></p>

1.2 Describe the scope of the PIA
The main part of the initiative covered by the PIA will be the leads-collection/usage (contact information for potential students) and display of selected student ambassadors. This project doesn't require to be launched in phases.

1.3 List any related PIAs:
N/A

1.4 What are the data or information elements involved in your initiative?
IP addresses, contact info, country of residence, field of study, hobbies and personal interests, university application stage (applied or not), worries/motivations, education level, profile pictures added by End User.

1.5 Is any personal information included?	Yes
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- If yes, go to [Part 2](#)
- If no, answer [question 1.8](#) and then submit Part 1 to the Privacy Officer. You do not need to complete the rest of the PIA template.

1.8 How will you reduce the risk of unintentionally collecting personal information?

PART 2: COLLECTION, USE AND DISCLOSURE

This section will help you identify the legal authority for collecting, using and disclosing personal information, and confirm that all personal information elements are necessary for the purpose of the initiative.

2.1 Collection, use and disclosure

Complete the table below. Use column 2 to identify whether the action in column 1 is a collection, use or disclosure of personal information. Use columns 3 and 4 to identify the legal authority you have for the collection, use or disclosure. If the data flow is complex insert or attach a drawing or flow diagram as an appendix to this PIA.

Use this column to describe the way personal information moves through your initiative step by step as if you were explaining it to someone who does not know about your initiative.	Collection, use or disclosure	FOIPPA authority	Other legal authority
Step 1: Capilano University collect student ambassador’s name, picture, country and program information. And collect the potential student contact information when students sign up on Unibuddy platform	Collection	26(d)	
Step 2: Capilano University display student ambassadors’ name, picture, country and program name (provided by the students) on Unibuddy platform, embedded on Capilano University’s website.	Disclosure		
Step 3: Capilano University use the potential student’s information collected via Unibuddy for recruitment email campaigns	Use		

2.2 Collection Notice

If personal information is collected directly from an individual the information is about, FOIPPA requires that you provide a collection notice (except in limited circumstances).

Your personal information will be collected for student recruitment campaigns and newsletters. This information is being collected by Capilano University under (s)(26)(c) of FIPPA. Information may be shared with Unibuddy for IT support and other customer service purpose. If you have any questions about the collection of this personal information, please contact international@capilanou.ca.

PART 3: STORING PERSONAL INFORMATION

If the initiative involves storing personal information outside of Canada, identify the sensitivity of the personal information and where and how it will be stored.

3.1	Is any personal information stored outside of Canada?	Yes
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3.2	Does your initiative involve sensitive personal information?	No
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- If yes, go to [question 3.3](#)
- If no, go to [question 3.4](#)

3.3	Is the sensitive personal information being disclosed outside of Canada under FOIPPA section 33(2)(f)?	Yes/No
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- If yes, answer [question 3.4 and then go directly to Part 5](#)
- If no, answer question 3.4 and then complete [Part 4](#)

3.4	Where are you storing the personal information involved in your initiative?
<p>Data is stored and processed in AWS Cloud services in Ireland. The sub-processors page provides more details of other processing arrangements - https://unibuddy.com/sub-processors/</p> <p>Unibuddy privacy policy - https://unibuddy.com/privacy-policy/ provides information around how Unibuddy comply with EU and UK GDPR requirements and how these benefit customer data protection concerns.</p>	

PART 4: ASSESSMENT FOR DISCLOSURES OUTSIDE OF CANADA

This section should be completed for any initiatives involving sensitive personal information to be stored outside of Canada, in collaboration with the Privacy Officer and the Cybersecurity manager.

NOT APPLICABLE FOR THIS ASSESSMENT

4.1	Is the sensitive personal information stored by a service provider?	n/a
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- If yes, fill in the table below (add more rows if necessary) and then go to [question 4.3](#)
- If no, do not complete the table and answer [question 4.2](#)

Name of service provider	Name of cloud infrastructure and/or platform provider(s) (if applicable)	Where is the sensitive personal information stored (including backups)?
n/a		
n/a		

4.2 Provide details on the disclosure, including to whom it is disclosed and where the sensitive personal information is stored
n/a

4.3 Does the contract you rely on include privacy-related terms?	n/a
If yes, describe the contractual measures related to your initiative.	

4.4 What controls are in place to prevent unauthorized access to sensitive personal information?

4.5 Provide details about how you will track access to sensitive personal information.

4.6 Describe the privacy risks for disclosure outside of Canada.

Privacy risk	Controls in place or planned	Impact	Likelihood	Level of privacy risk	Further action to reduce risk.
n/a					

N/A NO SENSITIVE PERSONAL INFORMATION WILL BE STORED OUTSIDE OF CANADA

The outcome of Part 4 will be a risk-based decision made by the project sponsors in consultation with the Privacy Officer and cybersecurity manager as to whether to proceed with the initiative as planned or to proceed only if additional risk reducing controls are implemented. If the privacy risk is determined to be too significant, alternatives that do not involve disclosure outside of Canada will need to be explored.

PART 5: SECURITY OF PERSONAL INFORMATION

Part 5 is focused on how personal information is kept secure. People, organizations, or governments outside of your initiative should not be able to access the personal information collected, used, stored or disclosed. Personal information must be safely secured in both physical and technical environments.

5.1 Does your initiative involve digital tools, databases, or information systems?	Yes
If yes, describe	
The vendor employs both web applications and a mobile app to connect to the Cloudflare and AWS cloud environments. Additionally, the vendor's network topology includes third-party vendors such as Google Analytics, MailChimp, and MixPanel.	

5.2 Will a separate security assessment be completed?	Yes
If yes, describe the assessment to be undertaken, including who will complete the assessment and when it will be completed.	
The cybersecurity assessment for the vendor was finalized on November 16, 2023, by Max Aryamand, Manager Cybersecurity. While the initial assessment was carried out by the vendor, additional information was required. Consequently, a secondary assessment was conducted to obtain a more comprehensive evaluation of the vendor's cybersecurity posture.	

The Cybersecurity manager in collaboration with the Privacy Officer will determine whether a security assessment is required. If a security assessment will be completed during the development of the initiative, the questions about technical security in this PIA template do not need to be completed. Instead once the assessment has been finished it should be attached to the template. If it is determined that a separate security assessment is not required, questions 5.3 and 5.4 should be answered.

5.3 What technical and physical security are in place or will be put into place during this initiative to protect personal information?
Please see the attached vendor cybersecurity questionnaire.

5.4 Controlling and tracking access	
Only individuals in specified roles are permitted access to personal information Please check the attached vendor cybersecurity questionnaire.	Yes
There is a defined approval process in place for access rights to be given to individuals that have an accepted need for standing or recurring access to personal information.	Yes

5.4 Controlling and tracking access	
Please check the attached vendor cybersecurity questionnaire.	
Audit logs are created that show who accesses personal information items and when. Please check the attached vendor cybersecurity questionnaire.	Yes
Describe any additional controls that limit or restrict who can access personal information and that track and monitor access to personal information:	
Please see the attached vendor cybersecurity questionnaire.	

PART 6: ACCURACY, CORRECTION AND RETENTION

Part 6 focuses on the obligation to make sure that personal information is kept accurate and complete and to have a process in place so that individuals can exercise their right to request correction of errors or omissions to their personal information.

6.1 What steps will be taken to ensure that personal information is accurate and complete?
The users/students will be able to edit all profile personal information in the platform. Student can reach out to Centre for International Experience department if they have any concern or challenge when using the platform.

6.2 What process will be used to enable individuals to request correction of errors or omissions to their personal information?
The users/students will be able to edit their profile pictures, name (nick name), home country information on the portal.

6.3 If it is not possible to correct personal information in the record itself is there a way to document the request to correct or annotate the record?	Yes
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6.3 Is there a process in place to notify third parties where a correction is requested and the personal information has been disclosed in the previous year?	Yes
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6.4 Does the initiative involve the of personal information to make decisions that directly affect an individual?	No
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- If yes, go to [question 6.5](#)
- If no, skip ahead to [Part 7](#)

6.5 What steps will be taken to make sure that information related to individuals used to take decisions about them will be kept for a minimum of one year?
Not applicable

PART 7: AGREEMENTS AND INFORMATION BANKS

Please provide information about whether the initiative will involve an information sharing agreement, research agreement or personal information bank.

7.1 Does this initiative involve an information sharing agreement?	No
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- If yes, complete the Information Sharing Agreement Supplement (Appendix B) and attach it to this PIA

7.2 Will this initiative result in the creation of a personal information bank?	No
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- If yes, complete the table below.

NOT APPLICABLE

7.2 a) Describe the type of information in the bank:
7.2 b) List any other ministries, agencies, public bodies, or organizations involved:
7.2 c) Record the Business contact title and phone number for person responsible for managing the PIB:

PART 8: ADDITIONAL RISKS

Describe any additional risks that arise from collecting, using, storing, accessing, or disclosing personal information in your initiative that have not been addressed by the questions on the template.

This is a low risk initiative.

Privacy risk	Controls in place or planned	Impact	Likelihood	Level of privacy risk	Further action to reduce risk.
<i>While no sensitive personal information is intended to be collected users could share information in free fields which could potentially be accessed and shared.</i>	Unibuddy follow GDPR compliance rules and have suitable information security controls in place.	<i>Most significant impact is likely to be personal embarrassment.</i>	<i>low,</i>	<i>low,</i>	<i>Student ambassadors should be trained to remind perspective students not to overshare</i>

PART 9: SIGN OFF

The completed PIA should be reviewed by those responsible for the initiative and submitted to all approving parties for sign off prior to the completion of the initiative.

Project Manager Sign off

This PIA accurately documents the data elements, information flows and information security arrangements for this initiative. If there are any changes to the overall initiative, including to the way personal information is collected, used, stored or disclosed, or to the information security measures in place the Project Manager will engage with the Privacy Officer and the Cybersecurity manager and if necessary the PIA will be updated.

Title	Name	Date
International Recruitment Manager	Jesse Yang	14 February 2024

Privacy Officer and Cyber Security Manager Sign off

This PIA is based on a review of the material provided by the Project Manager as of the date below.

Role	Name	Date
Privacy Officer	Jacquetta Goy	15 February 2024
Cyber security manager	Max Aryamand	7 February 2024

Approving Parties Sign Off:

The sponsor or lead for the initiative and the Director or Dean responsible for the relevant Academic or Administrative Unit should review and approve the PIA before the initiative is completed.

Initiative Sponsor or Lead

Role	Name	Date Signed
AVP International	Chris Bottrill	

Director responsible for the relevant Academic or Administrative Unit

Role	Name	Date Signed
AVP International	Chris Bottrill	

VP Administration and Finance or designate

Role	Name	Date Signed
AVP International	Chris Bottrill	

Appendix B

Information Sharing Agreement Supplement

Information Sharing Agreements

If the initiative includes or will be part of a regular and systematic exchange of personal information with partners, an [information sharing agreement \(ISA\) may be required](#).

Please provide information about the ISA.

Description of ISA:
Name of third parties involved:
Business contact title and phone number for person responsible for maintaining the ISA:
ISA start date:
ISA end date: