



Privacy Impact Assessment

Emily Carr University of Art + Design

Customer Relationship Management (CRM)

PIA# 2022-03

Part 1 – General Information

Name of Department/Unit	Student Services	Project ID	PROJ017
PIA Drafter	Version 1 – Toluwani Agbi / Kathy Woolverton		
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Project Sponsor(s)	Sandeep Sidhu (ITS) Trish Kelly (Academic Affairs) Marcia Guno (Student Services) Rob Maguire (Communications)		
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Project Manager	Toluwani Agbi		
Email	tagbi@ecuad.ca	Phone	Ext. 2915

1. What is the initiative?

The purpose of this initiative is to implement a web-based software as a service (SaaS) solution, generally referred to as a Customer Relationship Management software system (CRM). This initiative is scheduled to be completed in the summer of 2023.

The CRM tool will be provided by an external vendor, recruited through a request for proposal (RFP) process, and installed for the marketing and recruitment teams, to facilitate the identification, prioritization and continued interaction with prospective students who are interested in completing a course or program at Emily Carr University.

The adoption of this new CRM by ECUAD will entail sharing significant amounts of data, including personal information and sensitive information from ECUAD into what is commonly referred to as “the Cloud” (company name is Technolution Slate Services, and on Amazon Web Services located in Canada).

[See CRM ECU PIA Pre-Assessment Checklist](#)



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Table 1 Proposed uses of the CRM

Departmental Staff	Proposed CRM Use	Constituent Personal Information Affected	Data Integration from other Systems	Direct entry into the CRM	May Replace Existing stand-alone system(s)
Marketing + Communications	Support marketing campaigns via mass email, newsletters, advertising, social media and analytics	All contact/communications re individuals requesting information from ECU, applicants, Students, other advisors (e.g., parents, high schools), alumni, donors or subscribing to ECU email lists	MailChimp, Sumo, Survey Monkey, Swydo, Zapier Integration to receive data from ECUAD's social media and marketing/advertising	Yes	MailChimp, Sumo, Swydo, Zapier
Information Technology Services	Administration of CRM	All Users, roles/permissions	Single Sign-On, and implementing all data integrations	Yes	
Enrollment Services	Applications for Admissions, Student registration and official student records	Students, and in some cases parents/guardians. Financial information	ECU's Education Planner BC, Slideroom, Ellucian Colleague, plus tracking emails from MailChimp and Sumo Payment: TD, PayPal, PayMyTuition, RBC, Eigen	Yes	MailChimp, Sumo
Advancement	Donor management and alumni interactions	Donors Alumni Donor Prospects	Raiser's Edge	Yes	MailChimp
Events	Event registration, Payment history, advising appointments	All, including financial information	Ellucian Colleague, Eventbrite, Zoom, Sked Social, Calendly, Yocal, and MyWCOOnline Payment: TD, PayPal, PayMyTuition, RBC, Eigen	Yes	Eventbrite, Zoom, Sked Social, Calendly, Yocal, and MyWCOOnline



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2. What is the scope of this PIA?

The scope of this PIA is to assess personal information being collected, used, and disclosed to Technolutions Slate Services through use of the CRM.

3. What are the data or information elements involved in the initiative?

Personal information will be collected, stored, and processed in the CRM via a connection with ECUAD’s existing software and other chosen databases, as well as manual direct input into the CRM by ECUAD staff or by individuals themselves.

Identified data elements that may be included in the CRM listed by constituent group are listed in the table below. Contact information is not considered personal information under the BC *Freedom of Information and Protection of Privacy Act (FIPPA)*.

Table 2 Identified Data Elements by Constituent Group

Registered Students, Applicants and Alumni	Prospective Students
<ul style="list-style-type: none"> • Name • Birthdate • Contact information (including address, phone number & email) • Student ID Number • Program information • Course history including grades and assessment results • ECUAD Transcripts • Transfer Credit / Transcripts from other organizations • Advising notes • Counselling notes • Payment information (financial) • Records of student interactions with service departments 	<ul style="list-style-type: none"> • Name • Previous schooling information • Contact information (including address, phone, and email) • Academic intentions • Personal profile, which includes information such as Birthdate; connections (parents/guardians); or other external constituents that ECUAD may be communicating with e.g., prospective students may be siblings, or a prospective student may be child of a donor) • Historic Interaction between ECUAD and the prospective student. • Correspondence • Photo, digital, video or audio recordings • Event registration and attendance • Advising notes



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<ul style="list-style-type: none"> • Application details • References from applications • Date of graduation • Event registration and attendance • Correspondence history • International Student specific information (Visa; Study permit information; Homestay location; Travel details; Pictures; Agent relationships) • Photo, digital, video or audio recordings 	<ul style="list-style-type: none"> • Counselling notes
<p>ECUAD Employees</p> <ul style="list-style-type: none"> • Name • Contact information (including phone number & email) • Title / Department • Employee ID Number • Employee calendar (Office 365)? • Appointment information (Office 365)? • Employee notes, which include notes that employees have made for themselves as they use the system. This includes information ECUAD employees may want to retain on employees of external companies (e.g., Information for ECUAD employees to share amongst each other who may be collaborating with an external constituent who is an employee) • CRM usage history based on audit logs which will provide information on when employees may be accessing the portal and how they are using the portal 	<p>Donors</p> <ul style="list-style-type: none"> • Name • Contact Information (including address, phone number and email) • Employment information • Historic interactions • Event registration and attendance • Personal profile, which includes information that the Advancement staff collect in relation to prospective and existing donors. May also include information such as birth date • Correspondence • Financial details • Donation history
<p>Other Contacts</p> <ul style="list-style-type: none"> • Name • Contact information (including address, phone, and email) – personal and/or work 	



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<ul style="list-style-type: none"> • Employment information • Personal profile, which includes information such as connections (parents/guardians/students); or other external constituents that ECUAD may be communicating with e.g., prospective students may be siblings, or a prospective student may be child of a donor) • Historic Interaction between ECUAD and the prospective student. • Correspondence • Event registration and attendance 	
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4. Does the initiative include personal information?

Yes.

Personal information is any recorded information about an identifiable individual, other than business contact information. Personal information includes information that can be used to identify an individual through association or reference.

If personal information is involved in your initiative, please continue to the next page to complete your PIA. If no personal information is involved, please submit Parts 1, 6, and 7 to your privacy office. They will guide you through the completion of your PIA.

Part 2 – Collection, Use and Disclosure

Use this column to describe the way personal information moves through the initiative step by step as if you were explaining it to someone who does not know about your initiative.	Collection, use, disclosure	FOIPPA authority	Other legal authority
Step 1: CRM manual or automatic uptake of demographic/contact information about individuals requesting information from ECU, applicants, students, other advisors (e.g., parents, high schools), alumni, donors or subscribing to ECU email lists.	Collection	26(c)	n/a



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Use this column to describe the way personal information moves through the initiative step by step as if you were explaining it to someone who does not know about your initiative.	Collection, use, disclosure	FOIPPA authority	Other legal authority
Step 2: CRM automatic uptake of demographic/contact information about individuals interacting with ECU promotional information on the internet. Embedding internet marketing tracking code (such as Google Analytics, Google AdWords, social media, and conversion tracking) to identify which individuals are interacting with ECU.	Collection, Use	26(c) and 32	n/a
Step 3: CRM manual or automatic uptake of communication with the individuals identified in step 1 and 2. Including email opening and click-tracking for communications sent through Slate.	Collection, Use	26(c) and 32	n/a
Step 4: CRM manual or automatic uptake of interactions by the individuals identified in step 1 and 2 who visit the ECU website, by using a Ping tracking code.	Collection, Use	26(c) and 32	n/a
Step 5: CRM manual or automatic uptake of details contained in event registration.	Collection, Use	26(c) and 32	n/a
Step 6: CRM manual or automatic uptake of details contained in applications for admission.	Collection, Use	26(c) and 32	n/a
Step 7: CRM manual or automatic uptake of evaluating applications for admission and notifying applicants of their acceptance status.	Use	32	
Step 8: CRM manual or automatic uptake processing applicant's admission and registration, including payment. Store payment amounts/dates/method. (Actual payment information such as credit card numbers and bank accounts should only be stored on the applicable payment processor's system).	Collection, Use	26(c) and 32	
Step 9: CRM Student portal for manually or automatic uptake tracking interactions with students throughout application through registration, and ongoing after registration and graduation.	Use	32	



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5. Collection Notice

FIPPA authorities that allow for the collection, use and disclosure of personal information with the use of the CRM:

- Collection of personal information – section 26(c) + 26(e)
- Use of personal information – section 32
- Disclosure of personal information – section 33.1 + 33.2

Collection notifications should be presented to individuals at identified collection points as required under section 26 of the FIPPA. Each collection point may have its own purpose for the collection of personal information and these specific purposes must be included in each required notification.

Part 3– Storing Personal Information

6. Is any personal information stored outside of Canada?

No. Information stored in Slate CRM on cloud servers in Canada.

7. Does the initiative involve sensitive personal information?

Yes.

Whether or not personal information is sensitive can depend on context, including where and how the information is stored. This means that answering this question will depend on the context of the initiative. Sensitive personal information is expressly or implicitly confidential (e.g., Personal financial information, geolocation data, and Personal health information). Information about sexual orientation, gender identity, religious or political beliefs, and race or ethnicity, also are widely accepted as being “sensitive”.

8. Where and how are you storing the personal information involved in the initiative?

Personal information will be stored on the servers of the vendor (Technolutions) or the vendor’s contracted server provider, and on ECU Colleague servers.

Part 4 – Assessment of Disclosure Outside of Canada

9. Is the sensitive personal information stored by a service provider?



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Name of service provider	Name of cloud infrastructure and/or platform provider(s) (if applicable)	Where and how is the sensitive personal information stored (including backups)?
Technolutions	Slate	Canada
Amazon Web Services (AWS)	Amazon	Canada

See attached contract from Technolutions for Slate. Slate is a Software as a Service (SaaS) web hosted application. Licencing is for unlimited ECU users, and licencing tiers are based on the total number of submitted applications that an institution receives annually.

Contract duration will be 3-5 years.

10. Are you relying on an existing contract, such as an enterprise offering from BCNet?

No, although data will be integrated with existing ECU applications such as EPBC, SlideRoom and Colleague.

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

Slate logins for ECU staff will ideally be integrated with ECU’s network login user IDs and password security for single sign-on (SSO), in coordination with IT Services. Applicable group permissions can be set within Slate for various usage by staff in specific departments (i.e. admissions, registration, communications, etc).

Student logins are limited to only portions of their personal data.

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

ECU’s Slate Security Administrators role have ability to monitor the access logs and user login history through the Slate Security Dashboard.

13. Describe the privacy risks for disclosure outside of Canada?



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Privacy risk	Impact to individuals	Likelihood of unauthorized collection, use, disclosure or storage of the sensitive personal information (low, medium, high)	Level of privacy risk (low, medium, high)	Risk response (this may include contractual mitigations, technical controls and/or procedural and policy barriers)	Is there any outstanding risk? If yes, please describe.
Information stored in ECU's Slate system breached/ released.	Details of their interactions with ECU re communication, registration, events.	low	medium	Contractual mitigation with Slate vendor Technolutions	no
AWS may use or disclose ECUAD data for unauthorized purposes.	Unauthorized use and disclosure	low	low	AWS is contractually bound to use ECUAD's data only as ECUAD has authorized Technolutions to do. It is assumed that AWS is contractually bound to Technolution to comply with the same security standards that Technolution is bound to comply with under the Agreement.	no
Personal information will be collected in the CRM at various collection points. This collection of personal information across the CRM will have varying purposes.	Overcollection and data-linking	high	medium	ECUAD is required to notify affected individuals about the collection of their personal information prior to collecting it as set out in the FIPPA (s. 26 and 27)	no
ECUAD has international applicants.	Collection and use	high	medium	Collection notifications and consents must be compliant and informed	no



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ECUAD's collection and use of their personal information is subject to relevant jurisdictions.				consents for this data use is required. Contravention of out of Canada law could result in reputational risk and even fines from Privacy Regulators.	
It is unclear if personal information will be collected about individuals from social media sites and will be retained in the CRM.	Overcollection	high	Low/medium	Limit the collection of personal information from a social media site to the substance of the interaction and do not inadvertently capture personal information not related to an individual's query.	no
The CRM will track each time a user logs into the system		high	low	Employees and other users should be notified that CRM creates logs that collects information (their personal information) about their interactions with CRM ECUAD will review logs created for all computer systems and can review logs and learn about an employee's and other individual's activity in these systems.	no



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Part 5 – Security of Personal Information

14. Does the initiative involve digital tools, databases or information systems?

Yes.

15. Do you or will you have a security assessment to help you ensure the initiative meets the reasonable security requirements?

Will work with IT services to ideally integrated Slate logins for ECUAD staff with ECUAD’s staff network login user IDs and password security.

Details: <https://technolutions.com/solutions/slate/security>

IT Services can request additional information from the vendor Technolutions regarding Slate security.

16. Controlling and tracking access - Please check each strategy that describes how you limit or restrict who can access personal information and how you keep track of who has accessed personal information in the past. Insert your own strategies if needed.

Strategy	
We allow employees only in certain roles access to information	Yes
Employees that need standing or recurring access to personal information must be approved by the appropriate authority	Yes
We use audit logs to see who accesses a file and when	Yes

Part 6 – Accuracy, Correction + Retention

17. Do you have a process in place to correct personal information?

Users will correct personal information, when notified.



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Also, with Slate’s student portal functionality, users provide their own updated personal information when requesting information, signing up for ECUAD mailing lists, registering for events, and applying to attend ECUAD.

18. Does your initiative use personal information to make decisions that directly affect an individual(s)?

Yes, the individual’s application for admission and enrollment.

19. Do you have a retention schedule in place related to personal information used to make decisions? Retention and/or disposition schedule that will ensure that personal information is kept for at least one year after it is used in deciding directly affecting an individual?

The intention is to retain the data related to personal data used to make decisions. This will become part of the individual’s ECUAD record.

As outlined in the Master Services Agreement (MSA) between Technolutions and ECU, Termination Clause #13:

“Within five (5) business days of termination or expiration of Agreement, Provider will surrender to Client any and all records, drafts, notes, memorandum, documents, and other tangible information, existing in any medium, which relate to the Contracted Services provided hereunder or were supplied by Client to Provider in connection with the Contracted Services provided hereunder including, but not limited to, Client’s Confidential Information, and all copies, reprints, or reproductions thereof made by Provider in its possession or under its control (the “Data”). The Data is and shall remain the exclusive property of Client.”

“In the event of expiration or termination of Agreement, to the extent Provider has any continuing obligations under any Schedule, Provider shall, at no charge to Client, reasonably cooperate with Client and its designees to ensure a smooth transition of the Data to Client or its designee. Provider is obligated to provide the data in a format reasonably acceptable to Client.”

Please ensure Parts 7 and 8 are attached to your submitted PIA.



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Part 7 – Program Area Signatures

This PIA is based on a review of the material provided to the Privacy Office as of the date below. If, in future any substantive changes are made to the scope of this PIA, a PIA Update must be completed and submit it to Privacy Office.

Ali Enterzari

Department/Unit Manager

A handwritten signature in black ink that reads 'Ali Enterzari'.

Signature

27 June 2022

Date

Sandeep Sidhu

Chief Information Officer

A handwritten signature in black ink that reads 'Sandeep Sidhu'.

Signature

25 June 2022

Date

Adrian Tees

Privacy Officer

A handwritten signature in black ink that reads 'Adrian Tees'.

Signature

27 June 2022

Date

A final copy of this PIA (with all signatures) must be delivered to privacy@ecuad.ca for record keeping.