



Royal Roads University Privacy Impact Assessment *Destiny One Implementation* PIA# 2021-09

Table of Contents

PART 1: GENERAL INFORMATION	1
PART 2: COLLECTION, USE AND DISCLOSURE	4
PART 3: STORING PERSONAL INFORMATION	7
PART 4: ASSESSMENT FOR DISCLOSURES OUTSIDE OF CANADA	7
PART 5: SECURITY OF PERSONAL INFORMATION	7
PART 6: ACCURACY, CORRECTION AND RETENTION	9
PART 7: AGREEMENTS AND INFORMATION BANKS	11
PART 8: ADDITIONAL RISKS	11
PART 9: SIGNATURES	12

PART 1: GENERAL INFORMATION

PIA Drafter	Helen Love
<i>Business unit:</i>	IT Services
<i>Your name and title:</i>	Helen Love, Project Manager
<i>Your work phone:</i>	250-818-0312
<i>Your email:</i>	Helen.love@royalroads.ca
Initiative	PCS Systems Renewal Project – Destiny One implementation
<i>Initiative Lead name and title:</i>	Don Ostergard, CIO
<i>Initiative Lead phone:</i>	(250) 391-2600 x4166
<i>Initiative Lead email:</i>	Don.Ostergard@royalroads.ca



Royal Roads University Privacy Impact Assessment *Destiny One Implementation* PIA# 2021-09

GENERAL INFORMATION ABOUT THE PIA:

Is this initiative a data-linking program under FOIPPA? If this PIA addresses a data-linking program, you must submit this PIA to the Office of the Information and Privacy Commissioner.
No
Is this initiative a common or integrated program or activity? Under section FOIPPA 69 (5.4), you must submit this PIA to the Office of the Information and Privacy Commissioner.
No
Related PIAs, if any:
None

1. What is the initiative?

Effective December 2021 Royal Roads University will start to implement the Modern Campus Destiny One Student Management system. This system will be used by the Professional & Continuing Studies (PCS) department to manage student information, faculty contracts, partner (including clients and agents) contracts and curriculum offerings.

2. What is the scope of the PIA?

This PIA will identify the data elements being captured by the Destiny One application along with data flows to and from other applications associated with the use of the application. The PIA will also specify the controls placed around access to the data entered into the application and the potential risks to the data stored in the application.

This PIA will cover the initial implementation of the DestinyOne solution and ongoing use of the solution by the Royal Roads PCS division.

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



Royal Roads University Privacy Impact Assessment

Destiny One Implementation

PIA# 2021-09

Data	Description	Usage
Student:		
Last Name		Student identification & communication
First Name		Student identification & communication
Email – Personal		Student identification & communication
Date of Birth		Student identification
Address		Student identification & communication
Phone		Student identification & communication
SIN		Student identification & tax reporting
Citizenship Status	Canadian Y/N	Tax reporting
Ethnicity/EDI		Reporting
Payment Information	credit card #	Billing processing by a 3 rd party processor
Education Information		Credential audit
Guardian Information	For minor students	Communication
Sponsor Information		Payment & communication
Employment Information		Payment & communication

3.1 Did you list personal information in question 3?

YES

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

A person using the DestinyOne application will have to create an account and then purposely complete the form(s) in the application in order for their personal information to be collected. It would not be possible for personal information to be collected unintentionally.



Royal Roads University Privacy Impact Assessment

Destiny One Implementation

PIA# 2021-09

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.

5. Collection, use and disclosure

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
Users register in DestinyOne application using Royal Roads authentication “Person HUB”. During the registration process the individual registering will: Enter their first name, last name, preferred name, email address, address, telephone number and birthdate to complete identification. Additionally, they will indicate their preferred communication method (or opt-out of communications).	Collection	26(c) 26(d)	
The system will identify if the student has an existing account and create one assigning a student identifier if required.	Use	26(c)	
User will enter additional demographic information used for communications and to support required reporting: SIN, Citizenship Status, Ethnicity/EDI.	Collection	26(c) 26(d) 26(e)	
User may apply for a course of study and will complete an application form: Program choice, educational goal, professional history and educational history. User will complete payment for the application.	Collection	26(c) 26(d)	



Royal Roads University Privacy Impact Assessment

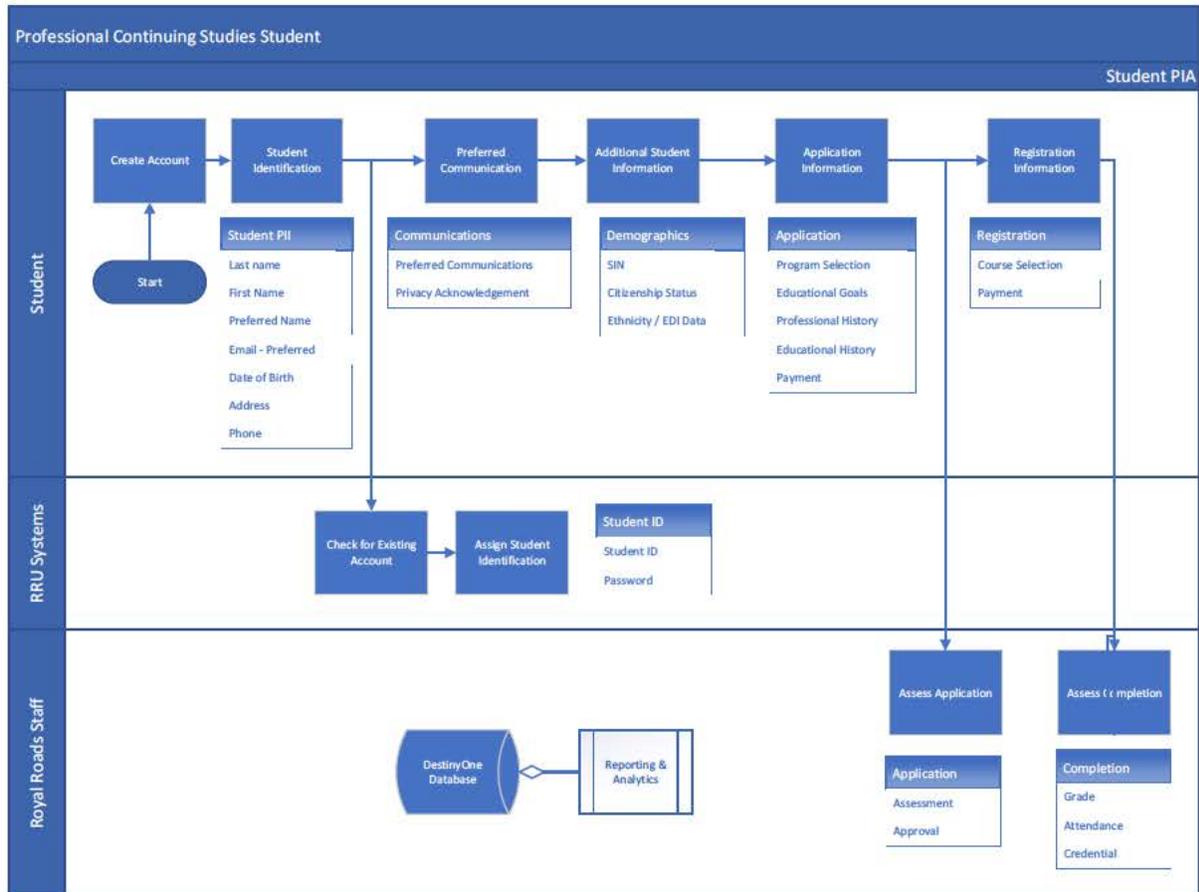
Destiny One Implementation

PIA# 2021-09

User registers for a course, program or area of study and completes payment for the selected courses.	Processing	32(a)	
Academic assessment information (e.g., grades) are entered by RRU.	Processing	32(a)	
Information collected is used for business management reporting and analytics.	Use	26(e) 32(a) 32(b)	
Information collected is disclosed in internal and external (e.g., ministry) reporting	Disclosure	33(2)(c) 33(2)(d)	
Information collected is disclosed to Clients/Partners/Agents to support invoicing.	Disclosure	33(2)(c) 33(2)(o)	



Royal Roads University Privacy Impact Assessment *Destiny One Implementation* PIA# 2021-09



6. Collection Notice

Your personal information is collected under the authority of the University Act and is subject to the Freedom of Information and Protection of Privacy Act. Your personal information will be used to complete create a student account and enable registration and payment for Royal Roads courses. Information submitted by you will be confidential and consequently shared with our contracted services provider (Modern Campus) managing this system and will not be disclosed to any other external third parties unless we are authorized to do so by you. For more information regarding the collection and use of your personal information please contact Royal Road's University's Privacy Officer via regular email privacyofficer@royalroads.ca.



Royal Roads University

Privacy Impact Assessment

Destiny One Implementation

PIA# 2021-09

PART 3: STORING PERSONAL INFORMATION

If you're storing personal information outside of Canada, identify the sensitivity of the personal information and where and how it will be stored.

7. Is any personal information stored outside of Canada?

No

8. Does your initiative involve sensitive personal information?

Yes

9. Is the sensitive personal information being disclosed outside of Canada under FOIPPA section 33(2)(f)?

No

10. Where are you storing the personal information involved in your initiative?

In Canada, in the Microsoft Azure Canada West data centre, and in the Royal Roads University data centre.

PART 4: ASSESSMENT FOR DISCLOSURES OUTSIDE OF CANADA

Not applicable.

PART 5: SECURITY OF PERSONAL INFORMATION

In Part 5 you will share information about the privacy aspect of securing personal information. People, organizations or governments outside of your initiative should not be able to access the



Royal Roads University Privacy Impact Assessment *Destiny One Implementation* PIA# 2021-09

personal information you collect, use, store or disclose. You need to make sure that the personal information is safely secured in both physical and technical environments.

15. Does your initiative involve digital tools, databases or information systems?

Yes

15.1 Do you or will you have a security assessment to help you ensure the initiative meets the security requirements of FOIPPA section 30?

Yes

16. What technical and physical security do you have in place to protect personal information?

Describe where the digital records for your initiative are stored (e.g. on your organization's LAN, on your computer desktop, etc.) and the technical security measures in place to protect those records. Technical security measures include secure passwords, encryption, firewalls, etc. Physical security measures include restricted access to filing cabinets or server locations, locked doors, security guards, etc.

Destiny One

Section 15(1)(l), Section 21

RRU

Section 15(1)(l)



Royal Roads University
Privacy Impact Assessment
Destiny One Implementation
 PIA# 2021-09

Section 15(1)(I)

17. 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 only allow employees in certain roles access to information	Yes
Employees that need standing or recurring access to personal information must be approved by managerial lead	Yes
We use audit logs to see who accesses a file and when	Yes
Describe any additional controls:	

PART 6: ACCURACY, CORRECTION AND RETENTION

In Part 6 you will demonstrate that you will make a reasonable effort to ensure the personal information that you have on file is accurate and complete.

18. How will you make sure that the personal information is accurate and complete?

Users (students, clients, partners) enter their own information using the Self-Service Portal and are responsible for its accuracy. To aid in data accuracy and completeness some data fields are subject to technical verification prior to the data being submitted.



Royal Roads University

Privacy Impact Assessment

Destiny One Implementation

PIA# 2021-09

19. Requests for correction

FOIPPA gives an individual the right to request correction of errors or omissions to their personal information. You must have a process in place to respond to these requests.

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

Yes

Users (students, clients, partners) have access to update their own information using the Self-Service Portal. Users may also contact Royal Roads PCS to update information if they are unable to use the Self-Service portal.

19.2 Sometimes it's not possible to correct the personal information. FOIPPA requires that you make a note on the record about the request for correction if you're not able to correct the record itself. Will you document the request to correct or annotate the record?

Yes

19.3 If you receive a request for correction from an individual and you know you disclosed their personal information in the last year, FOIPPA requires you to notify the other public body or third party of the request for correction. Will you ensure that you conduct these notifications when necessary?

Yes

20. Does your initiative use personal information to make decisions that directly affect an individual?

Yes



Royal Roads University

Privacy Impact Assessment

Destiny One Implementation

PIA# 2021-09

- 21. Do you have an information schedule in place related to personal information used to make a decision?**

Yes.

Royal Roads has a detailed records and retention schedule that may be viewed [HERE](#). A review of the appropriate section in this schedule confirms that personal information used to make a decision directly affecting an individual is retained for a minimum of one year.

PART 7: AGREEMENTS AND INFORMATION BANKS

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

- 22. Does your initiative involve an information sharing agreement?**

No

- 23. Will your initiative result in a personal information bank?**

A personal information bank (PIB) is a collection of personal information searchable by name or unique identifier.

No

PART 8: ADDITIONAL RISKS

Part 8 asks that you reflect on the risks to personal information in your initiative and list any risks that have not already been addressed by the questions in the template.



Royal Roads University Privacy Impact Assessment *Destiny One Implementation* PIA# 2021-09

24. Risk response

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.

Possible risk	Response
Employees could access personal information and use or disclose it for personal purposes	Oath of Employment; contractual terms, etc.
Request may not actually be from client (i.e., their email address may be compromised)	Implementation of identification verification procedures
Client's personal information is compromised when transferred to the service provider	Transmission is encrypted and over a secure line
Inherent risks in sending personal information to a client via email	Policy developed to inform clients of risk and ask if they would like the information via a different medium, such as through the mail. Use of Self-Service Portal

PART 9: SIGNATURES

Privacy Office Comments

Privacy Office Signatures

This PIA is based on a review of the material provided to the Privacy Office as of the date below.

Signing below constitutes a recommendation of this PIA to the RRU VP CFO.		
Signature:		
Name:	Don Devenney	Date: <u>9/28/2022</u>



Royal Roads University Privacy Impact Assessment

Destiny One Implementation

PIA# 2021-09

Program Area Signatures

This PIA accurately documents the data elements and information flow at the time of signing. If there are any changes to the overall initiative, including to the way personal information is collected, used, stored or disclosed, the program area will engage with their Privacy Office and if necessary, complete a PIA update.

Program Area Comments:

Role	Name / Signature <small>(Right-click on signature line and select "Sign")</small>	Date signed			
Program Area	<table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td style="background-color: #d9e1f2; width: 150px;">Signature:</td> <td rowspan="2" style="text-align: center; vertical-align: middle;"><ENTER FULL NAME></td> </tr> <tr> <td style="background-color: #d9e1f2;">Name:</td> </tr> </table>	Signature:	<ENTER FULL NAME>	Name:	Date: <DATE>
Signature:	<ENTER FULL NAME>				
Name:					
Chief Information Officer	<table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td style="background-color: #d9e1f2; width: 150px;">Signature:</td> <td rowspan="2" style="text-align: center; vertical-align: middle;"><ENTER FULL NAME></td> </tr> <tr> <td style="background-color: #d9e1f2;">Name:</td> </tr> </table>	Signature:	<ENTER FULL NAME>	Name:	Date: <DATE>
Signature:	<ENTER FULL NAME>				
Name:					
AVP, Operations & Resilience	<table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td style="background-color: #d9e1f2; width: 150px;">Signature:</td> <td rowspan="2" style="text-align: center; vertical-align: middle;"><ENTER FULL NAME></td> </tr> <tr> <td style="background-color: #d9e1f2;">Name:</td> </tr> </table>	Signature:	<ENTER FULL NAME>	Name:	Date: <DATE>
Signature:	<ENTER FULL NAME>				
Name:					
Head of public body, or designate	<table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td style="background-color: #d9e1f2; width: 150px;">Signature:</td> <td rowspan="2" style="text-align: center; vertical-align: middle;"><ENTER FULL NAME></td> </tr> <tr> <td style="background-color: #d9e1f2;">Name:</td> </tr> </table>	Signature:	<ENTER FULL NAME>	Name:	Date: <DATE>
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