



Royal Roads University Privacy Impact Assessment

IDP Connect

PIA# 2022-05

Table of Contents

PART 1: GENERAL INFORMATION	2
PART 2: COLLECTION, USE AND DISCLOSURE	5
PART 3: STORING PERSONAL INFORMATION	6
PART 4: ASSESSMENT FOR DISCLOSURES OUTSIDE OF CANADA	7
PART 5: SECURITY OF PERSONAL INFORMATION	10
PART 6: ACCURACY, CORRECTION AND RETENTION	11
PART 7: AGREEMENTS AND INFORMATION BANKS	13
PART 8: ADDITIONAL RISKS	13
PART 9: SIGNATURES	14



Royal Roads University Privacy Impact Assessment

IDP Connect

PIA# 2022-05

PART 1: GENERAL INFORMATION

PIA Drafter	Marcelo Alves
Business unit:	Global Recruitment and Partnerships
Your name and title:	Marcelo Barros Torres Alves Digital Global Recruitment Specialist
Your work phone:	(250) 412-1832
Your email:	Marcelo.barrostorresalves@royalroads.ca
Initiative	
Initiative Lead name and title:	Brooke Klassen Manager, Student Recruitment
Initiative Lead phone:	250.391.2600 ext. 4129
Initiative Lead email:	brooke.1klassen@royalroads.ca



Royal Roads University Privacy Impact Assessment

IDP Connect

PIA# 2022-05

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?

IDP Connect is a leading digital consolidator of higher education institutions that conveys through webpages, the unique selling points of an institution to specific audiences. IDP Connect provides brand awareness for institutions around the world through web presence.



Royal Roads University Privacy Impact Assessment

IDP Connect

PIA# 2022-05

2. What is the scope of the PIA?

The scope of this PIA includes the agreement between RRU GRP and IDP Connect to promote university's profile and programs digitally. IDP Connect is a web-based platform that acts as a consolidator of high education institutions for international students. Users can search for schools and programs based on a variety of criteria. Those who express an interest in RRU's programs must fill out a data collection form to receive more information. The form collects basic personal information that is shared with RRU, which eventually uploads it to its CRM.

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

The platform collects and share with RRU the following data: first name, last name, email address, country or residence, country of citizenship, program of interest, projected start date, option personal message.

3.1 Did you list personal information in question 3?

Yes

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

N/A. Personal information is collected only if the person submitting it specifically chooses to do so.



Royal Roads University Privacy Impact Assessment

IDP Connect

PIA# 2022-05

PART 2: COLLECTION, USE AND DISCLOSURE

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
Step 1: Students submit first name, last name, country of residence, country of citizenship, email address, questions to IDP Connect RMI Form https://www.hotcoursesabroad.com/study/university-enquiry/college.html?cid=414198&suborderitemid=95869&courseId=57673326&regGaPaGeNameUX=Course%20Details&fromCourseTile=Y&parentQualId=3&childQualId=58&ajax=true&preferredCatCode=D,D2	Collection	27 (1)(a)(i)	
Step 2: IDP Connect sends RRU an email with student information from RMI form	Collection	26 (c)	
Step 3: RRU sends follow up email to prospect through Campaign Monitor.	Use	32 (b)	
Step 4: RRU puts student information into CRM.	Collection	26 (c)	



Royal Roads University Privacy Impact Assessment

IDP Connect

PIA# 2022-05

6. Collection Notice

RRU does not collect any information directly from prospects. IDP Collects student information from prospects who give permission for IDP Connect to share with RRU. At the end of the RMI form the following is written “Your personal data will be shared with this institution so they can respond to you directly. Please don’t proceed if you’re unhappy with this.”

Students must also “Confirm I am over 16 and I agree to the Hotcourses Abroad Terms and Conditions & Privacy Notice” and this statement links here: <https://www.hotcoursesabroad.com/study/termscondition.html> and here <https://www.hotcoursesabroad.com/study/privacy.html>

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?

Yes

8. Does your initiative involve sensitive personal information?

No



Royal Roads University Privacy Impact Assessment

IDP Connect

PIA# 2022-05

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?

Information *collected* through the IDP Connect system located in the United Kingdom and Singapore. Information that IDP Connect *shares* with RRU is stored in RRU's CRM servers.

PART 4: ASSESSMENT FOR DISCLOSURES OUTSIDE OF CANADA

11. Does the contract you rely on include privacy-related terms?

Yes, privacy clauses are part of the standard IDP Connect Terms and conditions and Data Processing Agreement.



Royal Roads University Privacy Impact Assessment

IDP Connect

PIA# 2022-05

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

Section 15(1)(I), Section 21

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

IDP does not collect personal data classed as sensitive according to GDPR laws. However, access to personal data is subject to user access audit logging.

17. Describe the privacy risks for disclosure outside of Canada.

Use the table to indicate the privacy risks, potential impacts, likelihood of occurrence and level of privacy risk. For each privacy risk you identify describe a privacy risk response that is proportionate to the level of risk posed.



Royal Roads University Privacy Impact Assessment

IDP Connect

PIA# 2022-05

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, considering the impact and likelihood)	Risk response (this may include contractual mitigations, technical controls, and/or procedural and policy barriers)	Is there any outstanding risk? If yes, please describe.
Unauthorized disclosure of student information	Name and email address are shared with unauthorized individuals or companies	Low	Low	Section 15(1)(l), Section 21	No



Royal Roads University Privacy Impact Assessment

IDP Connect

PIA# 2022-05

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 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.

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

- Yes

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

- No

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

RRU

Section 15(1)(I)



Royal Roads University Privacy Impact Assessment

IDP Connect

PIA# 2022-05

20. 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	X
We use audit logs to see who accesses a file and when	X
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.

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

FOIPPA section 28 states that a public body must make every reasonable effort to ensure that an individual's personal information is accurate and complete.

22. 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.

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

Yes. IDP follows UK GDPR requirements, including

- a. Subject Access Requests



Royal Roads University Privacy Impact Assessment

IDP Connect

PIA# 2022-05

- b. Self-service user profile updates
- c. Data Deletion requests
- d. Data retention and anonymisation policy

22.2 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

22.3 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?

Not applicable. RRU will not be disclosing an individual's personal information to any entities outside of RRU.

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

- No

24. 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



Royal Roads University Privacy Impact Assessment

IDP Connect

PIA# 2022-05

decision directly affecting an individual (is / is not) retained for a minimum of one year. (edit as required.)

PART 7: AGREEMENTS AND INFORMATION BANKS

25. Does your initiative involve an [information sharing agreement](#)?

No

26. Will your initiative result in a personal information bank?

No

PART 8: ADDITIONAL RISKS

27. 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
Risk 1: User withdraws consent to receive RRU emails.	Users are informed about the right to withdraw their consent at anytime. Upon request, the contact is immediately tagged to not receive further emails and removed from RRU's CRM database.



Royal Roads University Privacy Impact Assessment

IDP Connect

PIA# 2022-05

PART 9: SIGNATURES

Privacy Office Comments

This initiative is an important method of generating interest in RRU's programs and following up with interested parties. There is a minimum amount of personal information involved and it represents a low risk to RRU from a privacy perspective.

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:

X 

2022-03-17

Privacy Officer, Royal Roads University
Signed by: Windows Admin Center Client



Royal Roads University Privacy Impact Assessment

IDP Connect

PIA# 2022-05

Program Area Comments:

Role	Name / Signature <small>(Right-click on signature line and select "Sign")</small>	Date signed
Initiative lead	Signature: X  <small>Initiative Lead Signed by: c17bb65b-5a1f-422c-8b28-69eecb8643c5</small>	3/16/2022