



Royal Roads University Privacy Impact Assessment *Jira Cloud Implementation* PIA#2023-05

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PART 1: GENERAL INFORMATION

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<i>Business unit:</i>	IT Services, Planning & Delivery
<i>Your name and title:</i>	Dexter Armstrong, Technical Analyst/Project Coordinator
<i>Your work phone:</i>	4003
<i>Your email:</i>	Dexter.2armstrong@royalroads.ca
Initiative	Jira Cloud Implementation
<i>Initiative Lead name and title:</i>	Madeline McPherson, Manager, Planning & Delivery
<i>Initiative Lead phone:</i>	
<i>Initiative Lead email:</i>	Madeline.McPherson@royalroads.ca



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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.
This initiative is a data-linking program under FOIPPA 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.
This initiative is a common or integrated program or activity No
Related PIAs, if any:
Confluence Cloud Migration

1. What is the initiative?

Royal Roads University’s current Atlassian product, Jira Service Desk (v3.16.2) and Jira Software (v7.13.2), server installations have been out of maintenance support and have not received updates since 2019 posing a potential security risk to the university, as seen with the Confluence vulnerability from early 2022.

Implementing the Cloud version of Jira Software and Jira Service Management will eliminate the security risk associated with out-of-maintenance applications and create additional efficiencies, security, stakeholder visibility, and accessibility to a heavily utilized application within IT and other areas of the university. A thorough review of the configuration options and additional features and workflows that come with the out-of-the-box products will reduce



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inefficiencies and redundancies in day-to-day work and with automation allow for quicker responses to organizational needs (ie. change requests, incidents, etc.).

The project will be implementing these cloud products and not migrating them from our current server installations, although some data from the server installations will be populated into the cloud. Permissions and access to the application and contents will be done through AzureAD groups that are synced to our Atlassian site; this is already setup and configured for the Confluence Cloud application we are using.

The work will be done primarily by RRU IT resources, but professional services may be provisioned by Highway Three Solutions if budget is approved. Once implemented, the hope is to continue to use the Atlassian cloud products for 5+ years as the main IT work management system.

2. What is the scope of the PIA?

The scope of this PIA is the implementation, configuration, and use of the following Atlassian Cloud products:

Phase 1

- Jira Software
- Jira Service Management

Phase 2

- BitBucket (TBD) – This may be migrated to Azure instead
- Assets

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



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Primarily, most information going into these applications will be linked to a staff, faculty, or student @royalroads.ca account. Data/information collected in this instance are:

- First name, last name
- @royalroads.ca email
- @royalroads.ca ID
- Content of issue, request, etc.

If a user is unable to login, they can submit a ticket via an online form that pushes the information to Outlook and then is manually inputted into Jira. Data/information collected by the form are:

- First name, last name
- Email address (RRU, personal, or work email)
 - When manually inputting into the system, a RRU user account would be found and added to the ticket but the original email address still could be found in the copied details.
- Subject
- Message

3.1 Did you list personal information in question 3?

Yes

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

- Self-serve portal forms will be tailored to be clear and concise to minimise the collection of personal information.



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- Helpdesk staff have been instructed not to collect or copy & paste personally identifiable information (PII) into tickets.

PART 2: COLLECTION, USE AND DISCLOSURE

5. Collection, use and disclosure

Submission by Jira Form (logged in)

Currently: <https://jira.royalroads.ca/servicedesk/customer/portal/2>

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: User logs in with their RRU ID credentials	Collection	s.26(c)	
Step 2: Users can submit a ticket with details and it is automatically linked to their Atlassian Jira account	Collection	s.26(c)	
Step 3: Communications between agent and customer through Jira using RRU account	Use	s.32(a)	
Step 4: User and ticket details stored in Jira, associated with their RRU Jira account	Collection	s.26(c)	

Submission by Contact Form (not logged in)

Currently: https://www.royalroads.ca/contact/computer_services



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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: User fills in form with first/last name, email, and details	Collection	s.26(c)	
Step 2: Information sent to Outlook inbox	Collection	s.26(c)	
Step 3: Jira ticket created, details of email added to ticket (A user account associated with an RRU account is found and assigned)	Use	s.32(a)	
Step 4: Communications between agent and customer through Jira using RRU account	Use	s.32(a)	
Step 5: User and ticket details stored in Jira, associated with their RRU Jira account	Collection	s.26(c)	

6. Collection Notice

There is currently no collection notice on either form. The following collection notice will be added as part of this project:

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 a support request submitted by you and will be shared with our contracted services provider managing this system and will not be disclosed to any other external third parties unless we are directed to do so by you. For more information regarding the collection and use of your personal



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information please contact Royal Road's University's Privacy Officer via regular email
privacyofficer@royalroads.ca

PART 3: STORING PERSONAL INFORMATION

7. Is any personal information stored outside of Canada?

Yes

8. Does your initiative involve sensitive personal information?

No

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?

Data will be stored in US Data Centres until we are able to move our data to the Canadian data centres in 2024. **Section 21** at which time we will transfer both Jira and Confluence to those data centres.

PART 4: Not applicable

PART 5: SECURITY OF PERSONAL INFORMATION

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

Yes



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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

- If yes, you may want to append the security assessment to this PIA. Go to [question 20](#)
- If no, go to [question 19](#)
- **What technical and physical security do you have in place to protect personal information?**

Personal information will be protected by the following safeguards:

Section 15(1)(I), Section 21

RRU

Section 15(1)(I)

16. Controlling and tracking access

Strategy	
We only allow employees in certain roles access to information	Yes, users will require a Jira Service Management license and be associated with



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Strategy	
	the appropriate Azure AD group to access the projects where PII may be stored.
Employees that need standing or recurring access to personal information must be approved by IT Services management or delegate.	IT manager approval will be required to be associated with the Azure AD groups that grant access to the projects where PII may be stored.
We use audit logs to see who accesses a file and when	Not regularly, but we do have the ability view who accesses areas where PII may be stored
Describe any additional controls:	Atlassian has additional safeguards in place to protect PII and customer data. https://www.atlassian.com/trust

PART 6: ACCURACY, CORRECTION AND RETENTION

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

In most cases, personal information going into Jira will be associated with an RRU user account. RRU user accounts are generated through automated processes that use data gathered from other RRU systems (Agresso, CAMP, HRSmart, etc.). The creation of user accounts based on data collected from a “single source of truth” and automated processing will result in account information being accurate.

Agents who access the information to complete support requests are expected to access and use the information in a professional and safe manner to avoid disclosure of information to additional persons or parties.



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RRU has an explicit expectation that Atlassian will abide by their promised safeguards and alert us immediately of any breaches that may have put our data at risk.

18. Requests for correction

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

Yes

18.2 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

18.3 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?

N/A

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

No



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

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

21. Does your initiative involve an information sharing agreement?

No

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

No

PART 8: ADDITIONAL RISKS

23. 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: Atlassian Data Breach	If an incident affecting RRU is confirmed, Atlassian will inform the RRU contact that they have on record.



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Possible risk	Response
Risk 2: Compromised user account <i>Basic access, low impact.</i>	RRU would enact their incident response process to address the issue, risk, and impact.
Risk 3: Compromised admin account <i>Broader access, risk of medium to high impact.</i>	RRU would enact their incident response process to address the issue, risk, and impact.

PART 9: SIGNATURES

Privacy Office Comments

Jira Cloud is a software-as-a-service offering from Atlassian. Atlassian is a well-established, mature organisation with mature processes and policies based on recognised standards and verified by independent audit. There is no sensitive personal information being exposed through this initiative, which lowers the overall risk. I see no impediments, from a privacy perspective, to proceeding with this implementation.

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:		Date: <u>7/7/2023</u>
Name:	Don Devenney	



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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
Initiative lead	Signature: Name: <ENTER FULL NAME>	Date: <DATE>
Chief Information Officer Only required if they have been involved in the PIA	Signature: Name: <ENTER FULL NAME>	Date: <DATE>
Head of public body, or designate Only required if personal information is involved	Signature: Name: <ENTER FULL NAME>	Date: <DATE>