



Royal Roads  
UNIVERSITY

**Royal Roads University  
Privacy Impact Assessment  
LinkedIn Learning  
PIA #2021-05**

**Part 1 – General**

|                      |  |        |                         |
|----------------------|--|--------|-------------------------|
| Name of Organization | Royal Roads University   |        |                         |
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**1. Description of the Initiative**

Royal Roads University (RRU) has licensed LinkedIn Learning as a tool to assist employees to grow their knowledge boundaries and provide opportunities for learning outside the classroom and office. RRU has obtained the LinkedIn license under a master agreement from BCNET.

LinkedIn Learning is an online learning platform that offers course videos in business, technology, and creative skills subject areas. The videos, which are led by industry experts, provide an alternative way for employees to increase their skill sets. Use of the LinkedIn Learning platform is optional for employees of RRU and is not yet available to students.

RRU's Human Resources Department will administer LinkedIn. The administrators will have the ability to manage permissions and access for all users and will have unlimited access to do the following:

**Groups**

- Create/delete groups
- Add/remove users from groups
- Rename groups

**People & licenses**

- Invite new users
- Assign/revoke licenses

## Content

- Create/edit/delete custom content
- Create/edit/delete learning paths
- Create/edit/delete collections
- Recommend custom content/learning paths/collections

## Reports

- View/generate reports

## Other

- Configure SSO
- Configure other advance integrations

Personal information collected by LinkedIn Learning will be stored outside Canada and, therefore, notification will be provided to all employees before they provide their personal information.

## **2. Scope of this PIA**

This Privacy Impact Assessment covers the collection, use, disclosure, security, and storage of personal information related to the use of LinkedIn Learning by employees of Royal Roads University.

## **3. Related Privacy Impact Assessment**

There are no related Privacy Impact Assessments.

## **4. Elements of Information or Data**

The following applies to LinkedIn.com and LinkedIn Learning.

To create an account, users provide personal data including their name, email address and/or mobile number, and a password. If the user registers for a premium service, they also provide payment (e.g., credit card) and billing information.

LinkedIn uses cookies and similar technologies (e.g., pixels and ad tags) to collect data (e.g., device IDs) to recognize the user and their device(s) on, off and across different services and devices where the user has engaged with the LinkedIn services. LinkedIn allows others, such as customers, partners and service providers, to use cookies as described in the LinkedIn Cookie Policy. For example, third parties may use cookies in their LinkedIn pages, job posts and their advertisements on and off LinkedIn for their own marketing purposes.

LinkedIn also collects (or relies on others who collect) information about the user's device where they have not engaged with LinkedIn services (e.g., ad ID, IP address, operating system and browser information) so they can provide their Members with relevant ads and better understand their effectiveness. Users can opt out from LinkedIn's use of data from cookies and similar technologies that track user's behavior on the sites of others for ad targeting and other ad-related purposes.

When users visit or leave LinkedIn services (including some plugins and LinkedIn's cookies or similar technology on the sites of others), LinkedIn receives the URL of both the site the user came from and the one the user goes to and the time of the users visit. LinkedIn also gets information about the user's network and device (e.g., IP address, proxy server, operating system, web browser and add-ons, device identifier and features, cookie IDs and/or ISP, or user's mobile carrier). If the user uses LinkedIn services from a mobile device, that device will send LinkedIn data about the user's location based on the user's phone settings. LinkedIn will ask the user to opt-in before LinkedIn uses GPS or other tools to identify the user's precise location.

LinkedIn collects information about the user when the user sends, receives, or engages with messages in connection with LinkedIn services. For example, if the user gets a LinkedIn connection request, LinkedIn tracks whether the user has acted on it and will send the user reminders. LinkedIn also uses automatic scanning technology on messages to support and protect their site. For example, LinkedIn uses this technology to suggest possible responses to messages and to manage or block content that violates LinkedIn's User Agreement or Professional Community Policies from LinkedIn's services

RRU will provide LinkedIn with personal data about the user and the user's eligibility to use the Services that they purchase for use by their employees. For example, LinkedIn will get contact information for "Company Page" administrators and for authorizing users of LinkedIn's premium services, such as LinkedIn's recruiting, sales or learning products.

LinkedIn receives information about user's visits and interaction with services provided by others when the user logs-in with LinkedIn or visits others' services that include some of LinkedIn's plugins (such as "Apply with LinkedIn") or LinkedIn ads, cookies or similar technologies.

## **Part 2 – Protection of Personal Information**

### **5. Storage or Access outside Canada**

Storage of data in LinkedIn Learning is managed internationally with the primary data centres located in the United States. As such, consent is required as part of registering for the platform, or RRU can anonymize the user data that is passed on to LinkedIn.

### **6. Data-linking Initiative**

|   |     |
|---|-----|
| <b>In FOIPPA, "data linking" and "data-linking initiative" are strictly defined. Answer the following questions to determine whether your initiative qualifies as a "data-linking initiative" under the Act. If you answer "yes" to all 3 questions, your initiative may be a data linking initiative and you must comply with specific requirements under the Act related to data-linking initiatives.</b> |     |
| 1. Personal information from one database is linked or combined with personal information from another database;  | No  |
| 2. The purpose for the linkage is different from those for which the personal information in each database was originally obtained or compiled;   | No  |
| 3. The data linking is occurring between either (1) two or more public bodies or (2) one or more public bodies and one or more agencies.  | No  |
| <b>If you have answered "yes" to all three questions, please contact your privacy office(r) to discuss the requirements of a data-linking initiative.</b>   | N/A |

### **7. Common or Integrated Program or Activity**

|   |
|---|
| <b>In FOIPPA, "common or integrated program or activity" is strictly defined. Answer the following questions to determine whether your initiative qualifies as "a common or integrated program or activity" under the Act. If you answer "yes" to all 3 of these questions, you must comply with requirements under the Act for common or integrated programs and activities.</b> |
|---|

|  |     |
|--|-----|
| 1. This initiative involves a program or activity that provides a service (or services);   | Yes |
| 2. Those services are provided through:<br>(a) a public body and at least one other public body or agency working collaboratively to provide that service; or<br>(b) one public body working on behalf of one or more other public bodies or agencies; | No  |
| 3. The common or integrated program/activity is confirmed by written documentation that meets the requirements set out in the FOIPP regulation.  | No  |
| <b>Please check this box if this program involves a common or integrated program or activity based on your answers to the three questions above.</b>   | N/A |

**8. Personal Information Flow Diagram and/or Personal Information Flow Table**

| Personal Information Flow Table |   |                   |                        |
|---------------------------------|---|-------------------|------------------------|
|                                 | Description/Purpose   | Type              | FOIPPA Authority       |
| 1.                              | User accesses the LinkedIn Learning platform for the first time. The user opens a browser session, connecting to LinkedIn Learning. When prompted to log in, the user enters their Royal Roads email address and is directed to the Royal Roads Shibboleth Single Sign-on page where they enter their RRU credentials.<br><br>Once the user is logged in, they will be prompted to link or not-link their RRU account with their LinkedIn account (if they have one). | Collection        | 26(d)                  |
| 2.                              | User completes learning modules which lead to recognizable course or program completion which they can choose to present to others through their LinkedIn account.  | Use<br>Disclosure | 32(b)<br>33.1(1) (e.1) |
| 3.                              | Full Administrator can monitor the activity of users by seeing profile information of all users and who has acquired, progressed through, and completed learning paths. The full administrator will not provide this information to any individuals except when an individual enquires about their own information to resolve technical/procedural concerns.  | Use<br>Disclosure | 32(b)<br>33.2(a)       |
| 4.                              | Full Administrator can designate Sub Administrators who can curate content to suggest learning paths for individuals. Sub Administrators can send these curated learning paths to individuals but do not monitor the individual's progress.   | Use               | 32(b)                  |

## 9. Risk Mitigation Table

| Risk Mitigation Table |  |   |            |        |
|-----------------------|--|---|------------|--------|
|                       | Risk   | Mitigation Strategy   | Likelihood | Impact |
| 1.                    | Unauthorized individuals at RRU access the personal information and use or disclose it for personal purposes.      | <p>Only authorized employees in the HR Department will have access to personal information.</p> <p>Security is in place for RRU servers (see Part 3 – Security).</p> <p>All employees receive privacy training and are required to abide by RRU's privacy policies and guidelines.</p> <p>User accounts are accessed via a secure sign on process via LinkedIn including unique user ID's and strong passwords.</p> | Low        | Low    |
| 2.                    | Unauthorized individuals at LinkedIn access the personal information and use or disclose it for personal purposes. | <p>Privacy and security policies are in place.</p> <p><b>Section 15(1)(l), Section 21</b></p>   | Low        | Low    |
| 3.                    | Data in LinkedIn Learning is compromised.  | <p><b>Section 15(1)(l), Section 21</b></p>  | Low        | Low    |
| 4.                    | A user could have their personal information shared within the greater LinkedIn community.                         | <p>Use of LinkedIn is optional. Users are responsible for their privacy settings. LinkedIn has a Safety Centre which provides information on how users can keep their account secure.</p>   | Medium     | Low    |

## 10. Collection Notice

Royal Roads University collects personal information pursuant to the *University Act* and is subject to the *Freedom of Information and Protection of Privacy Act*. Royal Roads University is collecting personal information for the purpose of the management and administration of LinkedIn Learning courses including learning path performance information for employees of the University. The LinkedIn Learning courses are optional and not a requirement of Royal Roads University.

The personal information you provide to LinkedIn Learning will be stored outside of Canada. For information regarding the collection, use, disclosure and security of your personal information by LinkedIn Learning, please see the LinkedIn Privacy Policy at <https://www.linkedin.com/legal/privacy-policy>.

If you have questions regarding the collection, use, disclosure and security of your personal information by Royal Roads University, please contact:

Privacy Officer  
Royal Roads University  
2005 Sooke Road  
Victoria, B.C. V9B 5Y2  
[privacyofficer@royalroads.ca](mailto:privacyofficer@royalroads.ca)

### **Part 3 – Security of Personal Information**

11. Please describe the physical security measures related to the initiative (if applicable).

RRU

# Section 15(1)(I)

LinkedIn

Users are responsible for managing how their devices interact with the LinkedIn service including ensuring their devices are locked and logged off when not in use. LinkedIn provides additional information for users about safely using their services at <https://safety.linkedin.com/>.

12. Please describe the technical security measures related to the initiative (if applicable).

RRU

# Section 15(1)(I)

LinkedIn

## Section 15(1)(I), Section 21

Users can opt into two-step verification to protect accounts against unauthorized third-party access. This two-factor authentication uses an account password and a numeric code sent to the user's phone via SMS whenever LinkedIn does not recognize the new device attempting to sign in. Alternatively, they can use authenticator app verification (Microsoft Authenticator) to conduct the second step of authentication.

**13. Does your branch/department rely on any security policies?**

RRU

Information Security Policy: <http://policies.royalroads.ca/policies/information-security-policy>

IT Security Policy: <http://policies.royalroads.ca/policies/it-services-information-security-policy>

Privacy Policy: <http://policies.royalroads.ca/policies/privacy-policy>

LinkedIn

LinkedIn Privacy Policy: [https://www.linkedin.com/legal/privacy-policy?trk=homepage-learning\\_footer-privacy-policy](https://www.linkedin.com/legal/privacy-policy?trk=homepage-learning_footer-privacy-policy)

LinkedIn Cookie Policy: [https://www.linkedin.com/legal/cookie-policy?trk=homepage-learning\\_footer-cookie-policy](https://www.linkedin.com/legal/cookie-policy?trk=homepage-learning_footer-cookie-policy)

LinkedIn Safety Centre: <https://safety.linkedin.com/>

**14. Please describe any access controls and/or ways in which you will limit or restrict unauthorized changes (such as additions or deletions) to personal information.**

RRU

The Full Administrator will have access to all user information including profile information and learning path performance information. The Full Administrator will not provide this information to anyone except as needed to facilitate resolving a technical issue or managing a complaint related to the service. Each user will only have access to their own LinkedIn Learning profile. Other individuals can provide recommended learning paths but will not directly monitor the progress of the user within LinkedIn Learning without the consent of the user.

LinkedIn

## Section 15(1)(I), Section 21

**15. Please describe how you track who has access to the personal information.**

Only the Full Administrator has the capacity to provide Sub Administrator the capacity to access information. To mitigate the unnecessary tracking of performance data, Sub Administrators will only be given Curate Content permissions.

Users have the option to turn on/off activity broadcasts to limit who can see changes made to the user's profile. Users who do not want others to see when changes to their profile are made can uncheck the option. Users can choose who can see their connections and who can see their profile photos.

Users can choose to display anonymous profile information or show up as an anonymous LinkedIn member when viewing other profiles.

### **Part 4 – Accuracy/Correction/Retention of Personal Information**

**16. How is an individual's information updated or corrected? If information is not updated or corrected (for physical, procedural, or other reasons) please explain how it will be annotated? If personal information will be disclosed to others, how will the public body notify them of the update, correction, or annotation?**

Users are responsible for updating and correcting their own personal information. LinkedIn offers the user settings to control and manage the personal data LinkedIn has about them as follows:

- Users can ask LinkedIn to erase or delete all or some of the user’s personal data (e.g., if it is no longer necessary to provide Services to the user).
- Users can edit some of their personal data through their account. Users can also ask LinkedIn to change, update or fix their data in certain cases, particularly if it’s inaccurate.
- Users can ask LinkedIn to stop using all or some of the user’s personal data (e.g., if LinkedIn has no legal right to keep using it) or to limit LinkedIn’s use of it (e.g., if the user’s personal data is inaccurate or unlawfully held).
- Users can ask LinkedIn for a copy of their personal data and can ask for a copy of personal data the user provided in machine readable form.

**17. Does your initiative use personal information to make decisions that directly affect an individual(s)? If yes, please explain.**

No.

**18. If you answered “yes” to question 17, please explain the efforts that will be made to ensure that the personal information is accurate and complete.**

N/A

**19. If you answered “yes” to question 17, do you have a records retention and/or disposition schedule that will ensure that personal information is kept for at least one year after it is used in making a decision directly affecting an individual?**

N/A

### **Part 5 – Further Information**

**20. Does the initiative involve systematic disclosures of personal information? If yes, please explain.**

No.

**21. Does the program involve access to personally identifiable information for research or statistical purposes? If yes, please explain.**

No.

**22. Will a personal information bank (PIB) result from this initiative? If yes, please list the legislatively required descriptors listed in section 69 (6) of FOIPPA. Under this same section, this information is required to be published in a public directory.**

No.

### **Part 6 – Comments, Conditions and Concerns**

**Part 7 – Program Area Signatures**

  
\_\_\_\_\_  
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March 5/21  
Date

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Chief Information Officer

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Date

Approved by:

  
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Cheryl Eason  
Vice-President and CFO

April 8, 2021  
Date