



# Royal Roads University

## Privacy Impact Assessment

### *Offstreet Technology application*

PIA# 2023-06

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### **PART 1: GENERAL INFORMATION**

<b>PIA Drafter</b>	Jessica Woollard
<b><i>Business unit:</i></b>	Operations and Resilience
<b><i>Your name and title:</i></b>	Jessica Woollard, Portfolio Administration Manager
<b><i>Your work phone:</i></b>	250-391-2600 ext. 4127
<b><i>Your email:</i></b>	<a href="mailto:Jessica.woollard@royalroads.ca">Jessica.woollard@royalroads.ca</a>
<b>Initiative</b>	Robbins Parking management using Offstreet Technology
<b><i>Initiative Lead name and title:</i></b>	Carolyn Levesque, Associate Vice-President, Operations and Resilience
<b><i>Initiative Lead phone:</i></b>	250-391-2503
<b><i>Initiative Lead email:</i></b>	Carolyn.levesque@royalroads.ca



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#### GENERAL INFORMATION ABOUT THE PIA:

<b>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.</b>
This initiative is a data-linking program under FOIPPA No
<b>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.</b>
This initiative is a common or integrated program or activity No
<b>Related PIAs, if any:</b>
N/A

#### 1. What is the initiative?

RRU is entering a contract with Robbins Parking to manage parking services and enforcement on the Colwood campus. Robbins uses Offstreet Technology, a Saskatchewan-based parking software company, to sell parking permits to customers, store information about permit holders, manage special event and complimentary parking, and support the enforcement of parking regulations. Offstreet stores its data in Canada.

Users wanting to purchase a long-term parking permit will have the option of purchasing a permit online through Offstreet. Should the user wish to purchase a pass through Offstreet, personal and financial information will be collected by the application.

Offstreet will store personal information and vehicle license plate numbers of long-term parking pass holders and users granted special event of complimentary parking. The database will be accessed by select RRU employees and Campus Security contractors and select Robbins



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Parking administrative employees. Robbins Parking enforcement personnel will only have access to vehicle license plate numbers and parking expiration dates through an application called IRIS – the license plates of vehicles with valid RRU parking permits or passes are sent to IRIS from Offstreet as well as any other application used to sell parking at RRU (e.g., Honk, Pay By Phone and parking meters). Note: vehicle license plate numbers are not considered personal information under FOIPPA.

The storage of license plate numbers enables Robbins to perform parking enforcement through an automatic license plate recognition (ALPR) service provided by Genetec Inc. Robbins Parking enforcement personnel will scan the actual license plates of vehicles parked on campus using Genetec’s camera technology. Genetec then compares the license plates scanned by camera with the license plates stored in IRIS.

Robbins uses only the license plate number to issue parking violations. If a parking violation is unpaid after a certain number of days, Robbins sends the license plate number to ICBC. ICBC releases the personal information (e.g., full name of vehicle’s registered owner and their registered address) associated with the license plate to Robbins to follow up on the violation. If the violation remains unpaid still, Robbins sends the personal information acquired through ICBC to a collection agency.

## **2. What is the scope of the PIA?**

This PIA covers the use of Offstreet Technology by select Robbins Parking and RRU employees and RRU’s Campus Security contractors for parking management and enforcement.



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This PIA does not cover any other parking technologies used on campus, for example, optional payment applications for short-term (e.g., hourly or daily) parking passes such as Honk and Pay By Phone.

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

I. Offstreet may collect, use, store, disclose or access the following information for each long-term parking permit holder (a long-term pass is valid for one week or more):

- First and last name
- Vehicle license plate number
- Type of vehicle (e.g., general, motorcycle)
- Affiliation to RRU (e.g., student, employee)
- Mailing address
- Email address
- Phone number
- Whether the user has an accessibility permit
- Payment information (credit card number, expiration date, amount paid)

The above information may be collected through (a) Offstreet's secure online application or (b) in person by RRU personnel. In (a), the information is entered by the individual; in (b) the information is provided by the individual but entered into Offstreet by authorised RRU personnel.



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III. RRU’s administrative users of Offstreet will have user accounts with pre-assigned permissions.

Admin accounts will include the following information

- First and last name
- RRU email address
- Username
- Password

#### 3.1 Did you list personal information in question 3?

Yes

## 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.

### 4. 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
<i>Parking pass information</i>	collection	s.26(c)(d)	



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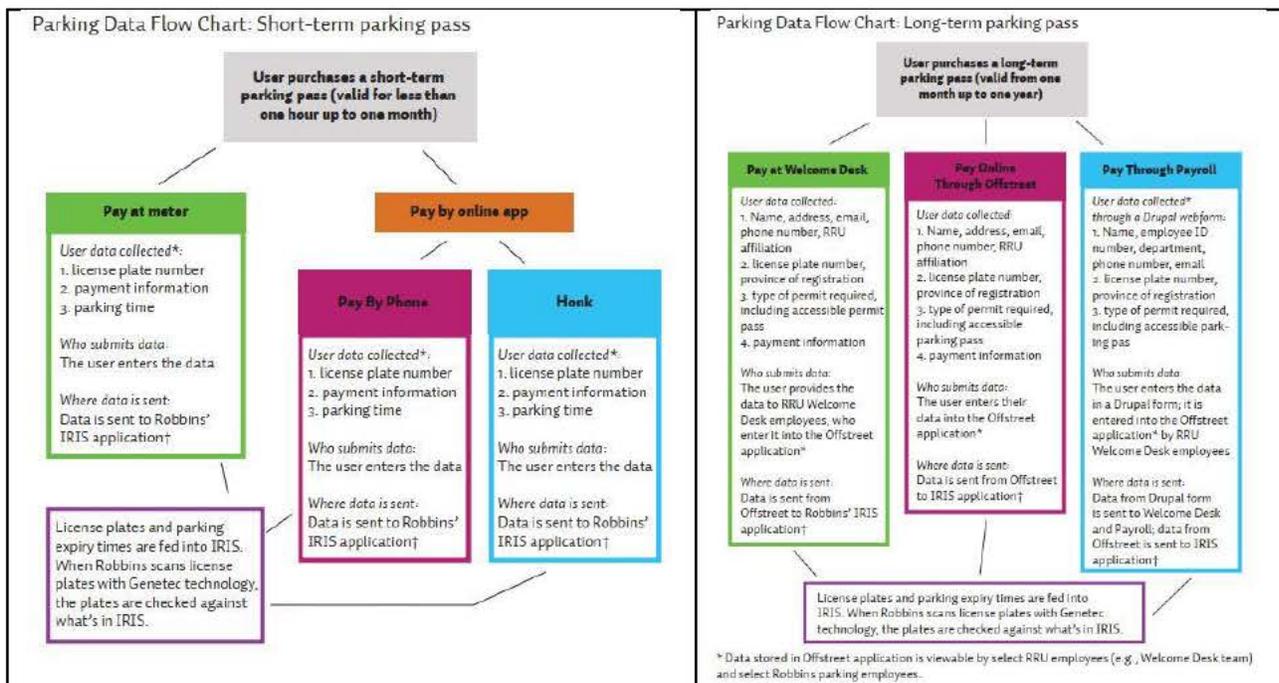
Use this column to describe the way personal information moves through your initiative step by step as if you were explaining it to someone who does not know about your initiative.	Collection, use or disclosure	FOIPPA authority	Other legal authority
At the time of purchasing a long-term parking pass, user submits their personal information.			
Personal information is added to Offstreet in one of two ways: (1) entered online by the user at the time of purchasing a permit online through Offstreet or (2) entered manually by RRU personnel.	use	s.32(a)	
<p>Robbins Parking regularly provides RRU with a list of license plates that have incurred parking violations. The list of license plates is cross-checked against the personal information in Offstreet to determine if vehicles with outstanding violations are registered to RRU students or employees. This information is used as follows:</p> <ul style="list-style-type: none"> <li>At convocation time, students with outstanding parking tickets may not be issued their parchment until violations are paid.</li> </ul>	disclosure	s.33(1)(d) s.33(1)(h) s.33(1)(o)(i)	



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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
<ul style="list-style-type: none"> <li>Disciplinary follow up may take place with employees with multiple parking violations, because violating parking standards is a breach of university policy.</li> </ul>			

## Data Flows





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#### 5. Collection Notice

A collection notice will not be required.

### PART 3: STORING PERSONAL INFORMATION

#### 6. Is any personal information stored outside of Canada?

No

#### 7. Does your initiative involve sensitive personal information?

No

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

N/A

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

The information is stored in the Offstreet application located on servers in Amazon Web Services (AWS) Canada data centre.

### PART 4: ASSESSMENT FOR DISCLOSURES OUTSIDE OF CANADA

N/A

### 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**

Offstreet has supplied a SOC 2 Type 2 audit report along with a HECVAT “All Surveys” security review. A review of these documents shows that Offstreet meets the requirements of FOIPPA section 30.

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

Offstreet has a Physical Security Policy that describes protocols in place to restrict entry to employee office space, the use of employee badges to monitor building access, employee security alarms and CCTV. All physical and logical access is revoked upon termination of employment.

**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.

Strategy	
RRU only allows employees in certain roles access to information.	X
Employees that need standing or recurring access to personal information must be approved by executive lead.	X
Offstreet has a built-in audit log that tracks which users take which actions in the database.	X
Onboarding and training at RRU includes confidentiality training.	X



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#### **PART 6: ACCURACY, CORRECTION AND RETENTION**

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

The personal information collected is provided by the individual.

**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

**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?**

No

**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?**

No



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#### **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.

**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**

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.

**23. Risk response**

<b>Possible risk</b>	<b>Response</b>
Offstreet experiences a data breach	<ol style="list-style-type: none"><li>1. Initiate RRU's Privacy Breach Response protocol.</li><li>2. Work with Robbins to ensure Offstreet follows requirements for disclosing a data breach.</li></ol>
Misuse of personal information	Train personnel with access to personal information to only collect, use, store and access personal information for the purposes outlined in this PIA.



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### PART 9: SIGNATURES

You have completed a PIA. Submit the PIA to your Privacy Officer for review and comment, and then have the PIA signed by those responsible for the initiative.

#### Privacy Office Comments

Recommended for approval.

#### 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>4/30/2024</u>
Name:	Privacy Officer Don Devenney		

#### 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:



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Role	Name / Signature <small>(Right-click on signature line and select "Sign")</small>	Date signed
<b>Initiative lead</b>	Signature: <i>Jason Humphries</i> Name: <b>Jason Humphries, Director Emergency Management &amp; Resilience</b>	Date: <u>5/2/2024</u>
<b>AVP, Operations &amp; Resilience</b>	Signature: <i>CLevesque 2May24</i> Name: <b>Carolyn Levesque</b>	Date: <u>5/2/2024</u>
<b>Head of public body, or designate</b>  Only required if personal information is involved	Signature: Philip Twyford, VPFO Name: Philip Twyford, VPFO	Date: <u>5/7/2024</u>