



Royal Roads University Privacy Impact Assessment SurveyMonkey

Part 1 – General

Name of Department/Branch:	RRU – Learning, Teaching and Research		
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1. Description of the Initiative

Online surveys are used extensively at Royal Roads University (RRU) for purposes such as course evaluations, research and faculty questionnaires. The use of surveys enables continuous improvement of teaching through course evaluations, and it provides an improved research tool to RRU students and faculty.

Royal Roads University is moving its survey tool from the current open source product, Lime Survey, to SurveyMonkey, as Lime Survey, which is an open source product hosted on premises at RRU, has become unsupported. Users are experiencing issues such as being unable to save a partially completed survey, and IT has data security concerns with the Lime Survey platform.

In April 2018, RRU purchased an enterprise license for SurveyMonkey through BCNET's licensing agreement with the vendor. Survey Monkey is an online platform used to develop and deploy surveys. SurveyMonkey is managed and hosted as a shared service for British Columbia higher education institutions through a Master Services Agreement between BCNET and SurveyMonkey executed on September 26, 2017.



The objective of moving to SurveyMonkey is to set up a stable and robust enterprise survey tool service that can serve all RRU's survey needs. This will support continuous feedback and improvements of RRU courses, programs, and services as well as RRU research activities. Another equally important objective is to improve RRU's data security.

Access to historical data currently in Lime Survey will be maintained and guidelines and requirements will be adhered to for maintaining access to the data for research purposes.

2. Scope of this PIA

This Privacy Impact Assessment covers the collection, use, disclosure, storage and security of personal information provided by RRU faculty, staff and students who use SurveyMonkey. Personal information is collected only for the purpose of using the SurveyMonkey tool and, if necessary, providing system support to users. Personal information including survey responses will be stored in Canada (Amazon Web Services Canada) with high level physical and technical security measures in place to protect the data.

Usage of personal information includes:

- Student retention surveys (withdrawals, deferrals)
- Faculty research/project-based surveys
- Ongoing/regular student surveys
- Project-based surveys such as understanding student needs on campus accommodations
- Course evaluations

Potential future uses include:

- Human Resources
- Research, including faculty, students and the Office of Research
- IT, Finance and other administrative groups
- Library (through records management)

3. Related Privacy Impact Assessments

This is the first PIA completed by RRU for this initiative. A 2017 BCNET AWS PIA examines Survey Monkey's contractor, Amazon Web Services. This PIA serves as a guidance and assurance as to the security of that entity with respect to personal information that may be provided to it.



4. Elements of Personal Information or Data

Information that SurveyMonkey collects includes:

- Full Name
- Position Held
- Email address
- Usage information
- Device and browser data including IP Address

- Information from page tags
- Log Data
- Referral information
- Personal comments provided by survey participants

Use of some of SurveyMonkey's services will also result in the collection of the following data:

- Address book information
- Survey/form/application data
- Profile data

Part 2 – Protection of Personal Information

5. Storage or Access outside Canada

Under the Special Terms of the Master Services Agreement between BCNET and SurveyMonkey, the Customer's survey responses will only be stored in Canada as follows:

"British Columbia, Canada BC1. Privacy Provisions. Despite the provisions of Section 7.3 (Privacy) and the privacy policies of FluidSurveys and SurveyMonkey, the Customer's survey responses (the "Survey Data") will only be stored in Canada. SurveyMonkey employees and subcontractors (the "Customer Support Staff") will not access the Survey Data from outside Canada, except (a) when authorized by the Customer for the purpose of implementing, maintaining, repairing, troubleshooting or upgrading the customer's account or the Services (the "Customer Support Services"), or (b) for data recovery purposes in the event of a system failure. Customer Support Staff will only ask for authorization to access the Survey Data as a last resort, after exploring every reasonable alternative. After receiving such authorization, Customer Support Staff will only access as much Survey Data as required to perform the Customer Support Services and will limit the period of access to the minimum time necessary. If the Customer does not authorize access to the Survey Data when reasonably requested to do so, the Customer acknowledges and agrees that as a consequence of the constraints imposed above, the Customer Support Services available to it in connection with the Services may be reduced or delayed and that any commitments, representations or warranties made by SurveyMonkey regarding Customer Support Services do not apply to accounts that have not enabled such access."

SurveyMonkey uses Amazon Web Services in the Canada (Central) Region. The data resides in discrete data centers on servers in Montreal, Quebec and at no time is stored or accessed outside of Canada.

6. Data-linking Initiative*

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.

- | | |
|---|----|
| 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 |

If you have answered "yes" to all three questions, please contact your privacy office(r) to discuss the requirements of a data-linking initiative.

7. Common or Integrated Program or Activity*

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.

- | | |
|--|-----|
| 1. This initiative involves a program or activity that provides a service (or services); | Yes |
| 2. Those services are provided through:
(a) a public body and at least one other public body or agency working collaboratively to provide that service; or
(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 |

Please check this box if this program involves a common or integrated program or activity based on your answers to the three questions above.

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

Personal information is collected only for the purpose of using the SurveyMonkey tool and, if necessary, providing system support to users. Users create surveys which are completed by

students, and the results, which are stored in Canada, are used for evaluating courses and programs and for research purposes. Information is not disclosed any further.

Personal Information Flow Table			
	Description/Purpose	Type	FOIPPA Authority
1.	Users create surveys to gather information on courses, programs, services, research, etc.	Collection	26(c)
2.	Respondents complete surveys	Collection	26(c)
3.	Survey results are used for evaluating courses and programs, and for research purposes	Use	32(a)
4.	Personal data may be accessed for system support services	Use	32(a)

9. Risk Mitigation Table

Risk Mitigation Table				
	Risk	Mitigation Strategy	Likelihood	Impact
1.	Unauthorized individuals access the personal information and use or disclose it for personal purposes	User access is based on need to know, contractual requirements, Survey Monkey privacy policies.	Low	High
2.	User's information is incorrect or inaccurate	Users may request correction of their personal information by contacting the survey creator.	Low	Medium
3.	User's personal information is compromised in SurveyMonkey	SurveyMonkey has physical and technical security measures in place as well as privacy and security policies and contractual requirements.	Low	High
4.	Inherent risk in providing access to third party	All SurveyMonkey employees are required to adhere to privacy and security policies and contractual requirements.	Low	Medium

10. Collection Notice

The following notification will be present before an individual commences the survey:

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*. The personal information that you provide in the survey will be used to assess your feedback for [identify initiative that is being conducted for] to support continuous improvements at Royal Roads University. The personal information provided 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 information please contact Royal Road's University's Privacy Officer at (250) 391-2600 (Extension 4178) or via regular mail at 2005 Sooke Road, Victoria, BC V9B 5Y2

Part 3 – Security of Personal Information

11. Please describe the physical security measures related to the initiative.

RRU:

Section 15(1)(l)

SurveyMonkey:

Section 15(1)(l), Section 21

12. Please describe the technical security measures related to the initiative.

RRU:

Section 15(1)(l)

SurveyMonkey:

Section 15(1)(l), Section 21

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

RRU:

RRU has the following security policies in place:

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>

SurveyMonkey:

SurveyMonkey maintains and regularly reviews and updates its information security policies at least on an annual basis. Employees must acknowledge policies on an annual basis and undergo additional training such as HIPAA training, Secure Coding, PCI, and job specific security and skills development and/or privacy law training for key job functions. The training schedule is designed to adhere to all specifications and regulations applicable to SurveyMonkey.

Security Policy: <https://www.surveymonkey.com/mp/legal/security/>

Privacy Policy: https://www.surveymonkey.com/mp/legal/privacy-policy/?ut_source=footer#three-two-respondent

Cookies Policy: <https://www.surveymonkey.com/mp/legal/cookies/>

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:

Access is controlled through RRU's active directory and Shibboleth services, and SurveyMonkey permissions are granted such that a user can only access survey responses for the surveys that they control.

SurveyMonkey:

Section 15(1)(l), Section 21

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

RRU:

RRU tracks access through RRU's active directory.

SurveyMonkey:

Section 15(1)(l), Section 21

Section 15(1)(l), Section 21

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?**

RRU:

Respondents to surveys may contact the survey creator at RRU to have their information corrected or deleted.

SurveyMonkey:

SurveyMonkey does not control response data. Respondents must contact the RRU survey creator to discuss managing, deleting, accessing, restricting access to or otherwise withdraw consent for use of, the information which respondents provide in their responses.

SurveyMonkey does not delete the data in accounts – users are responsible for and control the time periods for which data is retained. There are controls in accounts where users can delete data at the account level (all data in the account) and at the response level. Respondents must ask the creators of the surveys how long their responses will be stored in SurveyMonkey services.

- 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 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.

Please check this box if the related Information Sharing Agreement (ISA) is attached.

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

No

Please check this box if the related Research Agreement (RA) is attached. If you require assistance completing an RA please contact your privacy office(r).

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.

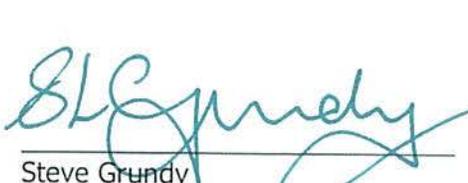
No.

Part 6 – Privacy Office(r) Comments

This PIA is based on a review of the material provided to the Privacy Office(r) as of the date below. If, in future any substantive changes are made to the scope of this PIA, the public body will have to complete a PIA Update and submit it to Privacy Office(r).


Bev Hooper
Privacy Officer
Royal Roads University

Nov 22/18
Date


Steve Grundy
Vice President, Academic & Provost
Royal Roads University

Nov. 29/18
Date



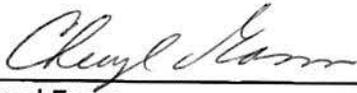
Jessica Subin
Associate Director, Financial Services
Royal Roads University

Nov 29, 2018
Date



Don Ostergard
A/Chief Information Officer
Royal Roads University

26 Nov 2018
Date



Cheryl Eason
Vice President & Chief Financial Officer
Royal Roads University

Nov. 29, 2018
Date

A final copy of this PIA (with all signatures) must be kept on record.