



COLLEGE OF  
THE ROCKIES

# Privacy **Impact** Assessment

Name of Initiative:

CEI eBook Site

PIA Number:

2024.02-10

## INSTRUCTIONS (READ BEFORE STARTING)

Submit a completed privacy impact assessment (PIA) before starting a new College Initiative or significantly changing an existing College Initiative that directly collects Personal Information, or results in the collection of Personal Information by COTR or a COTR service provider.

BC's Freedom of Information and Protection of Privacy Act (FIPPA) defines an "Initiative" as any enactment ("policy/procedure"), system (conceptual or technical), project, program, or activity.

Contact the COTR Privacy Officer (Keltie Ross – [PrivacyOfficer@cotr.bc.ca](mailto:PrivacyOfficer@cotr.bc.ca)) to receive support determining whether any change in how COTR employees are completing their duties to the College may require a Privacy Impact Assessment.

**Read through this form entirely before starting to populate it. Each question is designed to capture specific information for review.**

**Some information recorded in the PIA may be confidential or proprietary and not intended for distribution. Before you share the draft or completed PIA (internally or externally), please contact COTR'S Privacy Officer, Keltie Ross at [PrivacyOfficer@cotr.bc.ca](mailto:PrivacyOfficer@cotr.bc.ca) for guidance.**

## PART 1: GENERAL INFORMATION

Initiative Title:	CEI eBook Site
Department:	Student Life
Initiative Lead (PIA Drafter) Name and COTR Email Address:	Cori Andrichuk
Dean or Director Name, Title, and Email:	Doris Silva
Privacy Officer Assigned:	Keltie Ross
If initiative involves a third-party (i.e. vendor, consultant, partner), provide	
Third Party Name:	Campus eBookstore
Product Name (if applicable):	Campus eBookstore
Third Party Contact Name and Email:	Brent Beatty <a href="mailto:bbeatty@campusebookstore.com">bbeatty@campusebookstore.com</a>
Third Party URL:	<a href="http://Campusebookstore.com">Campusebookstore.com</a>

1. In three to five sentences, describe the Initiative including:

- a) what you are doing,
- b) an overview of the process,
- c) who is involved,
- d) and when and/or how long your Initiative runs.

This initiative involves entering into a contractual agreement with Campus eBookstore, a company that works with post-secondary institutions (PSI's) across Canada to provide access to digital curriculum materials that users purchase on their dedicated webpage.

A key part of the initiative is the implementation of a web-based system in the form of a link on the COTR Campus Store webpage. This link will allow the Campus Store to offer digital course materials

to students via Campus eBookstore, which handles the monitoring of the titles and the purchasing by users. The Campus eBookstore owns and runs this web-based system.

There will be a formal agreement between the College of the Rockies and Campus eBookstore (CEI) for this service/access to their product.

The initiative will be ongoing.

2. In a few sentences, explain the scope of this PIA. For example, is this initiative limited to specific individuals or departments at COTR? Is this PIA covering the full initiative or just one phase of a larger project? Are there exceptions to how the Initiative will be implemented?

This initiative is limited to the COTR Campus Store. This PIA covers the entire initiative.

3. Is this an administrative/operational, teaching and learning, or research Initiative? Select all that apply.

- Administrative/Operational                       Research (**Contact COTR Privacy Officer before continuing this PIA**)
- Teaching and Learning

4. Has a PIA previously been completed for this Initiative?

- Yes                                       No                                       Not sure

5. What activities will occur within the Initiative? Use the bullet points below to make action statements. Replace the example action statement. Add or delete bullets as necessary.

- A link is provided by CEI/Campus eBookstore to College of the Rockies to be placed on the Campus Store webpage.
- The link will direct students to the Campus eBookstore site.
- There will be clear information at the site of the link that users will be leaving the COTR webpage and directed to a vendor outside of College of the Rockies.

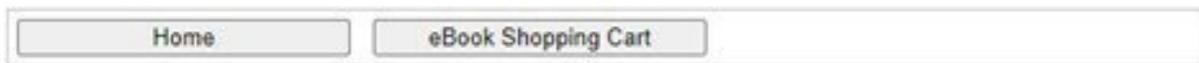
- Students that choose click on the link and move over to the CEI webpage will be required to submit their name and email address on the Campus eBookstore site to access digital materials.
  - The Campus Store will be able to review, select, and requisition digital materials as part of the CEI system.
  - The Campus Store will manage the margins for retail sales associated with this collaboration and will set the prices for digital materials that are made available via the Campus eBookstore.
  - All purchases of digital materials will occur through the Campus eBookstore webpage. COTR does not participate in monitoring or tracking these purchases.
6. In a bulleted list, please list all the types of data or information you might collect, use, store, disclose, or access in your Initiative - even if they are not Personal Information. Replace the bullet points below with the actual elements of information or data.
- The COTR Campus Store will not collect any personal information in this process. Any personal information collected is done so after the user has decided to click on the CEI link that will take them to another website – the Campus eBookstore.
7. Did you list Personal Information in question 6? [Personal Information](#) is any recorded information about an identifiable individual, other than business contact information. Personal information includes information that can be used to identify an individual through association or reference.
- Yes  No
8. If you answered "No" to question 7, in three to five sentences explain how will you ensure that you do not unintentionally collect Personal Information?
- Ensure that it is clear to students that they are entering their name and email address on a third-party system. See the template examples below.
- Ensure that third party system has a privacy policy:  
<https://www.campusebookstore.com/PrivacyPolicy.aspx>
9. Does the Initiative involve integration between COTR IT systems and Third-Party systems?
- Yes  No  N/A

If yes, list below: (put **N/A** on the first row if you answered **No** or **N/A** above. Add or delete rows)

COTR IT system: N/A

Third party system integrated: N/A

Campus eBookstore provides a dedicated link that is to be added to the existing COTR Campus Store website. Below, there are examples of the template provided by CEI that includes additional information that the user can choose to read through prior to deciding if they want to access the Campus eBookstore webpage and what to expect in the purchasing process.



**Important Information - Read Carefully**

**THERE ARE NO RETURNS, REFUNDS OR EXCHANGES ON DIGITAL PRODUCTS**

Please be aware that due to terms set by the publishers, digital products purchased **cannot be refunded, returned or exchanged.**

Before purchasing be absolutely certain that:

1. You have selected the appropriate Access Code or eBook for your course. If you are unsure, check with your professor.
2. Should you drop the course at a later date you will **NOT** be able to return, refund or exchange this digital product.
3. **Copy and printing of some eBooks will be limited or disabled** by some content providers. eBooks require an eBook reader. eBooks will **NOT** work on any other eBook platform like Kindle, Nook or Kobo.
4. You **MUST** use your **SCHOOL ASSIGNED EMAIL** for purchase and redemption of the product.
5. Digital products **CANNOT** be sold or shared with anyone other than original purchaser. Any attempts of disabling or altering the digital rights management software can result in non-academic misconduct.

Fulfillment is powered by secure servers and payment processing technology from our trusted partner Campus eBookstore. You will be taken to their website to place your order and checkout.

To continue, please click "I Agree..." below:

[I Disagree. Cancel](#) | [I Agree. Continue Checkout >>](#)

Checkout is powered by Campus eBookstore.  
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## The steps for Campus eBookstore are as follows:

- Select your courses below and add them to your cart
- You will pay for these codes **separately** from any other course materials purchased on the Bookstore website
- Make sure you enter your email address correctly during checkout. This is where you will receive your code

[Home](#)   [eBook Shopping Cart](#)

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1. You have selected the appropriate Access Code or eBook for your course. If you are unsure, check with your professor.
2. Should you drop the course at a later date you will **NOT** be able to return, refund or exchange this digital product.
3. **Copy and printing of some eBooks will be limited or disabled** by some content providers. eBooks require an eBook reader. eBooks will **NOT** work on any other eBook platform like Kindle, Nook or Kobo.
4. You **MUST** use your **SCHOOL ASSIGNED EMAIL** for purchase and redemption of the product.
5. Digital products **CANNOT** be sold or shared with anyone other than original purchaser. Any attempts of disabling or altering the digital rights management software can result in non-academic misconduct.

Fulfillment is powered by secure servers and payment processing technology from our trusted partner Campus eBookstore. You will be taken to their website to place your order and checkout.

To continue, please click "I Agree..." below:

[I Disagree, Cancel](#) | [I Agree, Continue Checkout >>](#)

**Note:** This website has TWO shopping carts. There is a checkout process for eBooks/access codes.

Have questions? Check out the [access codes FAQs](#).

If there is Personal Information involved in this Initiative, continue to complete the remaining sections of the PIA. If there is not any Personal Information involved in this Initiative, please submit questions 1-9 to the Privacy Officer along with the completed signatures page

## PART 2 : PRIVACY OFFICE(R) COMMENTS

If, in the future, any substantive changes are made to the scope of this PIA, the College will have to complete a PIA Update and submit it to Privacy Office(r).

This PIA is based on a review of the material provided to the COTR Privacy Office(r) as of **April 17, 2024**.

The details provided in this PIA indicates that the application to be developed and uploaded onto the COTR website in collaboration with the vendor, Campus eBookstore, can be delivered in compliance with FIPPA legislation.

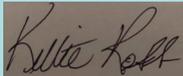
Should there be a change in scope to this part of the initiative, further assessment and/or a PIA update may be required as new related or expanded service is considered, or the privacy policies for the College change in the future.

Any substantive changes made to the scope of this PIA would need to be included in a PIA update and submitted to the Privacy Office(r).

- [https://www.bclaws.gov.bc.ca/civix/document/id/complete/statreg/96165\\_00](https://www.bclaws.gov.bc.ca/civix/document/id/complete/statreg/96165_00)
- [https://www.bclaws.gov.bc.ca/civix/document/id/complete/statreg/96165\\_03#section26](https://www.bclaws.gov.bc.ca/civix/document/id/complete/statreg/96165_03#section26)

### Privacy Office Signature

This PIA is based on a review of the material provided to the Privacy Officer as at the date in Part 13 Privacy Officer Comments above.

Name and Title	Signature	Date signed
Keltie Ross		April 17, 2024

## PART 3: APPROVAL SIGNATURES

### Institution Signatures

This PIA is compliant with FIPPA when it accurately documents information management practices 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 Department will inform the COTR Privacy Officer, and if necessary complete a PIA update.

By signing where required below, the signatories acknowledge and confirm their declarations as noted.

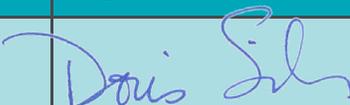
**Declaration of Initiative Lead:** I confirm that I understand the privacy impacts of this College Initiative and I am committed to my FIPPA obligations related to the collection and management of Personal Information involved in the Initiative. If there are any changes to the Initiative, including to the way Personal Information is collected, used, stored, or disclosed, I understand that the department will need to inform the COTR Privacy Officer and if necessary, complete a PIA update. I will establish and document information management guidelines for the Personal Information and ensure these are followed. I will ensure employees are trained on and able to comply with their obligations under FIPPA; related College policies and procedures; and COTR Privacy Officer recommendations relative to this Initiative.

### Signature of Initiative Lead or PIA Drafter

Name and Title	Signature	Date signed
Cori Andrichuk, Manager, Student Life		April 18, 2024

**Declaration of Dean / Director / One-Over-One Signatory:** I confirm that I have reviewed this PIA and I acknowledge the residual privacy risks identified. I support the department by providing required time and operational resources to comply with FIPPA, related College policies and procedures, and COTR Privacy Officer recommendations relative to this Initiative.

### Signature of Dean / Director

Name and Title	Signature	Date signed
Doris Silva, Director of Student Affairs		April 18, 2024



# Privacy Impact Assessment

Name of Initiative:

PIA Number:

**Declaration of Information Security:** I confirm that I am satisfied that the Information Security safeguards employed in this college Initiative meet reasonable requirements relative to the amount or sensitivity of the Personal Information or COTR business information described in this PIA.

**Signature of Information Security** (Required only when college Initiative involves Information Security considerations)

Name and Title	Signature	Date signed
Nathan Skretting, CIO		24 April 2024

**Declaration of Information Technology:** I confirm that I understand and approve of the proposed use-case of COTR IT systems described in this PIA, where applicable. I understand and approve of the Third Party's integration with COTR's IT systems for the College Initiative described in this PIA, where applicable.

**Signature of Information Technology** (Required when College Initiative involves use of COTR IT systems or integration of Third-Party technology with COTR IT systems.)

Name and Title	Signature	Date signed

**Declaration of Head of Public Body or Designate:** I have reviewed this PIA carefully and accept and will be accountable for the residual privacy risks identified for this College Initiative. I am satisfied with the completion of this PIA under FIPPA.

**Signature of Head of Public Body or Designate Under FIPPA** (Required only if Personal Information is involved in the Initiative as indicated in Question 7).

Name and Title	Signature	Date signed