



COLLEGE OF
THE ROCKIES

Privacy Impact Assessment

Name of Initiative:

Cookie Policy

PIA Number:

2023.11 - 02

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 – kross5@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 kross5@cotr.bc.ca for guidance.

PART 1: GENERAL INFORMATION

Initiative Title:	Cookies policy consent
Department:	IT Services
Initiative Lead (PIA Drafter) Name and COTR Email Address:	Miguel Peinado mpeinado@cotr.bc.ca
Dean or Director Name, Title, and Email:	Nathan Skretting nskretting@cotr.bc.ca
Privacy Officer Assigned:	Keltie Ross
If initiative involves a third-party (i.e. vendor, consultant, partner), provide	
Third Party Name:	Google
Product Name (if applicable):	Google Analytics
Third Party Contact Name and Email:	N/A
Third Party URL:	https://analytics.google.com/

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.

A.) We are advising any visitors to the COTR website that we are collecting non-sensitive data from cookies.

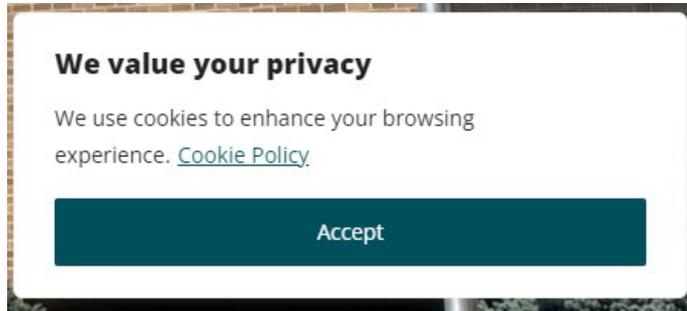
B.) A notification would appear in any of the college domains:

- <https://cotr.bc.ca>
- <https://portal.bc.ca>
- <https://forms.bc.ca>
- <https://outlines.cotr.bc.ca>

The message in the notification would be:

- **We value your privacy**
- **We use cookies to enhance your browsing experience. Cookie Policy**

Example of what the cookie policy will look like on the homepages:



The content for the Cookies Policy is currently under review and will be rewritten by the VPAR Office with assistance from legal counsel.

C.) Those involved with setting up the Cookies Policy pop-up are the Web Developer, Miguel Peinado, and the COTR Privacy Officer.

D.) The start date for the Cookie Policy pop-up appearing on COTR webpages will tentatively be in Spring 2024. This initiative will be permanent on the COTR website.

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?

The development and launch of the Cookies Policy message on the COTR webpages is one phase of a larger initiative.

This new pop-up message will be part of a larger initiative involving the collection of specific data by the College Marketing and Communications Department. This specific data is not personal information but assists Marketing staff with improving the webpage user experience and recording statistics for marketing purposes.

The privacy policy in place at the college – including the cookies policy – is currently being reviewed by the Vice President of Academic and Applied Research. Any updates to these privacy policies will be reviewed and approved by College Policy Committee, as per section D.4 of policy 1.1.4 Policy Development and Administration.

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.

- **Web visitors will receive cookies consent notification once the page is fully loaded.**
- **The user data will be stored in the Google Analytics app.**
- **The user would be able to click and read the legal text related to cookies policy, or just dismiss the notification by clicking Accept.**

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.

Google analytics data:

1.) User and Device Information:

COTR has the latest version of Google Analytics 4, and in this version, there are no IP addresses stored by the third party system (Google).

- **User agent: Information about the browser, device, and operating system used to access the website are collected by Google Analytics.**
- **Device type: Whether the user is on a desktop, mobile device, or tablet is collected by Google Analytics.**

2.) User Interactions:

Pages visited: The specific pages a user views on the website.

- **Duration of visit:** The amount of time a user spends on the site or on specific pages.
- **Clicks and interactions:** User interactions with elements on the page, such as clicks on links or buttons.

3 Traffic Sources:

- **Referral source:** The website or platform that referred the user to the site.
- **Search keywords:** The search terms users used to find the website via search engines.
- **Direct traffic:** Users who directly typed the website URL into their browser.

4 Demographics and Interests:

- **Age and gender:** Estimated demographic information based on user behavior.
- **Interests:** Inferred interests based on user activity and engagement.

5 Technical Information:

- **Browser and operating system:** The type and version of the browser and operating system used.
- **Screen resolution:** The dimensions of the user's screen.
- **JavaScript support:** Whether the user's browser has JavaScript enabled.

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?

The COTR website / homepage does not require users to register or sign in to browse any of the webpages or key information related to the college programs or courses. As such, COTR follows the BC Government's FOIPPA legislation, specifically section 26(c), in relation to the collection of personal information.

Purpose for which personal information may be collected:

26 A public body may collect personal information only if

(c)the information relates directly to and is necessary for a program or activity of the public body

The information that will be collected through the Cookies will NOT include any information deemed personal, such as:

- **Age, name, social security numbers, Race, national, or ethnic origin**
- **Medical, education or employment history**
- **Biometric information such as fingerprints, DNA**
- **Social insurance number or driver's license.**
- **Employee files, credit records, loan records, medical records, financial information**

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: **COTR website**

Third party system integrated: **Google Analytics**

COTR IT system:

Third party system integrated:

COTR IT system:

Third party system integrated:

COTR IT system:

Third party system integrated:

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 **January 8, 2024**.

The details provided in this PIA for this IT Department initiative, which is part of a larger ongoing project at COTR involving data collection for marketing purposes, indicates that the application to be developed and uploaded onto the COTR website can be delivered in compliance with FIPPA legislation.

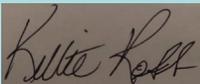
Should there be a change in scope to this part of the initiative, further assessment and/or a PIA update may be required as new related or expanded service is considered, or the privacy policies for the College change in the future.

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_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, Privacy Officer		January 8, 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
Miguel Peinado		January 8, 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
Nathan Skretting, Chief Information Officer		11 January 2024



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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

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
Nathan Skretting, Chief Information Officer		11 January 2024

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