



Privacy Impact Assessment for Non-Ministry Public Bodies

Phishing Response Training

PIA# 2019-002

Why do I need to do a PIA?

Section 69(5.3) of the *Freedom of Information and Protection of Privacy Act* (FOIPPA) requires the head of a public body to conduct a privacy impact assessment (PIA) in accordance with the directions of the minister responsible for FOIPPA. Public bodies should contact the privacy office(r) for their public body to determine internal policies for review and sign-off of the PIA. Public bodies may submit PIAs to the Office of the Information and Privacy Commissioner for BC (OIPC) for review and comment.

If you have any questions about this PIA template or FOIPPA generally, you may contact the Office of the Chief Information Officer (OCIO) at the Privacy and Access Helpline (250 356-1851). Please see our [PIA Guidelines](#) for question-specific guidance on completing a PIA.

What if my initiative does not include personal information?

Public bodies still need to complete Part 1 of the PIA and submit it along with the signatures pages to their privacy office(r) even if it is thought that no personal information is involved. This ensures that the initiative has been accurately assessed.

Part 1 – General

Name of Department/Branch:	IT Services, College of the Rockies		
PIA Drafter:	Jonathan Butt		
Email:	butt@cotr.bc.ca	Phone:	250-489-8298
Program Manager:	Jonathan Butt		
Email:	butt@cotr.bc.ca	Phone:	250-489-8298

In the following questions, delete the descriptive text and replace it with your own.

1. Description of the Initiative

KnowBe4 provides Security Awareness Training and a Simulated Phishing platform as well as other tools for assessing the college’s cyber risk profile. The product that is being leveraged in this initiative is the training program and simulated phishing tools to address urgent IT security problems of social engineering, spear phishing and ransom ware attacks.

This program allows us to send employees pre-training and post-training phishing security tests to show percentage of end users that are Phish-prone. It provides remedial online training for those who require it after a simulated phishing attack.



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2. Scope of this PIA

End users security training is required with the recent higher incidence of cyber-threat and this vendor provides a method to measure the effectiveness of the before and after training. This will maximize training RO/along with tracking security compliance.

3. Related Privacy Impact Assessments

None or not applicable,

4. Elements of Information or Data

Jonathan Butt will be the main administrator and will view results. Other Tier 2 IT services staff may be part of the initial configuration of the tool. A list of employee's email addresses will be uploaded to KnowBe4 for the purpose of simulating phishing attacks. No other data is required or will be released either by the account owner or the service provider. The list of email addresses will be hosted in a US based cloud service controlled by the IT services Tier 2 staff only. The list as per KnowBe4's Privacy Policy is used in compliance with the service provider's privacy policy. <https://www.knowbe4.com/privacy-policy> Estimated date of start is March 1st 2019 for a three year contract period. All data will be accessible only by the IT Services Admin staff for use of simulated attacks. In case of technical support, a KnowBe4 tech support person may indirectly see e-mail addresses in supporting a COTR tech staff member. Staff e-mail accounts are considered to be in the public realm at <http://www.cotr.bc.ca/departments/>

If personal information is involved in your initiative, please continue to the next page to complete your PIA.

If no personal information is involved, please submit Parts 1, 6, and 7 to your privacy office(r). They will guide you through the completion of your PIA.

As no personal information is involved, only Parts 6 and 7 are attached to this PIA.



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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).

I, Brenda Mathenia, Privacy Officer and Director, Teaching and Learning Resources, for the College of the Rockies, have reviewed this Privacy Impact Assessment as submitted under the guidance of the Directions to Heads of Public Bodies that are not Government Ministries, issued under Section 69 (5.3) of the Freedom of Information and Protection of Privacy Act, R.S.B.C. 1996 c.165.

Based on the information provided by the PIA originator, and my reading of sections 26, 32 and 33 of the British Columbia FOIPPA legislation, *the collection, use and disclosure of information in relation to the use of, the KnowB4 Security Awareness Training and Simulated Phishing platform, at the College of the Rockies, meets the established legislative standards for collection, use and disclosure of personal information* as outlined in Part 3, Protection of Privacy, Freedom of Information and Protection of Privacy Act (RSBC 1996), Chapter 165.

It is my determination, based on the information provided, that no further review is necessary.

Reviewed this day, Monday, July 29, 2019 by:

Brenda Mathenia, MSI, MUP, BSc
Privacy Officer and Director, Teaching & Learning Resources
College of the Rockies

Brenda Mathenia

Privacy Officer/Privacy Office
Representative

Brenda Mathenia

Signature

29 July 2019

Date



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Phishing Response Training

PIA# 2019-002

Part 7 – Program Area Signatures

_____ Program/Department Manager	_____ Signature	_____ Date
_____ Contact Responsible for Systems Maintenance and/or Security (Signature not required unless they have been involved in this PIA.)	_____ Signature	_____ Date
_____ Head of Public Body, or designate	_____ Signature	_____ Date

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

If you have any questions, please contact your public body's privacy office(r) or call the OCIO's Privacy and Access Helpline at 250 356-1851.