



# Privacy Impact Assessment for Non-Ministry Public Bodies

## *International Women’s Day Registration*

PIA#2019-14

### 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:	JIBC – Charlene Jordan-Jones		
PIA Drafter:	Melanie Chernoff		
Email:	mchernoff@jibc.ca	Phone:	604-528-5606
Program Manager:	Charlene Jordan-Jones		
Email:	Cjordan-jones@jibc.ca	Phone:	604-528-5669

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

### **1. Description of the Initiative**

To use Eventbrite as the registration process for International Women’s Day on March 6, 2020. The community would purchase tickets to the event through Eventbrite who would generate a participant list for JIBC. All funds would be collected through Eventbrite and distributed to JIBC 3-5 days after the event.



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### **2. Scope of this PIA**

This PIA covers the personal information collected by Eventbrite for the purpose of purchasing a ticket to a JIBC event.

### **3. Related Privacy Impact Assessments**

N/A

### **4. Elements of Information or Data**

The information collected for the purpose of the JIBC event, would be name, email, and credit card number.

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.



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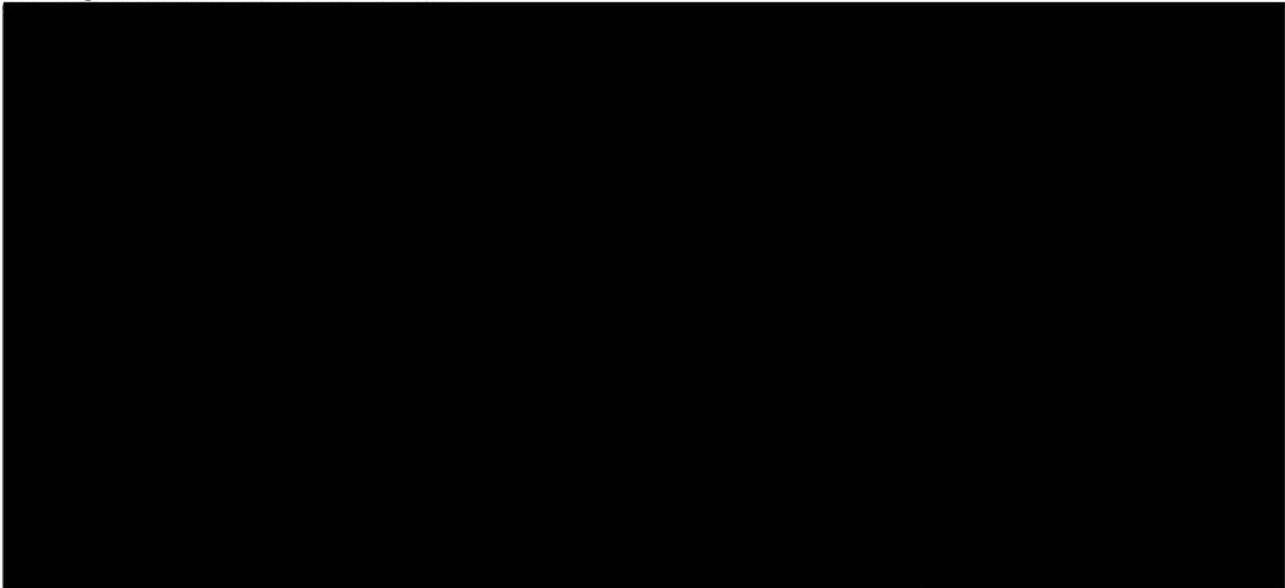
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### Part 2 – Protection of Personal Information

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

5. Storage or Access outside Canada

S.15(1)(l)



6. Data-linking Initiative\*

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



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### 7. Common or Integrated Program or Activity\*

<p>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.</p>	
1. This initiative involves a program or activity that provides a service (or services);	no
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
<b>Please check this box if this program involves a common or integrated program or activity based on your answers to the three questions above.</b>	

*\* Please note: If your initiative involves a “data-linking initiative” or a “common or integrated program or activity”, advanced notification and consultation on this PIA must take place with the Office of the Information and Privacy Commissioner (OIPC). Contact your public body’s privacy office(r) to determine how to proceed with this notification and consultation.*

*For future reference, public bodies are required to notify the OIPC of a “data-linking initiative” or a “common or integrated program or activity” in the early stages of developing the initiative, program or activity. Contact your public body’s privacy office(r) to determine how to proceed with this notification.*

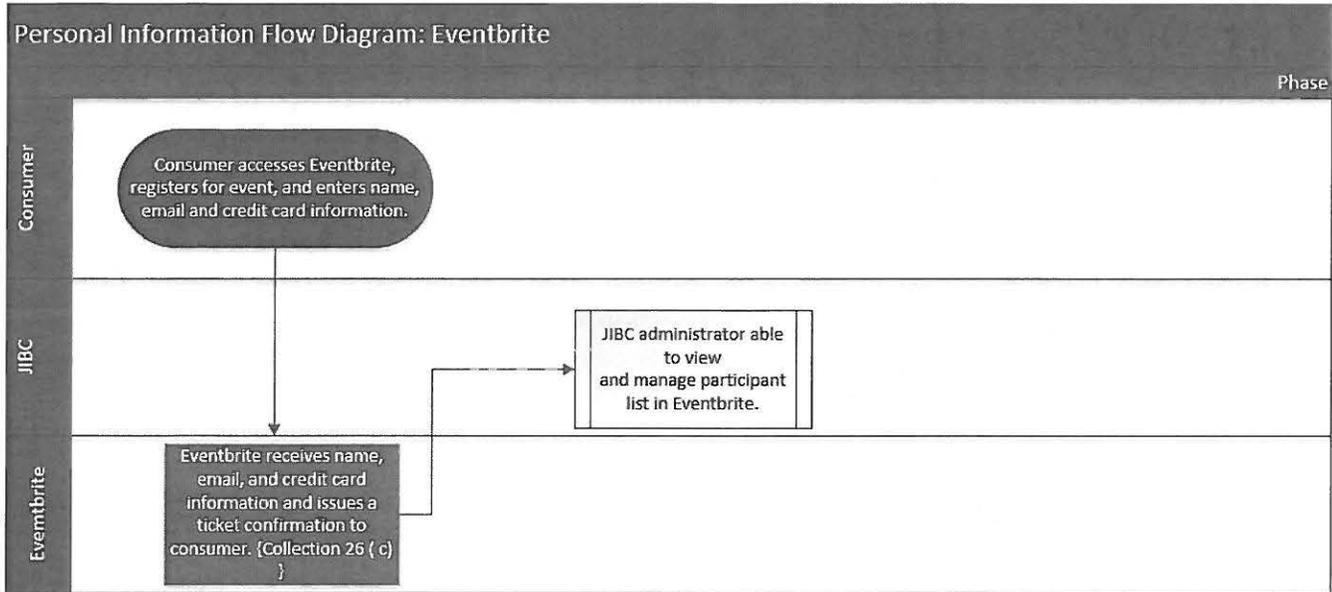
### 8. Personal Information Flow Diagram and/or Personal Information Flow Table



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Personal Information Flow Table			
	Description/Purpose	Type	FOIPPA Authority
1.	Eventbrite collects credit card information for ticket to event.	Collection	26(c)

### 9. Risk Mitigation Table

*Examples can be removed and additional lines added as needed.*

Risk Mitigation Table				
	Risk	Mitigation Strategy	Likelihood	Impact
1.	Eventbrite suffers a privacy breach	Contact Eventbrite: Eventbrite, Inc., Attn: Privacy Officer, 155 5th Street, Floor 7, San Francisco, CA 94103, USA	Low	High
2.	Participant email addresses distributed to a third party.	JIBC Privacy Policy	Low	High



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### 10. Collection Notice

The following information will be posted in Eventbrite along with a description of the event, on the JIBC International Women's Day 2020 event page. This information will be accessible and visible prior to ticket purchase.

"Your name, email, and credit card information will be collected for ticket purchase and for formation of the guest list for International Women's Day 2020 at JIBC (FOIPPA S. 26(c)). Credit card information will not be stored after transaction. Your email address may be used to contact you in regard to information about this event. Personal information may be stored in a database in USA. Please see [eventbrite.ca/privacypolicy](http://eventbrite.ca/privacypolicy) for additional information."

For additional questions, please contact:

Melanie Chernoff

715 McBride Boulevard

New Westminster, BC

V3L 5T4

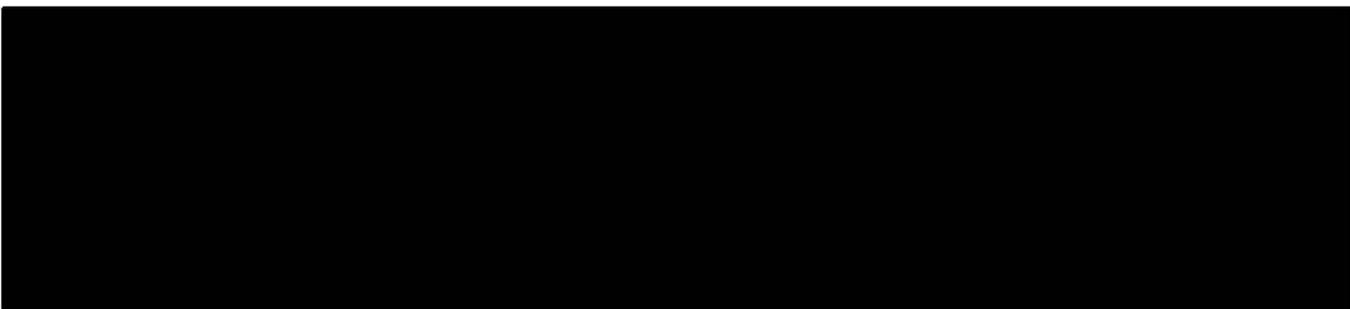
604-528-5606

mchernoff@jibc.ca

### **Part 3 – Security of Personal Information**

*If this PIA involves an information system, or if it is otherwise deemed necessary to do so, please consult with your public body's privacy office(r) and/or security personnel when filling out this section. They will also be able to tell you whether you will need to complete a separate security assessment for this initiative.*

11. Please describe the physical security measures related to the initiative (if applicable). S.15(1)(l)





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[REDACTED]

12. Please describe the technical security measures related to the initiative (if applicable).

[REDACTED]

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

JIBC employees are expected to follow policy.

[REDACTED]

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. S.15(1)(l)

7. How You Can Access, Update, Correct or Delete Your Personal Data.

[REDACTED]



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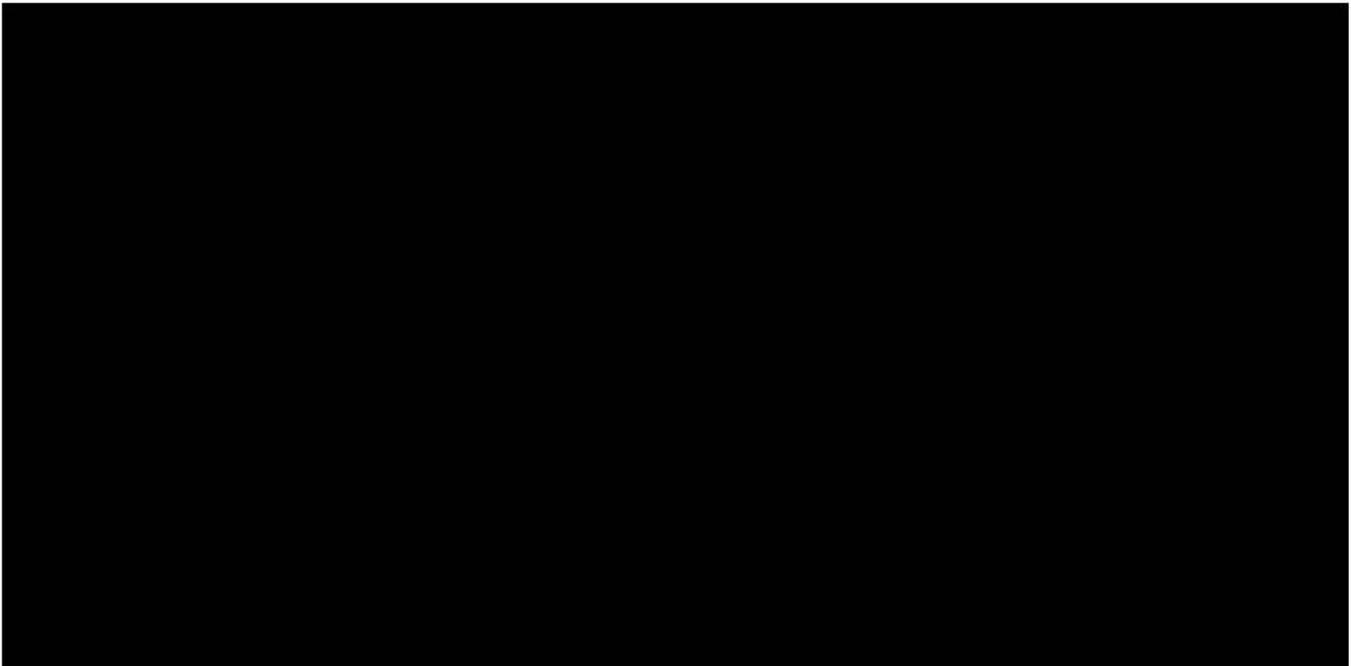
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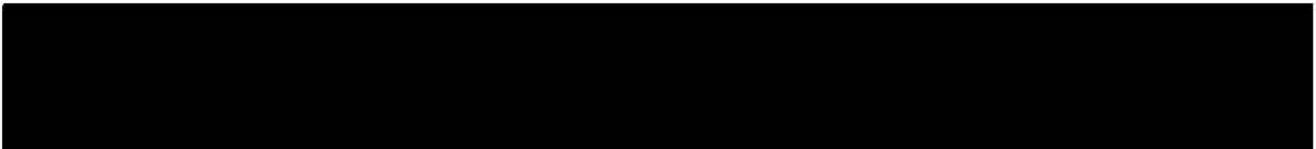
15. Please describe how you track who has access to the personal information.



### Part 4 – Accuracy/Correction/Retention of Personal Information

S.15(1)(l)

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?



17. Does your initiative use personal information to make decisions that directly affect an individual(s)? If yes, please explain.

No



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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 a 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. If you require assistance completing an ISA, please contact your privacy office(r).*

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

Please ensure Parts 6 and 7 are attached to your submitted 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).*

Eventbrite is a US company and will store the information in the US. The registering attendees are informed of this prior to registration. We are intending to collect only email and name. Eventbrite collects the person's credit card number, in Canada, and does not retain it. The risks are low and the information is contact information, only. I recommend we proceed with this use as the risk is low and there are benefits to the attendees and the organizers of the event.

George Jones

Privacy Officer/Privacy Office  
Representative

*George Jones*

Signature

2019 Dec 10

Date



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### Part 7 - Program Area Signatures

Charlene Jordan-Jones  
Program/Department Manager

[Signature]  
Signature

Dec. 4/19  
Date

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

Mike Proud  
Head of Public Body, or designate

[Signature]  
Signature

Dec 12/19  
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.*