



# Privacy Impact Assessment for Non-Ministry Public Bodies

*Knowledge Diffusion Inc.*

PIA# 2021 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:	Library		
PIA Drafter:	Derek Deacon		
Email:	<a href="mailto:ddeacon@jibc.ca">ddeacon@jibc.ca</a>	Phone:	604.836.1761
Responsibility:	April Haddad		
Email:	<a href="mailto:ahaddad@jibc.ca">ahaddad@jibc.ca</a>	Phone:	604.528.5594

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

### 1. Description of the Initiative

This PIA relates to the Justice Institute of British Columbia's ("JIBC") use of Knowledge Diffusion Inc. ("Osmosis").

Osmosis, owns and operates mobile and web learning platform that provides learning material such as questions, flashcards, and videos. JIBC would like to offer a better way to learn paramedicine more effectively by providing a comprehensive platform that helps its students understand health more thoroughly.



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## 2. Scope of this PIA

The following items are considered in-scope for this review:

- privacy and security of the Osmosis tool and service; and
- data collected, stored, retained, disclosed and disposed in connection with the user of Osmosis.

## 3. Related Privacy Impact Assessments

No other PIAs are currently related to this project.

## 4. Elements of Information or Data

### Collection of Information

We collect Personal Information when you:

- register to use Osmosis;
- log in with social networking credentials;
- use Osmosis; and
- communicate with us.

We also collect information, such as anonymous usage statistics, by using cookies, server logs, and other similar technology as you use Osmosis.

**Personal Information Collection.** You must register to use Osmosis. To register, you may need to provide Personal Information, such as your name, email address, gender, and social network log-in credentials. You may also provide other optional information.

JIBC procedure: Student information that will be used by Osmosis will be the student's first and last name and their personal email. We provide this information to Osmosis and they make the student accounts for them. Students are told that as Osmosis is kept on a US server, they have the option to use a pseudonym and an unidentifiable email address.

**Social Sign-On.** We collect Personal Information from the social media website when you use your social media credentials to log into Osmosis or connect your Osmosis account to the social media website account. For example, when you log in with your Facebook credentials, we may collect the Personal Information you have made publicly available in Facebook, such as your name and profile picture. We may also obtain other information with your permission, such as your Birthday, Groups, Institutional Affiliation, Graduation Year, Friend List, and Current City. You may also sign into your social media account to find friends who also use Osmosis.



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**Using Osmosis.** We collect information you post through Osmosis. For example, when you interact with other users by posting comments or by updating your account information, Osmosis will collect the information you provide in such submissions, including any Personal Information.

**Location Information from Your Mobile Device.** We may collect and store your location information if you enable your mobile device to send it to us. Collection of this information may improve the provision of Osmosis.

**Customer Support.** We may collect Personal Information through your communications with our customer-support team.

**Cookies, Automatic Data Collection, and Related Technologies.** Osmosis collects and stores information that is generated automatically as you use it, including your preferences and anonymous usage statistics.

When you visit Osmosis, we and our third-party service providers receive and record information on our server logs from your browser, including your IP address, and from cookies and similar technology. Cookies are small text files placed in visitors' computer browsers to store their preferences. Most browsers allow you to block and delete cookies. However, if you do that, Osmosis may not work properly.

By using Osmosis, you are authorizing us to gather, parse, and retain data related to the provision of Osmosis. We store your Personal Information for as long as is necessary to provide Osmosis to you and as long as you have an account on Osmosis.

## Use of Information

Osmosis may share the User's information:

- with its third-party service providers as necessary for the provision of Osmosis;
- to comply with legal obligations;
- to protect and defend its rights and property; and
- with the User's permission.

Osmosis does not rent, sell, or share Personal Information about the User with other people or nonaffiliated companies for its direct marketing purposes, unless it has the User's permission.

**Use Vendors and Service Providers.** Osmosis may share any information it receives with vendors and service providers retained in connection with the provision of Osmosis.

**Displaying to Other Users.** The content the User posts to Osmosis may be displayed on Osmosis. Other users of Osmosis, including Knowledge Diffusion-approved research and educational institutions, may be able to see some information about the User, such as the User's name, information in the comments the User posts, and aggregate information about the User question responses. Osmosis may provide the User with privacy settings to control where Personal Information is displayed on Osmosis. Osmosis is not responsible for privacy practices of the other users who will view and use the posted information.



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**Social Networking and Other Websites.** Osmosis may allow the User to share information, including Personal Information, with social networking websites, such as Facebook. Osmosis does not share the User's Personal Information with them unless you direct Osmosis to share it. Their use of the information will be governed by their privacy policies, and the User may be able to modify their privacy settings on their websites.

**Marketing.** Osmosis does not rent, sell, or share Personal Information about the Users with other people or non-affiliated companies for its direct marketing purposes, unless it has the User's permission.

**As Required By Law and Similar Disclosures.** Osmosis may access, preserve, and disclose the User's Personal Information, other account information, and content if it believes doing so is required or appropriate to: comply with law enforcement requests and legal process, such as a court order or subpoena; respond to the User's requests; or protect the Users', Osmosis' or others' rights, property, or safety.

**Merger, Sale, or Other Asset Transfers.** If Osmosis is involved in a merger, acquisition, financing due diligence, reorganization, bankruptcy, receivership, sale of Knowledge Diffusion assets, or transition of service to another provider, the User's information may be sold or transferred as part of such a transaction as permitted by law and/or contract. Osmosis cannot control how such entities may use or disclose such information.

Osmosis may also disclose the User's Personal Information with the User's permission.

Within a reasonable time after the User terminates their account, the User's Personal Information will be deleted and will no longer be stored by Knowledge Diffusion. Knowledge Diffusion may continue to use aggregated information from your account in the manner described in this policy and in the Terms even after your account has been cancelled.

Regarding the use of pseudonyms, Osmosis responded as follows:

“Osmosis is able to provide single sign-on (SSO) without PII authentication. Said differently, Osmosis can provision accounts using a user ID and password rather than name/email address and password.

There are limitations to SSO with user IDs, and SSO is not as smooth/efficient of a process as a roster of first and last name, and @jibc email address. Additionally, there are portions of Osmosis that students will not have access to, e.g. mobile app and spaced repetition, without providing an email address to Osmosis.”

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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## 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\*

<p>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.</p>	
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
<p><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></p>	



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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);	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
<p>Please check this box if this program involves a common or integrated program or activity based on your answers to the three questions above.</p>	

*\* 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

Personal information data flow diagrams and tables were not available for this review.

## 9. Risk Mitigation Table



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The following table indicates the associated risk levels as applicable and the potential or intended mitigation steps.

Risk Mitigation Table				
	Risk	Likelihood	Impact	Mitigation
1.	Student personal information is compromised when transferred to or from the service provider	Low	Medium	<ul style="list-style-type: none"> <li>Transmission is encrypted</li> </ul>

## 10. Collection Notice

Form of collection notice can vary, but individuals must be told:

1. purpose for which the information is being collected;
2. legal authority for collecting it; and
3. title, business address and business phone number of an officer or employee who can answer questions about the collection.

JIBC is not collecting any additional information from students, so a collection notice is not required.

## 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 Ministry Information Security Officer (MISO) when filling out this section. Your MISO will also be able to tell you whether you will need to complete a separate assessment called a Security Threat and Risk Assessment (STRA) for this initiative.*

### 11. Please describe the physical security measures related to the initiative (if applicable).

[Redacted]

S.15(1)(l)

[Redacted]

[Redacted]



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

██████████

13. Does your branch rely on security policies other than the Information Security Policy?

No.

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.

N/A

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

N/A

## 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 ministry notify them of the update, correction or annotation?

From Osmosis' privacy policy:

### "Changing the Use of Information

We provide many choices about the collection, use and sharing of your data, from deleting or correcting data you include in your profile and controlling the visibility of your posts to advertising opt-outs and communication controls. We offer you settings to control and manage the personal data we have about you (for SlideShare, please contact us).

For personal data that we have about you, you can:

- Delete Data: You can ask us to erase or delete all or some of your personal data (e.g., if it is no longer necessary to provide Services to you).
- Change or Correct Data: You can edit your personal data through your account. You can also ask us to change, update or fix your data in certain cases, particularly if it's inaccurate.
- Object to, or Limit or Restrict, Use of Data: You can ask us to stop using all or some of your personal data (e.g., if we have no legal right to keep using it) or to limit our use of it (e.g., if your personal data is inaccurate or unlawfully held).



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- **Right to Access and/or Take Your Data:** You can ask us for a copy of your personal data and can ask for a copy of personal data you provided in machine readable form.

To initiate any of these processes, please email [datasupport@osmosis.org](mailto:datasupport@osmosis.org) from the email account associated with your Osmosis account.”

**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 approved records retention and 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.

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

Yes, for research and analysis purposes.

**22. Will a personal information bank (PIB) result from this initiative?**

No.

Please ensure Parts 6 and 7 are attached unsigned 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).*

### Comments

Osmosis stores personal information outside of Canada and engaged service providers who may be located outside of Canada. As such, an “opt-out” consent whereby students may choose to use a pseudonym should be used.

Osmosis appears to share personal information for, among other things, research purposes.

### Analysis and Decision

The information provided for the review has established that Osmosis may be used subject to the following conditions.

### Conditions

The following conditions apply:

1. Create “opt-out” privacy notice with respect to personal information being stored outside of Canada, and provide students with the alternative of using a pseudonym. Such notice can look something like this:
  - “Osmosis is stored on servers outside of Canada. While Osmosis adheres to its privacy policy (<https://www.osmosis.org/privacy>), JIBC cannot guarantee security of your private details on servers outside of Canada. As such, you may wish to use a pseudonym and non-identifiable email address when using Osmosis. Please feel free to contact \_\_\_\_\_ or Osmosis if you have any questions or concerns.”
2. Provide users with information on how to restrict the privacy settings in their Osmosis account.



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Derek Deacon

A handwritten signature in blue ink that reads "Derek Deacon".

January 4, 2021

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Privacy Officer/Privacy Office  
Representative

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Signature

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Date



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## Part 7 – Program Area Signatures

April Haddad

December 21, 2020

Program/Department Manager

Signature

Date

George Jones

2021 January 20

Contact Responsible for Systems Maintenance and/or Security (Signature not required unless they have been involved in this PIA.)

Signature

Date

Mike Proud

January 21, 2021

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.***



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