



Privacy Impact Assessment for Non-Ministry Public Bodies

Customer Relationship Management System (CRM) – MS Dynamics PIA 2019-007

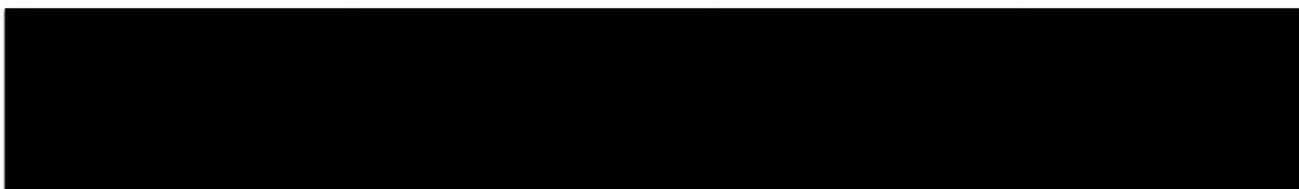
Part 1 – General

Name of Department/Branch:	Justice Institute of British Columbia – multiple schools/divisions		
PIA Drafter:	Pete Learoyd, Program Director EMD		
Email:	plearoyd@jibc.ca	Phone:	604-528-5523
Program Manager:	Pete Learoyd, Program Director EMD		
Email:	plearoyd@jibc.ca	Phone:	604-528-5523

1. Description of the Initiative

This PIA is related to Justice Institute of British Columbia (JIBC) use of a customer relationship management (CRM) system to support the tracking and management of business relationships that JIBC schools/divisions have with public and private sector organizations that are interested in obtaining contract training services from JIBC.

Specifically, this PIA involves the utilization of an application called Microsoft Dynamics 365 CRM and the installation of an Outlook add-on for the capturing of business leads, business contacts, organizational/business information, proposed services, quoted costs, and details/status of services provided. Through the Outlook add-on, the system would be able to capture business emails, appointments and tasks, when triggered by the JIBC user. Business documents such as product literature and copies of vendor contracts may also be stored in the system.



2. Scope of this PIA

This PIA covers the utilization of the standard web-based version of Microsoft Dynamics 365 customer relationship management system for the purpose of capturing business-to-business sales information and related deliverables for contract training services. The PIA also covers the utilization of the Dynamics 365 for Outlook add-on, which allows communication and sharing of information between a user's Outlook application and the CRM system.

This PIA does not cover the processing of any student information managed through the separate student information system or personal information managed through other JIBC systems.



Privacy Impact Assessment for Non-Ministry Public Bodies

Customer Relationship Management System (CRM) – MS Dynamics PIA 2019-007

3. Related Privacy Impact Assessments

None

4. Elements of Information or Data

This initiative involves the capturing of business-to-business information, such as:

- Organization information – name, address, email address, phone and fax numbers, list of contacts, category of organization (public, private, etc.)
- Business contact information for any person connecting or communicating with a JIBC representative for purposes of obtaining contract training services or identified as being a provider of instruction (“instructor”):
 - First and last name
 - Known as
 - Title
 - Address
 - Business email address
 - Business phone, fax number
 - Related organization
 - Category based on JIBC business requirements (e.g., “stakeholder”, “customer”, “payee”, instructor, etc.)
- Opportunity information, for example lead information plus proposed services, quoted costs, JIBC contacts, status of business opportunity, quote details, etc.
- Project/Order information, for example opportunity information plus course delivery locations, instructors assigned, delivery dates, shipping/billing addresses, general notes, etc.
- Communication records – emails, notes about phone calls, meetings, tasks, training requests – assuming they do not contain personal information.

The CRM does NOT track or record personal information. Since the system does have the capability of tracking communication records, there is a potential that a user could link a business email containing personal information to the CRM. To mitigate this situation, users will be briefed on this potential and be asked to sign a document which outlines the directive to not link messages which may contain personal information and to delete personal information found within the system.

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.



Privacy Impact Assessment for Non-Ministry Public Bodies

Customer Relationship Management System (CRM) – MS Dynamics

PIA 2019-007

NOTE: It was determined that the CRM system does not contain personal information. Any responses provided to Parts 2 to 5 are for general information only.

Part 2 – Protection of Personal Information

5. Storage or Access outside Canada

✓ The current Dynamics 365 tenant - and as such all data in storage and any collected by the proposed initiative - is located in Canada (Toronto or Quebec data stores) as part of Microsoft Canadian cloud offer.

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



Privacy Impact Assessment for Non-Ministry Public Bodies

Customer Relationship Management System (CRM) – MS Dynamics

PIA 2019-007

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
<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 Flow Table			
	Description/Purpose	Type	FOIPPA Authority



Privacy Impact Assessment for Non-Ministry Public Bodies

Customer Relationship Management System (CRM) – MS Dynamics PIA 2019-007

9. Risk Mitigation Table

Risk Mitigation Table				
	Risk	Mitigation Strategy	Likelihood	Impact
1	Employee could inadvertently attach an email from a client to the CRM containing personal information about students to be registered in course.	All users will be briefed on and asked to sign a document which directs users to not attach email to the system which contain personal information and to delete any emails or attachments which contain personal information. The CRM provides full auditing capabilities of user actions, if needed follow up and training could occur with those found to be attaching personal information.	Low	Low

10. Collection Notice

JIBC provides a public privacy notice, which can be found at <http://www.jibc.ca/privacy>. The JIBC Contract/Core Client Section Registration Form and the registration form for individual students both include a privacy summary statement and the link to the public privacy notice.

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)

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

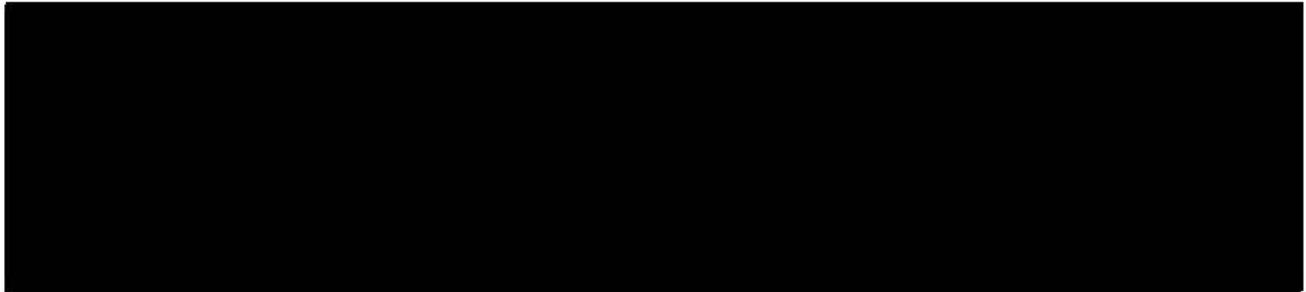
The technical security measures related to the proposed initiative will not change from the CRM and Exchange server systems already in use. Connections to the system are authenticated using JIBC’s Active Directory in combination with Dynamics 365 active directory extensions.



Privacy Impact Assessment for Non-Ministry Public Bodies

Customer Relationship Management System (CRM) – MS Dynamics PIA 2019-007

JIBC staff will access the system through the MS Dynamics 365 log-in page or through the Outlook add-on application, which would be installed on JIBC machines with internal network connectivity using the same network configuration as required by Outlook.



13. Does your branch/department rely on any security policies? S.15(1)(l)

JIBC's Information Security Policy (2502) and Records and Information Management Policy (2102) protect the security of JIBC's information assets and are applicable to all JIBC staff, faculty and students.

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.

Access to the system will be restricted subject to the same role-based access controls, which are currently managed internally by JIBC Technology Services administrators.

Official student records and personal information are stored in the JIBC's student information system and not in the CRM system.

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

There will be no change to the existing access logging, auditing and notification activities.

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 public body notify them of the update, correction or annotation?

Any changes or corrections received through the proposed initiative will be used to update non-personal information in the CRM system. Personal information will not be tracked in the system and requests to change personal information will be directed to the appropriate JIBC



Privacy Impact Assessment for Non-Ministry Public Bodies

Customer Relationship Management System (CRM) – MS Dynamics PIA 2019-007

representatives for updating in JIBC's student information system (or other systems intended for this purpose). If personal information so found in the CRM system it is to be deleted by the user.

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

No, any decisions directly about students are made through other existing practices and system within the JIBC and are outside the scope of the CRM system.

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).



Privacy Impact Assessment for Non-Ministry Public Bodies

Customer Relationship Management System (CRM) – MS Dynamics PIA 2019-007

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.

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).

There are appropriate measures to deal with accidental inclusion of private information within this system. It is not intended to contain confidential or private information.

Privacy Officer Representative	Signature	Date
George Jones		2019 March 18



Privacy Impact Assessment for Non-Ministry Public Bodies

Customer Relationship Management System (CRM) – MS Dynamics PIA 2019-007

Part 7 – Program Area Signatures

<u>SARAH WARREN</u> Program/Department Manager	<u>[Signature]</u> Signature	<u>MARCH 18/19</u> Date
Contact Responsible for Systems Maintenance and/or Security (Signature not required unless they have been involved in this PIA.)	Signature	Date
<u>KAYOKA MCCELLIGOTT</u> Head of Public Body, or designate	<u>[Signature]</u> Signature	<u>3/29/2019</u> 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.

