



Privacy Impact Assessment for Non-Ministry Public Bodies

Manulife Vitality

PIA# 2020 007

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:	Human Resources		
PIA Drafter:	Derek Deacon		
Email:	ddeacon@jibc.ca	Phone:	604.836.1761
Responsibility:	Erin Ramsay		
Email:	eramsay@jibc.ca	Phone:	604.528.5644

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 Manulife Vitality for Group Benefits Members ("Vitality").

Vitality is a wellness program that helps participants understand their current health, social and lifestyle habits. Vitality rewards participants for taking care of themselves and leading healthy lifestyles. The program gives participants the tools and motivation to reach their personal health and wellness goals.

Participation in Vitality is entirely voluntary. JIBC wishes to create a culture of wellness to improve employees' health and well-being, while increasing productivity and creating a positive work environment.



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Attached to this PIA is an FAQ for employees and sign up information.

2. Scope of this PIA

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

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

3. Related Privacy Impact Assessments

None.

4. Elements of Information or Data

According to the FAQ, participants' personally-identifiable health and lifestyle information is not shared with JIBC or Manulife without the participant's consent. JIBC will receive high-level depersonalized summary information, so that it can understand different trends and see how well they are doing as an organization.

According to the privacy and confidentiality statement on Manulife's group benefits portal:

Privacy and confidentiality

- Who has access to the personal information I submit online to Manulife Vitality?

Confidentiality is a top priority. We are committed to maintaining the highest level of confidentiality with all of the information we receive from our members. The Privacy statement on the Manulife Vitality app assures you that the information you share with Manulife Vitality is kept confidential and fully secure.

The privacy statement clearly states that Manulife will only have access to information about the Vitality Points you earned in the program and does not have access to your health or lifestyle information from the program. For example, Manulife will know the number of Vitality Points you earned to determine your Vitality Status, but Manulife does not know how you earned those points.

Your participation in the program is entirely voluntary and you are not required to participate in any element of the program if you don't wish to.

Any data shared with employers regarding the program is **always** on an aggregated, de-personalized basis. This is consistent with all other employer-level reporting for Manulife group benefits.

- Do I have control over the data that is shared?

You have absolute control over the data you want to share. You can sync with different devices and wearables to earn points, but, ultimately, you always control how and what you want to share. You can also choose to stop sharing at any time.

- Where is my data stored?

All member data that's part of the Manulife Vitality program for group benefits is stored in Canada in compliance with Group Benefits Canadian data residency requirements. Manulife and the Vitality Group treat customer data security and privacy with a high level of respect and customer data will be handled with great care.



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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>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>	



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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.	Vitality breach and employee PHI is released	Low	High	<ul style="list-style-type: none"> Starling Minds has taken reasonable steps to prevent a breach Platform automatically times out after 30 minutes of inactivity Access to view or change personal information requires password PI about users is restricted to usernames and email addresses only
2.	Vitality's use of individually identifiable data could result in de-anonymization of information	Low	High	<ul style="list-style-type: none"> JIBC's HR team should inquire with Mercer and/or directly with Manulife to ensure that there is no way that anonymous information provided to JIBC could be used to determine the underlying individuals

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.

This notice should be included on literature aimed at participants, as well as on any JIBC website or intranet pages leading to Vitality.

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).



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[REDACTED]

S.15(1)(l)

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]



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[Redacted]

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

See section 11.

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?

[Redacted]

S.15(1)(l)

[Redacted]

[Redacted]

[Redacted]



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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. Vitality’s data consent:

Vitality may share your personal information, other than your medical and lifestyle information, with Manulife for its reasonable business purposes related to the Manulife Vitality Program, including as necessary to administer your Manulife insurance policy or group benefits plan and to allow Manulife to provide administrative support in respect of the Manulife Vitality Program, as well as for **research purposes** and the development, marketing, sale and administration of insurance and other financial products to its customers. Manulife may share such information with its agents, third-party partners, affiliates and subsidiaries to enable them to perform functions or services on their behalf.

In order to evaluate and improve the Manulife Vitality Program, we may share de-identified data with third party researchers to study engagement, health improvements and website improvements.



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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

The privacy and confidentiality information on our Manulife group benefits portal provides helpful information to allow participants to make an informed decision about whether they wish to use this voluntary tool.

Vitality appears to share personal information for, among other things, research purposes. Although not a privacy concern *per se*, the appropriate people without JIBC should be consulted to ensure that there are no research ethics issues with respect to same.

Analysis and Decision

The information provided for the review has established that Vitality may be used for its intended purpose subject to the following conditions.

Conditions

1. Participants should be made aware of the privacy and confidentiality language on the Manulife group benefits portal, and should be encouraged to consider such information before deciding whether to participate in this voluntary initiative. Suggested language to include in emails concerning Vitality (perhaps after “Click the Sign up now button”, or somewhere else that is not hidden):
 - “Once in your Manulife Group Benefits account, we encourage you to click “Questions?” and to review and consider the “Privacy and confidentiality” section before deciding whether to participate in this voluntary program.”
2. JIBC’s HR team should inquire with Mercer and/or directly with Manulife to ensure that there is no way that anonymous information provided to JIBC could be used to determine the underlying individuals



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Derek Deacon

Privacy Officer/Privacy Office
Representative

Derek Deacon

Digitally signed by Derek Deacon
Date: 2020.12.17 15:18:04 -08'00'

Signature

12/17/2020

Date



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Part 7 – Program Area Signatures

Erin Ramsay

December 9, 2020

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

Erin Ramsay

December 9, 2020

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.