

**PRIVACY IMPACT ASSESSMENT (PIA)
CLOSURE SUMMARY**

Initiative	Piktochart
PIA Reference #	2023-xxx
PIA Completion Date	October __, 2023
Project Sponsor	Greg Keenan – Director, CCSD David Dосkotch – Coordinator/Instructor, Systems, CCSD
Unit	CCSD

The purpose of a PIA is to determine whether an initiative complies with the *Freedom of Information and Protection of Privacy Act* (“**FIPPA**”) and JIBC’s policies and procedures. This document is to advise that the PIA review of this initiative has been completed. The following outlines the scope, issues, legal basis and conclusions associated with this PIA.

Initiative Description & Scope

CCSD would like to use Piktochart software to use in its systems training area. Piktochart is a web-based graphic design tool and infographic maker.

Information Reviewed

Our review is based on the following information provided by the project team:

- a) Completed PIA Risk Classification Tool, the summary of which is at Schedule A.
- b) Completed PIA Questionnaire, completed by David Dосkotch, which is attached at Schedule B.
- c) An email thread explaining the nature of the proposed tool, which is attached at Schedule C.

Risk Classification

Based on the information in the PIA Risk Classification Tool, the proposed tool has a risk classification level of “**Medium**”, with a score of 9. Please see Schedule A for more information.

Legal Basis - Privacy

According to the PIA Questionnaire and the privacy policy of the proposed tool, the proposed tool will involve collection, use and disclosure of some biographical and demographic information, employment information and financial (billing) information with respect to an individual employee.

Such information is permitted to be collected pursuant to section 26(c) of FIPPA, which states that a public body may collect personal information if the information relates directly to and is necessary for a program or activity of a public body. Such information is also permitted to be collected pursuant to section 26(d) of

FIPPA, which states that a public body may collect personal information if the information is collected for a prescribed purpose, the individual the information is about has consented to that collection, and a reasonable person would consider that collection appropriate in the circumstances. Pursuant to section 27(2) of FIPPA, a public body must ensure that an individual from whom it collects personal information is told: (a) the purpose for collecting it; (b) the legal authority for collecting it; and (c) the contact information of an officer or employee of the public body who can answer the individual's questions about the collection. It is unclear if users are currently presented with a collection notice that meets this requirement.

Pursuant to section 32(a) of FIPPA, a public body may use personal information in its custody or under its control for the purpose for which the information was obtained, or compiled, or for a use consistent with that purpose. Pursuant to section 32(b) of FIPPA, a public body may use personal information in its custody or under its control if the individual the information is about has identified the information and has consented to its use.

Pursuant to section 33(2)(d) of FIPPA, a public body may disclose personal information for the purpose for which the information was obtained or compiled, or for a use consistent with that purpose. Pursuant to section 33(2)(c) of FIPPA, a public body may disclose personal information if the individual the information is about has identified the information and has consented to the disclosure.

Pursuant to section 34 of FIPPA, a use or disclosure of personal information is consistent with the purpose for which the information was obtained or compiled if the use: (a) has a reasonable and direct connection to that purpose; and (b) is necessary for performing the statutory duties of, or for operating a program or activity of, the public body that uses or discloses the information.

Section 33.1 of FIPPA requires additional analysis be conducted when personal information will be stored outside of Canada. It is unclear where personal information is being stored.

Sensitive personal information is not defined under FIPPA, and a determination of the sensitivity of personal information depends largely on context. In particular, the government of British Columbia has provided the following non-exhaustive list of personal information that are commonly considered sensitive:

- Personal health information
- Genetic and biometric data
- Personal financial information
- Geolocation data
- Criminal records
- Racial or ethnic origin
- Sexual orientation
- Religious, philosophical or political beliefs

The personal information that will be disclosed for storage outside of Canada with respect to the proposed tool does not appear to be sensitive. As such, we have determined that it is not necessary to complete the supplementary assessment.

The personal information collected, used and disclosed in connection with this proposed use is supported under FIPPA, provided that individuals are provided a collection notice in accordance with section 27(2) of FIPPA.

Legal Basis - Security

Pursuant to section 30 of FIPPA, a public body must protect personal information in its custody or under its control by making reasonable security arrangements against such risks as unauthorized collection, use, disclosure or disposal. The privacy policy of the proposed tool states that data is secured encrypted and safely stored by Paddle.com Market Limited. Paddle's privacy policy states that it has implemented appropriate technical and organizational security measures to protect personal data against unauthorized or unlawful processing, loss, destruction or damage. After reviewing the privacy policies of both the proposed tool and Paddle, we have determined that no further analysis is required with respect to security.

Conclusions

Based on the information provided, our review has concluded that there are no significant privacy or security risks introduced by the use of this proposed tool.

Responsibilities

CCSD are responsible for ensuring that individuals are informed that we will be collecting personal information about them. Here is a sample form of collection notice that could be used:

*"Your personal information is collected under the authority of section 26(c) of the *Freedom of Information and Protection of Privacy Act*. This information may be used by JIBC as for **[insert purpose of collection.]**. If you have any questions about the collection of this information, please contact privacy@jibc.ca."*

Given David's involvement in the preparation of this PIA, no formal collection notice will be required to be provided. However, if additional users begin using the proposed tool, a formal collection notice will be required. If you have any questions or concerns about that, please contact the General Counsel.

Furthermore, CCSD are responsible for Informing the General Counsel of any material omissions or inaccuracies in the information relied upon in this PIA, and submitting to the General Counsel a new PIA request if there are any significant changes (such as additional users of the proposed tool) to this initiative.

If you have any questions or concerns about this PIA, please contact the General Counsel.

**SCHEDULE A
PRIVACY IMPACT ASSESSMENT QUESTIONNAIRE**

Please see attached.

IMPACT			Score
1	How many individual records will be stored, accessed or used?	1-1000	2
2	What is the most sensitive type of Personal Information in these records?	A single employee	1

PROBABILITY			Score
3	Where will the information be stored?	██████	5
4	How many users will have access to the information?	1-10	1

S.15(1)(l)

PIA Priority Rating Table					
Impact	Probability				
	1	2	3	4	5
1	1	2	3	4	5
2	2	4	6	8	10
3	3	6	9	12	15
4	4	8	12	16	20
5	5	10	15	20	25

Colour Coding Key
LOW
MEDIUM
HIGH
VERY HIGH

Classification for this Project
9
MEDIUM

Legend

CLASSIFICATION	
Risk_No.	Risk_Rank
1	LOW
2	LOW
3	LOW
4	LOW
5	MEDIUM
6	MEDIUM
7	MEDIUM
8	MEDIUM
9	MEDIUM
10	MEDIUM
11	MEDIUM
12	MEDIUM
13	MEDIUM
14	MEDIUM
15	MEDIUM
16	HIGH
17	HIGH
18	HIGH
19	HIGH
20	HIGH
21	VERY HIGH
22	VERY HIGH
23	VERY HIGH
24	VERY HIGH
25	VERY HIGH

1- NUMBER OF RECORDS	
Records	Rec_Rank
1-1000	1
1,001-10,000	2
10,001-100,000	3
100,001-1,000,000	4
1,000,000+	5

2- INFORMATION TYPE	
PI_Risk	PI_Type
N/A - No Personal Information	0
Student Information	3
Donor, Alumni & Other Third Party Information	3
Credit Card Information	5
Employee Information	7
Health Information	7

4- LOCATION OF INFORMATION	
Location	Loc_Rank
[Redacted]	1
[Redacted]	2
[Redacted]	3
[Redacted]	5

[Redacted]	[Redacted]
[Redacted]	[Redacted]

5- NUMBER OF USERS	
Users	Use_Rank
1-10	1
11-100	2
101-1,000	3
1,001-10,000	4
10,001+	5

S.15(1)(l)

**SCHEDULE B
PIA QUESTIONNAIRE**

Please see attached.

**SCHEDULE C
SUPPORTING EMAIL TRAIL**

Please see attached.

PRIVACY IMPACT ASSESSMENT QUESTIONNAIRE

for

Piktochart

1. Purpose of the Privacy Impact Assessment Questionnaire

This form is used by JIBC to provide a high-level overview of the potential privacy risks of a current or proposed policy, system, project, program or activity. The results of these screening questions help judge the level of potential risk, the extent to which risk mitigation strategies may be needed and when completion of a privacy impact assessment is required under the *Freedom of Information and Protection of Privacy Act* (British Columbia) (the “Act”).

2. Privacy Questions

Questions	Answers
Does the program involve personally identifiable information (PII) (as defined by the Act)? [Y/N]	N
Will the program involve the collection or creation of new information about individuals? [Y/N]	N
Will personal information about individuals be disclosed to organizations, programs, processes or people who have not previously had routine access to the information? [Y/N]	N
Will personal information about individuals be used for a purpose it is not currently used for, or in a way it is not currently used? [Y/N]	N
Will the program require contacting individuals in ways that they may find intrusive? [Y/N]	N
Does the program have a collection notice or use policy? [Y/N]	u/k

3. Technology Questions

Questions	Answers
Does this program involve the implementation of a new electronic system or use of a new application or software to support the creation, collection, updating or storing, backing-up or disposition of personal information? [Y/N]	N
Does this program require any modifications to existing information technology (IT) systems (e.g., integration with or consolidation of other IT systems)? [Y/N]	N
Will a new or modified electronic system change the existing business workflow? [Y/N]	N
Does the program involve the use of new technology that might be perceived as being privacy intrusive? [Y/N]	N

4. Impact Questions

Questions	Answers
What are the purpose of collection, use and/or disclosure of the personal information? [Internal/External/Both]	u/k
Will personal information about the same individual that was previously maintained separately now be aggregated and stored together? [Y/N]	N
How would you describe the information classification level of the personal information? (Select all that apply) <ul style="list-style-type: none"> • Highly Confidential • Confidential • Public 	Public
What are the type(s) of personal information? (Select all that apply) <ul style="list-style-type: none"> • Bio/demographic information • Academic/education Information • Employment information • Medical/health Information • Financial Information • Criminal information • Images • Opinions about individuals • Individuals' personal views and opinions • Business contact information • Personal contact information • Other 	Some bio/demographic information, employment information, financial information (billing data) [DD: Looks like David is the only user at this point.]
What are the type(s) of individuals? (Select all that apply) <ul style="list-style-type: none"> • Prospects • Applicants • Students • Employees • Donors/alumni/other 3rd parties • Volunteers • Service providers • Other 	Employees (self)

How many records documenting individuals will be stored, accessed, used or disclosed? [1-1000], [1001-5000], [5,001-50,000], [50,001-100,000], [100,000+]	1
How many JIBC employees, volunteers and service provider employees will be able to access, collect, use or disclose the information? [1-10], [11-50], [51-100], [101-250], [251-500], [501-1,000], [1,000+]	1
Is any of the information owned by another organization? [Y/N]	N

5. Probability Questions

Questions	Answers
Where will the information be stored? (Select all that apply) <ul style="list-style-type: none"> On campus – JIBC servers On campus – other Off-campus – inside Canada Off-campus – outside Canada 	<div style="background-color: black; width: 150px; height: 15px; margin-bottom: 5px;"></div> <div style="background-color: black; width: 100px; height: 15px;"></div>
Is any of the information accessed from outside of Canada? [Y/N]	N
Will personal information be transmitted? (Select only one) <ul style="list-style-type: none"> Personal information is used in a closed system (i.e., no connections to the Internet, Intranet or any other system and the circulation of hardcopy documents is controlled) Personal information is used in a system that has connections to at least one other system Personal information is transferred to a portable device (i.e., USB key, diskette, laptop computer), transferred to a different medium or is printed Personal information is transmitted using wireless technologies 	Closed system
Will a third party (e.g., vendor or service provider) have access to the information? [Y/N]	N
Will the program result in different record keeping systems converging? [Y/N]	N

S.15(1)(l)