

Deacon, Derek

From: Deacon, Derek
Sent: February 20, 2024 10:05 AM
To: Kouvousis, Elsa
Subject: FW: Service Agreement with Smartcat - Online Translation Service
Attachments: PIA Questionnaire - SmartCAT (1 Feb 2024).docx; Smartcat - Master Services Agreement V. 2.1 - JIBC.docx.pdf

Morning Elsa,

Happy Monday. Just making sure you received this one, as I don't see anything from 2024 in the PIA share folder.

Cheers.

Derek

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From: Deacon, Derek
Sent: Thursday, February 1, 2024 12:26 PM
To: Learoyd, Pete <plearoyd@jibc.ca>; Kouvousis, Elsa <ekouvousis@jibc.ca>
Cc: Bowles, Ron <RBowles@jibc.ca>; Wareing, Sarah <swareing@jibc.ca>; Fabri, Michael <mfabri@jibc.ca>; Osiowy, Jordan <JOsiowy@jibc.ca>; Chau, Simon <schau@jibc.ca>; Gregorowicz, Peter <pgregorowicz@jibc.ca>
Subject: RE: Service Agreement with Smartcat - Online Translation Service

Thanks Pete. This is helpful. Regarding the note on a collection notice. If no PI is being collected, no need for that sort of notice.

This is a quick and tidy one. Nothing further required on this one, but if our use of SmartCAT should change to involve the use of PI, please come back so that we can update the PIA.

Elsa, please save the attached questionnaire and MSA, as well as this email thread in one PDF, attach a PIA number in the form of 2024-xxx, and save it to the PIA folder while updating the tracking spreadsheet in that folder. If you have any questions or concerns, please let me know.

Thank again, all.

Derek

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From: Learoyd, Pete <plearoyd@jibc.ca>
Sent: Thursday, February 1, 2024 9:20 AM
To: Deacon, Derek <ddeacon@jibc.ca>
Cc: Bowles, Ron <RBowles@jibc.ca>; Wareing, Sarah <swareing@jibc.ca>; Fabri, Michael <mfabri@jibc.ca>; Osiowy, Jordan <JOsiowy@jibc.ca>; Chau, Simon <schau@jibc.ca>; Gregorowicz, Peter <pgregorowicz@jibc.ca>
Subject: RE: Service Agreement with Smartcat - Online Translation Service

Thanks Derek! Attached is the completed PIA questionnaire for SmartCAT.

Pete

From: Deacon, Derek <ddeacon@jibc.ca>
Sent: Wednesday, January 31, 2024 6:14 PM
To: Gregorowicz, Peter <pgregorowicz@jibc.ca>; Learoyd, Pete <plearoyd@jibc.ca>
Cc: Bowles, Ron <RBowles@jibc.ca>; Wareing, Sarah <swareing@jibc.ca>; Fabri, Michael <mfabri@jibc.ca>; Osiowy, Jordan <JOsiowy@jibc.ca>; Chau, Simon <schau@jibc.ca>
Subject: RE: Service Agreement with Smartcat - Online Translation Service

Thanks Pete and Peter,

Let's hit two birds with this stone. First, Pete, if you could please take a few minutes to fill out the attached PIA questionnaire, it would be greatly appreciated. Do the best you can with the information you have, but I'll say right now, if we're sure there will be no PI involved, then I suspect the PIA process will end with the completed questionnaire. I note that section 13 of the DPA at the back of this agreement says that Smartcat will provide reasonable assistance with any data protection impact assessments, so if you do feel you need additional information, I wouldn't hesitate to reach out to them.

Second, I've gone ahead and forwarded it to UCIPP for their review and approval of the indemnity at section 7.3. At first glance, I don't believe they will have a problem with it and therefore that hurdle should also be relatively easy to clear. I've also taken a quick review of the full agreement and I don't see any major red flags. One thing I'll highlight is that section 3.3 says we'll pay invoices within 15 days. I understand our turnaround on invoices to be 30 days in most cases. I would suggest either checking with Finance to see if 15 days is doable, or asking Smartcat to change that from 15 to 30.

I'll let you know when I hear back from UCIPP. Otherwise, if you have any questions or concerns, please feel free to contact me.

Cheers.

Derek

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From: Gregorowicz, Peter <pgregorowicz@jibc.ca>

Sent: Wednesday, January 31, 2024 3:32 PM

To: Learoyd, Pete <plearoyd@jibc.ca>; Deacon, Derek <ddeacon@jibc.ca>

Cc: Bowles, Ron <RBowles@jibc.ca>; Wareing, Sarah <swareing@jibc.ca>; Fabri, Michael <mfabri@jibc.ca>; Osiowy, Jordan <JOsiowy@jibc.ca>; Chau, Simon <schau@jibc.ca>

Subject: RE: Service Agreement with Smartcat - Online Translation Service

Hi Pete et al,

Yes talking to TS sooner would be better.

I'll add to the reply everyone that will be touched by this.

Derec, I'll leave contract & PIA etc. with you.

Since JIBC doesn't have computerized translation service/system, in pre-TS governance state, first business unit identifying a need and often proposing solution, de-facto sets JIBC standard for that service/system.

This is best TS governance that we can be establish for now, in the context of JIBC.

As far as software / service, we need to include Michael from application side, Jordan from infra/cybersecurity side, and Simon from support,

(all though last maybe skipped, if the deployment is for very limited number of users, and everyone is aware to use online help when they have issues and not call service desk).

Two biggest wrinkles in this project are:

- Cybersecurity requirement for all systems (net-new systems), have to be procured with all enterprise level security features, in this case SSO. (see pic below)

This requires enterprise licensing, and looks like price is not listed and you need to contact them, so pls continue to work with the person you working with to get that (enterprise) quote.

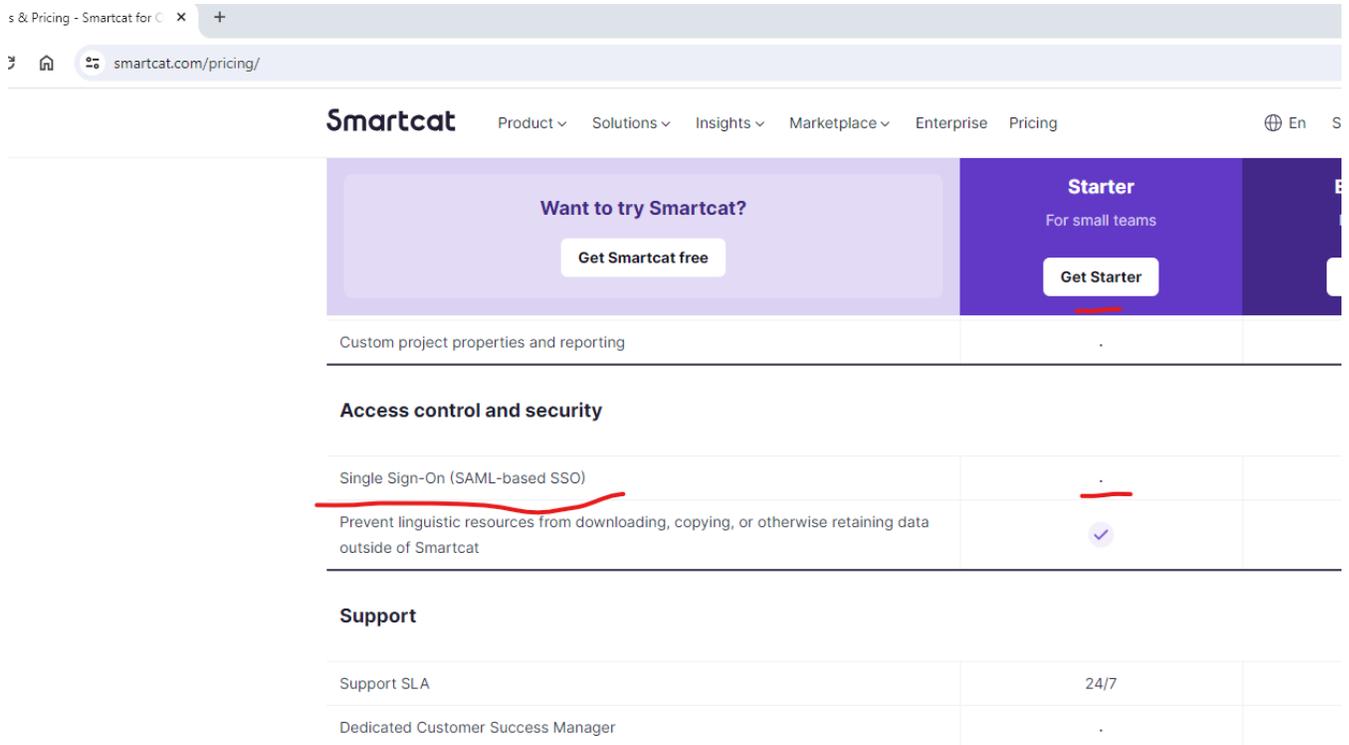
- Budgets, all technology is setup and maintain (contract, support, etc.) via TS budgets. This is funded only for two year cycle (potentially less), and to make it more complicated it is based on consumption model (0.05c per word), so someone should watch usage (but maybe enterprise licensing doesn't have that limit)

Place to start: please put together a meeting with you, your contact from the vendor, and TS.

Let the vendor know to bring his techies so the meeting will be useful if your person is strictly salesperson.

Thx
Peter

P.S. Sorry for long email, hopefully when TS governance is established such log emails and endless unstructured rush delivery will be a thing of the past.



From: Learoyd, Pete <plearoyd@jibc.ca>
Sent: Wednesday, January 31, 2024 8:43 AM
To: Gregorowicz, Peter <pgregorowicz@jibc.ca>
Cc: Bowles, Ron <RBowles@jibc.ca>; Wareing, Sarah <swareing@jibc.ca>
Subject: Service Agreement with Smartcat - Online Translation Service

Hi Peter,

I would like to get you up to speed on a “somewhat” urgent translation requirement we have within both our international contract work in Asia and some of our federal obligations in Canada.

In general, we need to translate some course materials in February and then over the coming year or two. Based on my review and past experience, our best solution is to contact with an online Computer Assisted Translation (CAT) service. I have demoed several services and would like to move forward with Smartcat <https://www.smartcat.com/>. This online/web service provide annual licensing (priced monthly), there is no software for our systems – it is a fully online/web-based service. I anticipate obtaining the one-year licenses and then evaluating if another year would be necessary/feasible. We have funding this year (up to \$20K) and over the next two years (\$10K per year) to cover this cost as part of our federal contract with Global Affairs Canada.

Sorry, I likely should have liked TS in sooner on this. I am evaluating our annual word count now which will be used by set our monthly/annual license rate. Their sales rep can then get back to me with an actual costs for the service. I also recognize we may need to complete a PIA, I have done these before and anticipate it could be very quick as there is NO personal information of any type being put in this system. It is only for the translation of various course materials.

Please let me know who I should work through in TS, so we can move this forward as soon as possible. I have attached their services master service agreement, which I recognize will also need to go through Finance for indemnification approval.

Thanks,
Pete

PRIVACY IMPACT ASSESSMENT QUESTIONNAIRE

for

Smartcat Platform Inc

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]	No
Will the program involve the collection or creation of new information about individuals? [Y/N]	No
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]	No
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]	No
Will the program require contacting individuals in ways that they may find intrusive? [Y/N]	No
Does the program have a collection notice or use policy? [Y/N]	No, but may not be clear on the question. Clarify?

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]	No
Does this program require any modifications to existing information technology (IT) systems (e.g., integration with or consolidation of other IT systems)? [Y/N]	No
Will a new or modified electronic system change the existing business workflow? [Y/N]	No
Does the program involve the use of new technology that might be perceived as being privacy intrusive? [Y/N]	No

4. Impact Questions

Questions	Answers
What are the purpose of collection, use and/or disclosure of the personal information? [Internal/External/Both]	There is no personal information.
Will personal information about the same individual that was previously maintained separately now be aggregated and stored together? [Y/N]	No
<p>How would you describe the information classification level of the personal information? (Select all that apply)</p> <ul style="list-style-type: none"> • Highly Confidential • Confidential • Public 	There is no personal information involved.
<p>What are the type(s) of personal information? (Select all that apply)</p> <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 	There is no personal information involved.
<p>What are the type(s) of individuals? (Select all that apply)</p> <ul style="list-style-type: none"> • Prospects • Applicants • Students • Employees • Donors/alumni/other 3rd parties • Volunteers • Service providers • Other 	There is no personal information involved.

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+]	There is no personal information involved.
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+]	+/- 4, but it is not personal information
Is any of the information owned by another organization? [Y/N]	No

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 	There is no personal information involved. Source and destination course materials are being translated. While translation is underway, documents maybe stored off-campus online, outside Canada.
Is any of the information accessed from outside of Canada? [Y/N]	See above
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 	There is no personal information involved.
Will a third party (e.g., vendor or service provider) have access to the information? [Y/N]	Yes/potentially, but it is not personal in nature. Contract will be in place to address confidentiality and ownership.
Will the program result in different record keeping systems converging? [Y/N]	No