

# Privacy Impact Assessment for Low-Risk Initiatives Involving Personal Information

(to be completed by Department Chair, or Manager)

*The initiative may use an external vendor, online service, product, or involve a program/activity that captures personal information*

Department/School: **Arts & Science: Chemistry** (Instructor: Larry Lee)      Chair/ Manager: Emily Schudel (CETL Chair)

Service / Product Name: **Aktiv Learning: Chemistry** (<https://aktiv.com/chemistry/>)      Vendor: **Aktiv Learning** (owned by Tophat)

Description & Purpose:

**Aktiv Learning for Chemistry is an online platform for Chemistry subjects that gives students opportunities to work with STEM equations and engage with cases for both practice and for formal assessment. Access to this platform will be integrated into Camosun's D2L Brightspace environment (through LTI integration)**

		Yes	No	Don't Know
<b>COLLECTION</b>				
<b>1.</b>	Will this activity or initiative collect personal information? <i>Personal information is recorded information about an identifiable individual other than business contact information.</i>	Y		
<b>1 a</b>	If yes, list what personal information will be collected, e.g., email address, name, identification number, academic/health/financial information, image, or voice.  <b>Students create accounts on Aktiv Learning, using First name, Last name, personal email address. Students will access Aktiv Learning through D2L integration for the course but individual accounts allow students to continue accessing their completed work on the Aktiv Learning servers after the course is over and access to D2L course site no longer active.</b>			
<b>STORAGE</b>				
<b>2.</b>	Will personal information be stored on servers external to Camosun (i.e., Cloud-based)?	Y		
<b>2.a</b>	If yes, will the external (i.e., Cloud-based) servers be located outside of Canada?			AWS servers in

				North America
2.b	If yes, will there be options to minimize the amount of personal information the user provides, or enter non-personally identifiable information?	Yes		
3.	What security measures does the vendor have in place to protect personal information stored on the external server or database? Provide copy or link, if available. <a href="https://aktiv.com/privacy/">https://aktiv.com/privacy/</a>			
		Yes	No	Don't Know
4.	How long will personal information be stored on the server or database (whether on-premise or external)? Data held in perpetuity so students can go back to review their activities at any time; data can be purged upon request by the student (for their individual data) or by representative admin from the college (e.g. instructor or eLearning Support)			
<b>USE</b>				
5.	How will this activity or initiative use personal information? Links students with the work they have done.			
6.	Will the activity or initiative be mandatory?	Yes		
6.a	If mandatory, can you provide an alternative activity? Please describe: Accommodation requests can be met.	Yes		
6.b	If mandatory and you cannot provide an alternative, how will you obtain written consent from students, employees, or others to store or access personal information outside of Canada? N/A			
6.c	Who holds the responsibility to correct or remove personal information, upon request of the affected individual? Students can withdraw their consent for the use of their Personal Information at any time by requesting the deletion of their User Account			
<b>DISCLOSURE</b>				
7.	Will the activity or initiative require disclosure of personal information to any external organization or agency?		No	
7.a	If yes, will there be a written agreement between Camosun and the other party?			
7.b	If yes, please provide a link or copy of the agreement.			

GENERAL INFORMATION			
8.	Will you use an online product or service for this activity or initiative?	Yes	
8.a	If yes, will you enter into a service agreement or contract with the vendor or service provider? <a href="https://aktiv.com/user-agreement/">https://aktiv.com/user-agreement/</a>	Yes	
8.b	If yes, does it include an indemnity clause? <i>Contact the Administration Office to request review of indemnity clause.</i>		No
9.	Is there a Privacy Policy or privacy/personal information-related clause associated with the product or service?	Yes	
9.a	If yes, please provide a link or copy to the agreement, terms of use and/or privacy policy, if available. <a href="#">Privacy Policy – Aktiv Learning – Activate Student Engagement in STEM</a>		

**PIA Review:**

**Yes** Meets privacy protection requirements and can proceed

Does not meet privacy protection requirements; please submit additional information prior to proceeding:

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*ESchudel*

Reviewed by: Workplace leader \_\_\_\_\_ Review Date: \_\_\_\_\_ August 24, 2023 \_\_\_\_\_

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*The initiative may use an external vendor, online service, product, or involve a program/activity that captures personal information*

Department/School: Automotive – School of Trades & Technology

Chair/ Manager: Kyle Broad

**PIA completion: Patrick Jones, M.Ed., Instructor, Program Leader, Motor Vehicle & Metal Trades Department, Camosun College, May 23, 2024**

Service / Product Name: “Get Ahead” Partnership Agreement

Vendor: Daimler Trucks North America

Description & Purpose: “Get Ahead” is a partnership between Daimler Trucks North America LLC (DTNA), a diesel school, and a DTNA service network location, i.e. a Freightliner® and/or Western Star® dealership or Detroit™ distributor. Through this partnership, DTNA offers diesel schools access to industry level web-based training free of charge.

		Yes	No	Don't Know
<b>COLLECTION</b>				
<b>1.</b>	Will this activity or initiative collect personal information? <i>Personal information is recorded information about an identifiable individual other than business contact information.</i>		NO	
<b>1 a</b>	If yes, list what personal information will be collected, e.g., email address, name, identification number, academic/health/financial information, image, or voice.			
<b>STORAGE</b>				
<b>2.</b>	Will personal information be stored on servers external to Camosun (i.e., Cloud-based)?		NO	
<b>2.a</b>	If yes, will the external (i.e., Cloud-based) servers be located outside of Canada?			
<b>2.b</b>	If yes, will there be options to minimize the amount of personal information the user provides, or enter non-personally identifiable information?			
<b>3.</b>	What security measures does the vendor have in place to protect personal information stored on the external server or database? Provide copy or link, if available.			
				<b>Not Applicable</b>
		Yes	No	Don't Know
<b>4.</b>	How long will personal information be stored on the server or database (whether on-premise or external)?			<b>Not Applicable</b>

<b>USE</b>			
<b>5.</b>	How will this activity or initiative use personal information? Name and email is collected to allow access to training site. <b>Not Applicable</b>		
<b>6.</b>	Will the activity or initiative be mandatory?		NO
<b>6.a</b>	If mandatory, can you provide an alternative activity?		
	Please describe:		
<b>6.b</b>	If mandatory and you cannot provide an alternative, how will you obtain written consent from students, employees, or others to store or access personal information outside of Canada? <b>Not Applicable</b>		
<b>6.c</b>	Who holds the responsibility to correct or remove personal information, upon request of the affected individual? <b>Not Applicable</b>		
<b>DISCLOSURE</b>			
<b>7.</b>	Will the activity or initiative require disclosure of personal information to any external organization or agency?		N/A
<b>7.a</b>	If yes, will there be a written agreement between Camosun and the other party?		
<b>7.b</b>	If yes, please provide a link or copy of the agreement.		
<b>GENERAL INFORMATION</b>			
<b>8.</b>	Will you use an online product or service for this activity or initiative?	YES	
<b>8.a</b>	If yes, will you enter into a service agreement or contract with the vendor or service provider?	YES	
<b>8.b</b>	If yes, does it include an indemnity clause? <i>Contact the Administration Office to request review of indemnity clause.</i>		No
<b>9.</b>	Is there a Privacy Policy or privacy/personal information-related clause associated with the product or service?		No
<b>9.a</b>	If yes, please provide a link or copy to the agreement, terms of use and/or privacy policy, if available.		

**PIA Review:**

Meets privacy protection requirements and can proceed

Does not meet privacy protection requirements; please submit additional information prior to proceeding: \_

Reviewed by: Ann Behennah, Privacy Office

Review Date: May 23, 2024

# Section 17

Section 15(1)(l)

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