

# 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: Facilities Services/Emergency Management

Chair/ Manager: Melodie Hutmacher

Service / Product Name: Rave Mobile Safety

Vendor: Rave Mobile Safety

**Description & Purpose:**

An emergency notification platform that quickly and reliably delivers mass notifications and targeted alerts for planned and unplanned events by SMS text, and email, as well as phone calls. Users must opt-in to receive the service. Users have the choice of what personal information is provided, and have complete control over their own account.

		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>	X		
<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>The Rave system will collect phone numbers, email, and a unique identifier (for example: student number/ employee number). The system can collect 3 landlines, 3 cell numbers, 3 emails, student/employee number (as the unique identifier), language preference and 35 additional attributes (20 string, 5 date, 5 integer, and 5 binary).</b>			
<b>STORAGE</b>				
<b>2.</b>	Will personal information be stored on servers external to Camosun (i.e., Cloud-based)? <b>Cloud: one of 2 servers ONLY in Canada</b>	X		
<b>2.a</b>	If yes, will the external (i.e., Cloud-based) servers be located outside of Canada?		X	
<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?			N/A

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. <b>Please see Rave Mobile Safety Information Security Overview document attached.</b>			
		Yes	No	Don't Know
4.	How long will personal information be stored on the server or database (whether on-premise or external)? <ul style="list-style-type: none"> <li><b>Notification logs are kept for 7 years, however information you enter in the system will be retained if Camosun chooses to do so. If Camosun were to no longer use Rave, Rave would retain the data only long enough to fulfill contractual obligations after which all the information will be removed from the system.</b></li> </ul>			
<b>USE</b>				
5.	How will this activity or initiative use personal information? <b>The information's use is strictly limited to the dissemination of emergency notifications or important informational alerts as they pertain to the safety of Camosun College students, employees, and visitors. Information collected will not be shared with any other party nor used for any other purpose</b>			
6.	Will the activity or initiative be mandatory? <b>Users must opt in to be eligible to receive Camosun messaging.</b>	X		
6.a	If mandatory, can you provide an alternative activity? Please describe: <b>Users can choose to opt in for the notifications or not; solely up to the user</b>			N/A
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? <b>Not applicable – it is not mandatory</b>			
6.c	Who holds the responsibility to correct or remove personal information, upon request of the affected individual? <b>Corrections, changes, removals is the personal responsibility of the registered user</b>			
<b>DISCLOSURE</b>				
7.	Will the activity or initiative require disclosure of personal information to any external organization or agency? <b>Camosun will not disclose any of the information collected to any external organization, agency, or person unless it is deemed necessary by Canadian law. Rave Alert will also not disclose any of the information collected to any external organization, agency, or person.</b>		X	
7.a	If yes, will there be a written agreement between Camosun and the other party?			N/A

<b>7.b</b>	If yes, please provide a link or copy of the agreement. <b>N/A</b>			
<b>GENERAL INFORMATION</b>				
<b>8.</b>	Will you use an online product or service for this activity or initiative? <b>Rave has its own Cloud. As a customer, Camosun will be using Rave's Cloud based service</b>	X		
<b>8.a</b>	If yes, will you enter into a service agreement or contract with the vendor or service provider? <b>Yes – agreement/contract sent to Purchasing for review.</b>	X		
<b>8.b</b>	If yes, does it include an indemnity clause? <i>Contact the Administration Office to request review of indemnity clause.</i> <b>All of Rave's legal requirements are listed in the contract currently under review</b>	X		
<b>9.</b>	Is there a Privacy Policy or privacy/personal information-related clause associated with the product or service? <b>Yes, when we create the Camosun account there will be a terms of use/ privacy policy. Those terms of use must be accepted to move forward.</b>	X		
<b>9.a</b>	If yes, please provide a link or copy to the agreement, terms of use and/or privacy policy, if available. <b>Please see attached Terms of Use</b>			

**PIA Review:**

Meets privacy protection requirements and can proceed

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

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Reviewed by: \_\_\_\_\_ Review Date: \_\_\_\_\_