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PART 1: GENERAL INFORMATION

PIA file number:

Initiative title:	Lucidpress
Organization:	College of New Caledonia
Branch or unit:	Communications Services Department
Your name and title:	Jarod Hooper - Hooper Access and Privacy Consulting Ltd.
Your work phone:	[REDACTED]
Your email:	jarod@hooperconsulting.ca
Initiative Lead name and title:	Stephanie Doel Associate Director of Marketing, Brand, and Creative
Initiative Lead phone:	250-961-1691
Initiative Lead email:	Deols2@cnc.bc.ca

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Privacy Officer:	
Privacy Officer phone:	
Privacy Officer email:	

General information about the PIA:

Is this initiative a data-linking program under FOIPPA? If this PIA addresses a data-linking program, you must submit this PIA to the Office of the Information and Privacy Commissioner.
No.
Is this initiative a common or integrated program or activity? Under section FOIPPA 69 (5.4), you must submit this PIA to the Office of the Information and Privacy Commissioner.
No.
Related PIAs, if any:
N/A

1. What is the initiative?

The Communication Services Department of CNC is planning to switch their current graphic tool, Canva, to Lucidpress. Lucidpress is brand templating platform which can be used to create and design on-brand content and collateral such as brochures, posters, and digital assets. Lucidpress will be owned and managed through the Graphic Designer within CNC Communication Services. This individual will be able to manage users, as well as brand materials and approve them within the platform before they are live to ensure they meet all required standards. Student photos may be used in the graphic design therefore students will be asked to sign a photo release form before their photos are used or shared by CNC.

Lucidpress features include:

- Drag-and-drop editor
- Pre-designed templates

- Data automation
- Template locking
- Brand asset management
- Team management
- Real-time collaboration
- Multi-channel distribution

2. What is the scope of the PIA?

This PIA will address the collection, use, disclosure, and storage of personal information in the Lucidpress graphic tool.

3. What are the data or information elements involved in your initiative?

Student photos will be used in the Lucidpress creative content.

3.1 Did you list personal information in question 3?

Personal information is any recorded information about an identifiable individual, other than business contact information. Personal information includes information that can be used to identify an individual through association or reference.

Yes.

- If yes, go to [Part 2](#)
- If no, answer [question 4](#) and submit questions 1 to 4 to your Privacy Officer. You do not need to complete the rest of the PIA template.

4. How will you reduce the risk of unintentionally collecting personal information?

N/A

PART 2: COLLECTION, USE AND DISCLOSURE

This section will help you identify the legal authority for collecting, using and disclosing personal information, and confirm that all personal information elements are necessary for the purpose of the initiative.

5. Collection, use and disclosure

Use column 2 to identify whether the action in column 1 is a collection, use or disclosure of personal information. Use columns 3 and 4 to identify the legal authority you have for the collection, use or disclosure.

Use this column to describe the way personal information moves through your initiative step by step as if you were explaining it to someone who does not know about your initiative.	Collection, use or disclosure	FOIPPA authority	Other legal authority
Step 1: CNC will collect photos of students to use in branding materials with the explicit consent of the student	Collection	26(d)	
Step 2: Student photos will be uploaded into Lucidpress for use in branding materials	Use	32(b)	
Step 3: Distribute branding materials for public consumption	Disclosure	33(2)(c)	

6. Collection Notice

If you are collecting personal information directly from an individual the information is about, FOIPPA requires that you provide a collection notice (except in limited circumstances).

See Appendix A.

PART 3: STORING PERSONAL INFORMATION

If you're storing personal information outside of Canada, identify the sensitivity of the personal information and where and how it will be stored.

7. Is any personal information stored outside of Canada?

No.

8. Does your initiative involve sensitive personal information?

No.

- If yes, go to [question 9](#)
- If no, go to [question 10](#)

9. Is the sensitive personal information being disclosed outside of Canada under FOIPPA section 33(2)(f)?

N/A

- If yes, go to [question 10](#)
- If no, go to [Part 4](#)

10. Where are you storing the personal information involved in your initiative?

Lucidpress is based in the United States and unless they expressly agree otherwise, they may host, transfer, and process data, including personal information, in the United States and in other countries through Lucid affiliates and third parties that they use to operate and manage the Services.

After you answer this question go to [Part 5](#).

PART 4: ASSESSMENT FOR DISCLOSURES OUTSIDE OF CANADA

Complete this section if you are disclosing sensitive personal information to be stored outside of Canada. You may need help from your organization’s Privacy Officer.

11. Is the sensitive personal information stored by a service provider?

N/A

- If yes, fill in the table below (add more rows if necessary) and go to [question 13](#)
- If no, go to [question 12](#)

Name of service provider	Name of cloud infrastructure and/or platform provider(s) (if applicable)	Where is the sensitive personal information stored (including backups)?

Name of service provider	Name of cloud infrastructure and/or platform provider(s) (if applicable)	Where is the sensitive personal information stored (including backups)?

12. Provide details on the disclosure, including to whom it is disclosed and where the sensitive personal information is stored.

N/A

13. Does the contract you rely on include privacy-related terms?

N/A

If yes, describe the contractual measures related to your initiative.

15. What controls are in place to prevent unauthorized access to sensitive personal information?

N/A

16. Provide details about how you will track access to sensitive personal information.

N/A

17. Describe the privacy risks for disclosure outside of Canada.

Use the table to indicate the privacy risks, potential impacts, likelihood of occurrence and level of privacy risk. For each privacy risk you identify describe a privacy risk response that is proportionate to the level of risk posed.

This may include reference to the measures to protect the sensitive personal information (contractual, technical, security, administrative and/or policy measures) you outlined. Add new rows if necessary.

Privacy risk	Impact to individuals	Likelihood of unauthorized collection, use, disclosure or storage of the sensitive personal information (low, medium, high)	Level of privacy risk (low, medium, high, considering the impact and likelihood)	Risk response (this may include contractual mitigations, technical controls, and/or procedural and policy barriers)	Is there any outstanding risk? If yes, please describe.
N/A.					

Outcome of Part 4

The outcome of Part 4 will be a **risk-based decision made by the head of the public body on whether to proceed with the initiative**, with consideration of the risks and risk responses, including consideration of the outstanding risks in question 17. **The public body may document the decision in an appropriate format as determined by the head of the public body or by using this PIA template.**

PART 5: SECURITY OF PERSONAL INFORMATION

In Part 5 you will share information about the privacy aspect of securing personal information. People, organizations or governments outside of your initiative should not be able to access the personal information you collect, use, store or disclose. You need to make sure that the personal information is safely secured in both physical and technical environments.

18. Does your initiative involve digital tools, databases or information systems?

Yes

- If yes, work with your Privacy Officer to determine whether you need a security assessment to ensure the initiative meets the reasonable security requirements of FOIPPA section 30

18.1 Do you or will you have a security assessment to help you ensure the initiative meets the security requirements of FOIPPA section 30?

No.

If yes, you may want to append the security assessment to this PIA. Go to [question 20](#)

- If no, go to [question 19](#)

19. What technical and physical security do you have in place to protect personal information?

Photos and release forms are digitally stored on department specific secure shared drives accessible only to staff in the Communication Services department and ITS Administrators. Once saved to the secure drives, photos are deleted from the digital camera storage. The Communication Services employee workspace is physically separated by a locked door monitored by the front desk staff. Printed photo release forms are stored for a short time in locked file drawers within the department until they are scanned and saved to the secure drives then shredded.

20. Controlling and tracking access

Please check each strategy that describes how you limit or restrict who can access personal information and how you keep track of who has accessed personal information in the past. Insert your own strategies if needed.

Strategy	
We only allow employees in certain roles access to information	Yes
Employees that need standing or recurring access to personal information must be approved by executive lead	Yes
We use audit logs to see who accesses a file and when	No
Describe any additional controls:	

PART 6: ACCURACY, CORRECTION AND RETENTION

In Part 6 you will demonstrate that you will make a reasonable effort to ensure the personal information that you have on file is accurate and complete.

21. How will you make sure that the personal information is accurate and complete?

FOIPPA section 28 states that a public body must make every reasonable effort to ensure that an individual’s personal information is accurate and complete.

Consent forms will be completed prior to student’s providing their photos confirming accuracy.

22. Requests for correction

FOIPPA gives an individual the right to request correction of errors or omissions to their personal information. You must have a process in place to respond to these requests.

22.1 Do you have a process in place to correct personal information?

No. Only real time student photos will be used. Students may request that their photos no longer be used.

22.2 Sometimes it's not possible to correct the personal information. FOIPPA requires that you make a note on the record about the request for correction if you're not able to correct the record itself. Will you document the request to correct or annotate the record?

No. Only real time student photos will be used. Students may request that their photos no longer be used.

22.3 If you receive a request for correction from an individual and you know you disclosed their personal information in the last year, FOIPPA requires you to notify the other public body or third party of the request for correction. Will you ensure that you conduct these notifications when necessary?

N/A

23. Does your initiative use personal information to make decisions that directly affect an individual?

No.

- If yes, go to [question 25](#)
- If no, skip ahead to [Part 7](#)

24. Do you have an information schedule in place related to personal information used to make a decision?

FOIPPA requires that public bodies keep personal information for a minimum of one year after it is used to make a decision. In addition, the [Information Management Act](#) requires that

you dispose of government information only in accordance with an approved information schedule.

N/A

- If no, describe how you will ensure the information will be kept for a minimum of one year after it's used to make a decision that directly affects an individual.

PART 7: AGREEMENTS AND INFORMATION BANKS

Please provide information about whether your initiative will involve an information sharing agreement, research agreement or personal information bank.

25. Does your initiative involve an information sharing agreement?

No.

26. Will your initiative result in a personal information bank?

A personal information bank (PIB) is a collection of personal information searchable by name or unique identifier.

No.

- If yes, please complete the table below.

Describe the type of information in the bank
Name of main organization involved
Any other ministries, agencies, public bodies or organizations involved
Business contact title and phone number for person responsible for managing the PIB

PART 8: ADDITIONAL RISKS

Part 8 asks that you reflect on the risks to personal information in your initiative and list any risks that have not already been addressed by the questions in the template.

27. Risk response

Describe any additional risks that arise from collecting, using, storing, accessing or disclosing personal information in your initiative that have not been addressed by the questions on the template.

Possible risk	Response
Risk 1: Employees of CNC access personal information and use or disclose it for unauthorized purposes	Employees receive training on confidentiality of student information and will be reminded of this requirement with the Lucidpress data. Access will be restricted to only those who require access to support the program.
Risk 2: Employees of Lucidpress access personal information and use or disclose it for unauthorized purposes	Only authorized staff at Lucidpress have access to the required systems and information. Lucidpress is SOC2, Type 2 certified. Lucidpress has privacy and security policies in place.
Risk 3: Photos are compromised during transmission to Lucidpress.	Data will be provided by CNC to Lucidpress to ensure precision.

PART 9: SIGNATURES

You have completed a PIA. Submit the PIA to your Privacy Officer for review and comment, and then have the PIA signed by those responsible for the initiative.

Privacy Office Comments

Privacy Office Signatures

This PIA is based on a review of the material provided to the Privacy Office as of the date below.

Role	Name	Electronic signature	Date signed
Privacy Officer / Privacy Office Representative	BEN HOOPER	[REDACTED]	Jan 31/22

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Program Area Signatures

This PIA accurately documents the data elements and information flow at the time of signing. If there are any changes to the overall initiative, including to the way personal information is collected, used, stored or disclosed, the program area will engage with their Privacy Office and if necessary, complete a PIA update.

Program Area Comments:

Role	Name	Electronic signature	Date signed
Initiative lead	Stephanie Deol	[REDACTED]	Jan 31/22
Program/Department Manager	Stephanie Deol	[REDACTED]	Jan 31/22
Contact Responsible for Systems Maintenance and/or Security Only required if they have been involved in the PIA			
Head of public body, or designate	David Lowen	[REDACTED]	Mar. 3/22

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Role	Name	Electronic signature	Date signed
Only required if personal information is involved			

Appendix A



Personal Information Consent for the Collection Use and/or Disclosure of Photographs/Videos

The personal information requested on this form will be used to record your consent for the collection and use of photographs, audio recordings, opinions, testimonials, and/or videos.

Name: <i>(please print)</i>			
Phone Number:		Email Address:	

* Shaded area denotes fields to be completed by the College of New Caledonia

Event or date:	
Description of the Personal Information being collected used and/or disclosed:	Photograph(s) _____ Video Recording(s) _____ Audio Recording(s) _____ Testimonial(s)/opinions(s) _____ identifying the individual named above appearing at or participating in the noted public event, photo shoot, or conversation.

COLLECTION OF PERSONAL INFORMATION:

The personal information indicated above will be collected for the purpose of promoting CNC or CNC programs, in print and online, in accordance with the *Freedom of Information and Protection of Privacy Act*.

USE AND DISCLOSURE OF PERSONAL INFORMATION:

The personal information will be used for: (please include any third party disclosures):

The personal information will not be shared with any other third parties (unless listed above) except as requested by you, and will be securely stored at all times. Please note that these images and/or recordings may be published on the College of New Caledonia's website, print publications, social media pages, and/or advertisements, and as such, will be publicly available.

CNC can choose to alter and combine the images and/or recordings with other text, audio, images, graphics, and video as needed for promotional purposes to support CNC, programs, and partnerships in print and online. CNC may upload the personal information identified above into the graphic and content design platform Lucidpress, which is based in the United States and may host, transfer, and process data, including personal information, in the United States and in other countries through Lucidpress affiliates and third parties that they use to operate and manage the Services. The College of New Caledonia takes every precaution to protect this personal information however, the College of New Caledonia is not responsible for any further unauthorized use or disclosure of the personal information by external third parties, in print, or online.

For Adults:

_____ I consent to the College of New Caledonia's collection, use and/or disclosure of my personal information according to the terms outlined above. I understand that I can revoke this consent at any time in writing by contacting the CNC Communication Services Department.

_____ I do not consent to the College of New Caledonia's collection, use and/or disclosure of my personal information according to the terms outlined above.

Signature

Date

For Youth: a parent or legal guardian must provide name and signature if the youth is under 18 years old. Please check applicable box: Parent Legal Guardian

Name of Youth: _____
(please print)

I, _____, am the parent or legal guardian of the youth named above and I
Parent or Legal Guardian name (please print)
hereby consent to the collection and use/disclosure of the youth's personal information as indicated above.

Parent or Legal Guardian Signature

Date