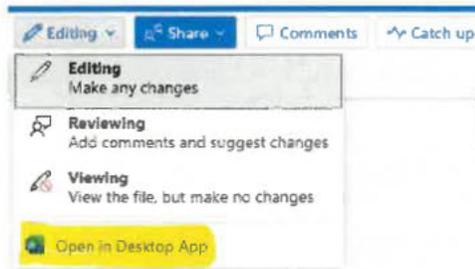


INSTRUCTIONS (READ BEFORE STARTING)

Use the Microsoft Word desktop app rather than the SharePoint online version of Word. Access the Desktop App from the Editing button drop down on the main ribbon beside Help on the upper right side of your screen. Checkbox functionality does not work reliably on the web-based versions of Word.



Submit a completed privacy impact assessment (PIA) before starting a new College Initiative or significantly changing an existing College Initiative that directly collects Personal Information, or results in the collection of Personal Information by CNC or a CNC service provider.

BC's Freedom of Information and Protection of Privacy Act (FIPPA) defines an "Initiative" as any enactment ("policy/procedure"), system (conceptual or technical), project, program, or activity.

Contact the Privacy Office at foipp@cnc.bc.ca to receive support determining whether any change in how College employees are completing their duties to the College may require a Privacy Impact Assessment.

Read through this form entirely before starting to populate it. Each question is designed to capture specific information for review.

Some information recorded in the PIA may be confidential or proprietary and not intended for distribution. Before you share the draft or completed PIA (internally or externally), please contact CNC's privacy office at foipp@cnc.bc.ca for guidance.



PART 1: GENERAL INFORMATION

Initiative Title:	Snapchat Lens Studio
Department:	Marketing & Communications
Initiative Lead (PIA Drafter) Name and CNC Email Address:	Cassie Huynh – Digital & Social Media Officer huynht3@cnc.bc.ca
Dean or Director Name, Title, and Email:	Stephanie Deol – Associate Director, Marketing, Brand, & Creative deols2@cnc.bc.ca
Privacy Officer Assigned:	Adam Cullum – Manager, Privacy & Records
If initiative involves a third-party (i.e. vendor, consultant, partner), provide	
Third Party Name:	Snapchat
Product Name (if applicable):	Lens Studio 4.55
Third Party Contact Name and Email:	N/A
Third Party URL:	https://ar.snap.com/download

1. In three to five sentences, describe the Initiative including:
 - a) what you are doing,
 - b) an overview of the process,
 - c) who is involved,
 - d) and when and/or how long your Initiative runs.

CNC Marketing and Communications are developing CNC branded Snapchat filters to allow the community members using Snapchat to engage in their optional use of the filter in the social media practices those community members would be wilfully participating in anyway. Filters are only tested on stock models found in the Snapchat Lens Studio program. There will never be a direct requirement, recommendation, or encouragement to use the specific filter to receive standard CNC services.

2. In a few sentences, explain the scope of this PIA. For example, is this initiative limited to specific individuals or departments at CNC? Is this PIA covering the full initiative or just one phase of a larger project? Are there exceptions to how the Initiative will be implemented?

Any individual with an existing Snapchat account can find the CNC filter and apply it to their content while posting.

3. Is this an administrative/operational, teaching and learning, or research Initiative? Select all that apply.

- Administrative/Operational Research (**Contact Privacy Office before continuing this PIA**)
 Teaching and Learning

4. Has a PIA previously been completed for this Initiative?

- Yes No Not sure

5. What activities will occur within the Initiative? Use the bullet points below to make action statements. Replace the example action statement. Add or delete bullets as necessary.

- Social Media Officers build CNC brand Snapchat filter.
- Snapchat users find the CNC brand Snapchat filter.
- Snapchat user applies the filter to their photos or other image content as Snapchat allows.
- CNC tracks the aggregated performance of the CNC branded Snapchat filter to gauge effectiveness.

6. In a bulleted list, please list all the types of data or information you might collect, use, store, disclose, or access in your Initiative - even if they are not Personal Information. Replace the bullet points below with the actual elements of information or data.

- CNC marketing information
- Image or photo loaded onto Snapchat
- Aggregated use statistics

7. Did you list Personal Information in question 6? [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 No

Privacy Officer Note: Snapchat Lens Studio is not changing the way in which personal information is managed in the custody and control of CNC. Snapchat users are managing their personal information within Snapchat already through Snapchat's Terms of Service and Privacy Policy.

8. If you answered "No" to question 7, in three to five sentences explain how will you ensure that you do not unintentionally collect Personal Information?

Snapchat filters marketing the CNC brand will be designed to not inherently encourage individuals to reveal any personal information about themselves that they would not present publicly. CNC Marketing & Communications will attach terms of service and privacy policies to any suggested use of the CNC brand Snapchat filter to encourage the CNC community to be better data stewards before posting themselves online. CNC will remind students that using filters transmits the filter and the likeness within the filter to Snapchat for any purposes it deems appropriate that CNC does not control.



9. Does the Initiative involve integration between CNC IT systems and Third-Party systems?

Yes

No

N/A

If yes, list below: (put N/A on the first row if you answered No or N/A above. Add or delete rows)

CNC IT system: N/A

Third party system integrated: N/A

If there is Personal Information involved in this Initiative, continue to complete the remaining sections of the PIA. If there is not any Personal Information involved in this Initiative, please submit questions 1-9 to the Privacy Officer along with the completed signatures page.

PART 13: PRIVACY OFFICE(R) COMMENTS

This PIA is based on a review of the material provided to the Privacy Office(r) as of **November 22, 2023**. If, in the future, any substantive changes are made to the scope of this PIA, the College will have to complete a PIA Update and submit it to Privacy Office(r).



13(1)

Privacy Office Signature

This PIA is based on a review of the material provided to the Privacy Office as at the date in Part 13 Privacy Officer Comments above.

Name and Title	Signature	Date signed
Adam Cullum – Manager Privacy & Records	As per email chain	November 22, 2023

PART 14: APPROVAL SIGNATURES

Institution Signatures

This PIA is compliant with FIPPA when it accurately documents information management practices 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 Department will inform the Privacy Office, and if necessary complete a PIA update.

By signing where required below, the signatories acknowledge and confirm their declarations as noted.

Declaration of Initiative Lead: I confirm that I understand the privacy impacts of this College Initiative and I am committed to my FIPPA obligations related to the collection and management of Personal Information involved in the Initiative. If there are any changes to the Initiative, including to the way Personal Information is collected, used, stored, or disclosed, I understand that the department will need to inform the Privacy Office and if necessary, complete a PIA update. I will establish and document information management guidelines for the Personal Information and ensure these are followed. I will ensure employees are trained on and able to comply with their obligations under FIPPA; related College policies and procedures; and CNC Privacy Office recommendations relative to this Initiative.

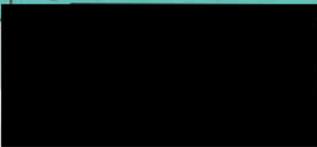
Signature of Initiative Lead or PIA Drafter

Name and Title	Signature	Date signed
Cassie Huynh – Digital & Social Media Officer		Dec 14 th 2023

22(1)

Declaration of Dean / Director / One-Over-One Signatory: I confirm that I have reviewed this PIA and I acknowledge the residual privacy risks identified. I support the department by providing required time and operational resources to comply with FIPPA, related College policies and procedures, and CNC Privacy Office recommendations relative to this Initiative.

Signature of Dean / Director

Name and Title	Signature	Date signed
Stephanie Deol – Associate Director, Marketing, Brand, & Creative		Dec. 14 / 23

22(1)

Declaration of Information Security: I confirm that I am satisfied that the Information Security safeguards employed in this college Initiative meet reasonable requirements relative to the amount or sensitivity of the Personal Information or CNC business information described in this PIA.

Signature of Information Security (Required only when college Initiative involves Information Security considerations)

Name and Title	Signature	Date signed
N/A - Personal information is not being managed	N/A	N/A

Declaration of Information Technology: I confirm that I understand and approve of the proposed use-case of CNC IT systems described in this PIA, where applicable. I understand and approve of the Third Party's integration with CNC's IT systems for the College Initiative described in this PIA, where applicable.

Signature of Information Technology (Required when College Initiative involves use of CNC IT systems or integration of Third-Party technology with CNC IT systems.)

Name and Title	Signature	Date signed
N/A - Not integrating with CNC IT systems	N/A	N/A

Declaration of Head of Public Body or Designate: I have reviewed this PIA carefully and accept and will be accountable for the residual privacy risks identified for this College Initiative. I am satisfied with the completion of this PIA under FIPPA.

Signature of Head of Public Body or Designate Under FIPPA (Required only if Personal Information is involved in the Initiative as indicated in Question 7.)

Name and Title	Signature	Date signed
N/A - Personal information is not being managed	N/A	N/A