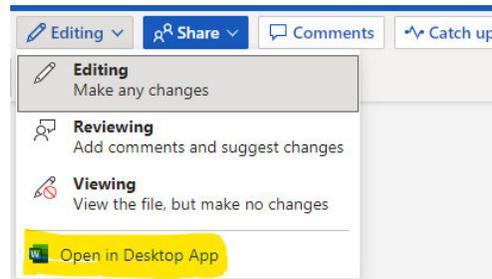


## INSTRUCTIONS (READ BEFORE STARTING)

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](mailto: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](mailto:foipp@cnc.bc.ca) for guidance.**

## PART 1: GENERAL INFORMATION

<b>Initiative Title:</b>	Sparkle Solutions SparkleXpress
<b>Department:</b>	Student Services
<b>Initiative Lead (PIA Drafter) Name and CNC Email Address:</b>	Sara Heembrock – Manager, Student Life & Housing
<b>Dean or Director Name, Title, and Email:</b>	Rafael de la Pena Gonzalez – Director, Student Services
<b>Privacy Officer Assigned:</b>	Adam Cullum – Manager, Privacy & Records
<b>If initiative involves a third-party (i.e. vendor, consultant, partner), provide</b>	
<b>Third Party Name:</b>	Sparkle Solutions
<b>Product Name (if applicable):</b>	SparkleXpress
<b>Third Party Contact Name and Email:</b>	N/A
<b>Third Party URL:</b>	<a href="https://sparklesolutions.ca/sparklxxpress-laundry-card-payment/">https://sparklesolutions.ca/sparklxxpress-laundry-card-payment/</a>

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.

Student Housing is exploring the option for a coin-free system through Sparkle Solutions. Sparkles utilizes a Reload Centre, activated by SparkleXpress to load student cards with funds to access laundry. With the Card System, each Student receives an anonymized laundry card. The laundry cards each have [REDACTED], which is links the money they load to their Sparkle Solutions account. Students load Value on their laundry card using the Reload Centre installed in the building at a common area accessible to all – the laundry room. The transaction is like any PCI compliant transactions done at retail outlets which [REDACTED] after the completion of payment. 15(1)(l)

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?

All students in CNC Housing may opt-in to using a Sparkle Solutions card. Students must be a current resident in student housing to have access to the laundry system.

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.

- Students are issued a Sparkle Solutions Card by Housing staff to use for laundry.
- Students load their Sparkle Solutions Card at a reload centre found with the laundry machines in Student Housing. They pay to load their card using their credit or debit card for set amounts.
- Students then use [REDACTED] loaded Sparkle Solutions card at the laundry machines to do 15(1)(l) laundry as needed.
- Sparkle Solutions cards are destroyed when the student no longer requires the use of that laundry card.

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.

- Payment information [REDACTED] to meet Payment Card Industry ("PCI") compliance requirements. 15(1)(l)
- Anonymized Usage tracking data

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

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?

Students will be instructed that they can only load their cards using the reload station and will not be required, recommended, or encouraged to use any online options to load their laundry cards. This will not be a significant detriment to the student experience because the reload stations are located conveniently beside the laundry machines.

The only potential detriment or risk associated with this initiative for the students will be [REDACTED] 15(1)(l)

[REDACTED]  
[REDACTED] Student Housing will stress the importance of keeping the laundry cards in a location where they can easily be found, but secure enough that no one else will use the funds they have loaded.



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).

[Redacted]

13(1)

[Redacted]

#### 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**

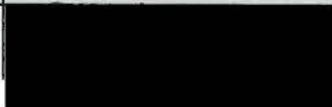
**Institution Signatures**

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.

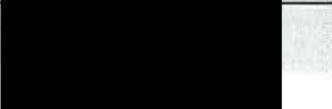
**Signature of Initiative Lead or PIA Drafter**

Name and Title	Signature	Date signed
Sara Heembrock - Manager, Student Life & Housing		Nov 28 <sup>th</sup> 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
Rafael de la Pena Gonzalez - Director, Student Services		Nov 29, 2023

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 – Operates independently of CNC information or systems	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 – Does not integrate with CNC 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