

# Privacy Impact Assessment

*Adobe Creative Cloud – Limited Use*

Form adapted from the BC Government template for Non-Ministry Public Bodies. June 2014

PIA#18-006 (Office of the University Secretariat to assign)

## Why do I need to do a PIA (Privacy Impact Assessment)?

Section 69(5.3) of the *Freedom of Information and Protection of Privacy Act* (FIPPA) requires the head of a public body to conduct a privacy impact assessment (PIA) in accordance with the directions of the minister responsible for FIPPA. Public bodies should contact the Information Governance Officer to determine internal policies for review and sign-off of the PIA. If you have any questions about this PIA template or FIPPA generally, please contact Adam Cullum (Information Governance Officer) at [adam.cullum@unbc.ca](mailto:adam.cullum@unbc.ca) or (250) 960-5139 or visit <http://www.unbc.ca/foippa>.

## What if my initiative does not include personal information?

Public bodies still need to complete Part 1 of the PIA and submit it along with the signatures pages to Information Governance Officer even if it is thought that no personal information is involved. This ensures that the initiative has been accurately assessed.

## Part 1 – General

Name of Department:	Communications and Marketing		
PIA Drafter:	Matt Wood, Director, Communications and Marketing		
Email:	Matt.wood@unbc.ca	Phone:	250-960-5626
Program Manager:	Same		
Email:		Phone:	

*In the following questions, delete the descriptive text and replace it with your own.*

### 1. Description of the Initiative

*Our office makes extensive use of various Adobe products. The institutional licencing that has been secured is not appropriate for high-volume users, as some functions, especially libraries, are now on the cloud-based service, and are essential to optimal staff performance.*

### 2. Scope of this PIA

*This PIA is submitted to determine if there are concerns regarding using Adobe's cloud functionality, especially for the purpose of accessing shared libraries. No personal information, other than the identities of the users would be shared on Adobe'*

### 3. Related Privacy Impact Assessments

N/A

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## 4. All Elements of Information or Data

*Advertising media, newsletters, and public reports*

If personal information is involved in your initiative, please continue to the next page to complete your PIA.

If no personal information is involved, please submit Parts 1, 6, and 7 to the Information Governance Officer for review. You will receive support completing the remaining steps of the PIA.

COMPLETED INITIATIVE

Please ensure Parts 6 and 7 are attached to your submitted PIA.

### **Part 6 – Information Governance Officer Comments**

*This PIA is based on a review of the material provided to the Information Governance Officer as of the date below. If, in future any substantive changes are made to the scope of this PIA, the public body will have to complete a PIA update and submit for approval.*

*The use of Adobe Creative Cloud must not include personal information of individuals beyond the minimal user data necessary to use the service except with explicit informed consent (consent supported by records) or implicit informed consent (if an already public event is being advertised using this service). The use of Adobe Creative Cloud must not include any business sensitive information that wouldn't be released publically including but not limited to: proposals or project information that hasn't been released to the public, event information that hasn't been publically announced, and information about service delivery that hasn't been released to the public.*

*Currently this PIA covers the use of Adobe Creative Cloud by the Communications department at UNBC. If another department seeks to use this service and requires it for a purpose that cannot be met under these conditions, that department will complete a PIA amendment before using this service.*

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## Part 7 – Program Area Signatures

Matt Wood

Name of Individual leading the Program/Project  
(Normally the individual who completed the PIA)

Signature

Date

May 1/2018

N/A

Program/Department Manager or Project Sponsor

Signature

Date

N/A (Low Risk)

Contact Responsible for Systems Maintenance and/or Security  
(if applicable)

Signature

Date

Adam Cullum

Information Governance Officer

Signature

Date

May 1/2018

Once the PIA has been approved with or without conditions, the Information Governance Officer will collect signatures from the individuals indicated above. A copy will be provided to all signatories for convenience or to attach to a requisition or file with a contract.

A final copy of this PIA (with all signatures) will be kept on record with the Information Governance Officer.