# Privacy Impact Assessment

PIA # and Name-  23-08_AlumniRelations

## Legislative Requirement

Under Section 69 (5.3) of FIPPA UNBC is required to conduct a privacy impact assessment (PIA)and must do so in accordance with the directions of the Minister responsible for the Act.

**A PIA needs to be conducted**
- For a new initiative for which no PIA has previously been conducted.
- Before implementing significant change to an existing initiative, including but not limited to a change in the location in which sensitive personal information is stored.
- At the discretion of the person(s) with delegated authority under section 66 of the Act

# 1. Accountability

## 1.1 Identify Department, Branch, or Program Area involved in the initiative

Office of Research and Innovation - Fundraising

## 1.2 Identify UNBC role responsible for the Initiative

Director of Research and Innovation

## 1.3 Describe the Governance Model – who is accountable for the program or system.

Vice President Research and Innovation

## 1.4 Timeline for the initiative

| Anticipated start date for the initiative, | Is this a one-time event? | | |
|---|---|---|---|
| 3/22/24 | | Yes | ✔ No |

# 2. Overview

## 2.1 Describe the New Program or Service or the Change.

Fundraising and relationship management at UNBC is an ongoing process that began at the inception of the institution.

In order to effectively manage relationships with donors, partners, alumni (including affiliate), staff, individuals, businesses, organizations, government etc. (constituents), software solutions need to be implemented.

Fundraising/Development/Advancement previously stored constituent information in the UNBC Banner system and moved to Blackbaud's Raiser's Edge system, which has been in use since 2018.

Blackbaud's Raisers Edge CRM is a tool used to manage various relationships UNBC has with constituents.

## 2.2 Describe the Purposes, Goals and Objectives.

To utilize the CRM to track and maintain constituent information to assist in managing relationships for the purpose of advancing the institution by raising funds to support all aspects of University business. Fundraising staff and other key UNBC employees track interactions with constituents (i.e. meeting outcomes and next steps). This allows UNBC to meet the need of tracking information for effective relationship management. LiveAlumni is used to source personal information of UNBC alumni from public sources on the web. This information is collected in order to update alumni contact information, and to provide more targeted invitations and opportunities to UNBC alumni. Mail-o-matic is a 3rd party used to send mail solicitations to UNBC donors and alumni.

## 2.3 List any Relevant PIAs

NA

## 2.4 List any relevant contracts or software purchases.
Be sure to follow UNBC guidelines regarding purchasing policies.

Blackbaud - Raiser's Edge, Live Alumni, Mail Merge Toolkit Pro

## 2.5 List all interested parties impacted / Involved
(i.e. who are you collecting information from, UNBC roles accessing/using information, 3rd parties with whom you will share information)

| Interested Party | Role in the initiative |
|---|---|
| UNBC Staff | Manages data |
| Mail-O-Matic | Data Processor - mailed solicitations |
| Constituents | Source of data |
| Youth Coordinator (x2)<br>Advancement Information Specialist<br>Manager, Philanthropy and Engagement<br>Development Officer (x2) | These roles all interact with the data in different ways such as contacting constituents, pulling data for reports, contacting/soliciting for donations, etc. |
| Director of Research & Innovation<br>Alumni Relations Officer<br>Director of Athletics & Recreation<br>Administrative Coordinator - Athletics & Recreation | These roles all interact with the data in different ways such as contacting constituents, pulling data for reports, contacting/soliciting for donations, etc. |
| LiveAlumni | Source of data |

# 3. Collection of Personal Information

## 3.1 List the data elements or personal information involved in your initiative.

| Data Element<br>name, email, id#, grade | Rationale for collection | Method of Collection | FIPPA Authorization |
|---|---|---|---|
| Email address | To contact the constituent | **Direct**<br>Indirect<br>NA | 26(c) |
| Phone number | To contact the constituent | **Direct**<br>Indirect<br>NA | 26(c) |
| Mailing address | To send mail to the constituent | **Direct**<br>Indirect<br>NA | 26(c) |
| Name (individual or organization) | Used to identify the constituent. | **Direct**<br>Indirect<br>NA | 26(c) |
| Constituent type | Helps us categorize how they are connected to UNBC. | Direct<br>Indirect<br>**NA** | TBD |
| Relationship (individual or organization) | Relationships are important to find connections between individuals/organizations, which in turn allows for better relationships building. | Direct<br>Indirect<br>**NA** | TBD |
| Education | Having constituent education information allows us to subgroup them for different communications such as e-newsletters, solicitations, alumni opportunities etc. | **Direct**<br>Indirect<br>NA | 26(c) |

## 3.2 Describe how personal information is to be collected.
If you already have a collection notice, attach it as an appendix.

Personal information is collected both directly and indirectly.

Alumni - Argos Report from Registrar's Office - pulled from internal data when students enroll/graduate
Affiliate Alumni - Report from NMP - pulled from internal data when students enroll/graduate
HR - Argos Report from HR - pulled from internal data when people get employed with UNBC
Award Recipients - Report from Award Office, student letters of appreciation
Individual Interactions - Meetings, phone calls, emails, events
Other - donation forms (physical and digital), update your information form on UNBC Giving webpage, web
LiveAlumni - Alumni data from service provider

# 4. Use of Personal Information

## 4.1 List all users of PI and Describe how personal information is to be used.

| User (UNBC Roles e.g Governance officer) | How the info is used | FIPPA Authorization |
|---|---|---|
| Youth Coordinator | Need names, emails, addresses, education, relationships, notes, giving history and tasks for contact. Used to pinpoint constituents involved with youth programs to solicit, etc. | 32(a) |
| Advancement Information Specialist | Need names, emails, addresses, education, relationships, notes, giving history and tasks for contact. Used for donation tracking, data reporting, and email/mail outs. | 32(a) |
| Manager, Philanthropy and Engagement | Need names, emails, addresses, education, relationships, notes, giving history and tasks for contact. Used for donor relations, donation tracking, data reporting, and email/mail outs. | 32(a) |
| Development Officer | Need names, emails, addresses, education, relationships, notes, giving history and tasks for contact. Used for donor relations and donation tracking. | 32(a) |
| Director of Research & Innovation | Need names, emails, addresses, education, relationships, notes, giving history and tasks for contact. Used for donor relations and donation tracking. | 32(a) |
| Alumni Relations Officer | Need names, emails, addresses, education, relationship, giving history for contact. Used for contact with UNBC Alumni. | 32(a) |
| Director of Athletics & Recreation Administrative Coordinator - Athletics & Recreation Executive Assistant, Office of the President | Need names, emails, addresses, education, relationships, notes, giving history and tasks for contact. Used for relationship management. | 32(a) |

## 4.2 Describe the record management of Personal information involved in the initiative.

| Does the initiative involve using personal information to make a decision about an individual? | Does the initiative have a retention schedule regarding personal information used to make decisions? |
|---|---|
| ✔ Yes ☐ No | ☐ Yes ✔ No |

If the initiative involves using personal information to make a decision about an individual, but does not have a record retention schedule, 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.

Each decision made refers to information within a constituents record such as notes, tasks, giving history, etc. These stay on the profile permanently unless manually removed. Our practice is to keep everything within the profile. Historical information is extremely important in relationships building and cannot be discarded after one year.

## 5. Research/ Health System Use of Personal Information

**5.1 Will data collected through this initiative be used for research or health system use?**

☐ Yes          ☑ No

**If "Yes" answer the following questions, if "No" please proceed to the next section.**

**5.2 Explain and provide details of data state  (aggregate, de-identified, anonymized  etc.)**

NA

**5.3 If data will it be disclosed as part of Health System Use, provide details on the method of disclosure, as well as where and how personal information will be stored by 3rd party.**

NA

**5.4 If data will it be disclosed as part of Research/ Open Data, provide details on the method of disclosure, as well as where and how personal information will be stored by 3rd party.**

NA

# 6. Storage of Personal Information

## 6.1 Does the initiative involve digital tools, databases, or information systems?

✔ Yes ☐ No

If yes, contact UNBC Information Security to determine whether the initiative requires a security and threat risk assessment.

## 6.2 As part of this initiative, will Personal information be stored outside of Canada?

✔ Yes ☐ No

## 6.3 Describe how information will be stored during this initiative (i.e., cloud storage, SaaS, etc).

Blackbaud's Raiser's Edge NXT is hosted in the US with Microsoft Azure, ███████████
████████████████████████████████. "data will remain in the United States."

# 7. Disclosure of Personal Information

**7.1 Does the initiative involve disclosing information to 3rd parties (i.e. non-unbc employees?**

☑ Yes          ☐ No

**If "Yes" answer the following questions, if "No" please proceed to the next section.**

**7.2 Provide details on the disclosure,including to whom, purpose, method of disclosure, and how personal information will be stored by the 3rd party.**

Mail-O-Matic is a mail house used to print and mail appeals for solicitations to specific constituents. Information such as name and address are shared via email of an excel spreadsheet for the purpose of printing customized letters and mailing them to constituents.

**7.3 If disclosing information to anyone outside of Canada, Provide details regarding to whom purpose , method of disclosure,and how personal information will be stored by 3rd party.**

The following is shared with LiveAlumni
- Student ID
- First and Last and Full name
- Graduation year
- Degree received

LiveAlumni is used to collect Linken Profile information including cooperate business position, industry and location. This information is used to update the existing alumni record in Raisers Edge NXT.

# 8. Accuracy and Correction of Personal Information

## 8.1 How will you make sure that the personal information collected is accurate and complete?

Advancement Information Officer regularly completes data integrity checks and performs processes such as data health checks, duplicate searches and merges, National Change of Address etc.

Constituents provide updates to their personal information directly. This information is updated as soon as possible by a Blackbaud Raiser's Edge NXT user with role permissions to do so.

There is also an update your information page on the alumni and giving web pages.

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

☑ Yes  ☐ No

## 8.3 If yes, please describe your process below?

See 8.1

## 8.4 Describe the process of how you will make a note on the record, if you're not able to correct the record itself.

NA

## 8.5 If you receive a request for correction from an individual and you know you disclosed their personal information in the last year, how will you ensure that you conduct these notifications when necessary?

The department will coordinate with UNBC Privacy to ensure that proper notification requirements are met.

# 9. Personal Information Bank

A personal information bank is a collection of personal information that is organized or searchable by the name of the individual or an identifying number, symbol, or other identifier. A personal information bank can be a simple list of personal information.

Personal information banks contain personal information that is:

- linked to an identifiable individual
- organized and capable of being retrieved by a personal identifier
- normally compiled for a single purpose

## 9.1 Will your initiative result in a personal information bank?

☑ Yes    ☐ No

**If "Yes", answer the following questions, if "No" please proceed to the next section.**

## 9.2 Describe the business purpose for the information bank (i.e., account management of clients/ students).

Account management of donors.

## 9.3 If aggregate reports are generated from the information bank, explain how Personal Information will be de-identified or anonymized.

Reports will exclude identifiable information or removed if necessary.

**9.4 Describe the category of users and the information to which the user will have access**

Category of Users (i.e., system admin, clerk, etc.)

Information accessed (i.e. contact info, grades, fee etc.)

| | |
|---|---|
| Administrator | Access to everything |
| User | Have some reporting limitations and limitations add/remove some data. |
| | |
| | |
| | |
| | |

**9.5 Identify the UNBC role(s) responsible for managing user accounts and audit user access.**

Manager, Philanthropy and Engagement
Advancement Information Specialist
Director of Research & Innovation

**9.6 Describe the process for auditing user access.**
How detailed is the data (e.g., date stamps,time stamps, IP address, etc.)? Does the audit log include the purpose of an access?

**9.7 Is there a separation of responsibility between those who supervise administration of the system, or security of the system, and those who verify the audit logs**

■ Yes          ■ No

**9.8 Are the audit logs immutable?**

■ Yes          ■ No

**9.9 Is the system responsive or passive?**
Is it possible to put a monitor on particular individuals? Will access produce an immediate response/notification or a log entry for review?

**9.10 How will those found to abuse access privileges be sanctioned ?**

Removal of access, discipline as appropriate and further action as required.

# 10. Common or Integrated Program or Activity

In FOIPPA, "common or integrated program or activity" is strictly defined. Answer the following questions to determine whether your initiative qualifies as "a common or integrated program or activity" under the Act. If you answer "yes" to all 3 of these questions, you must comply with requirements under the Act for common or integrated programs and activities.

**10.1 Does this initiative involve a program or activity that provides a service(s)through at least one other public body or agency working collaboratively to provide that service?**

☐ Yes          ☑ No

**10.2 Does this initiative involve a program or activity that provides a service(s) through UNBC that is working on behalf of one or more other public bodies or agencies?**

☐ Yes          ☑ No

**10.3 The common or integrated program/activity is confirmed by written documentation that meets the requirements set out in the Regulations? (Privacy Officer will answer).**

☐ Yes          ☑ No

If this PIA addresses a common or integrated program, UNBC must submit this PIA to the Office of the Information and Privacy Commissioner and be subject to their examination, advice, and timelines.

# 11. Privacy and Security Safeguards

**11.1 Describe administrative safeguards(i.e. policy documents, procedures, or training).**

**11.2 Describe physical safeguards(i.e. locked, filing cabinets, locked doors, or restricted areas).**

**11.3 Describe the controls in place to prevent unauthorized access to personal information(i.e. role-based access to software, access logs).**

**11.4 Describe technical safeguards(i.e. firewalls, encryption, or intrusion prevention systems).**

**UNBC** *UNIVERSITY OF NORTHERN BRITISH COLUMBIA*
**Office of University Governance**

## 12. Privacy Risk Identification and Mitigation

Identify any privacy risks and the corresponding mitigation strategies that will be implemented. Try to include at least one risk related to each step in the information cycle (collection, use, storage, disclosure, and retention. Refer to the risk classification table to assist with likelihood and impact rating. **If you are disclosing or storing data outside of Canada, you will need to identify additional risks related to storage/disclosure outside of Canada.**

**12.1 Risk Description**

| Risk Description | Likelihood | Impact | Risk level | Mitigation Strategy — Describe how above safeguards could be used to mitigate the risk |
|---|---|---|---|---|
| | Certian / Likely / Moderate / Unlikely / **Rare** | Severe / Major / Significant / Minor / **Insignificant** | | |
| | Certian / Likely / Moderate / Unlikely / **Rare** | Severe / Major / Significant / Minor / **Insignificant** | | |
| | Certian / Likely / Moderate / Unlikely / **Rare** | Severe / Major / Significant / Minor / **Insignificant** | | |

**Ph:** 250-960-5850
**unbc.ca/governance**

# 13. Collection Notice

All collection notices must include the:
- Purpose for the collection
- Legal authority for the collection
- Contact information for an employee of UNBC who can answer the individual's questions about the collection.

The employee responsible for responding to data collection questions should be able to explain why the personal information is being collected and how it will be used, retained, and disclosed.

The contact method should suit the collection method. For example, if you collect personal information through an online form, you could include an email contact.

## 13.1 Privacy notice
Be sure to include all 3 required parts of the notice

Alumni information is collected under the authority of the University Act and in compliance with the British Columbia Freedom of Information and Protection of Privacy Act (FIPPA) for the purposes of administering alumni relations and fund development programs for University of Northern British Columbia. Your information is needed to register you as a member of Convocation and as a member of the UNBC Alumni community. We may use your information to inform you about the UNBC Alumni educational, volunteer, networking, award and social programs; to provide you with information about alumni benefits and services; to facilitate alumni participation in research projects, surveys, fundraising and development activities; and to administer elections for university and alumni association governing bodies. The University may also disclose your contact information, under strict confidentiality agreements, to service providers solely for communicating with you on behalf of the University or the Alumni Council. The Freedom of Information and Protection of Privacy Act (FIPPA) requires that UNBC protects your information with appropriate safeguards and security measures. UNBC will not sell or otherwise publicly disclose alumni information, nor share alumni information with any of our corporate affinity partners. While we do communicate with you to market products and services provided by our affinity partners, these companies will never have direct access to your contact information without your consent. Please note that we use a third-party service to source information from public sources so we can keep our databases up to date and provide more targeted invitations and opportunities. This service is utilized to enhance our communication efforts and tailor them to your interests and preferences. We assure you that we take the security and privacy of your information seriously. We implement robust measures to safeguard your data from unauthorized access, disclosure, alteration, or destruction. If you would like to opt-out of communications from UNBC Alumni Relations, please fill out the following form: link to form Should you have any concerns or questions regarding our privacy practices or the handling of your personal information, please do not hesitate to contact us alumni@unbc.ca.

## 13.2 Location of Privacy Notice
If the notice is to be posted on the website please include url of webpage.

updated privacy statement will be posted on UNBC alumni webpage

## 14. Signing and Approval

**Individual leading the Program/Project:** Mark Barnes

**Position:** Director Research and Innovation

I confirm the information management practices in this initiative have been documented as accurately as I am aware. I commit to communicating appropriate information management practices to all individuals participating in this initiative. I commit to following the documented practices on this PIA, or arranging a PIA amendment if I am aware information management practices in this initiative change.

**Signature** ███████████████████████    **Date:** _____

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**Director/Dean Overseeing the Program/Project:** Same as lead

I am accountable for overseeing my staff involved in this initiative to ensure they adhere to information management practices presented in this PIA. I will arrange for the project lead named above to contact the Privacy Officer to arrange a PIA amendment if required.

**Signature:** _____    **Date:** _____

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**Vice-President authorizing the Program/Project:** Paula Wood-Adams

I confirm that this initiative to the best of my knowledge as written in the above sections, has information management practices that complies with policies and procedures of the University of Northern British Columbia.

**Signature:** ██████████████    **Date:** March 28, 2024

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**Privacy Officer reviewing the Program/Project:** Christopher Ross

I confirm that this initiative to the best of my knowledge as written in the above sections, has information management practices that comply with British Columbia's Freedom of Information and Protection of Privacy Act.

**Signature:** ████████████    **Date:** May 8, 2024

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**Ph:** 250-960-5850
**unbc.ca/governance**

# 15. Reference Tools

"**personal information**"means recorded information about an identifiable individual,including,

(a) information relating to the race, national or ethnic origin, colour, religion, age, sex,sexual orientation or marital or family status of the individual,

(b) information relating to the education or the medical, psychiatric,psychological,criminal or employment history of the individual or information relating to financial transactions in which the individual has been involved,

(c) any identifying number, symbol or other particular assigned to the individual,

(d) the address, telephone number, fingerprints or blood type of the individual,

(e) the personal opinions or views of the individual except where they relate to another individual,

(f) correspondence sent to an institution by the individual that is implicitly or explicitly of a private or confidential nature,and replies to that correspondence that would reveal the contents of the original correspondence,

(h) the individual's name where it appears with other personal information relating to the individual or where the disclosure of the name would reveal other personal information about the individual.

**Privacy Impact Risk assessment:**

| Probability Likelihood that identified risk will occur | Impact Severity of outcome of identified risk occurs | | | | |
|---|---|---|---|---|---|
| | Insignificant 1 | Minor 2 | Significant 3 | Major 4 | Severe 5 |
| almost certain 5 | Medium 5 | High 10 | Very High 15 | Extreme 20 | Extreme 25 |
| Likely 4 | Medium 4 | Medium 8 | High 12 | Very High 16 | Extreme 20 |
| Moderate 3 | Low 3 | Medium 6 | Medium 9 | High 12 | Very High 15 |
| Unlikely 2 | Very low 2 | Low 4 | Medium 6 | Medium 8 | High 10 |
| Rare 1 | Very low 1 | Very low 2 | Low 3 | Medium 4 | Medium 5 |

| Risk Rating | *Risk Levels | Description | Actions Required |
|---|---|---|---|
| 1-4 | Minimal | Unlikely that associated risk would result in harm to privacy | Review of safeguards to be done at PIA review date |
| 5-9 | Moderate | Unlikely that associated risk would result in significant harm to privacy | annually review existing safeguards required |
| 10-16 | Elevated | Likely that associated risk would result in harm to the privacy | Routine monitoring of data processing or additional safeguards required |
| 17-25 | Unacceptable | Associated Risk would likely cause significant and immediate harm to the privacy | Must not proceed as existing safeguards and controls are insufficient |

Return to Risk Matirix