

PIA # and Name- 22-040

1 General Information

1. Name of Department, Branch and Program Area

Convocation Office, Office of the Registrar, Enrolment Services

2. Name of Program or Service Representative

Bethany Haffner, Events Coordinator - Convocation

3. When will the initiative take place?

4/14/23

4. Is this a one-time event?

Yes

No

5. Do you have an end date planned?

Yes

No

6. Describe the New Program or Service or the Change.

AudienceView (formerly known as: University Tickets) provides an online eticketing platform so graduating students eligible to attend the UNBC Annual Convocation Ceremonies have the ability to register for guest tickets.

No credit card information is provided as guest tickets are free.

2015 Initial PIA Assessment done when contract signed with University Tickets.

7. Describe the Purposes, Goals and Objectives.

For event planning purposes, and for tracking of guest seating at the Charles Jago Northern Sport Centre venue, a robust ticket platform is required.

8. Describe the Governance Model – who is ultimately accountable for the program or system.

1. Vice President Academic & Provost: Dr. Wendy Rodgers
2. University Registrar, Interim University Registrar: Kimberly Read
3. Convocation Office, Event Assistant - Convocation: Bethany Haffner (Term position)

9. List any Relevant PIAs

PIA 14-006: original pia for audience view (former called University Tickets) signed in January 2016.

Although this initiative links with Banner, we do not have a complete and signed PIA.

10. List of All Stakeholders Impacted / Involved (i.e. who are you collecting information from, UNBC roles using PI, 3rd parties with whom you will share information)

Stakeholder	Role in the initiative
UNBC Convocation Office	Super Admin Access for creating eticket platform for each Convocation Ceremony
UNBC Information Technology Services (ITS)	Banner downloads required graduating student information into an Argos Report created for AudienceView - Eligibility report
Eligible UNBC Graduating Students	UNBC students who apply for graduation are eligible to have information uploaded to eticket platform so can register for guest tickets
AudienceView	eticket platform.

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

Contract provides is WR931234. Terms and conditions are between University Tickets and UNBC.

2 Collection and Use of Personal Information

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

Data Element name, email, id#, grade	Rationale for collection, use or disclosure	Method of Collection or Disclosure	FIPPA Section (completed by Privacy)
First & Last Name (UNBC provides)	Identification of eligible eticket platform users. Both UNBC staff administering platform as Super Users, plus uploaded Eligible Graduand/Graduates list	Direct Indirect	26(c)
Email and Billing Address (student provides)	All users of eticket platform must enter an email address - one of their choice. Once eligible students access eticket platform must enter a billing address	Direct Indirect	26(c)
Eligibility/User Type (i.e. Eligible Graduate, UNBC provides)	How eticket platform identifies those eligible to use platform	Direct Indirect	26(c)
Academic Major/Program (UNBC provides)	For Ceremony 1 / Ceremony 2 confirmation	Direct Indirect	26(c)
Event Eligibility (ie: Ceremony 1 or 2, UNBC provides)	Identifies which Ceremony student able to book guest tickets for as only eligible to take part in AM or PM Ceremony depending on Academic Major/Program	Direct Indirect	26(c)
Guest/Additional/Accessibility Ticket Limits	Maximum number of guest tickets per ticket type that students can book	Direct Indirect	26(c)
		Direct Indirect	TBD

13. Describe how personal information is to be collected

- UNBC Student Information System: Banner downloads required graduating student information into an Argos Report created for AudienceView - Eligibility report.
- Online via eticket platform: Graduating student logs in through UNBC Single Sign-On, then gains access to eticket platform and registers for guest tickets.
- Email Request to Convocation@unbc.ca: If graduating students does not wish for personal information to be collected/stored then they can email UNBC Convocation Office to request alternate method for guest tickets to be provided to them.

14. If you already have a collection notice, attach it as an appendix.

15. Please 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
ITS role undefined	Agros report from Banner to generate a list of eligible students
UNBC Convocation office Role undefined	upload student list to Audience View. Download list of registered tickets (scan tickets on convocation day)

16. Do you use personal information in your initiative to make a decision about an individual?

Yes

No

17. If yes, do you have a retention schedule in place related to personal information used to make decisions?

Yes

No

18. If yes, please your approved information schedule as an appendix.

19. If you answered 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.

We normally delete user profiles after the Convocation Ceremony has taken place as there is no reason to keep student information on the eticket platform. This is normally done within a 1-2 month period depending on wrap-up for each Annual Ceremony.

3 Storage of Personal Information

20. Is any personal information stored outside of Canada?

Yes

No

21. Describe how PI information will be stored

For example, are you using a cloud storage (OneDrive), or Software as a Service (SaaS).

AudienceView has cloud storage based in Canada for this 1st quarter of 2023, then will be moving to MS Azure by 3rd/4th quarter of 2023.

To upload an Eligibility file into the eticket platform, we get the student data information from an Argos report specifically tailored for AudienceView uploads in csv excel format. I go into the AudienceView platform and upload the csv excel file, matching the columns of information they require with the ones on the report.

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

Yes

No

If yes, please discuss with UNBC Information Security whether you also require a security and threat risk assessment

4 Research / Health System Use

23. Do you anticipate that data collected by this program / system will be used for research or health system use?

Yes

No

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

24. Please explain and provide details of data state (aggregate, de-identified, anonymized etc.)

[Empty text box for question 24]

25. Will it be disclosed as part of Health System Use?

Provide details on the disclosure, including where and how personal information will be stored.

[Empty text box for question 25]

26. Will it be disclosed as part of Research / Open Data?

Provide details on the disclosure, including where and how personal information will be stored.

[Empty text box for question 26]

5 Disclosure

27. Will you be 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.

28. To whom will you be disclosing personal information? Provide details on the disclosure, including where and how personal information will be stored.

[Empty text box for question 28]

29. If personal information will be disclosed to anyone outside of Canada, provide details on the disclosure, including where and how personal information will be stored.

[Empty text box for question 29]

6 Accuracy and Correction

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

Students will log in to Audience View and add their own information.

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

Yes

No

32. If yes, please describe your process below?

Upon request by an individual, to whom the PI relates, UNBC will correct the information in Audience View.

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

34. 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 recipient of the request for correction. How will you ensure that you conduct these notifications when necessary?

N/A no disclosure.

7 Personal Information Banks

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

35. 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.

36. Describe the business purpose for the information bank (i.e., account management of clients, student record management)

[Empty text box for question 36]

37. If aggregate reports are generated, explain how Personal Information will be de identified or anonymized and by whom?

[Empty text box for question 37]

38. Describe the category of users and the information to which they will have access

Category of Users

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

39. Who is responsible for oversight of user access?

40. Who reads the audit logs, and how long are they kept?

41. What does the audit log track? How detailed is the data (e.g., date stamps, time stamps, access control number, IP address, etc.)? Does the audit log include the purpose of an access?

42. Are the audit logs immutable?

Yes No

43. 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 (e.g., does the auditor in the organization have a role, or is it the security department?)

Yes No

44. Is the system responsive or passive? For instance, is it possible to put a monitor on particular individuals (e.g., in a hospital setting, if a celebrity is admitted as a patient, etc.)? Will access produce an immediate response and not just a log entry for review months later?

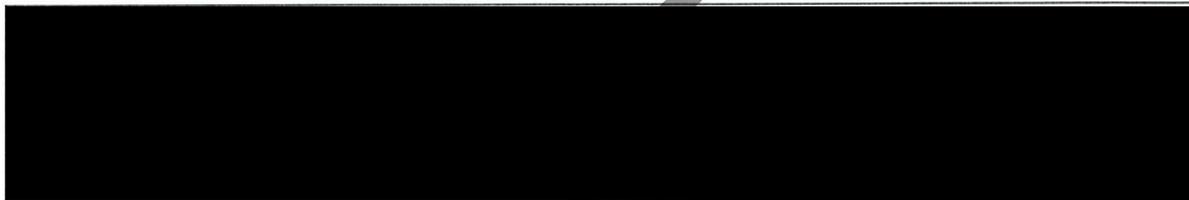
[Empty response box for question 44]

45. How will those found to abuse access privileges be sanctioned ?

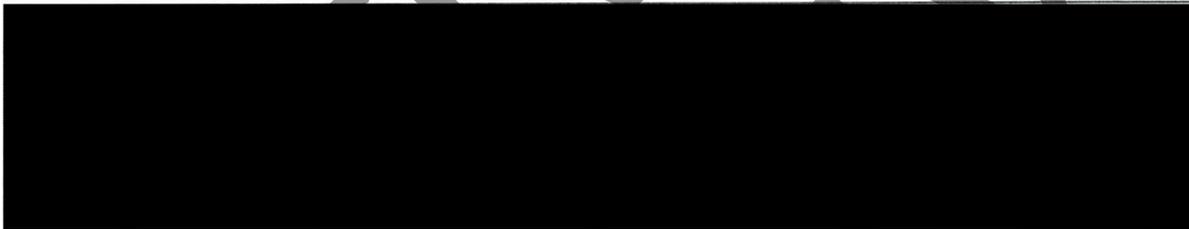
[Empty response box for question 45]

8 Privacy and Security Safeguards

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

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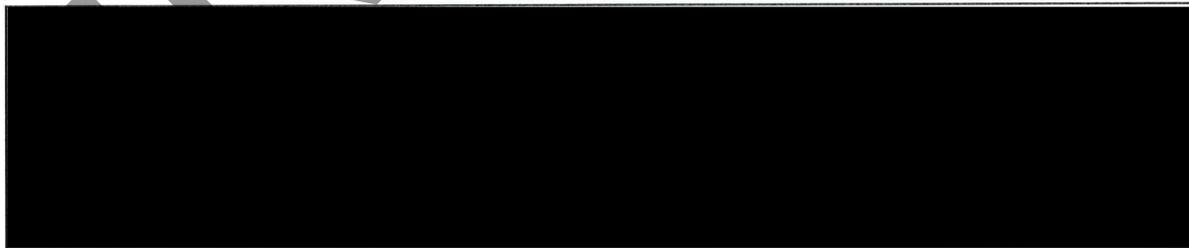
47. Describe physical safeguards (i.e. locked, filing cabinets, locked doors, or restricted areas).

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

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

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9 Privacy Risk Identification and Mitigation

50. Identify any privacy risks, even very unlikely ones, associated with the initiative and the mitigation strategies that will be implemented (see risk classification table).

Try to include at least one risk related to each step in the information cycle (collection, storage, access, disclosure, and destruction). **If you are disclosing or storing data outside of Canada you will need to identify additional risks related to storage/disclosure outside of Canada**

RISK

LIKELIHOOD

IMPACT

MITIGATION STRATEGY



RISK	LIKELIHOOD	IMPACT	MITIGATION STRATEGY
	<div style="background-color: black; color: white; padding: 2px;">Low</div> Moderate High	<div style="background-color: black; color: white; padding: 2px;">Low</div> Moderate High	
	<div style="background-color: black; color: white; padding: 2px;">Low</div> Moderate High	<div style="background-color: black; color: white; padding: 2px;">Low</div> Moderate High	
	<div style="background-color: black; color: white; padding: 2px;">Low</div> Moderate High	<div style="background-color: black; color: white; padding: 2px;">Low</div> Moderate High	

COPY OF RECORD RELEASED JULY 31, 2024 IN RESPONSE TO FOI 24-18

10 Data Linking

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.

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

Yes No

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

Yes No

53. 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 Conclusions and Approvals

Individual leading the Program/Project: Bethany Haffner

Position: Events Coordinator - Convocation

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: April 5, 2023

Director/Dean Overseeing the Program/Project:

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: April 12, 2023

Name of Chief Information Security Officer Dave Kubert

I confirm that this initiative to the best of my knowledge as written in the above sections, satisfactorily complies with the information security standards of the University of Northern British Columbia.

Signature:  Date: April 12, 2023

Name of Privacy Officer: Dr. William Owen, Acting Vice President Academic and Provost

Position:

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: April 12, 2023

12 Privacy Notice

AudienceView is a third party provider of e-ticketing services under contract with the University of Northern British Columbia (UNBC). Your personal information will be collected and used for UNBC event planning purposes, and for tracking of guest seating at UNBC events. All such activities comply with the BC Freedom of Information and Protection of Privacy Act, and with the policies and procedures of the University. If you do not wish for your personal information to be stored with AudienceView, or if you have any questions about the collection of this personal information, please contact the UNBC Convocation Office via convocation@unbc.ca.

13 Key Terms

“**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.

Risk Classification Table

***Risk Levels**

Likelihood

Harm

Low

Little possibility that the risk will occur due to mitigating factors

Compromise would likely not result in any significant harm to the privacy, safety, or economic standing of individuals or the corporation.

Moderate

A possibility that the risk will occur if no additional measures are taken.

Compromise would likely cause some harm to the privacy, safety, or economic standing of individuals or the corporation.

High

Near certainty that the risk will occur in the future if no corrective measures are taken.

Compromise would likely cause significant and immediate harm to the privacy, safety, or economic standing of individuals or the corporation.