

PIA # and Name- 22015 BookKing

## 1 General Information

1. Name of Department, Branch and Program Area

Continuing Studies, Business Services

2. Name of Program or Service Representative

Booking Registration System, Pacific Tier Solutions

3. When will the initiative take place?

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.

We are Updating the PIA's for Booking (Continuing Studies Registration System). Booking is a registration management system that enrolls students and collects payment. This is a software product that is accessed by staff in Prince George. There are not public events, or meeting that will be hosted as part of this service.

7. Describe the Purposes, Goals and Objectives.

Continuing Studies uses the software Booking for the primary means of registration for Continuing Studies F2F or virtual programming. The program supports students that are registering for Continuing Studies courses to register and pay for their courses. It is also used to create reports for finance and prepare class lists for instructors.

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

Continuing Studies is accountable for the system

9. List any Relevant PIAs

2013 draft PIA done by Aaron LeBlanc and Brenda Herbert

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
Continuing Studies	Oversees the whole system

11. List any relevant contracts or software purchases. Be sure to follow [UNBC guidelines](#) regarding purchasing policies.

VM994022 Rolling Purchase Order based on contract UNBC\_BK\_CK\_PA\_21112012\_S

## 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)
Name, Phone#, SIN , Gender, DOB	Required to register and correctly identify individual	Direct Indirect	26(c)
Individuals Home Address	Required to send certificates and test results to	Direct Indirect	26(c)
Individuals Email Address	Required to register and correctly identify individual and send registration information and results to	Direct Indirect	26(c)
Individuals Employer Name	Optional, to enable group registrations	Direct Indirect	26(c)
Registration record	Completion status entered into Booking as their record of completion	Direct Indirect	26(c)
		Direct Indirect	TBD
		Direct Indirect	TBD

13. Describe how [personal information](#) is to be collected

Information is collected for the intent of enrolling, receiving payment, and supporting students in the Continuing Studies courses (sending course confirmations, recording course progress, and sending completion records). Information is collected through implied consent, wherein students self-register for courses over the phone or independently online.

Personal information such as Student Name, Mailing Address, Email address will be used by Continuing Studies staff to support the student participating in a course. Student Name and Course Name will be shared with the instructor for the intent of a class list/roster.

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

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.

### 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).

All personal information is stored in the software system Booking. Booking services are provided by a SAAS License. All data is stored in Canada and if it is to be accessed outside of Canada, written consent must be attained from UNBC. The Contract is attached, which outlines the SAAS, in addition to the Confidentiality agreement. No external parties have access to the data.

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.)

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.*

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.*

## 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.

Student information is contained in our systems, and class lists that include student names are shared with instructors. Anonymized data pertaining to # of students in regional locations is generated with the intent of institutional reporting. (ie. 100 students from UNBC Campuses, 50 students from the rest of BC, 50 students from the rest of Canada).

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.

NA

## 6 Accuracy and Correction

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

Continuing Studies manages the data in Booking, data is entered from the student. At any point and time the student can independently update their information or call our office to update information.

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

Yes

No

32. If yes, please describe your process below?

If our staff identify information is inaccurate, the student is contacted and the correct information is updated in their profile.

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

NA

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?

## 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)

To support the student in taking Continuing Studies courses, and having accurate records to provide proof of completion from the student upon request.

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

Data that is used for the intent of regional location, will only consist of the City, Province and Country. All unique identifiers including Student Information, Course Information will be removed.

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?

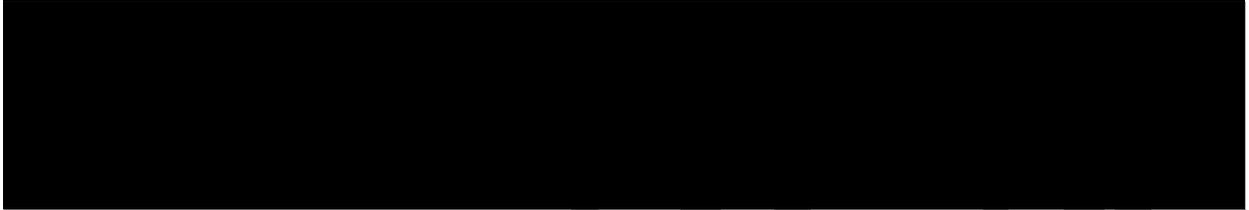
Empty response box for question 44.

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).

A large black rectangular redaction box covering the answer to question 46.

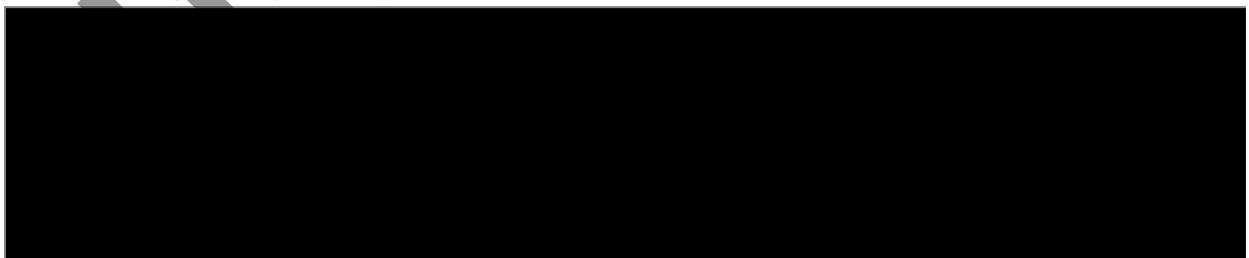
47. Describe physical safeguards (i.e. locked, filing cabinets, locked doors, or restricted areas).

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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](#)).

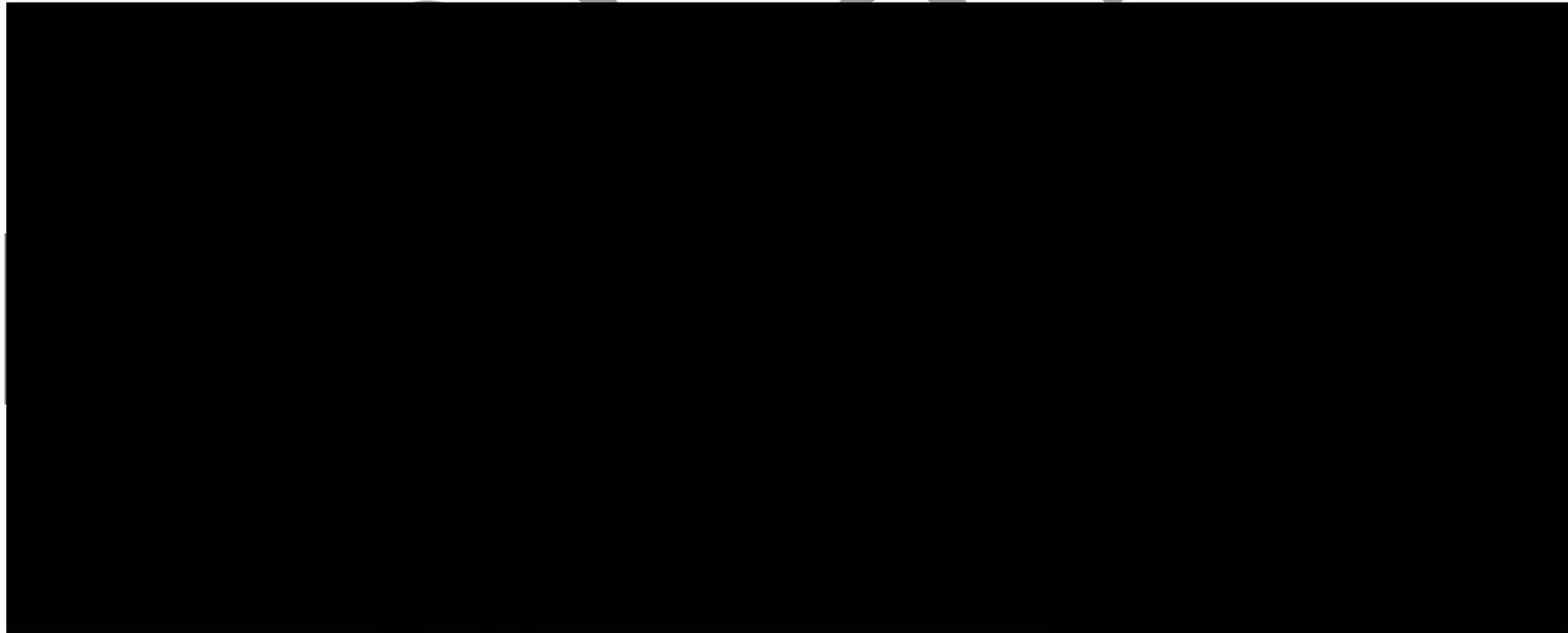
Try to include at least one risk related to each step in the information cycle (collection, storage, access, disclosure, and destruction). **If you are disclosing or storing data outside of Canada you will need to identify additional risks related to storage/disclosure outside of Canada**

RISK

LIKELIHOOD

IMPACT

MITIGATION STRATEGY



RISK

LIKELIHOOD

Low

Moderate

High

IMPACT

Low

Moderate

High

MITIGATION STRATEGY

Low

Moderate

High

## 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 PIA 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:

Position:

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: \_\_\_\_\_

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: \_\_\_\_\_

Name of Chief Information Security Officer

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: \_\_\_\_\_

Name of Privacy Officer: Christopher Ross

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: \_\_\_\_\_

## 12 Privacy 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 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.

You can use this template to write your draft collection notice:

Your personal information will be collected for [purpose]. If you have any questions about the collection of this personal information, please contact: name@unbc.ca.

This information is being collected by UNBC under FOIPPA 26(\*).

## 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
<b>Low</b>	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.
<b>Moderate</b>	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.
<b>High</b>	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.

## Addendum to Privacy Impact Assessment PIA 2215 BookKing

October 5, 2023

### Accountability

This initiative falls within the portfolio of the VP Academic. The lead for this initiative is the Manager of Continuing Studies.

### Summary

The purpose of the addendum is to enable Continuing Studies to assist with facilitating conference registration for UNBC hosted events. This use is consistent with the design and intended use of the software. Name, contact information, and dietary restrictions will be collected. Continuing Studies will remain the only users with access to the BookKing application; however, event registration information will be shared with relevant departments hosting the event. Information collected will only be used for event registration. Any secondary use of information remains out of scope.

[Redacted text]

Risk	Likelihood	Impact	Level	Mitigation
[Redacted table content]				

### Related Documents

**Current contract:** There is a rolling purchase order based on the 2012 contract. It is recommended to update the contract and include privacy and security schedules.

**Collection Notice for event registration:** To be added to online event registration form: "Your personal information will be collected for registration into [Conference Name], this information is being collected by UNBC under BC FOIPPA 26(e). if you have any questions contact [Respective Department]."

**Unit Procedures:** It is recommended that unit procedures are drafted for Continuing Studies use of Booking. These procedures should include all aspects of the data cycle (collection, use, storage, disclosure, and destruction). As booking is used as a personal information bank, procedures will also have to be drafted for creating users, defining access, and auditing user access.

### Date of Review

The initiative will need to be reviewed by April 14, 2025.