

***Privacy Impact Assessment (“PIA”)**

PIA # 20211115

COVID Vaccination Declaration

Privacy Impact Assessment is a tool to identify risks and mitigation strategies associated with the use of personal information within a specific program/system.

A PIA process will support institutions in identifying and addressing privacy risks when planning, designing, acquiring and implementing any program, system, process, practice, service, technology, application or other deliverable that involves personal information. It is relevant to new initiatives, as well as changes to existing information management processes or systems.

The PIA is often described as an “early warning system” because it enables institutions to identify and understand potential privacy risks, to prevent or mitigate negative privacy consequences, and to enhance privacy protection. The PIA should be started as early in a project’s lifecycle as possible.

DOCUMENT REVIEW AND APPROVAL IDENTIFICATION		
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APPROVED BY		
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Document Version, Review and Approval History

Version	Author	Nature of Change	Date
1.0	Kerry Roberts Doris Marshall Greenlaw		November 17, 2021

Term/Acronym	Definition

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Custody	The keeping, care, watch, preservation or security of the record for a legitimate business purpose
Control	The power or authority to make a decision about the creation, use, disposal or disclosure of the record
Personal Information -PI	means recorded information about an identifiable individual other than contact information
Personal Information Banks	A PIB is any collection or set of personal information where personal information is organized by: <ul style="list-style-type: none"> • The individual's name; • An identifying number or symbol; or • Other particular identifier assigned to the individual.
SparkPost	An Third Party Email optimization platform used by SurveyMonkey to send emails to survey recipients.
Survey Monkey-SM	Survey Monkey is an internet programme and hosting site that enables a person to develop a survey for use over the internet. It is owned by Momentive Inc- Momentive Inc. is an experience management company that offers cloud-based software in brand insights, market insights, product experience, employee experience, customer experience, and online survey development.

1. Executive Summary

Commented [DM-G1]: HR

2. Introduction

- a) Name of Program or Service
- b) Name of Department, Branch and Program Area

Human Resources

- c) Name of Program or Service Representative

Kerry Roberts

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d) Key Program or Service Dates

3. Description

a) Description of the New Program or Service or the Change

i. General Description

HR has been asked by the Presidents Executive Council to conduct a survey to determine if the Faculty, Staff, and Graduate Teaching Assistants have been vaccinated by choosing one of the 4 options:

1. Fully Vaccinated
2. Partially Vaccinated
3. I am not vaccinated
4. I prefer not to answer

Upon connection of this data, HR will ask the participant to provide their name, employee number, and click on one of the four selections above. This information will then be collected and entered into our banner system in a secure banner field which only three HR professionals and IT will have access to. The data is stored on premise at UNBC, and the only other copies are stored in “data-safe” in Kamloops. The data will then be reported on and the information will be provided to the Presidents Executive Council to enable appropriate Health and Safety decisions surrounding COVID-19. This collection of data will be done through Survey Monkey and then manually uploaded into banner by one of the three designated HR professionals led by the Health and Wellbeing Partner

If/when the data is reported publicly it will be aggregate and anonymized first, i.e. number of percentage of staff fully vaccinated, partially vaccinated, not vaccinated or those that chose not to answer.

ii. Purposes, Goals and Objectives

This project is intended to gather vaccination status information from all Faculty, Staff and Graduate Teaching Assistants.

iii. List of All Stakeholders Impacted / Involved

Faculty
Staff
Graduate Teaching Assistants
HR
P.E.C.

iv. The Need

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This project is intended to gather vaccination status declarations from UNBC staff to enable appropriate Health and Safety decisions surrounding COVID-19.

v. Governance Model

Accountability – who is ultimately accountable for the program or system

Commented [DM-G2]: HR?

vi. Relevant Existing Policies

UNBC Oath of Confidentiality
UNBC Code of Conduct
UNBC Privacy Policy

Survey Monkey Privacy Policy
SparkPost Privacy Policy

vii. Related PIAs

viii. Relevant contracts

Survey Monkey Contract and Indemnity Agreement

Commented [DM-G3]: I found some preliminary work on a SM PIA in 2018 which mentions both of these documents so we need signed copies of these

ix. Research / Health System Use

Do you anticipate that data collected by this program / system will be used for research or health system use? If so, please explain and provide details of data state (aggregate, de-identified, anonymized etc.)

b) The Intended Scope (Project and PIA)

Clearly identify project scope, and PIA scope.

And

i. Project Scope

This project is intended to gather vaccination status declarations from UNBC Faculty, Staff and Graduate Teaching Assistants to enable appropriate Health and Safety decisions surrounding COVID-19.

ii. Scope of PIA

This PIA covers to use of Survey Monkey to gather responses about vaccination status and the subsequent manual addition to these survey answers in BANNER.

iii. Out of Scope of PIA

4. Personal Information Flow Diagram and Explanation

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In the table below, complete the Description / Purpose highlighting separately by row each instance that information is collected, used, stored, protected, disclosed and disposed of during this initiative. Unless not possible, ensure these steps are arranged how they would occur chronologically in order to make a transparent work flow. The Privacy Officer will review your steps and determine which type of information management practice each entry is and ensure that the practice is compliant with sections under the Act. This table must be accompanied by a workflow diagram if practices are not transparent or if the PIA is related to a common or integrated program or activity or a data-linking initiative.

Personal Information Flow Table			
	Description/Purpose	Type	FIPPA Authority
1.	<i>When generating email invitations, HR will ask ITS to alias the participant list to protect the privacy of the participants.</i>		
2.	<i>UNBC HR will send each Staff Member, Faculty Member and Graduate Teaching Assistant a personalized Survey Monkey link to their UNBC email account.</i>		
3.	<i>Staff Members, Faculty Members and Graduate Teaching Assistants click on the link in the email that takes them to Survey Monkey.</i>		
4.	<i>There will be a privacy notice on the first page of the survey with two options: 1. participants accept the conditions of the informed consent notice; or 2. participants do not accept the conditions of the informed consent notice which takes the participant to a disqualification page. If they refuse consent their information will be collected manually by HR to be added to BANNER.</i>		

Commented [KH4]: I will complete the “Type” and “FIPPA Authority” sections, but HR will need to complete Description and Purpose steps. I have given a few possible examples to help you get started. Please complete the remainder of the chart. You may not need all of the rows provided or you may need more.

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..*

c) Planned pilot projects and /or data testing

*Please describe any planned projects including dates, location, users and data set.
Please describe any planned data testing including dates, location, users and data set.*

d) Data Sources

Please identify each source of data that you intend to access and its business owner. Also indicate that you have contacted the owner and received permission to access the data.

Commented [DM-G5]: Are there any more data elements required to be inputted?

Type of Data	Owner of the Data (organization)	Permission to access data received (yes/no)
Name	Survey Participant	
Employee Number	Survey Participant	
COVID Vaccination Declaration	Survey Participant	

5. Collection, Use and Disclosure of Personal Information

a) Legal Authority for the Collection, Use and Disclosure of Personal Information

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Personal information is being collected under the authority of the *University Act* and section 26 (a), (c), and (e) of the *Freedom of Information and Protection of Privacy Act (FOIPPA)*.

b) Consent Requirements

i. Collection

This personal information is being collected and is essential for operating programs and activities at UNBC and is in keeping with FIPPA Section 26.

Section 26 states that personal information may be collected only if such collection is authorized by or under legislation, essential for operating programs or activities, or collected for law enforcement purposes.

Purpose for which personal information may be collected

26 A public body may collect personal information only if
(a) the collection of the information is expressly authorized under an Act,

(c) the information relates directly to and is necessary for a program or activity of the public body,

(d) with respect to personal information collected for a prescribed purpose,

(i) the individual the information is about has consented in the prescribed manner to that collection, and

(ii) a reasonable person would consider that collection appropriate in the circumstances,

(e) the information is necessary for the purposes of planning or evaluating a program or activity of a public body,

Information is being collected directly from individuals and will be considered highly accurate.

How personal information is to be collected

Personal Information (PI) is being collected directly from Faculty, Staff and Graduate Teaching Assistants and meets the collection requirements of Section 27 of FIPPA.

27 (1) A public body must collect personal information directly from the individual the information is about unless

(a) another method of collection is authorized by

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(i) that individual,

(ii) the commissioner under section 42 (1) (i), or

(iii) another enactment,

CONSENT

Collection is only permitted through knowledgeable implied or express consent. The data collection form begins with a privacy and consent statement to ensure all participants understand what they are consenting to and how their information will be used, stored, shared and eventually deleted out of SurveyMonkey.

Copy/Paste or Fill in here:

The following informed consent notice will appear on the first page of the survey:

Informed Consent Notice for Collection of COVID-19 Vaccination Status

The personal information that you provide is being collected by UNBC Human Resources under the authority of the *University Act* and section 26 (a), (c), and (e) of the *Freedom of Information and Protection of Privacy Act (FOIPPA)*. Your personal information will be used to manage the health and safety of individuals attending activities on campus during the COVID-19 pandemic.

By accepting below, I consent to allow UNBC Human Resources to collect my personal information on this survey using SurveyMonkey. UNBC’s data will be stored on SurveyMonkey’s Canadian servers; however, your data will still be accessible by SurveyMonkey’s teams in the United States, Ireland, and Australia for the purpose of implementing, maintaining, repairing, troubleshooting or upgrading services provided by SurveyMonkey.

UNBC is collecting the information in the following survey for the purpose of:

- [Reason]
- [Reason]
- [Reason]

My individual responses will be removed from the SurveyMonkey platform on or before [date], and manually inputted into Banner. Human Resources will use and retain [individual responses and/or aggregate reports] extracted from SurveyMonkey for the purpose of [reason for use]. If I have any questions about how my information is managed by the Human Resources, SurveyMonkey or Banner, I can contact Health and Wellbeing Partner Kristi Muchalla at Kristi.Munchalla@unbc.ca or 250-960-6711 to ask questions at any time.

Commented [DM6]: Survey Monkey is now known as Momentive and their privacy policy states they collect:

Contact info (name or email)

Usage info (includes which webpages you visit, what you click on, when you perform those actions, what language preference you have)

Device and Browser data (P address, operating system version, device type, device ID/MAC address, system and performance information, and browser type.)

If the survey is done on a mobile device they also collect a UUID -UUID stands for Universally Unique Identifier.

Information from page tags (first party and third party cookies and tracking services that employ cookies and page tags (also known as [web beacons](#)) to collect data about visitors)

Log data (log files that record data each time a device accesses their servers) The log files contain data about the nature of each access, including originating IP addresses, internet service providers, the files viewed on our site (e.g. HTML pages, graphics, etc.), operating system versions, device type and timestamps.

Commented [DMG7]: See the plain language privacy and consent notice in Appendix A

Commented [KH8]: Please fee free to tweak this if this is not the reason for collecting this information.

Commented [KH9]: Please state the reason(s)/purpose of collecting this personal information.

Commented [KH10]: Please fill in the date.

Commented [KH11]: Which one will HR retain, or will you retain both?

Commented [KH12]: State the reason.

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UNBC does not have direct control over the security of the information that I provide in the following survey. I understand that by accepting below I am responsible for any risk associated with providing an external company with any of my identifiable personal information. I understand that I can skip answering any question I do not feel comfortable answering.

I understand that by refusing to accept the terms in this notice, I will not be able to participate in the following survey. I can use the contact information above to inquire about other ways to participate.

I have read the contents of this consent notice, and by accepting, I am providing informed consent to participate according to the terms above

ACCEPT

{continues to next page to start survey}

REFUSE

{continues to disqualification page}

Commented [KH13]: As stated earlier, you need to have a back-up plan if people refuse to use Survey Monkey.

UNBC is committed to ensuring that the Health and Safety of all Faculty and Staff is maintained. In order to assist UNBC in delivering on this commitment we are asking that you chose one of the 4 options below. Please ensure your name is filled in as it would be on your pay stub and that your employee number is accurate. This information will be pulled from the survey tool being used and will be stored in the UNBC employee management system (Banner). The information provided will be used for determining which measures need to be put into play to ensure a safe work environment is maintained. Only the data management team led by the Health and Wellbeing Partner (Kristi Muchalla) Kristi.Munchalla@unbc.ca will have access to this information. Once the data is placed into Banner it will be deleted from the survey tool and the aggregate information will be used to inform decision making by the Presidents Executive Council.

All personal information submitted is confidential and will be managed in a manner that ensures confidentiality is maintained.

Commented [KH14]: This is important information that should be included somewhere either in the email you send out or in Survey Monkey, but it should be separate from the above Collection/Consent Notice.

ii. Use

As described previously UNBC will use this information staff to enable appropriate Health and Safety decisions surrounding COVID-19 as per Section 32 of FIPPA.

Section 32

A public body may use personal information in its custody or under its control only

(a) for the purpose for which that information was obtained or compiled, or for a use consistent with that purpose (see section 34),

(b) if the individual the information is about has identified the information and has consented, in the prescribed manner, to the use, or

(c) for a purpose for which that information may be disclosed to that public body under sections 33 to 36.

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S.M. uses data to facilitate their collectors for sending surveys by email to Respondents. For email delivery, they use SparkPost. They share the relevant contact information for respondents (email address or phone number as applicable) with this third party.

iii. Disclosure

Disclosure of personal information

33 A public body may disclose personal information in its custody or under its control only as permitted under section 33.1, 33.2 or 33.3

Human Resources use of the data from Survey Monkey and transferring it to BANNER Is considered a use.

S.M. sharing data and PI with third parties as noted above is considered a disclosure under FIPPA.

iv. Health System Use

v. Research / Open Data

c) Compliance with *Personal Information International Disclosure Protection Act*

PIIDPA requires that personal information in the custody or control of a public body shall not be stored or accessed outside of Canada, subject to limited exceptions (s.5(1))

The data will be accessed outside of Canada by Survey Monkey for administrative purposes only and will not be shared or altered with any third party besides SparkPost who will send the email notification to all Faculty, Staff and Graduate TA;s.

d) The Sources and Accuracy of the Personal Information

- Who is providing the information – the individual or another source (e.g. another government department, a family member, provincial program database)?

Survey participants are providing their own personal information so it will be considered highly accurate.

- Is the information as accurate and up to date as is necessary for the purposes for which it would be used and disclosed?

The information can be considered accurate as it is being collected directly from the individual to whom it relates.

- Are there any data quality issues that are linked to user and system performance?

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- How does the information get corrected?

Should the information be incorrect three HR staff can correct it in BANNER.

e) The Location of the Personal Information

- Is the information on servers or in a data repository? Will it be electronic or recorded on paper and maintained in files?

YES

It will be stored electronically in both BANNER and Survey Monkey.
No hard copies of any PI will be kept by HR.

- Where will the information be located and used? List all locations within and outside British Columbia?

YES, BANNER stores our data in a data repository in Kamloops BC.

Survey Monkey keeps our data in Canada but access to its for its administrative /third party purposes is outside of Canada.

Does the information manager, vendor, and / or service provider operate from an office outside of Canada? **YES**

UNBC's data will be stored on SurveyMonkey's Canadian servers; however, the data will still be accessible by SurveyMonkey's teams in the United States, Ireland, and Australia for the purpose of implementing, maintaining, repairing, troubleshooting or upgrading services provided by SurveyMonkey.

Does any user of the information managed in this initiative access this information from outside of Canada beyond during short-term temporary travel? **no**

Does this initiative have any components that temporarily process information outside of Canada? **YES**

Does this initiative store information for operational use outside of Canada? **YES. Data is stored indefinitely by SurveyMonkey as long as an account is active with this vendor. HR will be deleted the data from SM on or before January 31, 2022.**

Does this initiative back up or make additional or redundant copies of information outside of Canada? **No**

- Will it be stored on portable devices?

- Will the data be interfaced with data from other systems? (Data matching or linkage)

Data Linking

Commented [DM15]: Please answer

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In FIPPA, “data linking” and “data-linking initiative” are strictly defined. Answer the following questions to determine whether your initiative qualifies as a “data-linking initiative” under the Act. If you answer “yes” to all 3 questions, your initiative may be a data linking initiative and you must comply with specific requirements under the Act related to data-linking initiatives.

Is personal information from one database linked or combined with personal information from another database? **No, information collected through Survey Monkey regarding vaccination status will be uploaded to Banner manually.**

Is the purpose for the linkage different from the original purpose for which the personal information in each database was originally obtained or compiled? **No**

Is the data linking is occurring between either two or more public bodies or one or more public bodies and one or more agencies? **No**

If I have answered yes to the above three questions, I will work with the Privacy Officer to ensure I meet the requirements for a data-linking initiative? **N/A**

Common or Integrated Program or Activity

In FIPPA, “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.

Does this initiative involve a program or activity that provides a service (or services) through a public body and at least one other public body or agency working collaboratively to provide that service? **No**

Does this initiative involve a program or activity that provides a service (or services) through a public body that is working on behalf of one or more other public bodies or agencies? **No**

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

Please note: If your initiative involves a “data-linking initiative” or a “common or integrated program or activity”, advanced notification and consultation on this PIA must take place with the Office of the Information and Privacy Commissioner (OIPC) as well. Contact the Governance Officer – Access, Privacy and Records Management to determine how to proceed with this notification and consultation in the early stages of developing the initiative, program or activity.

f) The Retention Schedule and Method of Destruction for Personal Information

S.M. does not have a retention schedule, as it keeps data indefinitely on active accounts. Data will be deleted from SM on or before January 31, 2022.

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Does your initiative use personal information to make decisions that directly affect an individual(s)? **Yes**

If you answered “yes”, please explain the efforts that will be made to ensure that information management from collection to disposal will ensure that information used to make a decision about someone is accurate, complete, available when needed and disposed of to meet legal requirements. Describe the records retention timeline for the records generated from this initiative.

Answer here or state N/A:

Yes, the information will inform the leadership of UNBC on what decisions they need to make to ensure a safe working environment. They will be using the aggregate data to make these decisions not the individual decision.

Commented [KH16]: Can you please clarify?

If you answered yes above, please describe retention schedules that apply where retention exceeds the one-year requirement under the Act. Please contact the Governance Officer – Privacy, Access and Records Management if you require assistance.

Answer here or state N/A:

Data in SM will be deleted once collected, and as stated previously deleted from that platform on or before January 31, 2022.. The information will be put into Banner (HRIS) for long term storage but will only be accessed by the data management team listed above.

Commented [DMG17]: SM keeps the data they collect as long as the user account is active so we are responsible for and must decide on the life cycle for the retention of data.

Personal Information Banks

Will a database or series of folders be created in this initiative that organizes information by name, identifying number, symbol, or other particular identifier of each individual involved. **Yes**

If yes, will the records or information collected about the individual contain similar types of personal information. If yes, I will contact the Privacy Officer to ensure that I am identifying that this is a Personal Information Bank (PIB) and identifying the legislatively required descriptors listed in section 69 (6) of FIPPA. **Yes**

g) Method of De-identification/Anonymization/Aggregation for Personal Information

Commented [DMG18]: We need IT to describe this process

h) Users of Personal Information

UNBC
SurveyMonkey

i) Audits

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- i. Audit Logs
- ii. Record of user activity (PHIA regulation 11)
- iii. Proactive Audit
- iv. Focused Audits

6. Access Rights for Individuals to their Personal Information

Access Request Management

FIPPA states that *states that an individual has a right of access to a record of personal information about the individual that is in the custody or under the control of the custodian.*

Any initial questions or concerns can be directed to HR Health and Wellbeing Partner Kristi Muchalla

Email: Kristi.Muchalla@unbc.ca
Telephone: 250-960-6711

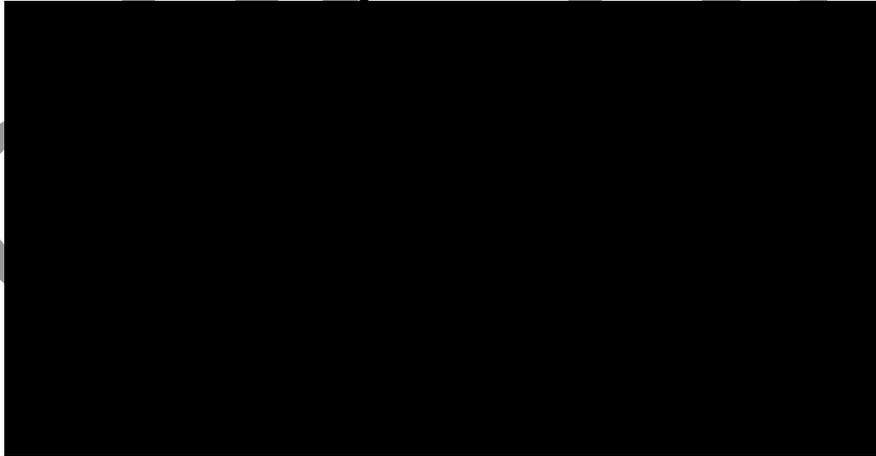
and if HR is unable to supply an answer or the Participant has more questions then they can contact the Governance Office.

7. Privacy and Security Safeguards

Commented [DM-G19]: HR to complete

a) Security Safeguards

- Administrative Safeguards



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[REDACTED]

- **Technical Safeguards**

[REDACTED]

- **Physical Safeguards**

[REDACTED]

- **Identify any outside partners or companies involved that may have access to the personal information**

SparkPost as a third party of Survey Monkey/Momentive

- **Website Domain Ownership (if applicable)**

8. Risk Mitigation Table

Please identify any privacy risks, even very unlikely ones, associated with the initiative and the mitigation strategies that will be implemented. Please provide details of all such strategies. The Privacy Officer will help identify the likelihood (low, medium, or high) of this risk happening and the degree of impact it would have on individuals if it occurred.

Risk Mitigation Table				
	Risk	Mitigation Strategy	Likelihood	Impact
1.	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]

Commented [KH20]: Please consider all of the risks involved in terms of participants disclosing personal medical information through Survey Monkey and then store in Banner. I have given an example in #2.

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2.	
3.	
4.	
5.	

Commented [DM-G21]: I added some risks so please review these

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9. Conclusions and Approvals

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

Please fill in the name, position, and date in the bolded areas indicated then each individual signs under the signature line confirming that individual agrees with the corresponding statement above the signature line.

Name of Individual leading the Program/Project: **Kerry Roberts**

Position: **Director of Human Resources**

I confirm the information management practices in this initiative have been documented on Form A, and B as applicable, as accurately as I am aware and I commit to communicating appropriate information management practices to all individuals participating in this initiative as appropriate. 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 **YYYY/MM/DD**

Director or Dean Overseeing the Program/Project: **Kerry Roberts**

Position: **Director of Human Resources**

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 **YYYY/MM/DD**

Contact Responsible for Records Maintenance: **Kristi Muchalla**

Position: **Health and Wellbeing Partner**

I am responsible for ensuring that I understand how records are being maintained within paper, digital or other information systems within this PIA and that I communicate concerns regarding the feasibility, accuracy, or security of information management in this initiative.

Signature: _____

Date **YYYY/MM/DD**



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Privacy Officer: **Enter here**

Position: **Enter here**

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

Signature: _____

Date **YYYY/MM/DD**

A final copy of this PIA (with all signatures) will be kept on record with the Privacy Officer. The Privacy Impact Assessment does not commit UNBC to financially or operationally approve this initiative. This signed form does not guarantee that all other appropriate assessments have been completed for this initiative.

COMPLETED INITIATIVE

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Appendix A – Privacy Notice

WE NEED TO COLLECT INFORMATION FROM YOU

This project is intended to gather vaccination status declarations from UNBC Faculty, Staff and Graduate Teaching Assistants to enable appropriate Health and Safety decisions surrounding COVID-19.

WE HAVE PERMISSION TO DO THIS

BC’s *Freedom of Information and Protection of Privacy Act (FIPPA)* gives us the legal permission to collect, use, share, store and eventually delete, if applicable, the Personal Information necessary to conduct its operations and plan for next stages of the COVID 19 pandemic.

How UNBC WILL USE YOUR INFORMATION

We will report it to the President’s Executive Council and perhaps publicly in an aggregated, de-identified or anonymized manner (i.e. number or percentage of Faculty, Staff and Graduate TA,s fully, partially, not vaccinated or that preferred not to answer.)

INFORMATION THAT MAY BE SENT TO OTHERS:

We will only share your personal information in ways that are allowed under FIPPA. This includes only sharing your personal information with those who need to know it and only in certain ways:

We will only disclose your personal information for the purposes we have explained here, unless the disclosure is authorized or required by law.

HOW WILL WE PROTECT YOUR INFORMATION?

The personal information you give us will be kept secure from unauthorized sharing and use. We will also make sure that your personal information is stored according to requirements of *Personal Information International Disclosure Protection Act (PIIDPA)*. A very small number of staff will have access to your personal information and they are bound by UNBC’s Privacy and Confidentiality Policies.

HOW LONG WILL WE KEEP YOUR INFORMATION?

The information will be deleted from Survey Monkey on or before January 31, 2021. It will be kept in the BANNER system indefinitely.

WHAT IF THE INFORMATION WE HAVE COLLECTED FROM YOU IS INCORRECT, OR YOU HAVE QUESTIONS?

You can ask to see the information we collect from you, and if it is not right, you have the right to have it corrected.

For any questions or concerns please contact Health and Wellbeing Partner Kristi Muchalla
Email: Kristi.Muchalla@unbc.ca
Telephone: 250-960-6711

You can read more about the UNBC’s privacy information practices [\(INSERT UNBC LINK here\)](#)

I have read and understood how UNBC will collect, use and disclose my personal information.

I agree

I do not agree

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