

PIA Determination and Template

PIA#: (assigned by Privacy Office)

Topic: Course Merchant

PART A

Document Version, Review and Approval History

Version	Author	Nature of Change	Date
1.0	Nicole Neufeld	Renewal	March 22, 2022

1. Introduction

General Description

c) Name of Program or Service

We are Updating the PIA's for Course Merchant (Continuing Studies Registration System). Course Merchant is a registration management system that enrolls students, collects payment and enrolls students into D2L. This is a software product that is accessed by UNBC CS staff. There are not public events, or meeting that will be hosted as part of this service.

d) Name of Department, Branch and Program Area

Continuing Studies, Business Services

e) Name of Program or Service Representative

Course Merchant Connected Shopping Ltd

f) Key Program or Service Dates

This service is already running and will continue to run for the foreseeable future with no end date.

2. Description

Description of the New Program or Service or the Change

a) Purposes, Goals and Objectives

Continuing Studies uses the software Course Merchant for the primary means of registration for Continuing Studies online programming in D2L. 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. There is a prior PIA that was completed by Aaron LeBlanc and Brenda Herbert September 2013. It is attached.

b) List of All Stakeholders Impacted / Involved

Stakeholder	Role
Continuing Studies	Oversees the whole system

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c) The Need

This system is required to enroll CS students into our programming and process payment. It meets the needs of student enrollment, payment, course management, and record keeping.

d) Governance Model

Continuing Studies is accountable for the system

e) Relevant Existing Policies

N/A

f) Related PIAs

2013 draft PIA done by Aaron LeBlanc and Brenda Herbert

g) Relevant contracts

19-3135-CON Course Merchant

h) Research / Health System Use

No

i) The Intended Scope (Project and PIA)

- i. Scope of PIA
Regular Student Enrollment and data collection
- ii. Out of Scope of PIA

j) Definitions

Add any applicable definitions here:
See Appendix C for examples

Term/Acronym	Definition
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.

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3. Personal Information Flow Diagram and Explanation

List of Personal health information / personal information / sensitive information to be Collected, Used and/or disclosed and the Rationale for each.

Data Element	Rationale for collection, use or disclosure	Method of Collection or Disclosure
Individuals Name	Required to register and correctly identify individual	Direct Collection and Use
Individuals Phone Number	Required to register and correctly identify individual	Direct Collection and Use
Individuals Home Address	Required to send certificates and test results to.	Direct Collection and Use
Individuals Email Address	Required to register and correctly identify individual and send registration information and results to.	Direct Collection and Use
Individuals Birthdate	Required to register and correctly identify individual	Direct Collection and Use
Individuals Employer Name	Optional, to enable group registrations	Direct Collection and Use
Individuals SIN	Required to register and correctly identify individual and issue t2202's	Direct Collection and Use
Individuals Gender	Required to register and correctly identify individual	Direct Collection and Use
Registration record	Student information is pushed to D2L to register students into the system.	Disclosure and Use

PART B

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4. Collection, Use and Disclosure of Personal Information

1. Consent Requirements for Collection, Use and Disclosure (for each party to the system or program)

a) Collection

Purpose for which personal information may be collected

Information is collected for the intent of registering, receiving payment, and enrolling students in the Continuing Studies courses in D2L.

How personal information is to be collected

Information is collected through implied consent, wherein students self-register for courses independently online.

Copy/Paste or Fill in your Privacy/Consent Notice here:

For students self-registering for themselves online, consent is implied as part of the process.

b) Use

Use of Personal Information

Information is collected for the intent of registering a student into Continuing Studies Courses, receiving payment, and enrolling them into D2L. Anonymized data is used for institutional reports (ie. # of students from regional locations in programming)

c) Disclosure

Student information is contained in our systems, and class lists that include student names are shared with instructors. Student information is pushed to D2L to enroll them into online courses. 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).

Disclosure of personal information

Personal information is only disclosed when explicit consent is provided by the student.

d) Health System Use N/A

e) Research / Open Data N/A

2. The Sources and Accuracy of the Personal Information

Continuing Studies manages the data in Course Merchant, data is entered from the student. At any point and time the student can independently update their information. If our staff

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identify information is inaccurate, the student is contacted and informed to update their profiles with correct information.

3. The Storage and Location of the Personal Information

All personal information is stored in the software system Course Merchant, and data is pushed to D2L, where student accounts are created.

FOIPPA was amended effective November 26, 2021 and those amendments affect this section.

Disclosure inside or outside Canada

Course Merchant services are provided by a SAAS License. All data is stored in Canada through AWS. Contract is attached, which outlines the SAAS, in addition to security standards. No external parties have access to the data.

Data Linking

In FOIPPA, "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? **Yes**

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? **Yes**

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

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

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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? **Yes**

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).

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.

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.

The Retention Schedule and Method of Destruction for Personal Information

Retention of personal information

Do you use personal information in your initiative to make a decision about an individual? **No**

Keeping information for one year after it is used to make a decision that affects an individual is a minimum requirement under FOIPPA.

You may have other operational or administrative requirements that dictate how long records must be kept and when they must be disposed of. It’s important to maintain the records in your initiative according to an approved records schedule.

Answer here or state N/A: Student records are kept indefinitely.

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.

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Answer here or state N/A: Student records are kept indefinitely.

Personal Information Banks

Name: Continuing Studies

Location: Course Merchant

Description: Student records including personal information is maintained for the intent of student enrolment, course management, and student record management

Authority: This personal information is begin 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).

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

Category of Users: UNBC Continuing Studies Staff

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. No all student data resides in Course Merchant or D2L .

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 FOIPPA.

1. Method of De-identification/Anonymization/Aggregation for Personal Information

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.

2. Users of Personal Information

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.

3. Audits

Information is not accessible by anyone aside from Continuing Studies staff.

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5. Access Rights for Individuals to their Personal Information

Access Request Management

Section 4 of FOIPOP gives individuals the right to access any record under the custody or control of a public body. UNBC is a public body under the Act.

- a) How will you manage access to information requests?
Work with the privacy office to identify the respective data, the parameters, and modes for distribution, then the manager will generate the respective report.
- b) If only aggregate or de-identified data to be released, who is responsible to do so and how is that done?
The manager will generate the respective report, and anonymize/aggregate the data.

Request for Personal Information from Persons to Whom It Relates

- a) How will personal requests for access be managed?
When an individual requests their own information, it will be communicated in the requested mode, ie. Verbally, written, email.

****Please note****

Individuals do not have to make a formal FOI request to access their own personal information held by UNBC.

6. Privacy and Security Safeguards

Does your initiative involve digital tools, databases information systems? IF yes please discuss with ITS whether you also require a security and threat risk assessment

A digital tool, database or information system may leave personal information exposed or otherwise vulnerable to security threats. Security assessments are used on information systems and other digital tools to assess and document security risks, risk ratings and planned risk responses.

An in-depth security assessment known as a STRA (Security Threat and Risk Assessment) results in a document called the statement of acceptable risk.

a) Security Safeguards

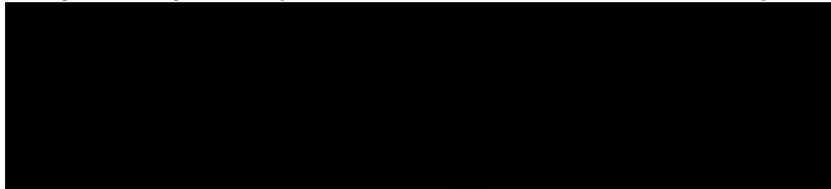
- **Administrative Safeguards**



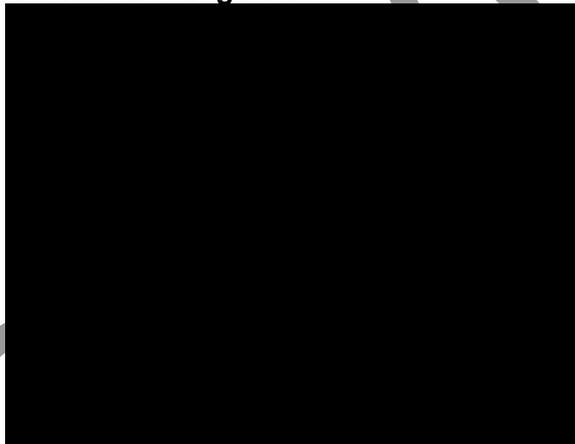
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- **Technical Safeguards**



- **Physical Safeguards**



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



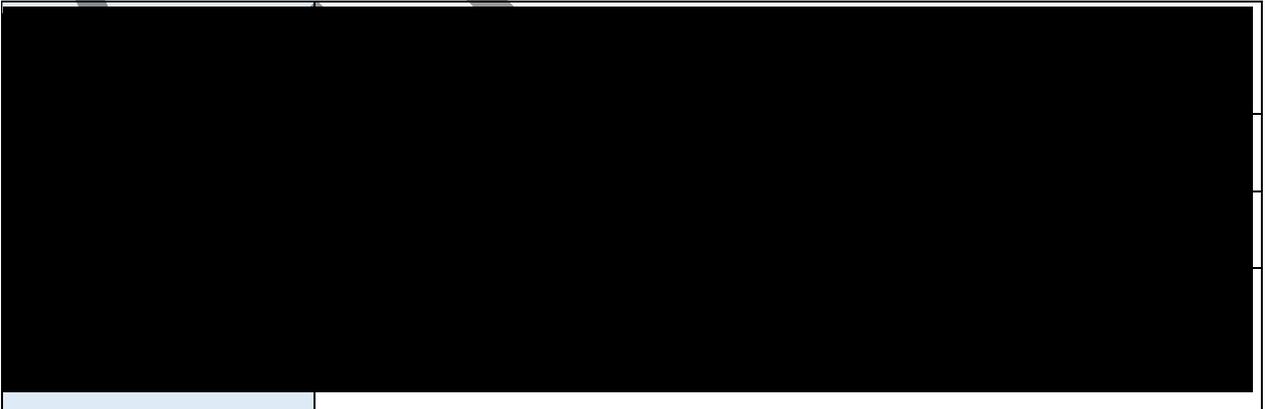
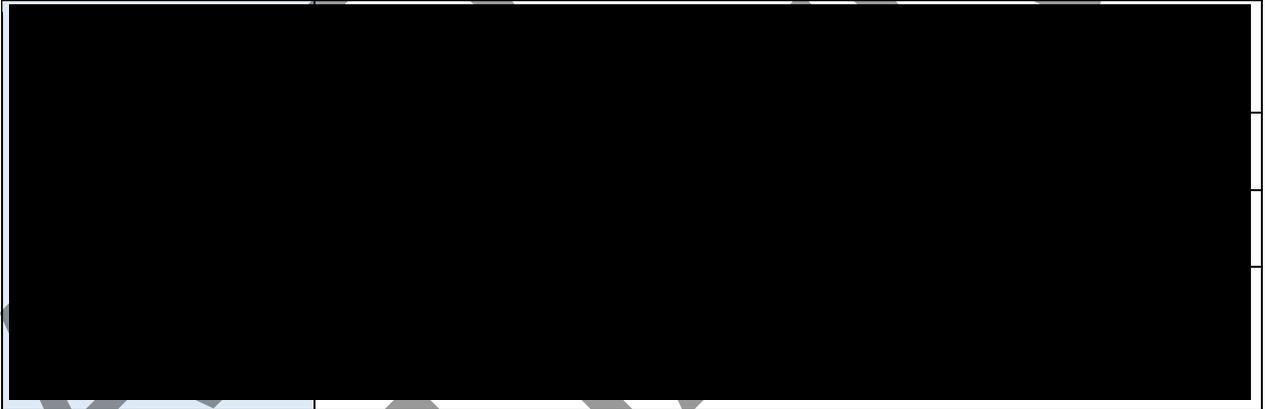
- **Website Domain Ownership (if applicable) N/A**

7. Privacy Risk Identification and Mitigation

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PART C

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8. 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.

Name of Individual leading the Program/Project: Nicole Neufeld

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: Oct. 3, 2022

Director or 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: _____

Chief Information Security Officer

Signature: _____ Date: _____

Designated Privacy Officer: _____

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: _____