

*[Ancillary: Conference Services -  
Expedia.ca for Guest Accommodations]*

PIA# **15-004** (Privacy Officer to complete)



**Why do I need to do a PIA?**

Section 69(5.3) of the *Freedom of Information and Protection of Privacy Act* (FOIPPA) requires the head of a public body to conduct a privacy impact assessment (PIA) in accordance with the directions of the minister responsible for FOIPPA. Public bodies should contact the Privacy Officer to determine internal policies for review and sign-off of the PIA. If you have any questions about this PIA template or FOIPPA generally, please contact Shelley McKenzie (Privacy Officer) at [shelley.mckenzie@unbc.ca](mailto:shelley.mckenzie@unbc.ca) or (250) 960-6310 or visit <http://www.unbc.ca/foippa>.

**What if my initiative does not include personal information?**

Public bodies still need to complete Part 1 of the PIA and submit it along with the signatures pages to their privacy office(r) even if it is thought that no personal information is involved. This ensures that the initiative has been accurately assessed.

**Part 1 – General**

Name of Department:	UNBC Conference and Events Services		
PIA Drafter:	Deb van Adrichem		
Email:	<a href="mailto:Deborah.vanadrichem@unbc.ca">Deborah.vanadrichem@unbc.ca</a>	Phone:	<b>250-960-5821</b>
Program Manager:	<b>As above</b>		
Email:		Phone:	

**1. Description of the Initiative**

*UNBC Conference and Events Services wishes to establish an account and property listing for UNBC Guest Accommodations with **Expedia.ca**. The purpose of listing UNBC Guest Accommodations as an apartment-style property with Expedia is to generate business. Expedia.ca is Canada’s largest online travel provider and it works much the same as a travel agent. Expedia.ca is part of the overall Expedia Inc. family, the largest online travel company in the world that has an extensive brand portfolio. To learn more about Expedia Inc, visit [www.expediainc.com](http://www.expediainc.com). This PIA will review the arrangement between UNBC Conference Services and Expedia.ca. It is not intended to review the privacy policy between Expedia and its customers.*

**2. Scope of this PIA**

*UNBC Guest Accommodations will list rates, availability, descriptions, photos, etc... on the Expedia website and Expedia.ca will accept reservations and take payments from guests directly. Expedia will retain a percentage of the room rate as payment. Once a reservation has been received by Expedia, they will send the Guest first/last name, check in/out dates, and booking ID to UNBC*

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Guest Accommodations (via email). Expedia will collect the full payment directly from the customer. UNBC Guest Accommodations will collect payment from Expedia. Expedia retains a percentage of the total sale. A contract agreement will exist between Expedia.ca and UNBC for this service. Expedia collects the advertised rate from the guest. Then UNBC will collect the amount less the retainer from Expedia. The client only pays once (to Expedia). UNBC only collects once (from Expedia).

### 3. Related Privacy Impact Assessments

N/A

### 4. All Elements of Information or Data

Expedia.ca will send (via email) the Guest First/Last Name, the Expedia booking ID, Check in/out date, and the applicable rate(s), fees and taxes to UNBC Guest Accommodations. The Guest will work directly with Expedia to adjust the booking dates and/or cancel the reservation. If they have any changes/cancellation, they will make them with Expedia and then Expedia notifies UNBC.

If personal information is involved in your initiative, please continue to the next page to complete your PIA.

If no personal information is involved, please submit Parts 1, 6, and 7 to your privacy office(r). They will guide you through the completion of your PIA.

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## Part 2 – Protection of Personal Information

*In the following questions, delete the descriptive text and replace it with your own.*

### **5. Storage or Access outside Canada**

*UNBC Guest Accommodations will not collect guest information from Expedia. The reservation service is between the Expedia account holder (the guest) and Expedia itself. The Expedia account holder will acknowledge the Expedia privacy policy when creating the reservation/account. Expedia discloses its privacy policies on all Expedia travel booking websites. In addition, Expedia customers who make a booking using Expedia's websites have a direct relationship with Expedia, and any information that is collected is processed directly by Expedia. When Expedia collects personal data from its customers, it is not acting on behalf of or as a vendor of the accommodations provider. Expedia storage servers are located outside of Canada. However, the guest is specifically agreeing to be an Expedia account holder. Therefore, UNBC is exempt/excluded from any privacy issues, breaches, or data governance issues.*

*Once the guest arrives at UNBC Guest Accommodations (in person), they will be asked to sign the UNBC Rental Agreement (includes the UNBC Guest Guidelines), provide billing information, and supply a credit card for incidentals. This information will be stored as per our usual methods on campus: an Event Coordinator will receive the completed form(s) from the Guest Services Representative after check-in. The forms are filed according to guest name/reservation number and then stored in a locked cabinet in the Conference Services office. The final invoice will be prepared within a few days of the guest check-out. If applicable, outstanding charges will be applied to the credit card. Once the account is settled, the form(s) containing credit card information are shredded. The reservation files containing guest names, guest contact information, check-in/out dates, reservation number(s), rental agreements, booking confirmations, etc... are stored in a locked file cabinet in the Conference Services office for 1 year. After 1 year, files are then re-located to a storage locker for 6 years. After 7 years in locked storage, files are shredded.*

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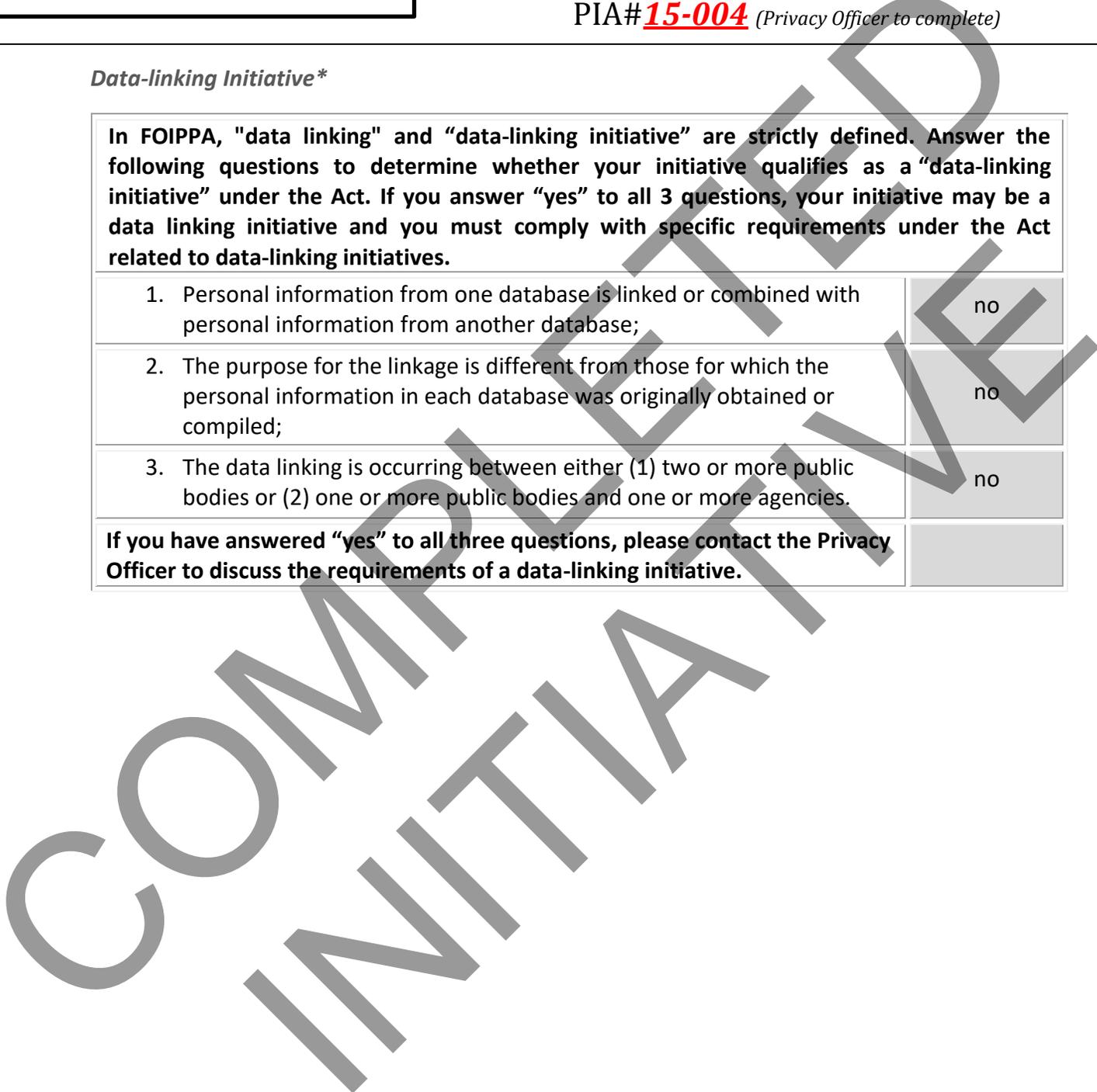


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*Data-linking Initiative\**

<p>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.</p>	
1. Personal information from one database is linked or combined with personal information from another database;	no
2. The purpose for the linkage is different from those for which the personal information in each database was originally obtained or compiled;	no
3. The data linking is occurring between either (1) two or more public bodies or (2) one or more public bodies and one or more agencies.	no
<p>If you have answered "yes" to all three questions, please contact the Privacy Officer to discuss the requirements of a data-linking initiative.</p>	





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**6. Common or Integrated Program or Activity\***

<p>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.</p>	
1. This initiative involves a program or activity that provides a service (or services);	yes
2. Those services are provided through: (a) a public body and at least one other public body or agency working collaboratively to provide that service; or (b) one public body working on behalf of one or more other public bodies or agencies;	NO
3. The common or integrated program/activity is confirmed by written documentation that meets the requirements set out in the FOIPP regulation.	NO
<b>Please check this box if this program involves a common or integrated program or activity based on your answers to the three questions above.</b>	No – Expedia is a private corporation

**\* 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 Privacy Officer to determine how to proceed with this notification and consultation in the early stages of developing the initiative, program or activity.**

**7. Personal Information Flow Diagram and/or Personal Information Flow Table**

<p>Guest establishes an Expedia.ca account in order to make a reservation and payment (for UNBC Guest Accommodations) -----&gt;</p>	<p>Guest(s) make the reservation on-line with Expedia.ca. Expedia.ca collects the guest(s)'(s) personal information and reservation payment directly. -----&gt;</p>	<p>Expedia.ca sends UNBC Guest Accommodations the Guest first/last name, Check in/out dates, Expedia booking ID, and rates/fees via email. -----&gt;</p>	<p>Guest arrives at UNBC, signs rental agreement and provides credit card for incidentals.  -----&gt;</p>	<p>After check-out, UNBC collects payment from Expedia.ca (less Expedia's retained percentage of the sale)-----&gt;</p>
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## 8. Risk Mitigation Table

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

**Examples can be removed and additional lines added as needed.**

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

## 9. Collection Notice

Conference and Event Services will receive a notification email which contains the Guest first/last names, Expedia booking ID, and check in/out dates. Once the guest has arrived on-site, the booking process will be completed as per pre-existing Guest accommodations forms and procedures.

Expedia.ca privacy policy FOR GUESTS: <http://www.expedia.ca/p/support/privacy>

Sample screen-shot of the Privacy Policy from the Expedia website:

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**Expedia.ca Privacy Policy**

Below you will find the Privacy Policy for personal data collected on [www.expedia.ca](http://www.expedia.ca).

We at Expedia, Inc. understand that booking online involves significant trust on your part. We value your trust, and make it a high priority to ensure the security and confidentiality of the personal information you provide to us. Please read this policy to learn about our privacy practices. By visiting this website, you are accepting the practices described herein.

- What information we collect from you
- How we use your information
- With whom we share your information
- How you can access your information
- Your choices with respect to collection and use of your information
- Cookies and other technologies
- Display of tailored advertising/Your choices
- How we protect your information
- Children's privacy
- External links
- Data storage outside of Canada
- Changes to this Privacy Policy
- How you can contact us

Expedia.ca rules and restrictions FOR GUESTS:

<https://www.expedia.ca/Checkout/HotelRulesAndRestrictions?tripid=d228c2bd-9cdd-4a88-8093-062d3db2fcec>

Sample screen-shot of the Rules & Restrictions from the Expedia website:

**Rules & Restrictions**

- We understand that sometimes plans fall through. We do not charge a cancel or change fee. When the hotel charges such fees in accordance with its own policies, the cost will be passed on to you. University of British Columbia - UBC Okanagan Campus charges the following cancellation and change fees.
- Cancellations or changes made after 3:00 PM (Pacific Daylight Time (US & Canada); Tijuana) on 18 July, 2015 or no-shows are subject to a hotel fee equal to 100% of the total amount paid for the reservation.
- Your room will be guaranteed for late arrival.
- Hotel supplier loyalty points and/or airline miles may not be awarded when booking Expedia Special Rate hotels.
- The price shown DOES NOT include any applicable hotel service fees, charges for optional incidentals (such as minibar snacks or telephone calls), or regulatory surcharges. The lodging will assess these fees, charges, and surcharges upon check-out.
- This hotel requires that you are at least 18 to check in.
- Base rate is for 1 guest.
- Total maximum number of guests per room/unit is 1.
- Maximum number of adults per room/unit is 1.
- This property considers guests aged 17 and under, at time of travel, to be children.
- Availability of accommodation in the same property for extra guests is not guaranteed.
- Your credit card is charged the total cost at time of purchase. Prices and room availability are not guaranteed until full payment is received.
- Some hotels request that we wait to submit guest names until 7 days prior to check in. In such a case, your hotel room is reserved, but your name is not yet on file with the hotel.
- Unless specified otherwise, rates are quoted in Canadian dollars.
- For residents of Québec, prices include a contribution to the Indemnity Fund of C\$1.00 per C\$1,000 of travel services purchased.

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Expedia.ca Web Site Terms of Use FOR GUESTS:

<http://www.expedia.ca/p/support/legal>

Sample screen-shot of the Web Site Terms of Use from the Expedia website:

The screenshot shows the Expedia.ca website interface. At the top, there is a navigation bar with the Expedia.ca logo on the left and user account options like 'Hello, Guest', 'My Scratchpad', 'Manage Trips', 'Support', and 'Français' on the right. Below the navigation bar is a horizontal menu with links for Home, Flights, Package Deals, Vacations, Hotels, Deals, Disney, Things to Do, Car Rental, Cruises, Insurance, and Rewards. The main content area is titled 'Web Site Terms of Use' and includes a sub-header 'Last Revised May 13, 2014'. The text begins with 'AGREEMENT BETWEEN CUSTOMER AND EXPEDIA, INC.' and a welcome message. It then details the 'USE OF THE WEBSITE' and 'PROHIBITED ACTIVITIES' sections. A large, semi-transparent watermark reading 'COPYRIGHTED' is overlaid diagonally across the entire screenshot.

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## Part 3 – Security of Personal Information

*If this PIA involves an information system, or if it is otherwise deemed necessary to do so, please consult with the Privacy Officer, CIO or IT Security Officer when filling out this section.*

10. Please describe the physical security measures related to the initiative (if applicable).

[REDACTED]

11. Please describe the technical security measures related to the initiative (if applicable).

[REDACTED]

12. Does your department rely on any security policies? If so, indicate here:

N/A

13. Please describe any access controls and/or ways in which you will limit or restrict unauthorized changes (such as additions or deletions) to personal information.

N/A

14. Please describe how you track who has access to the personal information.

[REDACTED]

## Part 4 – Accuracy/Correction/Retention of Personal Information

15. How is an individual's information updated or corrected? If information is not updated or corrected (for physical, procedural or other reasons) please explain how it will be annotated. If personal information will be disclosed to others, how will the public body notify them of the update, correction or annotation?

*If a Guest needs to adjust dates or cancel the reservation prior to arrival, they will work directly with Expedia.ca to make the changes. Expedia.ca will then notify Conference and Events Services of the change.*

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Full payment is required 3 days prior to arrival and is non-refundable. Parking is included in the rate. A credit card is collected at arrival for incidentals. If the reservation has dates added (after the guest has arrived), then UNBC will charge for the extra days because Expedia is only involved with the initial reservation. If the original reservation has to be discounted (for any reason) after the guest arrives, then UNBC will work with Expedia to refund the guest.

**16. Does your initiative use personal information to make decisions that directly affect an individual(s)? If yes, please explain.**

*Indirectly: Not using personal information collected directly via Expedia.ca. UNBC receives minimal personal information via email from Expedia.ca.*

*Directly: Once on-site, the guest will complete the reservation process in person as per normal procedures. A rental agreement will be signed (includes Guest Guidelines), and a credit card will be collected for incidentals. See above.*

**17. If you answered “yes” to question 16, please explain the efforts that will be made to ensure that the personal information is accurate and complete.**

*Once the guest arrives at UNBC Guest Accommodations (in person), they will be asked to sign the UNBC Rental Agreement (includes the UNBC Guest Guidelines), provide billing information, and supply a credit card for incidentals. This information will be stored as per our usual methods on campus: an Event Coordinator will receive the completed form(s) from the Guest Services Representative after check-in. The forms are filed according to guest name/reservation number and then stored in a locked cabinet in the Conference Services office. The final invoice will be prepared within a few days of the guest check-out. If applicable, outstanding charges will be applied to the credit card. Once the account is settled, the form(s) containing credit card information are shredded. The reservation files containing guest names, guest contact information, check-in/out dates, reservation number(s), rental agreements, booking confirmations, etc... are stored in a locked file cabinet in the Conference Services office for 1 year. After 1 year, files are then re-located to a storage locker for 6 years. After 7 years in locked storage, files are shredded.*

**18. If you answered “yes” to question 17, do you have a records retention and/or disposition schedule that will ensure that personal information is kept for at least one year after it is used in making a decision directly affecting an individual?**

*Records containing personal information are kept a minimum of 1 year in the Conference Services office after used and then stored for 7 years before destroyed. See 17 above.*

### **Part 5 – Further Information**

**19. Does the initiative involve systematic disclosures of personal information? If yes, please explain.**

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N/A

*Please check this box if the related Information Sharing Agreement (ISA) is attached. If you require assistance completing an ISA, please contact the Privacy Officer.*

**20. Does the program involve access to personally identifiable information for research or statistical purposes? If yes, please explain.**

*N/A – General guest information may be used for statistical or planning purposes (e.g. overall #, usage patterns), but specific personal information will not be used.*

*Please check this box if the related Research Agreement (RA) is attached. If you require assistance completing an RA please contact the Privacy Officer, the UNBC Research Office or UNBC Archives.*

**21. Will a personal information bank (PIB) result from this initiative? If yes, please list the legislatively required descriptors listed in section 69 (6) of FOIPPA. Under this same section, this information is required to be published in a public directory.**

N/A

Please ensure Parts 6 and 7 are attached to your submitted PIA.

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## Part 6 – Privacy Officer Comments

*This PIA is based on a review of the material provided to the Privacy Officer as of the date below. If, in future any substantive changes are made to the scope of this PIA, the public body will have to complete a PIA Update and submit it to Privacy Officer.*

Given that individuals (guests) book directly with Expedia.ca and use an account they create, all personal information is contained within Expedia.ca's system. Any privacy concerns or breaches will therefore be between Expedia and the account holder (guest/booker) directly. UNBC's risk related to this initiative is very limited.

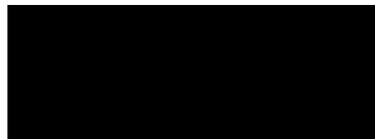
Any future adjustments or enhancements to the system/initiative or Expedia contract will require an amended PIA to be submitted to the APR Office.

Privacy Officer/Privacy Office  
Representative

Signature

Date

*Shelley McKenzie*  
*Manager of Access, Privacy & Records*



23-June-2015

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## Part 7 - Program Area Signatures

_____ Program/Department Manager	_____ Signature	_____ Date
_____ Contact Responsible for Systems Maintenance and/or Security (if applicable)	_____ Signature	_____ Date
<i>Shelley McKenzie</i>		23-June-2015
_____ Head of Public Body, or designate (at UNBC, this is the Privacy Officer)	_____ Signature	_____ Date

Please send a copy of this PIA with the respective signatures to Shelley McKenzie for comment, review, approval & filing.  
A final copy of this PIA (with all signatures) will be kept on record with the Privacy Office.