

Privacy Impact Assessment

Facebook and HEPData add-ons to FrontStream Processes

PIA#16-020 (Office of the University Secretariat to assign)

Form adapted from the BC Government template for Non-Ministry Public Bodies. June 2014

Why do I need to do a PIA (Privacy Impact Assessment)?

Section 69(5.3) of the *Freedom of Information and Protection of Privacy Act* (FIPPA) requires the head of a public body to conduct a privacy impact assessment (PIA) in accordance with the directions of the minister responsible for FIPPA. Public bodies should contact the Information Governance Officer to determine internal policies for review and sign-off of the PIA. If you have any questions about this PIA template or FIPPA generally, please contact Adam Cullum (Information Governance Officer) at adam.cullum@unbc.ca or (250) 960-5139 or visit <http://www.unbc.ca/foippa>.

What if my initiative does not include personal information?

Public bodies still need to complete a PIA of the HEPData and submit it along with the signature pages to Information Governance Officer 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:	Office of University Advancement		
PIA Drafter:	Zarrah Holvick		
Email:	Zarrah.Holvick@unbc.ca	Phone:	Ext. 25754
Program Manager:	Kathie Scouten		
Email:	Katherine.Scouten@unbc.ca	Phone:	Ext. 25751

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

1. Description of the Initiative

To add HEPData, and Facebook single sign-on to FrontStream services.

2. Scope of this PIA

Additions of HEPData access and Facebook single sign-on to FrontStream processes in Development Office.

3. Related Privacy Impact Assessments

PIA of Artez Interactive (the service provider is called FrontStream) completed in first quarter 2012.

4. All Elements of Information or Data

Donor name, home address/business address, phone numbers, emails, Facebook pages, workplace, gift amount, affiliation with UNBC, donation destination, university id, spouse name, donor recognition approval, and credit card information.

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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 the Information Governance Officer for review. You will receive support completing the remaining steps of the PIA.

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

FrontStream has Canadian servers for Artez located at a datacenter in Toronto, ON. Although HEPData and Facebook are companies outside Canada, there is not data storage or transmission of data to either company. FrontStream uses Facebook for authentication purposes only, and all data stays within the Artez servers. Similarly, FrontStream pulls data from HEPData into the Canadian servers to authenticate donor information, but no data is sent out to HEPData.

6. Data-linking Initiative*

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.

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
If you have answered "yes" to all three questions, please contact the Information Governance Officer to discuss the requirements of a data-linking initiative.	

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7. Common or Integrated Program or Activity*

<p>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.</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
<p>Please check this box if this program involves a common or integrated program or activity based on your answers to the three questions above.</p>	

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

8. Personal Information Flow Diagram and/or Personal Information Flow Table

Personal Information Flow Table (Facebook Single Sign-on)			
	Description/Purpose	Type	FIPPA Authority
1.	Donor reaches direct donation/tribute/purchase/event/campaign page and chooses to log in with an already existing personal Facebook account.	Collection	26(c)
2.	The FrontStream interface authenticates a Facebook account using an authentication token. This fills in fields on	Collection	26(c)

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	<i>the donation/tribute/purchase/event/campaign form on FrontStream if the authentication process comes back with a response.status === 'connected.'</i>		
3.	<i>The donor or purchaser continues with the standard process of providing donation or purchase in FrontStream as indicated in the Artez PIA.</i>	Collection and Use	26(c) and 32(a)
4.	<i>At the confirmation page, the donor or purchaser is invited to share this activity on his/her own Facebook wall.</i>	Self-Disclosure (Optional)	N/A
Personal Information Flow Table (HEPData)			
	Description/Purpose	Type	FIPPA Authority
1.	<i>Go to the donation/tribute/purchase/event/campaign page. The donor or purchaser opts-in to enter his/her company name and searches for the company using HEPData information collected by FrontStream's GET API. The donor or purchaser selects the correct company from the provided search results and completes the registration to associate his/her donation with that company.</i>	Collection	26(c)
2.	<i>The donor or purchaser continues with the standard process of providing donation or purchase in FrontStream as indicated in the Artez PIA.</i>	Collection and Use	26(c) and 32(a)

9. 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. 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.				
2.				

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3.	
4.	

10. Collection Notice

Do not post the instructions in bold. Find a place on your form to put the following collection notice.

Choosing to use HEPData and/or Facebook on this form will not add undue risk to your privacy. No data is transmitted or released to either company, as UNBC's service provider (FrontStream) only uses authentication procedures and searches within their own servers. All personal information filled in on this form is stored on high security Canadian servers.

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Part 3 – Security of Personal Information

Please consult with the Information Governance Officer, the Chief Information Officer or the IT Security Officer when filling out this section if you have any questions.

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

[REDACTED]

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

[REDACTED]

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

[REDACTED]

14. 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.

[REDACTED]

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

[REDACTED]

Part 4 – Accuracy/Correction/Retention of Personal Information

16. 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 donor information is not inputted correctly into FrontStream then the donor/purchaser can make a request for changes to the personal information provided. The Development Officer or Advancement Information Specialist will apply the requested changes to Banner when information about the donation/purchase is loaded there.

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

Yes, the donation will produce a tax refundable receipt and the donor recognition program will be applied based on preferences collected on the form.

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

The Development Officers and/or Advancement Information Specialist will contact individuals directly if there are any concerns regarding the accuracy of information. The Development Officers and/or Advancement Information Specialist will cross-reference Banner records.

19. 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 retention schedule will reflect Canada Revenue Agency Books and Records guidelines as

indicated here →



Part 5 – Further Information

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

No.

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

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

No.

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

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

The records from this initiative are integrated into Banner Advancement database but this process does not create a new Personal Information Bank.

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

Part 6 – Information Governance Officer Comments

This PIA is based on a review of the material provided to the Information Governance 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 for approval.

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Part 7 – Program Area Signatures

Zarrah Holvick

Name of Individual leading the
Program/Project
(Normally the individual who
completed the PIA)

Signature

July 27 2016

Date

Kathie Scouten

Program/Department Manager or
Project Sponsor

Signature

July 27 2016

Date

Alla Shchepotkina

Contact Responsible for Systems
Maintenance and/or Security
(if applicable)

Signature

July 27 2016

Date

Adam Cullum

Information Governance Officer

Signature

July 27 2016

Date

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

A final copy of this PIA (with all signatures) will be kept on record with the Information Governance Officer.