

Form A

Please review the entire form before you answer any questions. Providing more information than the questions asks, providing information answering the wrong questions, or leaving sections blank will delay Privacy Officer approval.

In the following questions, answer the open ended questions in the **bolded** prompts. Keep bold font on all answers provided. Answer **Yes/No** questions by deleting the answer that does not apply. Do not add open ended text to **Yes/No** responses.

Name of Department: **International**

PIA Drafter: **Bjorn Petersen**

Email: **bjorn.petersen@unbc.ca**

Phone: **250-960-5986**

Oversight Provided by: **Dr. Mark Dale**

Email: **mark.dale@unbc.ca**

Phone: **250-960-5581**

Description and Scope of Information Management

Describe the purpose of your project/initiative/software. Describe a brief high level overview of the functions, who will benefit from those functions, and who will be impacted if that is not transparent. Indicate if there are groups that are restricted from use and the reason for proposed restrictions. Describe whether there are other reference documents including previous PIAs, whitepapers, or compliance documentation that may support this assessment.

All international students, who are new arrivals to British Columbia and/or Canada, are required under UNBC policy to have private health insurance. The purpose of this is to ensure there is complete medical coverage during the 3-month period individuals must wait to be eligible for the British Columbia Medical Services Plan to begin to provide coverage. All prospective students are notified of this mandatory enrollment prior to their arrival through official emails from the International office. Students are not given the option to opt-out of this coverage.

UNBC therefore requires a vendor to provide insurance to students during this waiting period. UNBC has had a service agreement with guard.me insurance since 2017 to provide this coverage to students. A service agreement was drafted, however the fully executed agreement cannot be found. There is no record of a PIA being previously completed for this vendor.

Regarding restrictions, the International office orders policies for all students, that require coverage, prior to their arrival thereby ensuring coverage. This is beneficial to students as they do not need to be concerned about their health insurance during their transition to life in Canada. UNBC International holds the policy application records and then destroys them after the policies are issued to the students.

All Elements of Information or Data

Using concise point form, please list the elements of information or data involved in the initiative, even if no personal information is involved. This could include client's name, age, address, work/home email, work/home phone number, educational history, employment history, work status, health information, financial information, photos, comments on a blog, or information specific to your subject area.

- **First and last name**
- **Date of birth**
- **Nationality**

In addition to the above information, guard.me collects the following if a student files a claim:

- **Doctor's name**
- **Diagnosis**
- **Detailed medical records**
- **Cost of visit**
- **Any claims examiner notations**
- **Banking information**

Location of Where Information is Managed

Does the information manager, vendor, and / or service provider operate from an office outside of Canada? **No**

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? **No**

Does this initiative store information for operational use outside of Canada? **No**

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

Privacy Officer Comments, Conditions & Concerns

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.

The management of personal information that could affect an individual's reputation or right to privacy if disclosed requires Form B to be completed.

Form B

Please review the entire form before you answer any questions. Providing more information than the questions ask, providing information answering the wrong questions, or leaving sections blank will delay Privacy Officer approval.

In the following questions, answer the open-ended questions in the "Answer here" prompts. Keep bold font on all answers provided. Answer **Yes / No** questions by deleting the answer that does not apply. Do not add open ended text to **Yes / No** responses.

Name of Department: **International**

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Email: **bjorn.petersen@unbc.ca**

Phone: **250-960-5986**

Oversight Provided by: **Dr. Mark Dale**

Email: **mark.dale@unbc.ca**

Phone: **250-960-5581**

Institutional Approvals and Assessments

I have contacted the Chief Information Security Officer to complete all required physical and technical security assessments to ensure my initiative complies with industry standards as applicable to my initiative. **Yes**

I have contacted the Contracts and Supply Chain Management department to complete a review that ensures the purchasing agreement, service agreement, contract, MOA, MOU or other contractual agreement with any external parties involved ensures the compliant management of any information that UNBC provides about its stakeholders. **Yes**

Does the initiative involve systematic disclosures of personal information outside of UNBC? If yes, I will contact the Privacy Officer to ensure that an Information Sharing Agreement is in place. **Yes - the new service agreement with guard.me includes a Privacy Schedule, so an information sharing agreement is not necessary.**

Does the program involve access to personally identifiable information for research or statistical purposes? If yes, I will contact the Privacy Officer to ensure that an Access to Restricted Records Agreement is in place **No**

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.

Is personal information from one database linked or combined with personal information from another database? **No**

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). **No**

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.

Personal Information Flow Diagram and/or Personal Information Flow Table

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>Students are notified in Welcome Package of mandatory medical insurance requirements. Wording for this is provided below in Collection/Consent Notice.</i>	<i>Consent</i>	<i>30.1(a)</i>
2.	<i>Enrolments will be made through enrollment portal – information provided includes first/last name of student, date of birth, UNBC email address and country of origin. Above information is drawn from Banner and included in an enrollment spreadsheet. In the event a dependent is added, information on dependent comes from student directly.</i>	<i>Collection</i>	<i>26(d) 27(1)(a)(i)</i>
3.	<i>Enrolment spreadsheet is uploaded to Guard Me through their secure online portal.</i>	<i>Disclosure and Use</i>	<i>32(b), 33.1(b)</i>
4.	<i>Guard Me then creates individual accounts for each student. Student creates unique password to access account. As per the attached documents from guard.me two factor authentication is always used by the student. Steps to ensure secure storage of student data is outlined in attachments from Guard.me dated August 17th.</i>	<i>Use</i>	<i>33.1(1)(b)</i>
5.	<i>Guard.me sends notice to student with instructions on how to set-up and access their account.</i>	<i>Disclosure and Use</i>	<i>32(b), 33.1 (1)(b)</i>
6.	<i>When filing a claim, each policy holder has a unique online account with guard.me. When filing a claim, policy holder logs into their account to make a claim and upload relevant/required information and documents.(E.g. doctor’s name, diagnosis, detailed medical records, date of visit, cost of visit, claims examiner notations and banking information).</i>	<i>Collection</i>	<i>26(d)</i>

PIA # 21-009

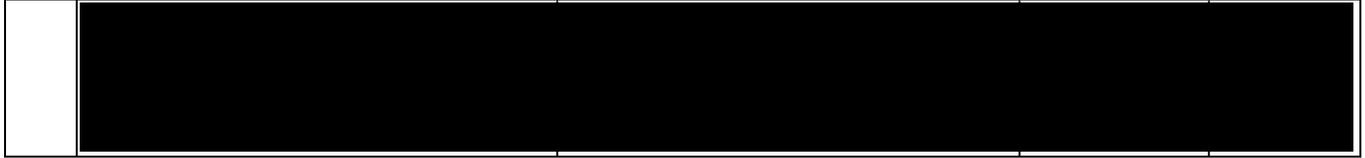
guard.me

7.	<i>The above information is collected by Guard Me to determine the eligibility for the claim to be processed and the student reimbursed and/or the provider paid.</i>		
8.	<i>Enrollment spreadsheet is retained by UNBC for 1 year and then destroyed.</i>	<i>Disposal</i>	<i>31</i>
9.	<i>Students records are destroyed by Guard Me after 15 years.</i>	<i>Disposal</i>	<i>31</i>

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.				
2.				
3.				
4.				



Collection / Consent Notice

If your initiative is collecting personal information directly or indirectly from individuals, you must ensure that all individuals involved are told the following:

- The purpose for which the information is being collected
- The legal authority for collecting it, and
- The title, business address and business telephone number of an officer or employee who can answer questions about the collection.

Please include your proposed wording for a collection & consent notice and where it will be located for individuals to read before collection takes place in the space below. The Privacy Officer will review and provide feedback.

Collection and consent notice will be sent to student within the Welcome Package student receive from International that outlines, among other things, mandatory medical insurance provided by Guard Me.

This information is being collected in order to enroll you in mandatory private health-insurance as per UNBC's *Compulsory Medical Insurance for International Students Policy* and under the authority of section 26(c) of the British Columbia *Freedom of Information and Protection of Privacy Act RSBC 1996 c.165*. Questions regarding the collection of this information can be directed to UNBC International, 3333 University Way, Prince George BC, V2N 4Z9 phone 250-960-5858 attention to Bjorn Petersen, Manager International Operations.

Information Management Controls

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. How is access to information monitored and logged?

Personal Information is drawn directly from the Banner system to ensure it is accurate. It is then cut and pasted into an enrollment spreadsheet, which is then uploaded directly into the enrollment portal to ensure data integrity and security. Only authorized UNBC staff member are given portal access. Authorization and restrictions are determined by the Manager, International Operations.

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?

PIA # 21-009

guard.me

If an error in information is discovered after the enrollment is made through the portal, or a change needs to be made, authorized UNBC staff members can modify the information through the portal.

Information Disposal

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

All information submitted to Guard Me is drawn from Banner directly. Any records retained by our office are destroyed after 1 year. Guard Me retains records for 15 years and then destroys them.

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**

UNBC does not create a database with the above identified information; however Guard.me does.

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**

Name: Guard.me International Insurance

Location:

The servers are located in the Data Centre at:

Colosseum Online Inc.
8-800 Petrolia Road
Toronto, Ontario
M3J 3K4, Canada

Description:

Categories of Data:

- Personal Identifiable Information (Name, Date of Birth, Policy Number, Student Number, Email, Address, Phone Number, Passport Number)
-

- Personal Health Information (Doctor’s Name, Diagnosis, Prescription, Medical Records)
- Financial Information (Bank Account Number)

Name, Date of Birth, Student Number are used to identify unique individuals to issue a Policy Number. Email address is used to send the Welcome Letter to students with instructions on how to access their MyAccount and retrieve their Health Care Access Card. Email address is also used to login to My Account and receive 2 factor authentication codes. Email may also be used to correspond to answer questions about their policy coverage, process claims and answer other general inquiries. Address may be collected if guard.me is asked to send a receipt or correspondence via Canada Poste. Students may choose to add phone number to receive via SMS 2 factor authentication codes to login to My Account. A phone number will also be collected when they call into the Customer Care Call Centre so if the call gets disconnected, they can be called back or if a follow up call is required. If a Visa letter is required for the student to travel, then the Passport Number will be collected. If a claim is submitted then Doctor’s Name, Diagnosis, Prescription, Medical Records will be collected to adjudicate the claim. If a claim is approved and the selected settlement method is Direct Deposit, then a Bank Account Number is collected.

Authority: *The authority for collecting this personal information is the information relates to and is necessary for a program or activity of the public body as per section 26(c) and 26(d) of the Act.*

Purpose:

Personal Information is obtained for the purposes of issuing insurance policies, purchasing insurance, producing Health Care Access cards, issuing Visa letters, processing claims, adjudicating claims, paying claims and for corresponding with insured individuals.

Category of Users: International Students

- Students
- Dependants of Students
- Staff
- Dependants of Staff
- Graduates

Privacy Officer Comments, Conditions & Concerns

This PIA is based on a review of the material provided to the Senior Project Consultant, who is the University’s current 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 for approval.

On August 17, 2021, guard.me provided at letter (attached as Appendix I), answering UNBC’s Chief Information Security Officer’s questions about the steps the organization has taken to enhance their data security in response to the privacy incident that happened on May 12 and June 18 (recorded in UNBC files as PB 21-012 GuardMe).

ACTIVELY INITIATIVE

Form C

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: **Bjorn Petersen**

Position: **Manager, International**

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 **2021/09/27**

Director or Dean Overseeing the Program/Project: **Mark Dale**

Position: **Provost and Vice President, Academic**

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 **2021/09/27**

Contact Responsible for Records Maintenance: **Bjorn Petersen**

Position: **Manager, International**

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 **2021/09/27**

PIA # 21-009

guard.me

Privacy Officer: **Kellie Howitt**

Position: **Senior Project Consultant**

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 **2021/09/27**

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.

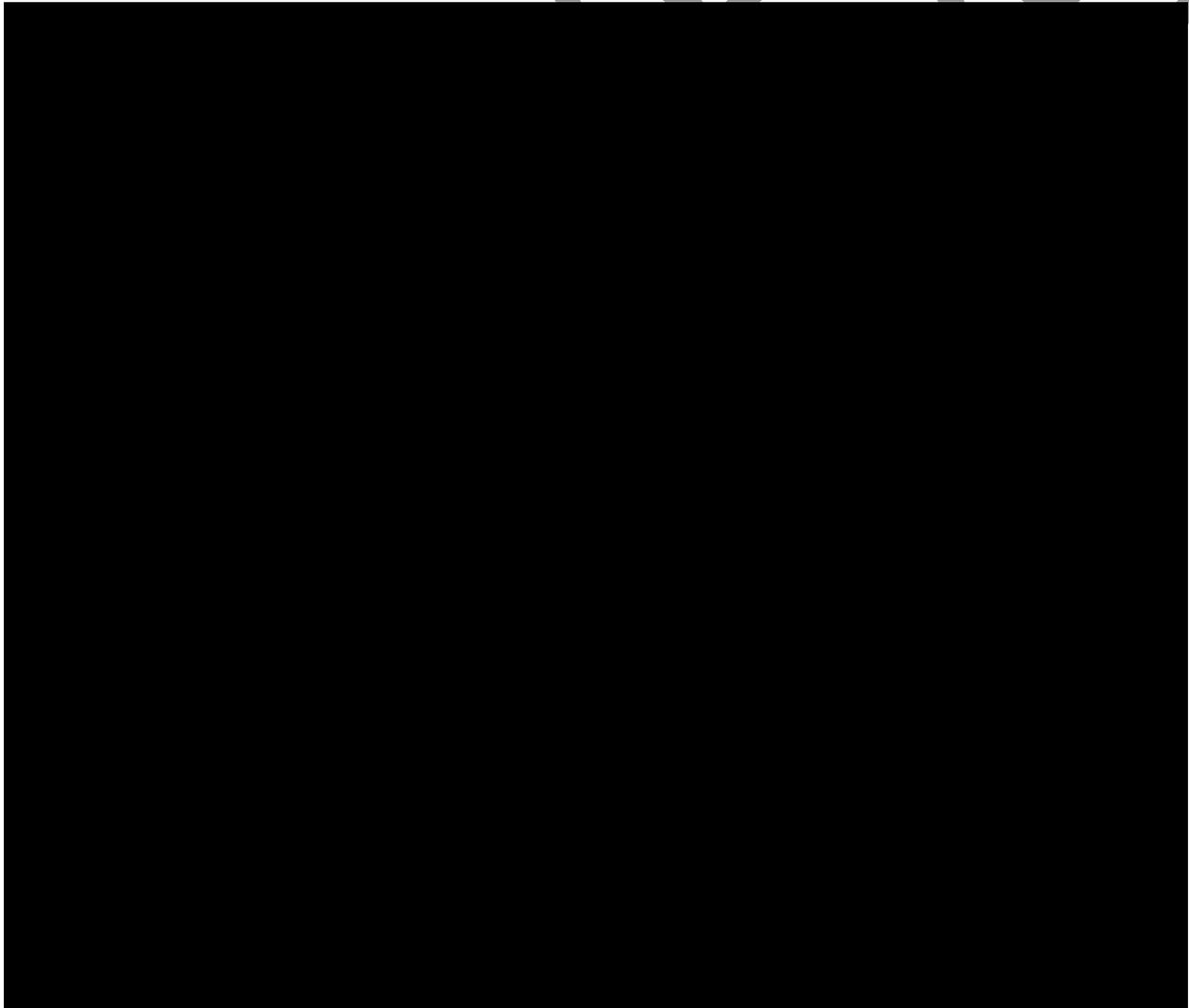
ACTIVATED INITIATIVE

August 17, 2021

TO: University of Northern British Columbia

RE: Request for information regarding guard.me cyber security breach

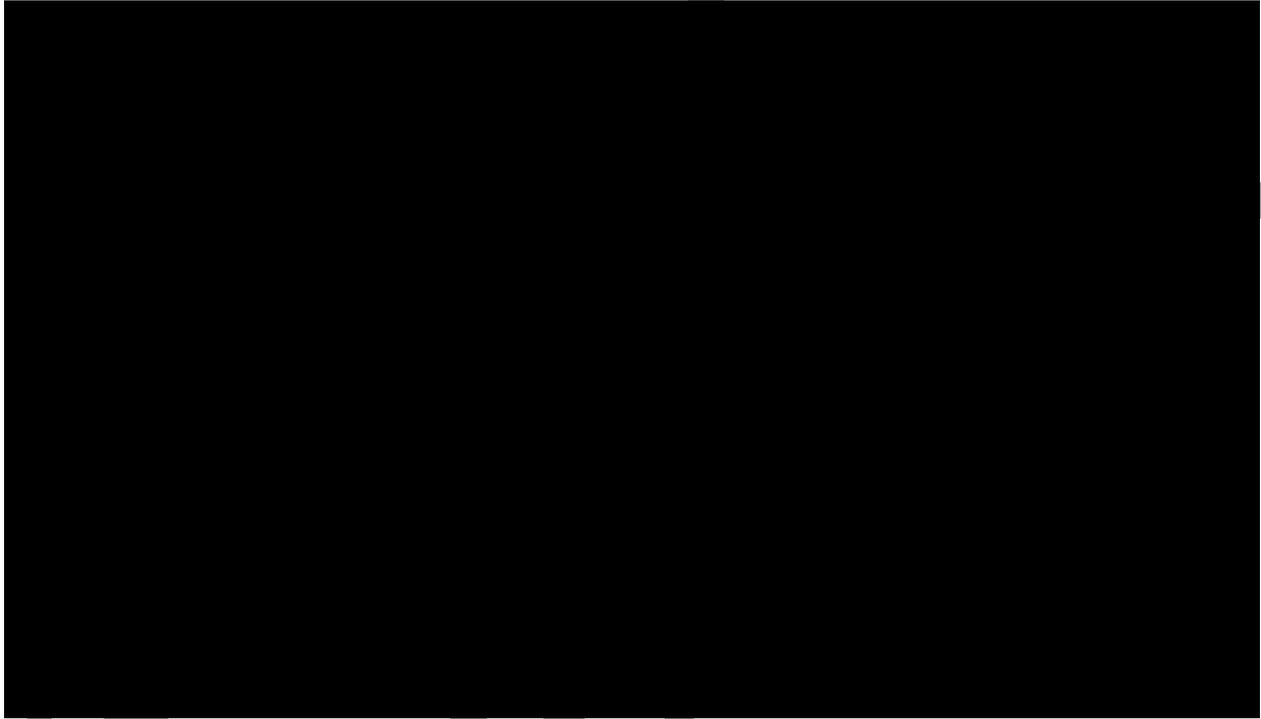
1. What controls do they have in place to protect the security of the information about our users? (This is not a quick or simple question to answer; I'm asking for an outline of their security program)



2. How did those controls fail?



3. What are they doing to ensure that their security posture is more robust?



INTERNET

