

**PIA #21-017**

**LINKTREE**

A 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.

<b>DOCUMENT REVIEW AND APPROVAL IDENTIFICATION</b>	
<b>Project Title:</b>	LinkTree
<b>Document Name/Title:</b>	PIA 21- LinkTree
<b>Document Date</b>	December 6, 2021
<b>Author of Document</b>	Zarrah Holvick Doris Marshall Greenlaw

**Document Version, Review and Approval History**

<b>Version</b>	<b>Author</b>	<b>Nature of Change</b>	<b>Date</b>
1.0			

<b>Term/Acronym</b>	<b>Definition</b>
<b>Custody</b>	The keeping, care, watch, preservation or security of the record for a legitimate business purpose
<b>Control</b>	The power or authority to make a decision about the creation, use, disposal or disclosure of the record
<b>Personal Information -PI</b>	means recorded information about an identifiable individual other than contact information
<b>Personal Information Banks</b>	A PIB is any collection or set of personal information where personal information is organized by: <ul style="list-style-type: none"> <li>• The individual’s name;</li> <li>• An identifying number or symbol; or</li> <li>• Other particular identifier assigned to the individual.</li> </ul>

<b>Account holder</b>	a Paid Plan User or a Free Plan User
<b>Visitor</b>	a visitor to the LinkTree Website

### 1. Executive Summary

LinkTree is a social media reference landing page UNBC to share multiple links on Instagram and drive traffic to various UNBC websites. It allows users to create a personalized and customizable page, that houses all social media links and official websites

### 2. Introduction

**a) Name of Program or Service**

LinkTree

**b) Name of Department, Branch and Program Area**

UNBC Bookstore

**c) Name of Program or Service Representative**

Zarah Holvick, Manager, Retail Services

**d) Key Program or Service Dates**

### 3. Description

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

**i. General Description**

LinkTree is a tool that allows you to share multiple links on Instagram. It basically creates a simple landing page that hosts multiple links.

**ii. Purposes, Goals and Objectives**

Adding marketing capacity and customer information to the Bookstore by using a free application called LinkTree (currently being used by UNBC Communications). LinkTree is a web link system for any Instagram account holders that would be ‘linked’ to our Bookstore Instagram account. This allows for more than the standard home link in the bio, allowing the Bookstore to optimize marketing potential by adding multiple links out to various initiatives, sales, and promotional content.

**iii. List of All Stakeholders Impacted / Involved**

**iv. The Need**

UNBC Bookstore

**v. Governance Model**

**vi. Relevant Existing Policies**

UNBC Privacy Policy  
UNBC Oath of Confidentiality  
LinkTree Privacy Policy- see appendix  
UNBC Acceptable Use Policy

**vii. Related PIAs**

N/A

**viii. Relevant contracts**

**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.)* **NO**

**b) The Intended Scope (Project and PIA)<sup>14</sup>**

*Clearly identify project scope, and PIA scope.*

**i. Project Scope**

The use of LinkTree to optimize marketing opportunities.

**ii. Scope of PIA**

**iii. Out of Scope of PIA**

No financial transactions will be processed on the LinkTree site and are out of scope.

**4. Personal Information Flow Diagram and Explanation**

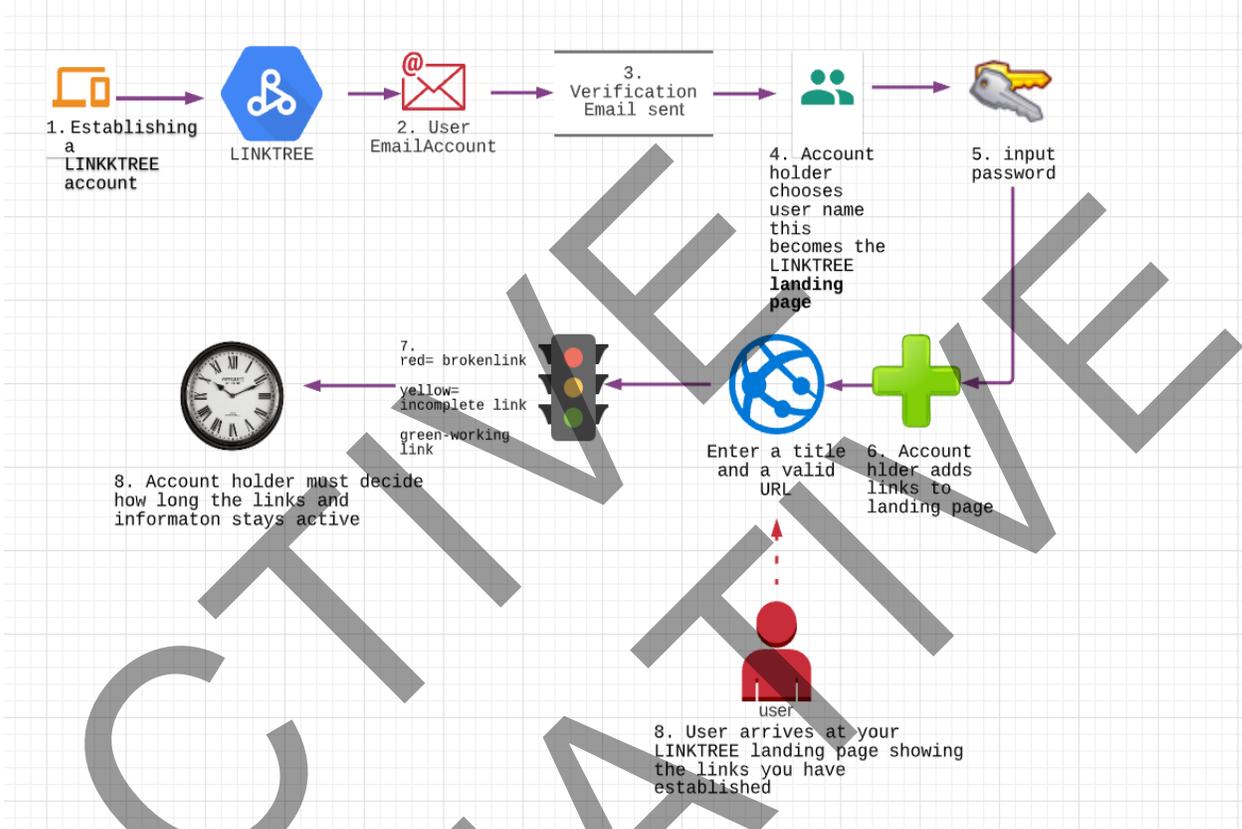
In the table below, complete the Description / Purpose highlighting separately by row each instance that information is collected, used, stored, protected, disclosed and disposed of during this initiative. Unless not possible, ensure these steps are arranged how they would occur chronologically in order to make a transparent work flow. The Privacy Officer will review your steps and determine which type of information management practice each entry

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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.	Visit Linktree,ee to make an account		
2.	Proposed Account Holder inputs email		
3.	Verification link received to that inputted email address		
4.	Account holder chooses username which becomes the LINKTREE landing page		
5.	Account holder inputs password		
6.	User adds link the landing page		
7.	LINKTREE immediately indicates if link is complete, incomplete or broken		
8.	Account holder must decide on how long to keep links in LINKTREE		
9.	User enters at the LINKTREE landing page from various social media sites		



**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.

N/A

**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.

Type of Data	Owner of the Data (organization)	Permission to access data received (yes/no)
<b>FROM ACCOUNT HOLDERS:</b>	UNBC Bookstore Account Holders	YES- at account creation and while possessing an active LINKTREE account
Email address	UNBC Bookstore Account Holders	

Name	UNBC Bookstore Account Holders	YES- at account creation and while possessing an active LINKTREE account
User name	UNBC Bookstore Account Holders	YES- at account creation and while possessing an active LINKTREE account
Password	UNBC Bookstore Account Holders	YES- at account creation and while possessing an active LINKTREE account
City /country of sign up	UNBC Bookstore Account Holders	YES- at account creation and while possessing an active LINKTREE account
Country of last sign in	UNBC Bookstore Account Holders	YES- at account creation and while possessing an active LINKTREE account
Language/browser type	UNBC Bookstore Account Holders	YES- at account creation and while possessing an active LINKTREE account
Application state (user preferences)	UNBC Bookstore Account Holders	YES- at account creation and while possessing an active LINKTREE account
<b>FROM USERS/VISITORS</b>		
user’s approximate location (e.g. country, city or postcode) using geographic information from an IP address	User/Visitor	Whenever using LINKTREE landing page

**5. Collection, Use and Disclosure of Personal Information**

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

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 of Collection**

1. To provide and deliver LT services
2. To ensure the service is relevant, to notify about changes to their service and to deliver targeted content

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3. For consumer research
4. To provide customer support
5. To monitor usage of the service
6. To process any transactions
7. To deliver promotional materials
8. For the administration of their business
9. To comply with legal obligations and law enforcement
10. To verify identity of users

**b) Consent Requirements**

**i. Collection**

**Consent is not required** under FOIPPA. Public bodies are allowed to collect, use and disclose personal information without consent.

However, FOIPPA does put some limits on what purposes a public body is allowed to collect and use personal information for, and on how and where it can be disclosed.

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,

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The free version of LinkTree collects:  
email address,  
name,  
username,  
hashed password,  
city/country when signing up,  
any country of last sign-in,  
Language/browser type, vertical (industry),  
application data (eg user preference).

#### Usage Data

They also use and store information about visitors. This is anonymized and aggregated, and they remove any PI.

#### Location Data

LinkTree will use and store information about user’s approximate location (e.g. country, city or postcode) using geographic information from an IP address. They use this data to provide features of the Linktree Service, and to improve and customize the Linktree Service.

#### **How personal information is to be collected**

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*

- (i) that individual,*
- (ii) the commissioner under section 42 (1) (i), or*
- (iii) another enactment,*

Collection is only permitted through knowledgeable implied or express consent.

LinkTree collects PI directly from users via

1. use and access to their services, including during registration as a user.
2. Website links, social media or through any other platform or channel that is made available to them
3. Responses to surveys or marketing materials they send out
4. Information and recommendations loaded to LT site from users
5. Interactions between users and LT staff

LT also collects information from third parties

1. third parties who partner with them and help provide Linktree Services;
2. third parties that provide them with marketing leads;
3. third parties for whom they provide marketing and data analysis services; and
4. via public sources or when users connect with a social network service when using and accessing the Service.

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## CONSENT

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.

N/A

**Copy/Paste or Fill in here:**

N/A

### ii. Use

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

#### 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.*

The Personal Information collected as noted previously will only be from account users and not visitors to the landing page.

The only information collected of users is an approximate geographic location based on the IP address and this one data element cannot be used to definitively identify a visitor to the landing page.

### iii. Disclosure

#### Disclosure of personal information

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**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

LINKTREE may disclose PI to third parties such as

1. Technology and media partners
2. Their lawyers, accountants, and professional advisors
3. Third party services provides
4. LinkTree related companies
5. Law Enforcement
6. In event of sale or transfer of business or its assets
7. Third party payment processors

iv. **Health System Use** N/A

v. **Research / Open Data** N/A

**c) 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)?

UNBC's LINKTREE Account Users are directly supplying their own PI.

- Is the information as accurate and up to date as is necessary for the purposes for which it would be used and disclosed? **YES**
- Are there any data quality issues that are linked to user and system performance? **NO**

**d) The Location of the Personal Information**

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

**Disclosure inside or outside Canada**

**A public body may disclose personal information referred to in section 33 inside or outside Canada as follows:**

**in accordance with Part 2;**

**if the information or disclosure is of a type described in section 22 (4) (e), (f), (h), (i) or (j);**

**if the individual the information is about has identified the information and consented, in the prescribed manner, to its disclosure inside or outside Canada, as applicable;**

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- Information will be maintained electronically only and by the Bookstore.

The landing page could effectively be used by anyone inside or outside Canada.

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

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, just in that LT offices for IT and process support are not in Canada.**

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**

Will it be stored on portable devices? **NO**

Will the data be interfaced with data from other systems? (Data matching or linkage) **NO**

### **Data Linking**

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?

### **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

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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? **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**

**e) The Retention Schedule and Method of Destruction for Personal Information**

Account users are required to ensure that the information is retained only as long as operationally necessary and that links are modified and removed as necessary. LINKTREE does not remove them.

Does your initiative use personal information to make decisions that directly affect an individual(s)? **NO**

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: **N/A**

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: **N/A**

**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. **NO**

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

**g) Users of Personal Information**

LinkTree isn't using any personal information and Google Analytics will report on trends of links accessed, time spent on pages etc as noted earlier.

**h) Audits N/A**

- i. Audit Logs*
- ii. Record of user activity*
- iii. Proactive Audit*
- iv. Focused Audits*

**6. Access Rights for Individuals to their Personal Information**

**Access Request Management**

*If aggregate or de-identified data only to be released, who responsible to do so and how is that done? N/A*

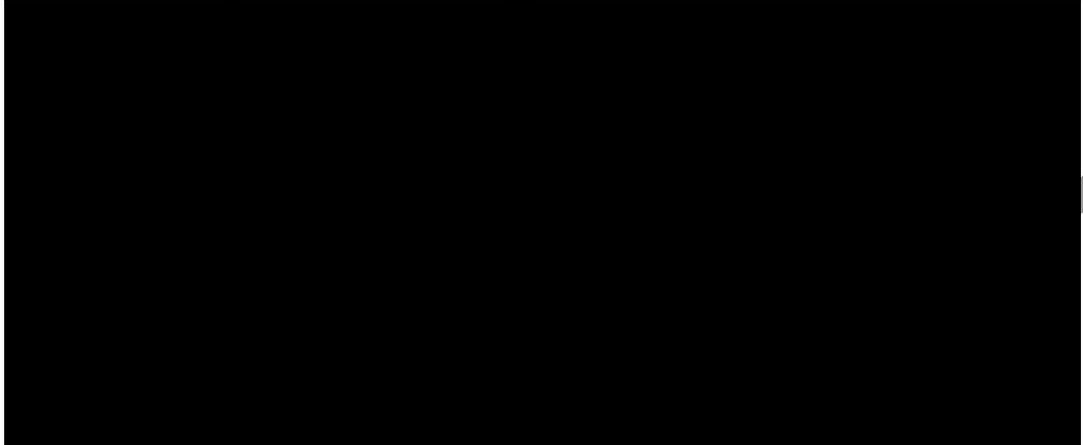
**7. Privacy and Security Safeguards**

**a) Security Safeguards**

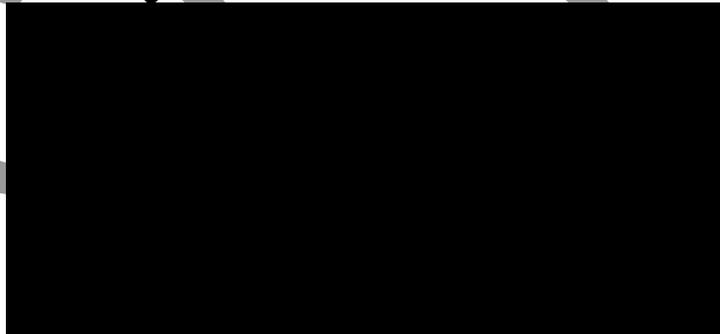
- **Administrative Safeguards**



- **Technical Safeguards**



- **Physical Safeguards**



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

LinkTree

- **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.				
2.				
3.				
4.				

**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:

Position:

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**

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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 **YYYY/MM/DD**

Privacy Officer: **Doris Marshall Greenlaw**

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: [REDACTED] Date **2022-01-13**

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.