

# Privacy Impact Assessment

## LinkedIn Learning

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

PIA# 20-012 (Office of the University Secretariat to assign)

### 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](mailto: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 Part 1 of the PIA and submit it along with the signatures 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:	HR / Business Services / ITS		
PIA Drafter:	Kevin Schretlen		
Email:	Kevin.schretlen@unbc.ca	Phone:	250-960-5653
Department Manager:	Lisa Haslett – Director, Business Services, UNBC		
Email:	Lisa.haslett@unbc.ca	Phone:	250-960-6443

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

### 1. Description of the Initiative

*UNBC has purchased LinkedIn Learning as a tool to help employees and students grow their knowledge boundaries and assist with learning outside the classroom and office. LinkedIn Learning is a collection of courses that provide education on subjects ranging from technology, to creative pursuits, to business. For example, there are courses on leadership, and courses on how to use Microsoft Excel. This software is opt-in for students and employees.*

### 2. Scope of this PIA

*The initiative that this PIA covers is the implementation of LinkedIn Learning including federated access with LinkedIn. All current employees, casual employees between positions, emeritus, and faculty in their grace period are covered. All active students (who have taken at least one Bachelor's level course or higher in the last 18 months for most programs, and 36 months for Nursing and Engineering) are eligible to use this service. Alumni are not eligible for this service.*

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### 3. Related Privacy Impact Assessments

N/A

### 4. All Elements of Information or Data

*This service is opt-in, meaning that the users can choose to use the service, or they can choose not to use the service. At the first login to LinkedIn Learning, a token with the following information will be passed from the IdP (Identity Provider)(Azure Active Directory) to the SP (Service Provider)(LinkedIn Learning); First Name, Last Name, Email Address, Unique User Identifier, Department (if populated). Every subsequent login, the same information will be passed, but will only be used to update the information if it has changed on the IdP.*

*At the first login users will be prompted to choose if they want to couple their personal LinkedIn Account with their LinkedIn Learning account, a choice can be made yes or no.*

*Users will be able to couple or decouple their LinkedIn learning account from their personal LinkedIn account at their discretion. Instructions as to how to do this will be provided in a Learning Module.*

*Performance data for certifications are managed wholly within the LinkedIn Learning platform.*

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

*Storage of data is managed internationally with the primary data centres located in the United States of America. A privacy notice is placed as a module in LinkedIn Learning explaining where data is stored and individuals have full control over any linkage to other LinkedIn services. This is an entirely optional social media service. Any required use of this service is not approved under this PIA.*

#### 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
<b>If you have answered "yes" to all three questions, please contact the Information Governance Officer to discuss the requirements of a data-linking initiative.</b>	N/A

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### 7. Common or Integrated Program or Activity\*

<p><b>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.</b></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>	N/A

**\* 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			
	Description/Purpose	Type	FIPPA Authority
1.	User access the LinkedIn Learning platform for the first time. If individuals open browser sessions with M365 and LinkedIn already signed in, the system will sign into LinkedIn Learning and bind their personal LinkedIn accounts to their LinkedIn Learning profiles.	Collection	26(d)

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	<p>If they're only logged into M365 using AAD then they won't be prompted to log into LinkedIn learning, but will be prompted to link or not-link their accounts.</p> <p>If they're only logged into LinkedIn, they will be prompted to login to M365 AAD, but won't be prompted to login to their LinkedIn account.</p> <p>If they're not logged into either one of the services, then they will require a full login for both M365 AAD and the optional LinkedIn account binding.</p>		
2.	User accesses the UNBC Privacy Statement Learning Path to learn more about how they can protect their own privacy including managing who can see their profiles, and how to couple and decouple their LinkedIn Learning profile to their overall LinkedIn account.	Use / Disclosure	32(b), 33.1(1)(e.1)
3.	User completes learning modules which lead to recognizable course or program completion which they can choose to present to others through their LinkedIn account.	Use / Disclosure	32(b), 33.1(1)(e.1)
4.	User controls how their LinkedIn Learning materials are presented on their own profile and can delete this information from their own profile as needed. User is responsible for working with LinkedIn to dispose of their own information from LinkedIn's services.	Disposal	31 (though this is controlled by user).
5.	Full Administrator is able to monitor the activity of users by seeing profile information of all users and who has acquired, progressed through and completed learning paths. The full administrator will not provide this information to any individuals except when an individual inquires about their own information to resolve technical / procedural concerns.	Use / Disclosure	32(b), 33.2(a)
6.	Full Administrator is able to designate Sub Administrators who can curate content to suggest learning paths for individuals. Sub Administrators are able to send these curated learning paths to individuals but do not monitor the individual's progress.	Use	32(b)

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### 9. Risk Mitigation Table

Risk Mitigation Table				
	Risk	Mitigation Strategy	Likelihood	Impact
1.	[Redacted Content]			
2.				

### 10. Collection Notice

#### *Privacy and Information Management Notice*

#### *LinkedIn Learning*

*The use of LinkedIn Learning provides an optional opportunity for active students and current employees of UNBC to receive professional development through the suite of programs provided on this platform. You have the choice to use this platform and to discontinue the use of this platform at any time. By using the platform, you are agreeing that you understand and accept this entire notice. If you believe you are being compelled to use this service, or if you do not understand any part of this notice, please contact [privacy@unbc.ca](mailto:privacy@unbc.ca) and do not continue to use LinkedIn Learning.*

*When you use the LinkedIn Learning platform, UNBC cannot manage or be accountable for how your personal information will be managed by LinkedIn. You are responsible for ensuring your personal information is managed and protected to your standards while working in the LinkedIn Learning Platform.*

*UNBC is not responsible for maintaining warranty, service, or data on any device that interacts with LinkedIn Learning, nor guaranteeing the security and availability of the LinkedIn Learning service itself. Any User Agreement with LinkedIn for the use of the LinkedIn Learning platform is made directly between you as the user and LinkedIn, while not including UNBC.*

*While UNBC cannot manage your relationship with LinkedIn, if you have concerns about the use of this service and you want to inform UNBC, please contact [Lisa.Haslett@unbc.ca](mailto:Lisa.Haslett@unbc.ca) to report your concerns. UNBC does not commit to resolving your concern, nor directly communicating to you about your concern with LinkedIn Learning.*

*LinkedIn Learning transmits the professional development information, performance information, and other types of personal information you elect to provide to servers outside of Canada. You have full control over how your LinkedIn Learning account connects to rest of LinkedIn's services. Do not provide any information to LinkedIn or LinkedIn learning that you would not provide to another social media platform.*

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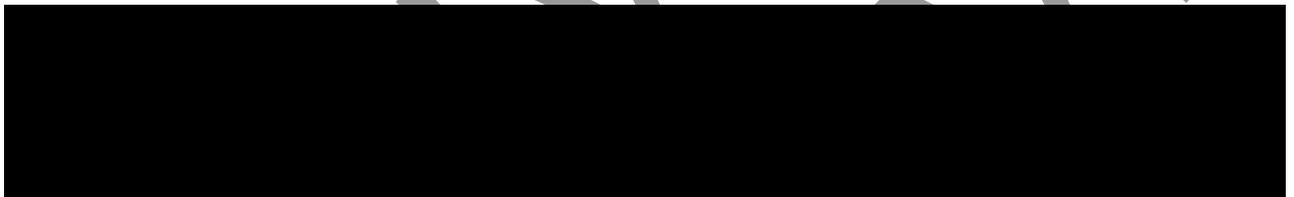
### **Part 3 – Security of Personal Information**

*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).



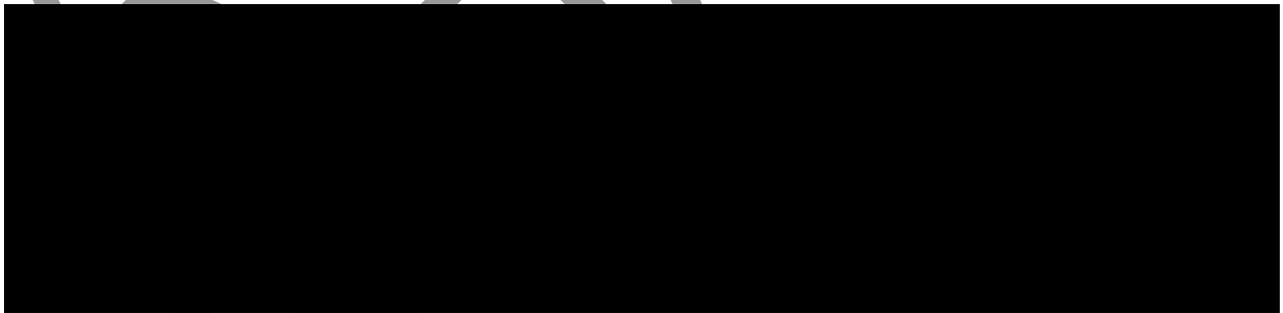
12. Please describe the technical security measures related to the initiative (if applicable).



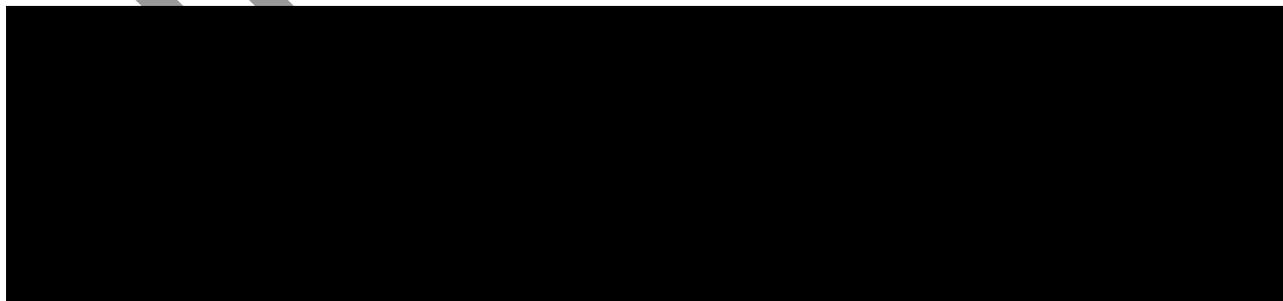
13. Does your department rely on any security policies? If so, indicate here:



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.



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



*Users can choose to display anonymous profile information or show up as an anonymous LinkedIn member when viewing other profiles.*

### **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?**

*The individual is responsible for updating and correcting their own personal information and have that capacity within the LinkedIn Learning platform.*

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

No. While a decision is being made on the platform to allow course completion or certification, the university is not responsible for making that decision, and the user doesn't have to report that decision to the university unless that user wants to.

**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 individual is responsible for ensuring their personal information is accurate and complete. The individual can contact LinkedIn to update and correct information as needed.*

**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?**

*LinkedIn Learning retains most user information for the lifetime of the user's account and retains information beyond that point to meet regulatory requirements.*

### **Part 5 – Further Information**

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

No

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**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.**

N/A

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

No

**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.**

N/A

**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.**

*As an optional service, UNBC will not be creating a PIB for this initiative. LinkedIn Learning will have an existing customer database that will incorporate UNBC users.*

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

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### **Part 6 – 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.*

*Approval of this PIA is based on LinkedIn Learning remaining optional without any pressure to participate. For departments in the university that would like to make LinkedIn Learning required, a PIA amendment will need to specify the scope of who it will be required for, informed consent collected in advance, and a second option if the individual(s) don't feel comfortable putting their personal information on an international platform.*

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### Part 7 - Program Area Signatures

Kevin Schretlen Name of Individual leading the Program/Project <i>(Normally the individual who completed the PIA)</i>	As agreed to in email chain Signature	September 2 2020 Date
Lisa Haslett Director or Dean Overseeing the Program/Project	As agreed to in email chain Signature	September 3 2020 Date
Kevin Schretlen Contact Responsible for Systems Maintenance and/or Security <i>(if applicable)</i>	As agreed to in email chain Signature	September 2 2020 Date
Adam Cullum Information Governance Officer (Privacy Officer)	As agreed to in email chain Signature	September 3 2020 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.