UNBC UNIVERSITY OF NORTHERN BRITISH COLUMBIA

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

Privacy Impact Assessment

Online Library Fine Payment – Innovative Interfaces ECommerce and Paypal Payflow Link

PIA#16-007

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 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 FOIPPA 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 <u>does not include personal information?</u>

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:	Library		
PIA Drafter:	James MacDonald		
Email:	James.macdonald@unbc.ca	Phone:	6601
Program Manager:	**Allan Wilson**		
Email:	Allan.wilson@unbc.ca	Phone:	6612

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

1. Description of the Initiative

This initiative will provide library users with the ability to pay library fines and fees online. This involves 3 components: the library catalogue software (Innovative Interface's Sierra) where users login to a "my account" to view their fines and fees. (view access through their "my account" has long been available); The use of Paypal's Payflow Link as a gateway service to the third component, an online merchant account.

Once online payment is in place it is our intention to discontinue collecting cash at the library circulation desk for the payment of fines and fees.

2. Scope of this PIA

The PIA is for the incorporation of Paypal's Payflow link gateway and the merchant account with the library catalogue software.

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3. **Related Privacy Impact Assessments**

   N/A

4. **All Elements of Information or Data**

   - *Patron's name and account number*

   - *Patron Campus Login Credentials*

   - *Fines and fees associated with the patron's account*

   - *Details on the levied fines: book record information, overdue periods, other library transaction descriptions*

   - *Information required for credit card processing*

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 Information Governance Officer. The Information Governance Officer 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

The library catalogue information is stored locally.

Payflow Link and the Merchant account are external to UNBC. Paypal will not disclose the location of the servers the information is held on. Use of this service is elective and patrons will be warned that UNBC does not have any control on how information is managed by Paypal.

6. Data-linking Initiative*

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.	
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*

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.

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

* 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

Examples can be removed and additional lines added as needed.

Personal Information Flow Table

	Description/Purpose	Type	FOIPPA Authority
1.	Client opts in for optional online payment program of library fines and agrees to collection statement placed on it. Client enters all billing information required to pay fines	Collection	26(d)
2.	Client receives email notification of fines assessed or checks	Disclosure	33.1(b)

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	online account		
3.	Client logs into online catalogue using university credentials and selects fines/fees to pay in their My Account	Use	32(c) → 33.1(i.1)
4.	Upon selection of fines/fees information about those fines is sent to Payflow Link service (gateway to the merchant account) According to Innovative Interfaces Incorporated the only information sent is the fine amount (or aggregated fine amount in paying multiple fines at once) and the patron's record number.	Disclosure	33.1(i.1)
5.	Sierra system provides Payflow Link with information necessary for processing a credit card payment	Disclosure	33.1 (i.1)
6.	Sierra system receives confirmation that the payment has been made and the fine is updated as paid in the patron account.	Collection	26(c)

9. 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. ■■■■■■■■■■■■■■■■■■■■			
2. ■■■■■■■■■■■■■■■■■■■■			

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10. Terms of Service

Terms of Service for the Use of Online Fine Payment Services

You may pay library fines and fees using the following methods:

- *By credit card through your online patron account (24/7)*
- *At the circulation desk in the library by credit or debit card (click here for hours)*
- *At the UNBC cashier's office by cash, credit or debit. (click here for hours)*

I understand that by using online payment services to pay library fines or fees I agree to the following terms of service: I may refuse to use the online payment service in favour of our two other payment methods if I am concerned about these terms of service.

I understand that I need to provide my credit card and billing address information to make a payment and that my address as stored in the library system, will be transferred to Paypal Payflow Link portal in the United States for your payment to be processed. I accept the risk of my information being accessed by Paypal or being intercepted in exchanges between the library system on UNBC servers and Paypal. I understand that I am responsible for entering accurate information whenever I need to input information about myself to use this service.

My payment information will be kept within the library system database for one year after the expiration of my account. If I require this information for longer than that time, I will be responsible for collecting it before it is disposed of. UNBC does not determine or control how long Paypal retains records pertaining to your fine payment.

If I identify, or am concerned about, the accuracy of my information or unauthorized access to my information, I will report any errors or concerns to the library circulation desk, at circulation@unbc.ca or 250 960 6613.

[Back button] [I agree button]

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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 Information Governance Officer, CIO or IT Security Officer when filling out this section.

11. Please describe the <u>physical</u> security measures related to the initiative (if applicable).

██████████████████████████████████

12. Please describe the <u>technical</u> 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.

██████████████████████

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?

Information is updated to Sierra automatically via a sync with Banner.

For community members, all information is inputted manually by circulation staff.

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Banner updates: Banner updates the following fields in the patron record: name, university ID number, patron type, address, phone number, email address, home library, barcode.

Staff can update any field that Banner does not update including: statistical fields, notes fields, block fields, fines are generally automatically applied but can be added manually by staff or waived.

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

Yes – students cannot graduate without paying their library fines/fees.

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.

Banner updates the records to ensure they correspond with the authoritative university record.

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?

Geoffrey R. Weller library will keep the record for one year after the expiry of the patron's account. The library keeps daily and monthly backups of all transactions through Innovative System (Sierra).

Paypal does not have a retention schedule for transaction records on their databases. Patrons will be provided a warning in the Terms of Service that UNBC does not determine or control the length of time Paypal documents history of transactions.

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 FOIPPA. Under this same section, this information is required to be published in a public directory.**

    While a new personal information bank will not be created, it expands the already existing patron account database in Sierra to include online payment services.

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

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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 it to Information Governance Officer.

The terms of service must be visible and readable to the patron. The patron must review and acknowledge these terms of service before making online fine payments with the Geoffrey R. Weller Library. Part of these terms of service must include acknowledgment that UNBC does not determine or control any retention, use and disclosure of information by Paypal.

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Part 7 – Program Area Signatures

James MacDonald
_____
Name of Individual leading the Program/Project
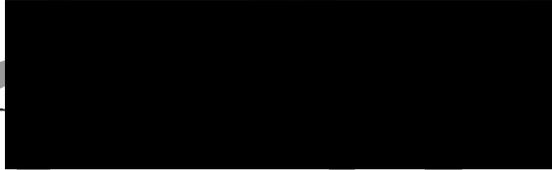*(Normally the individual who completed the PIA)*

June 22, 2016
_____
Date

Allan Wilson
_____
Program/Department Manager or Project Sponsor

Signature

June 22/2016
_____
Date

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

June 22, 2016
_____
Date

Adam Cullum
_____
Information Governance Officer

Signature

June 22/2016
_____
Date

Please send a copy of this PIA with the respective signatures to Adam Cullum for comment, review, approval & filing.

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

COMPLETED

INITIATIVE