

Privacy Impact Assessment

SiteImprove

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

PIA# 19-007 (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 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:	Communications and Marketing		
PIA Drafter:	Lindsay Hastey		
Email:	lindsay.hastey@unbc.ca	Phone:	2509605810
Department Manager:	Matt Wood		
Email:	Matt.Wood@unbc.ca	Phone:	2509605626

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

1. Description of the Initiative

SiteImprove is a web governance software that checks for web quality assurance, accessibility, search engine optimization. It allows us to create web policies that allows us to check for identifiable information about old names, emails. Individuals can make requests to be de-identified on the website. Web policies can flag and remove ID numbers, SIN numbers, and credit card numbers if they are mistakenly put on the website in real time. Does not collect information inputted into the website including information submitted on web forms.

2. Scope of this PIA

All live webpages, and hyperlinked attachments on the website.

3. Related Privacy Impact Assessments

N/A.

4. All Elements of Information or Data

Web url, names, public body employee positions, business contact information, department information, public reports, photos, hyperlinks, (all website content accessible to the internet).

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.

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

Part 6 – Comments, Conditions & Concerns

All information accessed by SiteImprove's integrated module with Drupal will be publically available website information. While SiteImprove does operate internationally, none of the information is personal information that requires consent to be transmitted outside of Canada. This PIA will need to be revisited if SiteImprove's scope of service extends to any information collected from what individuals submit to the website including information on web forms.

Part 7 – Program Area Signatures

Lindsay Hasteley		July 12/19
Name of Individual leading the Program/Project (Normally the individual who completed the PIA)	Signature	Date
Matt Wood		Aug 6/2019
Director or Dean Overseeing the Program/Project	Signature	Date
N/A (Separate Assessment Done)	N/A	N/A
Contact Responsible for Systems Maintenance and/or Security (if applicable)	Signature	Date
Adam Cullum		July 12/19
Information Governance Officer (Privacy Officer)	Signature	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.

ACTIVE
INITIATIVE