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

PIA Amendment#1 *16-016 (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:	Information Technology Services
PIA Drafter:	Glen Montgomery
Email:	Glen.Montgomery@unbc.ca	Phone:	**250 960 6517**
Program Manager:	**Greg Condon**
Email:	Greg.Condon@unbc.ca	Phone:	**250 960 5289**

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

1. Description of the Initiative

Sync.com provides cloud based file storage for personal computing devices that individuals affiliated with UNBC can use to conduct collaborative work, as an alternative to cloud services which do not meet the residency requirements within the Freedom of Information and Protection of Privacy Act (like DropBox). Files that are stored in a designated folder on a computer are automatically replicated into Sync.com's cloud infrastructure. Files can also be accessed from, and stored by, mobile devices, and web browsers. Files stored on Sync.com can be shared with other users of Sync.com; file shares can be set up dynamically to include specific individuals with whom the files are desired to be shared. Sync.com is a Canadian company with data centres only in Canada (specifically Toronto and Markham, Ontario). No data other than the files themselves are stored in Sync.com (for example, there is no Active Directory synchronization).

2. Scope of this PIA

This PIA covers the sharing of documents with external parties. While email is currently used to share small files, the current process for sharing large files with parties external to UNBC is to use

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an internally developed, but outdated, system (fileportal.unbc.ca). The internal system was developed for the purpose of sharing large files so as to avoid encumbering UNBC's email system with large attachments. Whatever documents are currently being shared, and whatever policies are currently in place would also apply to using sync.com. This is NOT intended to be used as a wholesale document storage system; UNBC has its own internal document storage system (also known by common terms such as "H: Drive" or "G: Drive" among other names).

3. Related Privacy Impact Assessments

Amendment of PIA 16-016.

4. All Elements of Information or Data

The files that the user decides to share. These files would contain whatever data is relevant to the users, and the sharing of such files is the responsibility of, and at the discretion of, the user, just as it currently is when sending email and email attachments. In addition to the files shared, user account information for each user is required. The user account information required is the user's email address.

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.

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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 data stored within Sync.com is stored only in Canada. The data can be accessed anywhere in the world, but only by the users designated by the originator.

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

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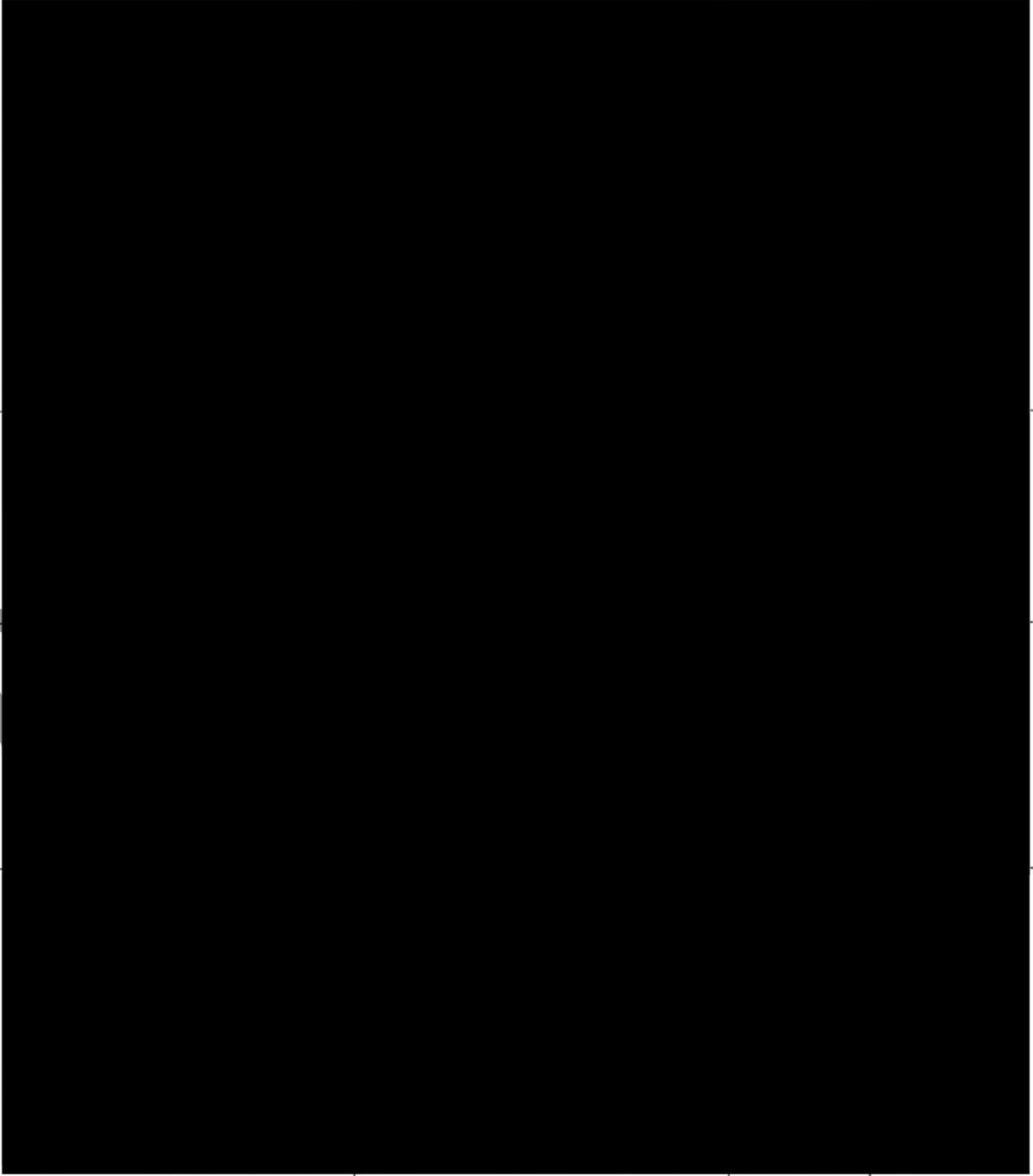### 7. Common or Integrated Program or Activity*

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.	
1. This initiative involves a program or activity that provides a service (or services);	No
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.	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

There is not a specific flow of personal information because the nature of each individual's use of the service will vary. Generally a file will be uploaded and a link will be provided to another individual that may or may not have a Sync.com account and they will be able to download the records using the link from the user's Sync.com repository. Management of personal information by UNBC employees on Sync.com will be subject to either a PIA for the corresponding initiative or through REB approval.

9. Risk Mitigation Table

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Risk Mitigation Table

	Risk	Mitigation Strategy	Likelihood	Impact
1.				
2.				
3.				
4.				

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10. Collection Notice

Not applicable to the use of the system but may be applicable to associated projects using this system if necessary.

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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 <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.

███

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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?**

    No personal information is to be stored in Sync.com without a completed PIA pertaining to the project or initiative handling the personal information or without REB approval for research. Anyone storing personal information without PIA or REB approval will be personally responsible for the management of that personal information. Project managers or researchers will be responsible for indicating in a PIA or REB who will correct personal information for associated projects. Sync.com does not provide the capacity for a third party to make this request.

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

    No personal information is to be stored in Sync.com without a completed PIA pertaining to the project or initiative handling the personal information or without REB approval for research. Anyone storing personal information without PIA or REB approval will be personally responsible for the management of that personal information. Project managers or researchers will be responsible for determining how the use of personal information will impact individuals involved in a project or initiative for administrative, operational or research purposes.

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.**

    Project managers or researchers will be responsible for determining this criteria in an associated PIA or REB application. Anyone storing personal information without PIA or REB approval will be personally responsible for the management of that personal information.

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?**

    Project managers or researchers will be responsible for determining this criteria in an associated PIA or REB applications. Sync.com Use Guidelines will indicate that Sync.com will not be a repository for records and that information will be migrated to UNBC servers or provided to third parties and then removed as soon as transferring the documents has completed. Records will not remain on Sync.com for more than a year.

Part 5 – Further Information

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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.	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.

No.

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

Part 6 – Information Governance Officer Comments

Use of Sync.com service will be subject to individuals being informed of the Use of Sync.com Guidelines that ITS and the Information Governance Officer will create. "Informed" employees will confirm they understand that Sync.com is not a records repository, use of the service to store personal information on behalf of UNBC can occur with approval from the Information Governance Officer or through the Research Ethics Board, and they are personally responsible for the use of the service if approval has not been provided. The Information Technology Services in collaboration with the Information Governance Officer will create, post, regularly review and update the Use of Sync.com Guidelines. These guidelines will regularly promote proper use of the program through announcements and will also be available on the UNBC website for employees to access when needed.

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Part 7 – Program Area Signatures

Glen Montgomery
_____

Jun. 28/17
Date

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

Greg Condon
_____

06/28/17
Date

**Program/Department Manager or
Project Sponsor**

FOR Dave Kubert
_____
ANNETTE DOYLE
Signature

28 June 2017
Date

**Contact Responsible for Systems
Maintenance and/or Security**
(if applicable)

Adam Cullum
_____

28 June 2017
Date

Information Governance Officer

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.

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