UNBC UNIVERSITY OF NORTHERN BRITISH COLUMBIA

Privacy Impact Assessment
Sync.com

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:	Annette Doyle		
Email:	Annette.Doyle@unbc.ca	Phone:	250 960 6324
Program Manager:	**Dave Kubert**		
Email:	Dave.Kubert@unbc.ca	Phone:	250 960 5651

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

1. **Description of the Initiative**

   Sync.com will provide a service that individuals affiliated with UNBC can use to conduct collaborative work as an alternative to collaborative cloud services like Dropbox and OneDrive which do not meet the residency requirements within the Freedom of Information and Protection of Privacy Act.

   An eligibility orientation and test will be used to ensure that Sync users understand their responsibility for managing information using this service.

2. **Scope of this PIA**

   All individuals with an affiliation to UNBC including but not limited to employees, students, and researchers or any combination of these categories that will be generating records for or in association with UNBC.

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3. **Related Privacy Impact Assessments**

N/A – This PIA will be referenced in future PIAs.

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

Information will vary from project to project but could include any information collected in completing the duties of any public body employee, or research information collected for research projects. Associated PIAs in the future will indicate in more detail which information will be part of a particular project.

Information for eligibility to use Sync will be name of individual.

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**

   One of Sync's selling features is that the information meets data residency requirements by holding their primary data centre in Toronto, Ontario with backup servers in Markham, Ontario.

   The eligibility list for sync users will be housed on UNBC servers.

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.	

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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);	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

This personal information flow table only covers acquiring access to the service and determining eligibility to provide access to the service. When additional PIAs for specific projects using Sync are done, steps will be indicated in those Personal Information Flow Tables.

Personal Information Flow Table			
	Description/Purpose	**Type**	**FIPPA Authority**
1.	*Potential Sync user requests UNBC Client Services help them set up a Sync account associated with UNBC with a brief description regarding the purpose. Client Services requires*	*Disclosure*	*33.2(c)*

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	the potential sync user to prove that a PIA or REB review for the initiative has been done before providing the set up unless only public information will be generated.		
2.	Potential Sync user is provided an orientation or orientation materials to review before that potential sync user can generate an account as a UNBC affiliate. Potential Sync User must complete a short test to qualify for use of sync as a UNBC affiliate.	Training for Security Purposes / Collection	26(c), 30
3.	Potential Sync user is listed as an eligible user for Sync services to determine if the user is able to officially use Sync for business or research purposes. This list is managed by Client Services.	Collection/Use	26(c), 32(a)
4.	Potential Sync user receives a recommendation from Client Services on whether a free or pro version of Sync will meet the operational needs and privacy requirements of the project. Client Services may ask the Information Governance Officer or the IT Security Analyst for assistance. The recommendation will highlight which Sync features the user will need to utilize for a project or regular operational use.	Collection	26(c)
5.	In cases where Sync Pro needs to be purchased, the potential Sync user sends the signed associated Privacy Impact Assessment or evidence of REB approval with their requisition to Purchasing. Client Services attaches a note indicating eligibility requirements have been met.	Disclosure	33.2(c)
6.	Potential Sync user signs up for the type of sync.com account corresponding with the recommendation and uses a UNBC email to sign up. Sync user uses Sync for consistent proposed purpose.	Use	33.2(c) and 32(a)

9. Risk Mitigation Table

Risk Mitigation Table			
Risk	**Mitigation Strategy**	**Likelihood**	**Impact**
1.			
2.			

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3.

4.

5.

10. Collection Notice

No collection/use/disclosure notice necessary for this system. Each project or proposed use for the system will/may generate conditions that need to be complied to if third party personal information is being used. Orientation of using Sync will be in place to ensure the sync account user understands how information is stored.

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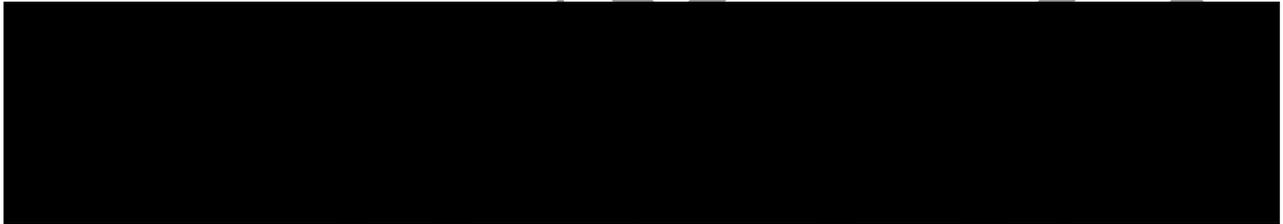
12. Please describe the <u>technical</u> security measures related to the initiative (if applicable).

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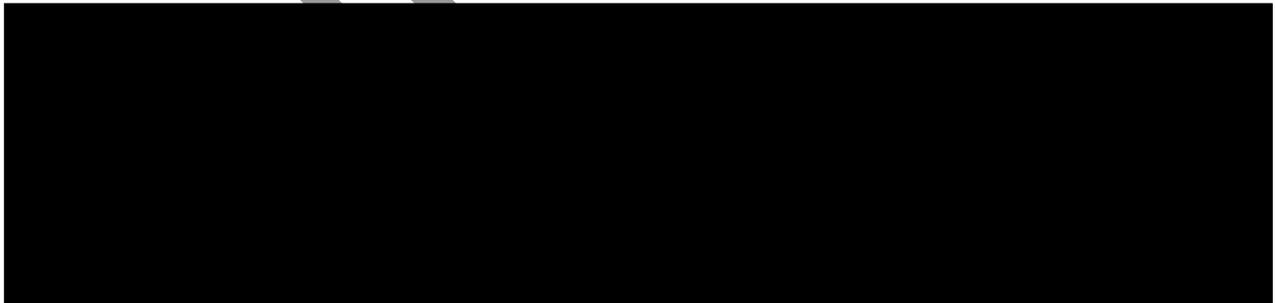
15. Please describe how you track who has access to the personal information.

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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?**

    Sync Account user will be responsible for managing the accuracy of the personal information that the user stores on Sync. Sync user will be provided with instructions on how and when to annotate information if a third party requests a correction.

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

    The use of Sync will determine whether these projects make decisions that impact individuals.

    The information collected during orientation and testing will determine if the user can use Sync officially for conducting business or research at UNBC.

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.**

    Sync account user will be responsible for communicating with individuals whose personal information is stored on Sync to ensure that information is accurate or complete. In all cases, a copy of the information will be stored on UNBC servers where the information can be accessed or copied for the individual to indicate where changes or additions need to be made.

    All assessment information to determine eligibility to use Sync will be provided directly from the potential user.

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?**

    Records retention schedules will be determined during associated PIAs. During the Sync orientation, individuals will be shown how to delete information.

    Eligibility lists will be reviewed annually to remove employees that no longer work for UNBC. As part of an employee's exit, the supervisor will be responsible for ensuring that the employee will

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not have access to department information stored on the Sync account. Outgoing employees will be encouraged to generate a personal Sync account that does not have any affiliation to UNBC.

Part 5 – Further Information

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

Determined by associated PIA.

> ***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.

Determined by associated PIA.

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

Determined by associated PIA. If there is the option to have the PIA stored on servers, then the Sync Account will not be able to be used for long term storage of the PIB.

Eligibility lists will not contain any details beyond a list of names indicating the users are eligible to use a Sync account.

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

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 for approval.

Sync's use as a recommended service to the UNBC community depends on proper training and the use of Sync as a temporary storage medium only unless individuals do not have access rights to UNBC's servers to store their information. Whether Sync is used for sharing information or long term storage, an associated PIA needs to be completed before UNBC approves the use of this cloud service for university business unless the information produced is exclusively public information.

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Part 7 – Program Area Signatures

Annette Doyle	[redacted]	12 July 2016
Name of Individual leading the Program/Project *(Normally the individual who completed the PIA)*	Signature	Date

~~Dave Kubert~~ GREG CONDON	[redacted]	12/07/16
Program/Department Manager or Project Sponsor	Signature	Date

N/A		
Contact Responsible for Systems Maintenance and/or Security *(if applicable)*	Signature	Date

Adam Cullum	[redacted]	12 July 2016
Information Governance 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