

# Privacy Impact Assessment

## TeejLab API Discovery

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

PIA#19-008 (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:	Office of Research		
PIA Drafter:	Mark Barnes, Director of Research		
Email:	mark.barnes@unbc.ca	Phone:	250-960-5184
Department Manager:	Geoff Payne, VP Research and Graduate Programs		
Email:	geoff.payne@unbc.ca	Phone:	250-960-6110

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

### 1. Description of the Initiative

*The TeejLab API Discovery software will assist researchers in gathering important data to facilitate research and development work. "API Discovery is a Software as a Service (SaaS) platform that offers a unique opportunity to researchers, developers and enterprises to reap the benefits of thousands of publicly available APIs in a seamless way. It allows users for exploring, testing and integrating internal APIs (developed by your own organization) as well as various external APIs (developed by other organizations that are available publicly on the Internet) without sacrificing the integrity, security and privacy of their data. API Discovery is the only platform that provides API Composition Analysis to discover security and compliance risks from APIs embedded in software."*  
<https://apidiscovery.com>

### 2. Scope of this PIA

*The use of API Discovery at UNBC. UNBC users will use the API Discovery platform to search and test various publicly available APIs for their research and professional development purposes. Once users*

*find suitable APIs, they can use those APIs to create applications and other artifacts independent of the API Discovery Platform.*

### 3. Related Privacy Impact Assessments

*n/a*

### 4. All Elements of Information or Data

*Names, email addresses, login tracking, search histories*

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**

*To instance of the API Discovery platform that UNBC team will access stores data on an AWS server in Montreal, QC (in AWS terminology it's known as Central Canada).*

**6. Data-linking Initiative\***

<p><b>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.</b></p>	
<p>1. Personal information from one database is linked or combined with personal information from another database;</p>	no
<p>2. The purpose for the linkage is different from those for which the personal information in each database was originally obtained or compiled;</p>	no
<p>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.</p>	no
<p><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></p>	N/A

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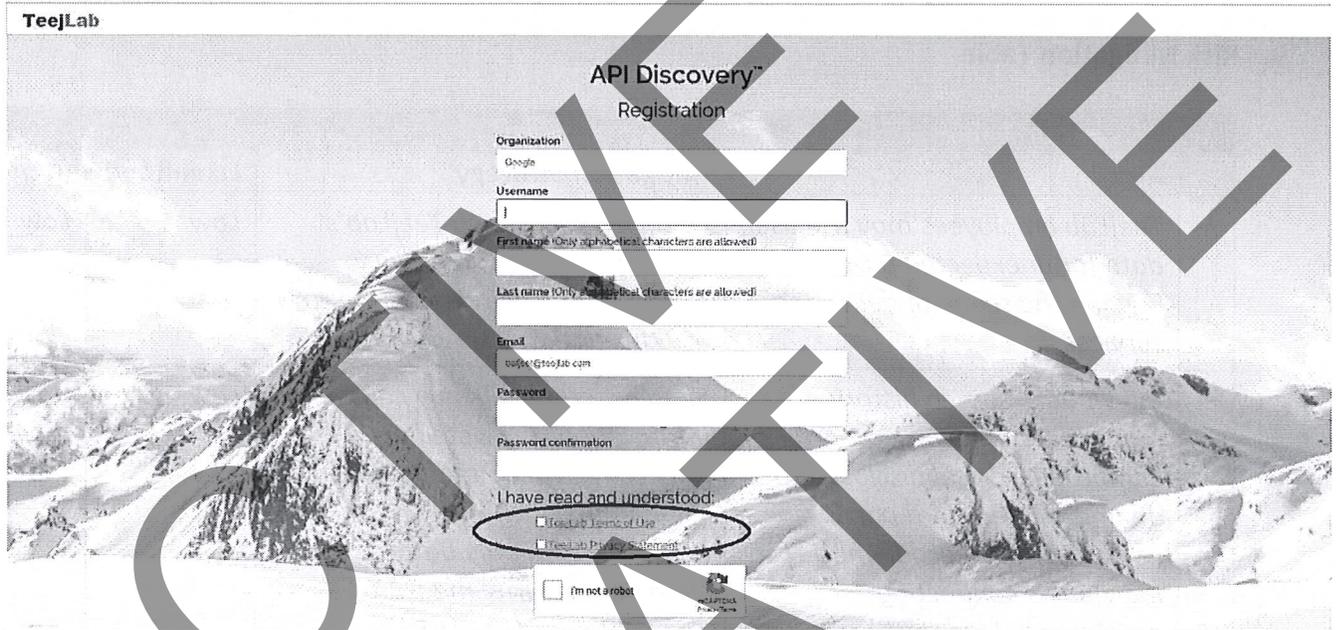
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### 7. Common or Integrated Program or Activity\*

<p>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.</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
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



Personal Information Flow Table			
	Description/Purpose	Type	FIPPA Authority
1.	With permission from the Director of Research, an individual registers to use TeejLab API Discovery service through limited license keys on apidiscovery.com registration page.	Collection	26(d) – Through Terms of Usage and Privacy Statement
2.	Once registered, the individual conducts queries and, through the APIs available, receive responsive information.	Use / Disclosure	32(b), 33.1(1)(b) -- Through Terms of Usage and Privacy Statement
3.	Each user's search queries and the APIs utilized to find responsive data is tracked as a search history for each individual user.	Use	32(b)

4.	UNBC Office of Research tracks and deletes user accounts as needed to manage available licenses.	Disposition	31
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### 9. Risk Mitigation Table

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

### 10. Collection Notice

Users can not complete the registration process (and hence access the system) without accepting TeejLab's Terms of Usage and Privacy Statements. The use of API Discovery is not required to continue as a student, employee, or researcher at UNBC.

### 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).**

[REDACTED]

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

[REDACTED]

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

[REDACTED]

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.

[REDACTED]

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

[REDACTED]

### 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?

*Each individual user has the option of updating their personal information.*

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

*There is no functionality built in the system to influence user behaviour or directly impact an individual.*

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.

N/A

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?

N/A

### 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.*

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.

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

### **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 only applies to the API Discovery service. The use of other initiatives, software or services provided by TeejLab will require a separate PIA.*

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### Part 7 – Program Area Signatures

Mark Barnes

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

[Redacted Signature]

Aug 29/19  
Date

Geoffrey Payne

Overseeing the Program/Project

[Redacted Signature]

Aug 29/19  
Date

N/A

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

Signature

Date

[Redacted Signature]

Adam Cullum

Information Governance Officer  
(Privacy Officer)

Signature

Aug 29/19  
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.