

### 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:	ITS Client Services		
PIA Drafter:	Clayton Hanson – Client Services Manager		
Email:	<a href="mailto:clayton.hanson@unbc.ca">clayton.hanson@unbc.ca</a>	Phone:	250-960-6467
Department Manager:	Greg Condon – CIO		
Email:	<a href="mailto:gcondon@unbc.ca">gcondon@unbc.ca</a>	Phone:	250-960-5289

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

### 1. Description of the Initiative

*This initiative is to deploy Microsoft Windows 10 in the UNBC computing environment.*

### 2. Scope of this PIA

*The scope of this project encompasses all departments in UNBC that employ computing technologies within their environment. All computers utilizing a Microsoft Windows environment will be upgraded to a Windows 10 PC during standard capital equipment replacement processes. Applications utilized within the Windows 10 environment are not in the scope of this PIA.*

### 3. Related Privacy Impact Assessments

N/A

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

*Windows 10 does not directly collect nor hold personal information. Through the use of supporting applications, (examples: spreadsheets, Word Documents) these applications may store personal information within them that may result in records containing personal information and their metadata being stored within the Windows 10 environment.*

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

*Windows 10 does not directly collect nor hold personal information (PI) although through the use of supporting applications, (examples: spreadsheets, Word Documents) these applications may store personal information (pi) within them that may result in them being stored within the Windows 10 environment. UNBC is customizing the delivery of the Windows 10 environment to restrict the operating system from sending identifiable personal information to Microsoft. Applications may send information outside of UNBC and need to be assessed separately.*

#### 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
<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>	N/A

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

<p>In FIPPA, “common or integrated program or activity” is strictly defined. (27.1.e)(33.2.d)(69.5.2)(69.5.4)(69.5.2)(76.2.h.1) 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);	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
<b>Please check this box if this program involves a common or integrated program or activity based on your answers to the three questions above.</b>	N/A

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### 8. Personal Information Flow Diagram and/or Personal Information Flow Table

	Data Input	Normal Operating System Procedure	Risk Mitigation Policy	Result
Operating System Application Data Collection	<p>UNBC Windows 10 User logs into system</p>	<p>Data is captured by Microsoft Applications</p>	<p>Microsoft Cloud Applications are blocked by Risk Mitigation Policy</p>	<p>No Personally Identifiable Data is forwarded to Microsoft Cloud Services</p>
Third Party Application Data Collection	<p>Personally Identified Data is collected</p>	<p>Application crashes due to Operating System Error</p>	<p>Operating System only transfers level 0 Telemetry to Microsoft</p>	<p>No Personally Identifiable Data is forwarded to Microsoft Cloud Services</p> <p>No Personally Identifiable Data is stored offsite</p>

### 9. Risk Mitigation Table

Risk Mitigation Table			
	Risk	Mitigation Strategy	Likelihood Impact
1.			
2.			
3.			
4.			
5.			
6.			
7.			

### 10. Collection Notice

*There is no collection of personal information from identifiable individuals taking place as a direct result of using the Windows 10 environment. PIAs utilizing the collection of personal information will address collection notices for Microsoft and third party applications utilized within the Windows 10 environment.*

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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 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?

N/A

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

*The operating system itself does not collect or use personal information that could be used*

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.

N/A

*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.

N/A

*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.

N/A

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.*

*If any future changes to the base configuration or options of configuring the Windows 10 environment, a PIA update will be made to address these changes. ITS will review how Windows 10 manages information every six months to watch for development updates that could alter UNBC's ability to control the configuration of Windows 10.*

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### Part 7 - Program Area Signatures

*David Sivertsen*

~~Clayton Hanson~~

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

[Redacted Signature]

*July 9<sup>th</sup>, 2018*

Date

*Clayton Hanson*

~~Greg Condon~~

Director or Dean Overseeing the Program/Project

[Redacted Signature]

Signature

*July 09, 2018*

Date

*Greg Condon*

~~Dave Kubert~~

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

[Redacted Signature]

Signature

*07/10/18*

Date

Adam Cullum

Information Governance Officer (Privacy Officer)

[Redacted Signature]

Signature

*July 9/2018*

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.

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