



# Privacy Impact Assessment

## Bookware Bookstore Management Solution

### Part 1 – General

Name of Department/Branch:	Vancouver Community College Bookstore		
PIA Drafter:	Norman Chang		
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*In the following questions, delete the descriptive text and replace it with your own.*

#### 1. Description of the Initiative

The VCC Bookstore is owned and operated by the Vancouver Community College Commercial Services Division. Each Campus has a store front: VCC Broadway and VCC Downtown Campus. VCC Bookstore provides course materials, merchandise, technology products, stationery, special orders, e-commerce, convenience products and services. The annual sales through the bookstores are about \$2,500,000. VCC Bookstore currently uses Booklog and Herkermedia. VCC is looking to replace the current systems with a modern, fully integrated cloud based software and hardware solution that provides real time inventory, superior customer service experience and is robust enough to meet future expansion needs.

Through the RFP process, “Bookware” has been selected as the replacement candidate. The implementation will encompass inventory management, point of sale and e-commerce as well as backend integration.

#### 2. Scope of this PIA

This PIA encompasses the whole of the Bookware platform: inventory management, point of sale and e-commerce.

*3rd hosting service is outside the scope of this PIA.*

*Elluician Banner is outside the scope of this PIA.*

*Active Directory (AD) is outside the scope of this PIA.*



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### 3. Related Privacy Impact Assessments

We are unaware of any PIA associated with Bookware through BCNet.

### 4. Elements of Information or Data

Data may include: name, address, phone number, school email address, personal email address, single sign on identifier, items purchased, method of payment (method only – no card holder data), IP address, web browser, student number, sponsor information, sponsorship amounts, and/or faculty number.

Customer/Student data:

What information is collected?	How is it used?
Information that Customers submit about themselves: <ul style="list-style-type: none"><li>• Name</li><li>• Address</li><li>• Phone number</li><li>• Email address</li><li>• Single Sign On unique identifier</li></ul>	This information is collected by the Merchant to complete and deliver a Customer order and communicate regarding an order.
Order History: <ul style="list-style-type: none"><li>• Items purchased</li><li>• Method of payment (no sensitive card holder data is transmitted, processed or stored at any time)</li></ul>	This information is retained in order to provide Customer service.
Usage Data, including: <ul style="list-style-type: none"><li>• IP address</li><li>• Web browser</li><li>• Other data submitted automatically by the Customer's web browser</li></ul>	Logs of when Our Software is used by a Customer are collected to meet legal and compliance requirements and are used to improve Our Software.



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### Merchant data:

What is collected?	How is it used?
Information that the Merchant collects about Customers: <ul style="list-style-type: none"> <li>• Name</li> <li>• Address</li> <li>• Phone number</li> <li>• Email address</li> <li>• Single Sign On unique identifier</li> </ul>	This information is collected by the Merchant to complete and deliver Customer orders and communicate regarding orders.
Order History: <ul style="list-style-type: none"> <li>• Items purchased</li> <li>• Method of payment (no sensitive card holder data is transmitted, processed or stored at any time)</li> </ul>	This information is retained in order to provide Customer service.
Usage Data, including: <ul style="list-style-type: none"> <li>• IP address</li> <li>• Web browser</li> <li>• Other data submitted automatically by the Customer's web browser</li> </ul>	Logs of when Our Software is used by a Customer are collected to meet legal and compliance requirements and are used to improve Our Software.
Information that the Merchant collects about Customers who are Sponsored Students: <ul style="list-style-type: none"> <li>• Student number</li> <li>• Name</li> <li>• Address</li> <li>• Phone number</li> <li>• Email address</li> <li>• Single Sign On unique identifier</li> <li>• Sponsor</li> <li>• Sponsorship amounts</li> </ul>	Student numbers are collected by some Merchants to provide the ability to bill a third party who sponsors a student.
Information that the Merchant collects about their Vendors: <ul style="list-style-type: none"> <li>• Vendor name</li> <li>• Contact name</li> <li>• Address</li> <li>• Phone number</li> <li>• Fax number</li> <li>• Email address</li> <li>• Web address</li> </ul>	This information is collected by the Merchant to enable the Merchant to place purchase orders and communicate with the Vendor.
Information that the Merchant collect about their Users, including faculty and staff: <ul style="list-style-type: none"> <li>• Name</li> <li>• Address</li> <li>• Phone number</li> <li>• Email address</li> <li>• Single Sign On unique identifier</li> </ul>	This information is collected by the Merchant to add functionality to Our Software such as delivering scheduled reports.  This information is also stored to identify who is accessing Our Software to meet legal and compliance requirements.



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Partner and Integrations data:

What information is received?	How is it used?
Non-Sensitive Card Holder Information such as: <ul style="list-style-type: none"><li>• Name</li><li>• Masked card number</li><li>• Address verification.</li></ul>	This information is collected by Our Software for fraud prevention, legal, and compliance requirements.
Identity information: <ul style="list-style-type: none"><li>• Name</li><li>• Email address</li><li>• Single Sign On unique identifier</li><li>• Student number</li><li>• Faculty number</li></ul>	This information is collected to identify and correlate an individual to specific courses.

Visitor data:

What is collected?	How is it used?
Information that Visitors submit about themselves: <ul style="list-style-type: none"><li>• Name</li><li>• Address</li><li>• Phone number</li><li>• Email address</li></ul>	This information is collected by Carleton Technologies to complete a sales or support request submitted by the Visitor. It is also used to communicate with the Visitor regarding Our Software.
Usage Data, including: <ul style="list-style-type: none"><li>• IP address</li><li>• Web browser</li><li>• Other data submitted automatically by the Visitor's web browser</li></ul>	Logs of when Our Software is used by a Visitor are collected to meet legal and compliance requirements and are used to improve Our Software.



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### Part 2 – Protection of Personal Information

#### 5. Storage or Access outside Canada

All data is stored in Ottawa, Ontario, Canada; the service provider Carleton Technologies (CTI) operates within Canada at all times.

As a Canadian company, CTI's products and services are in compliance with the Personal Information Protection and Electronic Documents Act (PIPEDA) and the various Freedom of Information and Protection of Privacy Acts (FOIPPA) which apply in each province and territory.

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

In FOIPPA, "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;	yes
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 your privacy office(r) to discuss the requirements of a data-linking initiative.</b>	



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

In FOIPPA, “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
<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>	



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

Bookware System  
Personal Information Flow Diagram

s. 15(1)(l)



Personal Information Flow Table			
	Description/Purpose	Type	FOIPPA Authority
A	• Name • Address • Phone number • Email address	Collection, storage, use	26(c), 32(b)
B	• Name • Address • Phone number • Email address • Single	Storage, use	26(c), 32(b)



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	sign on unique identifier • Student number • Sponsor • Sponsorship amount		
<b>C</b>	• Name • Address • Phone number • Email address • Student number • Sponsor • Sponsorship amount	Collection	26(c)
<b>D</b>	• Name • Address • Phone number • Email address • Single sign on unique identifier	Collection	26(c)
<b>E</b>	• Name • Address • Phone number • Email address • Single sign on unique identifier • Student number • Sponsor • Sponsorship amount	Storage, use	26(c), 32(b)
<b>F</b>	• Name • Address • Phone number • Email address • Single sign on unique identifier	Storage	26(c)
<b>H</b>	• Bookstore staff single sign on unique identifier	Use	32(b)
<b>I</b>	• Student and Faculty single sign on unique identifier • List of courses associated with a student	Use	32(b)
<b>J</b>	• Faculty single sign on unique identifier • Name • Email address • Courses they are teaching	Use	32(b)
<b>K</b>	• Email address (optional)	Collection, use	26(c)
<b>M</b>	• Name • Email address • Address • Phone number	Use, disclosure	33.1(1)(i), 33.1(1)(i.1) and 32(a)
<b>N</b>	• Name • Address • Phone number • Email address • Single sign on unique identifier • Student number • Sponsor • Sponsorship amount	Use, disclosure	33.1(1)(i), 33.1(1)(i.1) and 32(a)
	Documents sent by email and the PI contained in them: <ul style="list-style-type: none"> <li>• Order Confirmation - name, email address, optionally address and phone number</li> <li>• Access to Digital Product - name, email address</li> <li>• Order Shipment Notification - name, email address</li> <li>• Order Pickup Notification - name, email address</li> <li>• Faculty Course Material Adoption Confirmation - name, email address</li> <li>• POS receipts - name, email address (containing no financial/PCI information).</li> <li>• Customer Quotes and Orders - name, email address,</li> </ul>	Disclosure	33.1(1)(i), 33.1(1)(i.1) and 32(a)



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<p>optionally address and phone number.</p> <ul style="list-style-type: none"> <li>• Application Reports - The Bookware Report Scheduler can email any report. Depending on the report, it could contain any information listed in N. Access to the Report Scheduler is role-based. By default, the Report Scheduler will send reports only to the originating user and cannot send to other email addresses.</li> </ul>		
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### 9. Risk Mitigation Table

Risk Mitigation Table				
	Risk	Mitigation Strategy	Likelihood	Impact
1.	<i>Employees could access personal information and use or disclose it for personal purposes</i>	<i>Staff and contract instructors bound by employee/contractor agreement; staff bound by Standards of Conduct</i>	<i>Low</i>	<i>Moderate</i>
2.	<i>Request may not actually be from client (i.e. their email address may be compromised)</i>	<i>Implementation of identification verification procedures</i>	<i>Low</i>	<i>High</i>
3.	<i>Client's personal information is compromised when transferred to the service provider</i>	<i>Transmission is encrypted and over a secure line</i>	<i>Low</i>	<i>High</i>
4.	<i>Inherent risks in sending personal information to a client via email</i>	<i>Policy developed to inform clients of risk and ask if they would like the information via a different medium, such as through the mail</i>	<i>Medium</i>	<i>Medium</i>

### 10. Collection Notice

*If your initiative is collecting personal information directly from individuals you must ensure that all individuals involved are told the following:*

- 1. The purpose for which the information is being collected*
- 2. The legal authority for collecting it, and*
- 3. The title, business address and business telephone number of an officer or employee who can answer questions about the collection.*



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VCC privacy page link is added to the footer on every page of the website:

<https://www.vcc.ca/about/college-information/privacy-policy/>

Within the above policy, a summary of the approach has been provided with link to disclaimer as well as contact information (#3).

In addition, new students will necessarily be required to review and confirm their preferences with regard to subsequent marketing communications from VCC, and are provided with a link to our privacy policy as part of their initial account creation (see screenshot below). They are able to review this policy and make changes to their communication preferences at any time within the Student Portal > My Profile > Privacy.

**Privacy**

May we contact you about courses that we think may interest you? \*

Choosing "Yes" will provide you the latest information on course and program offerings. Your information will not be shared. [Privacy & Policy Information is available here.](#)

Yes, by any method

Yes, but only by the following methods (please check the methods that we may use to contact you)

Email

Mail

No, please do not contact me

More detail information is included under the information disclaimer section:

<https://www.vcc.ca/about/college-information/disclaimer/>

### **Under What Authorization We Collect (#2)**

We collect personal information from you as authorized by the College and Institute Act. The personal information we collect is necessary to:

- obtain a personal education number (PEN) for the student
- carry out institutional responsibilities related to operating program or activity
- prepare and submit budgets, financial statements, reports and other information that the minister considers necessary to carry out the minister's responsibilities in relation to institutions
- conduct institutional research and statistical analysis



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*The Freedom of Information and Protection of Privacy Act has directed that we provide you with this background. You may be assured that we will take all reasonable measures to ensure that your information is treated in a confidential manner.*

### **Why We Collect (#1)**

*We collect personal information:*

- *For the purpose of sending you official correspondence related to your education at VCC, communicating with you in an instructional capacity, and gathering essential information for operating purposes.*
- *For the purpose of providing students with the opportunity to participate in former student outcome surveys. The results of these surveys are used to improve the quality and effectiveness of instruction and services that we provide.*

*The Ministry uses this information in order to monitor institutional progress and comply with government stated objectives.*

*To conduct institutional research on education policy issues, such as quality of education, student satisfaction, ease of transfers, student access, future student needs, evaluate training needs for a variety of population groups such as insert students, transfer students, first nations students, international student etc.*

## **Part 3 – Security of Personal Information**

***If this PIA involves an information system, or if it is otherwise deemed necessary to do so, please consult with the Privacy Officer, CIO or IT Security Officer when filling out this section..***

### **11. Please describe the physical security measures related to the initiative (if applicable).**

CTI's primary data center is located in Ottawa, Ontario, Canada. All data is stored in Canada at all times. The data centre has two stage, two factor authentication to access the server room. The physical security of the facility is monitored 24hrs/day, 7days/week; additional CCTV security cameras monitor the interior of the facility 24hrs/day, 7days/week. The data center is temperature and humidity controlled.



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The data center has 2N power redundancy, 2N redundant uninterruptible power supply (UPS) systems, high capacity continuous dual-fuel generators with fuel for a minimum of 24 hours of operation, and 24hrs/day, 7days/week power monitoring. The data center has multiple Internet connections through multiple providers over multiple routes with real time failover and 24hrs/day, 7days/week network monitoring.

The data center has 2N+1 Server Redundancy. All servers have complete redundant components (RAID-1 disks, dual network, dual power supplies) and are clustered with a duplicate hot stand-by system. This enables zero downtime hardware maintenance as systems can be moved between nodes at all times. All data is stored encrypted at rest and is monitored 24hrs/day, 7days/week.

Offsite backup is continually maintained, a 4 week rolling consistent backup is maintained for all systems. All backups are transmitted using strong encryption and are stored encrypted at rest. All backup systems have redundant hardware (RAID-10 drives, power supply, network) and are monitored 24hrs/day, 7days/week.

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

Please see the service provider's PCI-DSS SAQ-D.



2-3-8-2 Carleton  
Technologies AOC-5

### 13. Does your branch/department rely on any security policies?

VCC IT Security Policies:

*Information Technology General Policy (B.5.1, B.5.2, B.5.4, B.5.5)*

<https://www.vcc.ca/about/governance--policies/policies/administration-policies/>

*Other IT Policies:*



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*IT Administrative Rights Application and Policy*

<https://employee.vcc.ca/media/myvcc/content-assets/documents/departments/information-technology/forms/it-Administrative-Rights-Policy.pdf>

*Vulnerability Management*

<https://employee.vcc.ca/media/myvcc/content-assets/documents/departments/information-technology/other/Vulnerability-Management-IT-Standard.pdf>

### Bookware Security Policies:

*Protecting personal information is Carleton Technologies' highest priority. To ensure that personal information is protected, Carleton Technologies follows industry best practices and maintains PCI-DSS compliance in regards to credit card data. All data collected by Bookware Software is owned by the Merchant. Carleton Technologies does not share data with any party other than the Merchant who owns the data unless legally required to by an enforceable court order, subpoena, or search warrant. Carleton Technologies will notify the Merchant before disclosing information unless Carleton Technologies is legally prohibited from doing so.*

*CTI acknowledges that VCC's data and information is the property of VCC.*

#### *Permitted Use*

*CTI shall use the Information for the purposes of providing VCC with the application and shall not collect, use, retain or disclose Personal Information except as reasonably necessary to give effect to its duties and obligations under the Agreement or this Undertaking. CTI is prohibited from using the Information for any secondary purposes, including, without limitation, marketing purposes.*

#### *Confidentiality Obligations*

*CTI shall treat the Information as confidential and not disclose the Information to any third party, including a subcontractor, without the prior written consent of VCC. CTI shall only reveal the Information to those involved in providing VCC with the application on a need to know basis, and shall ensure that any individuals who have access to the Information are bound by CTI's obligations under this Undertaking.*

#### *Security Requirements*



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*CTI shall implement organizational security measures to restrict access to and prevent improper access, modification, collection, use, retention, disclosure or disposal of the Information by any of its employees, agents, representative and advisors, or any third party.*

### *Compliance with Laws*

*CTI shall comply with all applicable privacy legislation including but not limited to PIPEDA and FIPPA. CTI shall refer any third party who requests access to Information to VCC and CTI agrees that all responses to such requests for access to Personal Information are to be handled by VCC, unless prohibited by law, and CTI shall provide all reasonable assistance to VCC to facilitate its handling of such requests.*

*More details can be found in the attached document.*



3-8-1 Privacy  
Policy.pdf

#### **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.**

Bookware requires users to log in with a password. Access is controlled on a user/role basis; including access to/editing of/deleting of personal information. Bookstore staff access is managed by a permissions library and uses standard access control methods for every object in the system. The ability to view, create, modify and delete is all controlled at the user level with role-based permissions framework. Bookstore staff assigned administrative rights set staff access based on their business processes.

Bookware supports centralized identification for user login which prevents users from sharing their credentials. With Bookware's role-based access control, a clear separation of duties can be defined to prevent unauthorized access to modules outside of a user's duties.

Each program to which a user has access also has controls in place to limit data access based on role-specific settings. This layering of security and controls fine tunes the data access available for each user.

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

All changes to information are logged in the database with user ID. Bookware records a full audit of all actions which occur at BookwarePOS, including every transaction, every void and any time



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the "No Sale" button is used to open the cash drawer. This information is accessible in real-time in the back-office POS Inquiry.

As per PCI requirements, all access would be logged and include file integrity monitoring.

### **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?**

Users have the ability to update their personal information via their Bookware account. Order information corrections would be made through the Bookstore staff

Personal information is not shared outside of Vancouver Community College.

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

No.

- 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.**



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No

*Please check this box if the related Information Sharing Agreement (ISA) is attached. If you require assistance completing an ISA, please contact your privacy office(r).*

**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 your privacy office(r).*

**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 FOIPPA. Under this same section, this information is required**

A personal information bank of customer information will be created in Bookware. VCC is able to provide the descriptors required as part of this initiative.

*As per section 69 (6) of FOIPPA:*

*(6) The head of a public body that is not a ministry must make available for inspection and copying by the public a directory that lists the public body's personal information banks and includes the following information with respect to each personal information bank:*

- (a) its title and location;*
- (b) a description of the kind of personal information and the categories of individuals whose personal information is included;*
- (c) the authority for collecting the personal information;*
- (d) the purposes for which the personal information was obtained or compiled and the purposes for which it is used or disclosed;*
- (e) the categories of persons who use the personal information or to whom it is disclosed;*



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Refer to question 4 for data descriptors.

### **Part 6 – Privacy Office(r) Comments**

*This PIA is based on a review of the material provided to the Privacy Office(r) 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*



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### Part 7 - Program Area Signatures

_____ Director Commercial Services	_____ Signature	_____ Date
_____ Chief Information Officer or Privacy Officer	_____ Signature	_____ Date
_____ Associate Director IT	_____ Signature	_____ Date