



Privacy Impact Assessment

Modern Campus Destiny One

Part 1 – General

Name of Department:	VCC Continuing Studies		
PIA Document #	20210621D		
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In the following questions, delete the descriptive text and replace it with your own.

1. Description of the Initiative

The systems currently utilized for Continuing Studies (CS) registration, marketing CMS and web site are unable to meet the needs of CS. As a replacement, CS has determined that Destiny One provides an integrated solution that meets their needs.

Destiny One is a hosted software application utilizing Amazon Web Services (AWS) located in Montreal, Canada. As per the Destiny One web site:

“Destiny One, is customer lifecycle management software for higher education administrators serving non-traditional students. It integrates with main-campus systems, engages students with Amazon-like experience, optimizes staff efficiency, and provides business intelligence empowering data-driven decisions. It allows schools to unite, understand, and control all aspects of their business at once.

Destiny One manages the entire learner lifecycle:

Curriculum: Plan and manage courses, certificates and programs

Enrollment: Increase registrations by engaging learners and automating the enrollment process

Marketing: Target marketing campaigns and define consistent branding

Reporting: Leverage dashboards and reports to make business-intelligent decisions

Finance: Govern accounting transactions and manage financial information

System Administration: Configure workflows, staff roles and permissions, and business rules and fees”



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Destiny One will become an integral part of the VCC CS registration experience, integrated with the college's web site (www.vcc.ca) and Enterprise Resource Planning (Ellucian Banner). Existing integrations between these 2 systems will not be affected.

2. Scope of this PIA

This PIA covers the use of the hosted software application (Destiny One), authentication with Active Directory, link to the VCC web site, integration with credit card payment processor, the batch Finance file, and one-time historical data migration.

AWS as a hosting service is outside the scope of this PIA.

Ellucian Banner is outside the scope of this PIA.

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

Badging software solution is outside the scope of this PIA.

3. Related Privacy Impact Assessments

We are unaware of any PIA associated with Destiny One. The use of AWS is covered by the BCNET PIA.



2017 BCNET AWS
PIA.doc

4. All Elements of Information or Data

The elements of information or data utilized varies based on the integration of service.

Student interaction with Destiny One:

- *Student name (first and last)*
- *Student contact information (address, email address, telephone number)*
- *Student birthdate*
- *Student gender*



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-
- *Student grades associated with completed courses, if applicable*
 - *Account payment details*
 - *Username (X#) and password for Destiny One*
 - *Student and/or CS staff have the ability to set up a student accounts on behalf of a student*

CS staff interaction with Destiny One:

- *CS staff information, including:*
 - *Name (first and last)*
 - *VCC email address*
 - *Administrative access based on assigned roles*
- *Instructor information, including:*
 - *Name (first and last)*
 - *Contact information (address, email address, telephone number)*
 - *Contract details (payment terms, course taught, etc.)*

Destiny interaction with VCC:

- *Authentication:*

There are three authentication paths with this project.

- *Students can authenticate with Destiny One directly using Destiny's native authentication, signing in with a unique Destiny One generated username and password (student creates password when they create their Destiny One account) BEFORE the VCC active directory is being provisioned. The creation process can take up to 24 hours.*
- *After the creation of the VCC active directory account, email notification with instructions will be sent to individual student. The native Destiny One authentication will then be disabled. Students will need to use their assigned AD accounts for any future login within Destiny One.*



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- *CS staff and trainers authenticate via VCC's instance of Active Directory. A user authenticates with his or her organizational credentials, and the organization (or identity provider) passes the minimal identity information necessary to the service provider to enable an authorization decision.*
- *Destiny One sends several export files, which includes name, personal information, and course/section to VCC. VCC uses this information to create an Active Directory account for the student as well as updating Banner. This VCC account allows students to authenticate using Active Directory when accessing VCC-related resources.*

Destiny One interaction with VCC website:

- *VCC is employing an out-of-the-box implementation of the Destiny One software to power the VCC Continuing Studies website (continuingstudies.vcc.ca). In this solution, all dynamic pages (including curriculum catalog, browse, search, applications, inquiries, news stories / events, etc.) as well as the Checkout Process take place on secure, hosted servers managed by Modern Campus.*

By default, Destiny One offers the Destiny One Public View. Destiny One offers over 150+ public view tiles and pages that can be leveraged out of the box. In this model, Destiny One's Public View powers all dynamic pages (including curriculum catalog, browse, search, applications, inquiries, news stories / events, etc.) as well as the Checkout Process.

Here is the standard implementation from Destiny One:

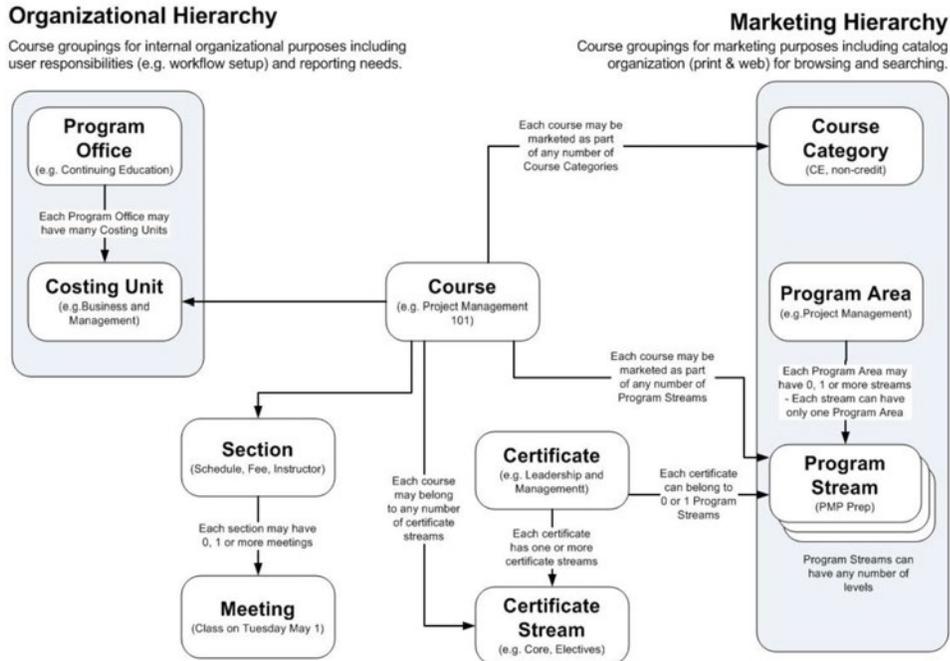


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Destiny Solutions Inc.

Destiny One Organizational and Marketing Hierarchy



Destiny One integration with payment processor (Moneris):

- *Destiny One will utilize Moneris for the credit card payment processing. Students will provide credit card and any necessary payment information details directly to Moneris. Moneris is Payment Card Industry Data Security Standards certified as a payment service provider.*

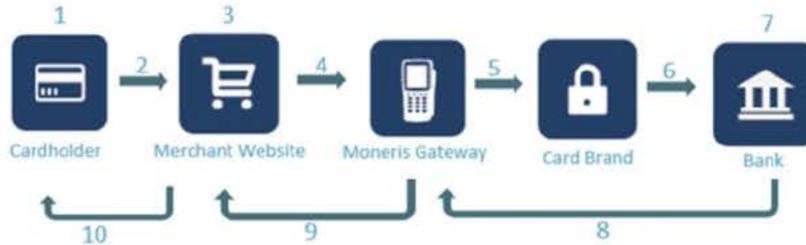
Moneris API is being utilized to integrate Destiny One and Moneris payment gateway. The real-time API allows Destiny One to provide a seamless checkout experience plus a number of advance security measures and validations. Transaction results are submitted back within seconds allowing Destiny One to update accounting and registration records, as well as allowing Destiny one to make real-time decisions on whether or not to proceed with the sale.

Here is the standard payment data flow:

<https://developer.moneris.com/en/Documentation/NA/E-Commerce%20Solutions/API>

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- *Cardholder visits website, selects items and checks out.*
- *Cardholder selects a method of payment.*
- *Cardholder enters payment information and clicks submit.*
- *Merchant's website will post cardholder details to the Moneris Gateway.*
- *Cardholder details are sent through the Moneris gateway to the card associations for authorization*
- *The message will travel through MasterCard or Visa's data processing networks. The card number and expiry date is sent through the corresponding network to the cardholder's issuing bank.*
- *The cardholder's bank reviews the authorization request and sends the authorization response.*
- *Moneris (Moneris Gateway) returns the response to the merchant to display the final receipt.*
- *Merchant will be required to generate a cardholder receipt in accordance with the guidelines provided on this site.*
- *Cardholder receives confirmation of order through merchant's website.*

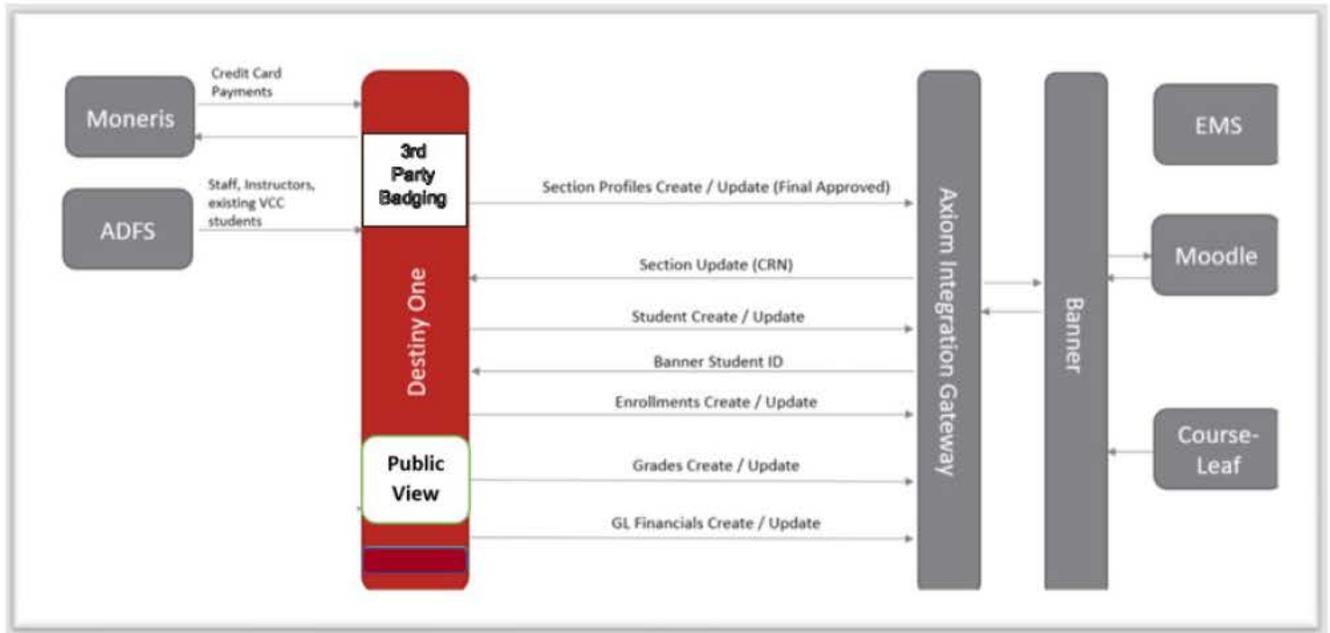
Destiny one interaction with Banner Ellucian:

- *Banner is considered as system of record. Several integrations have been built to support data exchange between Banner Ellucian and Destiny One. All integrations are scheduled to run multiple times a day with validation check and exception reports.*



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Historical data migration:

Full enrolment history for students currently progressing towards a credential in Continuing Studies.

If personal information is involved in your initiative, please continue to the next page to complete your PIA.



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Part 2 – Protection of Personal Information

5. Storage or Access outside Canada

Data for this initiative will only be stored and accessed in Canada. Destiny One is a Canadian company utilizing the Canadian AWS cloud hosting service to supply its service.

Access to the data in this initiative by Destiny One is restricted to their hosting operations team (3 staff), all of whom have also undergone background checks and reside in Canada. Any other access of customer data (i.e. for support purposes) used obfuscated data whereby personally identifiable information has been removed.

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



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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
Please check this box if this program involves a common or integrated program or activity based on your answers to the three questions above.	



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

s. 15(1)(l)



Personal Information Flow Table			
	Description/Purpose	Type	FOIPPA Authority
1.	<i>New student accesses Destiny One web site to create account and register for course(s)</i>	<i>Collection</i>	<i>26(c)</i>



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2.	<i>Existing student accesses Destiny One web site using VCC student number and password</i>	<i>Use</i>	<i>32(b)</i>
3.	<i>VCC CS staff create staff/instructor accounts</i>	<i>Collection & Use</i>	<i>26(c) and 32(a)</i>
4.	<i>Financial and Personal information exported from Destiny One to Ellucian Banner through a secure integration data exchange.</i>	<i>Disclosure & Use</i>	<i>33.1(1)(i), 33.1(1)(i.1) and 32(a)</i>
5	<i>CS information sent to 3rd party digital badging software for digital badge and credential.</i>	<i>Disclosure & Use</i>	<i>33.1(1)(i), 33.1(1)(i.1) and 32(a)</i>
6	<i>Payment information sent to Moneris for processing</i>	<i>Disclosure & Use</i>	<i>33.1(1)(i), 33.1(1)(i.1) and 32(a)</i>

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>Student information request may not actually be from student (i.e. their Destiny One account may be compromised)</i>	<i>Students are instructed not to share account login information; students can update passwords if they believe they have been compromised</i>	<i>Low</i>	<i>High</i>
3.	<i>Student's credit card information is hacked</i>	<i>Moneris is PCI DSS payment provider certified</i>	<i>Low</i>	<i>High</i>
4	<i>Axiom integration server is compromised</i>	<i>This server will be located behind VCC firewall and protect with standard VCC security practices</i>	<i>Low</i>	<i>High</i>



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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.*

Please include your proposed wording for a collection & consent notice and where it will be located for individuals to read before collection takes place. You can also attach a screen shot or a copy of your form where the collection notice would be located.

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



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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*

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.



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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).

Destiny One application is hosted at the secure Amazon Web Services data centre in Montreal. AWS physical access security is stated in the details under this page:

<https://aws.amazon.com/compliance/data-center/controls/>

EMPLOYEE DATA CENTER ACCESS

AWS provides physical data center access only to approved employees. All employees who need data center access must first apply for access and provide a valid business justification. These requests are granted based on the principle of least privilege, where requests must specify to which layer of the data center the individual needs access and are time-bound. Requests are reviewed and approved by authorized personnel, and access is revoked after the requested time expires. Once granted admittance, individuals are restricted to areas specified in their permissions.

THIRD-PARTY DATA CENTER ACCESS

Third-party access is requested by approved AWS employees, who must apply for third-party access and provide a valid business justification. These requests are granted based on the principle of least privilege, where requests must specify to which layer of the data center the individual needs access, and are time-bound. These requests are approved by authorized personnel, and access is revoked after request time expires. Once granted admittance, individuals are restricted to areas specified in their permissions. Anyone granted visitor badge access must present identification when arriving on site and are signed in and escorted by authorized staff.



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

Information on technical security measures provided by AWS can be found at: <https://aws.amazon.com/compliance/data-center/controls/> otherwise, the remainder of this section focuses on Destiny One. As per the Destiny One Services Agreement:

Service Level Monitoring: Destiny will utilize appropriate measurement and monitoring tools and procedures necessary to measure its performance of the Support Services and compare such performance to that required by the service levels.

Redundant Systems: s. 15(1)(f)

[Redacted content]

Backup: Destiny performs bi-weekly full database backups (26 week retention) and daily incremental backups (28 day retention). All database backups are encrypted. s. 15(1)(f)

[Redacted content]

System Access: Destiny does not give Customers direct access to the production database for security and data protection purposes. s. 15(1)(f)

[Redacted content]

Disaster Recovery: Destiny is hosted on a fully redundant infrastructure that ensures that the Destiny One application will operate under normal circumstances with minimal or no downtime in the case of specific, individual component hardware failure. Automated messaging is in place and designed to alert Destiny staff of any potential service degradation.

s. 15(1)(f)

[Redacted content]

To reduce or eliminate the downtime that may occur as a result of a catastrophic failure of the hosting environment (core network services, loss of data center), Destiny maintains a mirror image of the latest production application installation in a cold backup (for more clarity, the environment is mirrored but not accessible except in the event that a disaster recovery event has occurred or is to be tested) in a separate physical data center geographically removed from the production installation. This mirror image is updated each time the Destiny One production application environment is updated. In addition, all encrypted database backup copies are stored on a file server in this same geographically unique data center.



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A detailed Disaster Recovery Planning Checklist is developed collaboratively between the Customer and Destiny Solutions prior to a production go-live to ensure that roles and responsibilities of both organizations are understood.

s. 15(1)(l)

Access to the System is through a secure connection over the public Internet. Destiny One also performs regular SaaS security audit to ensure its internal controls are effective through 3rd party. The goal is to provide reasonable assurance that Destiny One Solutions' service commitments and system requirements were achieved based on the trust services criteria relevant to security and confidentiality set forth in TSP 100, 2017 Trust Services Criteria for Security, Availability, Processing Integrity, confidentiality, and Privacy.



Destiny Solutions
SOC 2 Type 2 Final F

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

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:

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>



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Destiny IT Security Policies:

<https://www.youtube.com/watch?v=VsKUZppWUMs>

As per the Destiny One video noted above: Destiny One is a PA DSS and PCI DSS service provider level 2 certified. These are the most stringent security standards in the industry for personal information protection and e-commerce transactions. Destiny One undergoes regular third-party auditing and recertification, as such, strong security authentication and confidentiality controls are built into the software (see Item 12). Software is developed following secure software development lifecycle; the security of the software application is taken into account at the inception of every development activity and remains in the forefront through deployment including defensive programming techniques, OWASP top-10, intrusion analysis and other security best practices.

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.

As per PCI requirements, roles-based access is required for Destiny One staff systems access. Destiny One does not give Customers direct access to the production database for security and data protection purposes. Access to Customer data without utilizing the production database can be done through the secure API. VCC is not utilizing this feature at this moment.

Destiny One staff access is restricted to their hosting operations team (3 staff), all of whom have also undergone background checks and reside in Canada. Any other access of customer data (i.e. for support purposes) used obfuscated data whereby personally identifiable information has been removed.

CS 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. CS staff assigned administrative rights set staff and instructor access based on their business processes.

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

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

Part 4 – Accuracy/Correction/Retention of Personal Information



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- 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?**

Students have the ability to update their personal information via their Destiny account. Course information corrections would be made through the Continuing Studies staff and/or the course instructor.

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.**

Grade information could possibly be used to make decisions regarding a student's ability to hold a designation and meet requirements for further course enrollment (i.e. GPA pre-requisite). Students may be required to submit other information (e.g., portfolio pieces; other application information) as part of the program application process to enable the administration to determine a student's ability to successfully complete a program of study.

- 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.**

Staff and instructors of Vancouver Community College are held to a professional standard.

- 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?**

Grade information is retained as per the college's Record Management Policy:

<https://www.vcc.ca/media/vancouver-community-college/content-assets/documents/policies/a.3.9-records-management-policy-2018-06-27.pdf>

and associated procedures:

<https://www.vcc.ca/media/vancouver-community-college/content-assets/documents/policies/a.3.9-records-management-procedures-2018-06-27.pdf>



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Part 5 – Further Information

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

No.

<p><i>Please check this box if the related Information Sharing Agreement (ISA) is attached. If you require assistance completing an ISA, please contact the Privacy Officer.</i></p>	<input type="checkbox"/>
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21. Does the program involve access to personally identifiable information for research or statistical purposes? If yes, please explain.

No.

<p><i>Please check this box if the related Research Agreement (RA) is attached. If you require assistance completing an RA please contact the Privacy Officer.</i></p>	<input type="checkbox"/>
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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 to be published in a public directory.

A personal information bank of student information will be created in Destiny One. 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;



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(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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Part 6 – Privacy Comments

This PIA is based on a review of the material provided 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

Claire Sauve	<i>Claire Sauve</i>	June 24, 2021
Associate Director CS	Signature	Date
Surinder Aulakh	<i>Surinder Aulakh</i>	June 25, 2021
Chief Information Officer or Privacy Officer	Signature	Date
Norman Chang	<i>Norman Chang</i>	6/24/2021
Associate Director IT	Signature	Date