



PRIVACY IMPACT ASSESSMENT

I BASIC INFORMATION - New or Existing Program, System or Legislation

1. Public Body and Program Area.

Public Body	Vancouver Community College
Program	
School/Depart.	International Education
Initiative Title	Flywire Payment Portal

2. Contact Position and/or Name, Telephone Number and E-Mail Address.

(This should be the name of the individual most qualified to respond to questions regarding the PIA).

Name, Title	Barbara Cousins - Privacy Officer
School/Depart.	
Phone Number	
E-Mail	privacy@flywire.com

3. Description of the Program/System/Legislation (Initiative) being assessed.

(Please note here if the initiative does **not** collect, use or disclose personal information). If this is a change to an existing legislation, system or program, describe the current system or program and the proposed changes.

GDPR

		*Yes	No
(a)	Does this PIA involve a common or integrated program/activity (as defined in the FOIPP Act)?	<input type="radio"/>	<input checked="" type="radio"/>
	and		
	Is the common or integrated program/activity confirmed by the written requirements set out in the regulation?	<input type="radio"/>	<input checked="" type="radio"/>
(b)	Does this PIA involve a data-linking initiative (as defined in the FOIPP Act)?	<input type="radio"/>	<input checked="" type="radio"/>

If yes, please ensure you have notified the Office of the Information and Privacy Commissioner at an early stage of development of the initiative pursuant to section 69 (5.5) of the FOIPP Act.

4. Purpose/Objectives of the initiative (if statutory, provide citation).

To use Flywire payment platform/portal for processing payments, refunds, and paying beneficiaries.



5. **What are the potential impacts of this proposal?** (Include privacy impacts in this description).

GDPR

6. **Provide details of any previous PIA or other form of personal information assessment done on this initiative (in whole or in part).**

Flywire does an PIA of all major initiatives - one has been done on this platform

IF THERE IS NO PERSONAL INFORMATION INVOLVED, GO TO [X. SIGNATURES](#).

****IMPORTANT NOTE:** The FOIPP Act defines personal information as "recorded information about an identifiable individual other than contact information." Contact information includes the name, title, telephone or facsimile number, email address etc., which enables an individual at a place of business to be contacted.

II DESCRIPTIVE INFORMATION

1. **Describe the elements of personal information that will be collected, used and/or disclosed and the nature and sensitivity of the personal information.** [See note above about the definition of personal information.]

For example: Name, home address, gender, age/birthdate, SIN, Employee#, race/national, ethnic origin.

First and last name, address, email, student ID, phone number

2. **Provide a description (either a narrative or flow chart) of the linkages and flows of personal information collected, used and/or disclosed.**

See attached

III PERSONAL INFORMATION COLLECTION

(Section 26 and section 27 of the *Freedom of Information and Protection of Privacy Act* "FOIPP Act")

****IMPORTANT NOTE:** Recent amendments to the FOIPP Act have clarified when personal information has *not* been collected by a public body. See section 27.1 or contact VCC's Privacy Officer for further details.

	Yes	No	n/a
Is personal information being collected?	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>

IF THERE IS NO PERSONAL INFORMATION BEING COLLECTED, GO TO [IV. USE OF PERSONAL INFORMATION](#)

1) Authorization for Collection:

A public body may collect personal information as authorized by one of the following provisions:

s. 26	Yes	No	n/a
(a) Is the collection of personal information specifically authorized by, or under, an Act, other than the FOIPP Act?	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
If yes, please specify the name of the Act and relevant section			
GDPR			
(b) Is the personal information being collected for law enforcement purposes?	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
(c) Is the personal information directly related to, and necessary for, a program or activity of the public body?	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
(d) Is the personal information being collected for a prescribed purpose (where there is a regulation defining that purpose)?	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
If yes, please specify the prescribed purpose.			
(i) Has the individual whose personal information is being collected consented, in the prescribed manner, to that collection?	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
and			
(ii) Would a reasonable person consider that collection appropriate in the circumstances?	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
(e) Is the collection of personal information necessary for the purposes of planning or evaluating a program or activity of a public body?	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
(f) Is the collection of personal information necessary for the purpose of reducing the risk that an individual will be a victim of domestic violence, if domestic violence is reasonably likely to occur?	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
(g) Is the personal information being collected by observation at a presentation, ceremony, performance, sports meet, or similar event where the individual voluntarily appears and that is open to the public?	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Please identify event:			

s. 26		Yes	No	n/a
(h)	Is personal identity information being collected by:			
	A designated provincial identity information services provider and the collection of the information is necessary to enable it to provide services under section 69.2, or	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
	A public body from a designated provincial identity information services provider and the collection of the information is necessary to enable the public body to identify an individual for the purposes of providing a service to the individual or the provincial identity information services provider to provide services under section 69.2.	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>

If none of the above questions has been answered "yes", your office does not have the authority under the FOIPP Act to collect the personal information in question. If you have any questions or require clarification please contact VCC's Privacy Officer.

2) How will the personal information be collected?

A public body must collect personal information directly from the individual the information is about, with certain specific exceptions.

	Yes	No	n/a
Will the personal information be collected <u>directly</u> from the individual that the information is about?	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>

IF YOU ARE ONLY COLLECTING PERSONAL INFORMATION DIRECTLY AS NOTED ABOVE, YOU WILL NOT NEED TO COMPLETE THE NEXT SECTION ON INDIRECT COLLECTION. GO TO [3. NOTIFICATION TO COLLECT INFORMATION](#).

If the personal information has not been collected directly from the individual it is about, check which of the following authorizes the indirect collection:

s. 27(1)		Yes	No	n/a
(a)(i)	Did the individual the information is about authorize another method of collection?	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
(a)(ii)	Has indirect collection been authorized by the Information and Privacy Commissioner?	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
(a)(iii)	Has indirect collection been authorized by another enactment?	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
	If yes, please specify the name of the Act and relevant section(s)			
(a.1)(i)	Is the personal information necessary for the medical treatment of an individual and it is not possible to collect the information directly from that individual?	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
(a.1)(ii)	Is the personal information necessary for the medical treatment of an individual and it is not possible to obtain authority under (iv) for another method of collection?	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>

s. 27(1)		Yes	No	n/a
(b)	Is the public body collecting personal information disclosed to it by another public body under an authority within sections 33 to 36 of the FOIPP Act?	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Specify relevant section(s) or subsections that apply.				
(c)(i)	Is the personal information being collected for the purpose of determining suitability for an honour or award including an honorary degree, scholarship, prize or bursary?	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
(c)(ii)	Is the personal information being collected for the purpose of a proceeding before a court or a judicial or quasi-judicial tribunal?	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
(c)(iii)	Is the personal information being collected for the purpose of collecting a debt or fine or making a payment?	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
(c)(iv)	Is the personal information being collected for the purpose of law enforcement?	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
(c)(v)	Is the personal information being collected to reduce the risk that an individual will be a victim of domestic violence, if domestic violence is reasonably likely to occur?	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
(d)	Is the personal information being transferred to the public body from another public body in accordance with section 27.1?	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
(e)	Is the personal information being collected necessary for delivering a common or integrated program or activity?	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
(f)	Is the personal information about an employee, other than a service provider, and the collection of the information is necessary for the purposes of managing or terminating an employment relationship between a public body and the employee?	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
(g)	Is the information personal identity information that is collected by the designated provincial identity information service that is necessary to provide services under section 69.2?	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Additional details as required (e.g., explanation of method of collection)				

If none of the above authorities have been checked, your office does not have the authority under the FOIPP Act to collect the personal information in question. If you have any questions or require clarification please contact VCC's Privacy Officer.

3) Notification to collect information

A public body must ensure that an individual from whom it collects personal information is notified of the collection as outlined below.

27(2)	Yes	No	n/a
Has the individual from whom personal information is being collected, been informed of:			
(a) the purpose for collection?	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
(b) the legal authority for collection?	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
(c) the contact information of the person who can answer questions regarding the collection?	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Additional details as required (e.g., method of notification) Acceptance of our terms of use and privacy policy			

Notification is not required if the answer is “yes” to any of the following:

27(3)	Yes	No	n/a
(a)	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Is the personal information about law enforcement or anything referred to in section 15(1) or section 15(2) of the FOIPP Act?			
(b)	Has the Minister responsible for the FOIPP Act excused your public body from complying because it would		
	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
(a) result in the collection of inaccurate information?			
	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
or			
	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
(b) defeat the purpose or prejudice the use for which the personal information is collected?			
(c)	The information		
	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
(a) is not required, under subsection 27(1), to be collected directly from the individual the information is about, and			
(b) is not collected directly from the individual the information is about			
(d)	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Is the information collected by observation at a presentation, ceremony, performance, sports meet or similar event at which the individual voluntarily appears and that is open to the public.			
Please identify event:			
27 (4)	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Is it reasonable to expect that notifying an employee of collection under subsection 27 (1) (f) would compromise			
	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
(a) the availability or accuracy of the information, or			
(b) an investigation or a proceeding related to the employment of the employee?			
Additional details as required			

If you have not provided the required notification as outlined above, please contact Knowledge and Information Services.

IV USE OF PERSONAL INFORMATION - (Section 32 of the FOIPP Act)

	Yes	No	n/a
Is personal information being used?	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>

IF THERE IS NO PERSONAL INFORMATION BEING USED, GO TO [V. DISCLOSURE OF PERSONAL INFORMATION](#)

Under the FOIPP Act, a public body may use personal information in its custody or under its control only for certain specified purposes as outlined below.

The public body must check one or more of the authorities listed below:

s.32		Yes	No	n/a
(a)	Has the individual the personal information is about consented to the use? (Note: Supporting documentation must be on file.)	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
(b)	Will the information be used only for the purpose for which it was obtained or compiled or for a use consistent with the original purposes?	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
	Please provide details of the original purpose for which the personal information was obtained or compiled. Include, if applicable, details of the consistent/secondary use. Payment processing			
(c)	If the personal information was disclosed to the public body by another public body under an authority within sections 33 to 36, is the information being used for that same purpose?	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
	Specify subsection(s) being applied			

If you have not checked one of the above, you do not have the authority to use the information. If you have any questions or require clarification please contact VCC's Privacy Officer.

V DISCLOSURE OF PERSONAL INFORMATION

(Section 33, section 33.1, section 33.2, section 33.3, section 34, section 35 and section 36 of the FOIPP Act)

	Yes	No	n/a
Is personal information being disclosed?	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>

IF THERE IS NO PERSONAL INFORMATION BEING DISCLOSED, GO TO [VI. ACCURACY AND CORRECTION OF PERSONAL INFORMATION](#).

A public body may disclose personal information in its custody or under its control only as permitted under sections 33.1, 33.2, or 33.3 of the FOIPP Act.

1) Disclosure of Personal Information

Sections 33, 33.1, 33.2 and 33.3 of the FOIPP Act provide the legislative authority to disclose personal information. Section 33 provides that personal information **cannot** be disclosed unless it is authorized under section 33.1 or 33.2.

Please choose the **main** authorization(s) for disclosure below. All authorities that **may** apply do not need to be checked, only the main authorizations for the initiative.

s. 33.1	Disclosure inside OR outside Canada	Yes	No	n/a
(1)(a)	In accordance with Part 2 (pursuant to an FOI request)	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
(1)(a.1)	If the information or disclosure is of a type described in section 22(4) (e), (f), (h), (i) or (j): 22(4) A disclosure of personal information is not an unreasonable invasion of a third party's personal privacy if			
	(e) the information is about the third party's position, functions or remuneration as an officer, employee or member of a public body or as a member of a minister's staff,	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
	(f) the disclosure reveals financial and other details of a contract to supply goods or services to a public body,	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
	(h) the information is about expenses incurred by the third party while travelling at the expense of a public body,	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
	(i) the disclosure reveals details of a licence, permit or other similar discretionary benefit granted to the third party by a public body, not including personal information supplied in support of the application for the benefit, or	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
	(j) the disclosure reveals details of a discretionary benefit of a financial nature granted to the third party by a public body, not including personal information that is supplied in support of the application for the benefit or is referred to in subsection 22(3)(c).	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
(1)(b)	If the individual the information is about has identified the information and consented, in the prescribed manner, to its disclosure inside or outside Canada, as applicable (Note: Supporting documentation must be on file)	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
(1)(c)	In accordance with an enactment of British Columbia (other than the <i>Freedom of Information and Protection of Privacy Act</i>) or Canada that authorizes or requires its disclosure	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
	Specify name of enactment and relevant section(s)			
(1)(c.1)	If the personal information is made available to the public in British Columbia under an enactment, (other than the <i>Freedom of Information and Protection of Privacy Act</i>) that authorizes or requires the information to be made public	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
	Specify name of enactment and relevant section(s)			

s. 33.1	Disclosure inside OR outside Canada	Yes	No	n/a
(1)(d)	In accordance with a provision of a treaty, arrangement or written agreement that (i) authorizes or requires its disclosure, and (ii) is made under an enactment of British Columbia (other than the <i>Freedom of Information and Protection of Privacy Act</i>) or Canada	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Specify name of enactment and relevant section(s)				
(1)(e)	To an individual who is a minister, an officer of the public body or an employee of the public body other than a service provider, if (i) the information is necessary for the performance of the duties of the minister, officer or employee,	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
and (ii) in relation to disclosure outside Canada, the outside disclosure is necessary because the individual is temporarily travelling outside Canada		<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
If paragraph (1)(e)(ii) applies, please explain how the travel is temporary and why disclosure outside Canada is necessary				
(1)(e.1)	To an individual who is a service provider of the public body, or an employee or associate of such a service provider, if (i) the information is necessary for the performance of the duties of the individual in relation to the public body,	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
and (ii) in relation to disclosure outside Canada, (A) the individual normally receives such disclosure only inside Canada for the purpose of performing those duties, and (B) the outside disclosure is necessary because the individual is temporarily travelling outside Canada		<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
If paragraph (1)(e.1)(ii) applies, please explain how the travel is temporary and why disclosure outside Canada is necessary				
(1)(f)	To an officer or employee of the public body or to a minister, if the information is immediately necessary for the protection of the health or safety of the officer, employee, or minister	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
(1)(g)	To the Attorney General or legal counsel for the public body, for the purpose of preparing or obtaining legal advice for the government or public body or for use in civil proceedings involving the government or public body	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
(1)(h)	To the minister responsible for the <i>Coroner's Act</i> or a person referred to in section 36 of that Act, for the purposes of that Act	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
(1)(i)	If			
	(i) the disclosure is for the purposes of collecting amounts owing to the government of British Columbia or a public body by	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>

	a. an individual, or	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
	b. corporation of which the individual the information is about is or was a director or officer,	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
	and			
	(ii) in relation to disclosure outside Canada, there are reasonable grounds for believing that	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
	a. the individual the information is about is in, resides in or has assets in the other jurisdiction, or	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
	b. if applicable, the corporation was incorporated in, is doing business in or has assets in the other jurisdiction	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
1(i.1)	For the purposes of			
	(i) a payment to be made to or by the government of British Columbia or a public body,	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
	(ii) authorizing, administering, processing, verifying or cancelling such a payment, or	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
	(iii) resolving an issue regarding such a payment	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
(1)(j)	(i) Repealed.	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
(1)(k)	For the purposes of			
	(i) licensing or registration of motor vehicles or drivers, or	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
	(ii) verification of motor vehicle insurance, motor vehicle registration or drivers licences	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
(1)(l)	For the purposes of licensing, registration, insurance, investigation or discipline of persons regulated inside or outside Canada by governing bodies of professions and occupations	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
(1)(m)	If			
	(i) the head of the public body determines that compelling circumstances exist that affect anyone's health or safety, and			
	(ii) notice of disclosure is mailed to the last known address of the individual the information is about, unless the head of the public body considers that giving this notice could harm someone's health or safety	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
(1) (m.1)	For the purpose of reducing the risk that an individual will be a victim of domestic violence, if domestic violence is reasonably likely to occur	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
(1)(n)	So that the next of kin or a friend of an injured, ill or deceased individual may be contacted	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
(1)(o)	In accordance with section 36 (disclosure for archival or historical purposes)	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
(1)(p)	The disclosure			
	(i) is necessary for			

	(A) installing, implementing, maintaining, repairing, trouble shooting or upgrading an electronic system or equipment that includes an electronic system that is used in Canada by the public body or by a service provider for the purposes of providing services to a public body, or	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
	(B) data recovery that is being undertaken following failure of an electronic system that is used in Canada by the public body or by a service provider for the purposes of providing services to a public body	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
	and (ii) in the case of disclosure outside Canada (A) is limited to temporary access and storage for the minimum time necessary for that purpose, and (B) in relation to data recovery under subparagraph (i)(B), is limited to access and storage only after the system failure has occurred	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
	If paragraph (1)(p)(ii) applies, please explain how the temporary access and storage is for the <i>minimum time necessary</i>			
(1)(q)	If the information was collected by observation at a presentation, ceremony, performance, sports meet or similar event at which the individual voluntarily appeared and that was open to the public. Please identify event:	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
(1)(r)	If the information Was disclosed on a social media site by the individual the information is about, Was obtained or compiled by the public body for the purpose of enabling the public body to engage individuals in public discussion or promotion respecting proposed or existing initiatives, policies, proposals, programs or activities of the public body or respecting legislation relating to the public body, and Is disclosed for a use that is consistent with the purpose described in subparagraph (ii).	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
	Additional details as required			
(1)(s)	<u>In accordance with section 35 (disclosure for research or statistical purposes).</u>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
(1)(t)	<u>To comply with a subpoena, a warrant or an order issued or made by a court, person or body in Canada with jurisdiction to compel the production of information</u>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
(2)	In addition to the authority under any other provision of this section or section 33.2, a public body that is a law enforcement agency may disclose personal information referred to in section 33			

(2)(a)	To another law enforcement agency in Canada	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
(2)(b)	To a law enforcement agency in a foreign country under an arrangement, a written agreement, a treaty or provincial or Canadian legislative authority.	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
(3)	The minister responsible for this Act may, by order, allow disclosure outside Canada under a provision of section 33.2 in specific cases or specified circumstances, subject to any restrictions or conditions that the minister considers advisable.	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
(4)	In addition to the authority under any other provision of this section or section 33.2, the Insurance Corporation of British Columbia may disclose personal information if, (a) the information was obtained or compiled by that public body for the purposes of insurance provided by the public body, and (b) disclosure of the information is necessary to investigate, manage or settle a specific insurance claim.	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
(5) and (6)	For the purposes of operating the designated provincial identity information services as permitted under section 33.1 (5) and (6)	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
(7)	To respond to citizens' enquiries as permitted under section 33.1(7)	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
	Additional details as required			

s. 33.2	Disclosure inside Canada only	Yes	No	n/a
(a)	For the purpose for which it was obtained or compiled or for a use consistent with that purpose (see section 34)	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
	Please provide details of the original purpose for which the personal information was obtained or compiled. Include, if applicable, details of the consistent/secondary use.			
(b)	Repealed.	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
(c)	To an officer or employee of the public body or to a minister, if the information is necessary for the performance of the duties of the officer, employee or minister	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
(d)	To an officer or employee of (i) a public body, or (ii) an agency or to a minister, if the information is necessary for the delivery of a common or integrated program or activity and for the performance of the duties, respecting the common or integrated program or activity, of the officer, employee or minister to whom the information is disclosed	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
(e)	To an officer or employee of a public body or to a minister, if the information is necessary for the protection of the health or safety of the officer, employee or minister	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>

s. 33.2 Disclosure inside Canada only		Yes	No	n/a
(f)	To the auditor general or any other prescribed person or body for audit purposes	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
(g)	To a member of the Legislative Assembly who has been requested by the individual the information is about to assist in resolving a problem	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
(h)	To a representative of the bargaining agent, who has been authorized in writing by the employee whom the information is about, to make an inquiry	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
(i)	To a public body or a law enforcement agency in Canada to assist in a specific investigation			
	(i) undertaken with a view to a law enforcement proceeding, or	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
	(ii) from which a law enforcement proceeding is likely to result	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
(j)	To the archives of the government of British Columbia or the archives of a public body, for archival purposes	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
(k)	Repealed.	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
(l)	To an officer or employee of a public body or to a minister, if the information is necessary for the purposes of planning or evaluating a program or activity of a public body	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Additional details as required				

s. 33.3 Disclosure to Public Without Request		Yes	No	n/a
(1)	Do the records fall within a category established under section 71 (1)?	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Additional details as required				
(2)	Do the records fall within a category established under section 71.1 (1)?	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Additional details as required				

2) **Systematic or Repetitious Disclosure/Exchanges?**

		Yes	No	n/a
i.	Do the disclosures of personal information under section 33.2 occur on a regular basis?	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
ii.	Has an Information Sharing Agreement been completed for these disclosures/exchanges?	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
iii.	Has information related to the Information Sharing Agreement(s) been entered into the Personal Information Directory ?	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>

Personal information exchanges within a public body do not normally require an Information Sharing Agreement (ISA) if they are for a consistent purpose as defined under



section 33.2(a) of the Act or are necessary for the performance of an employee of the public body under section 33.2(c). However, depending on the nature and sensitivity of the personal information exchanged, the public body might choose to prepare an ISA or similar written statement of understanding.

3) Research or Statistical Purposes (Section 35)

	Yes	No	n/a
Has a researcher requested access to personal information in an identifiable form for research purposes?	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>

If “yes”, a research agreement that conforms to the criteria established in section 35(d) must be in place. Contact VCC Privacy Officer for assistance.

Please note: Research using personal information may only be conducted if it meets all of the terms of section 35.

4) Archival or Historical Purposes (Section 36)

The archives of the government of British Columbia, the archives of a public body, or a board or a francophone education authority (as defined in the [School Act](#)) may disclose personal information in its custody or under its control to be disclosed for archival or historical purposes as authorized by section 36.

Please check the authorization(s) for disclosure listed below.

	Yes	No	n/a
(a) The disclosure would not be an unreasonable invasion of personal privacy under section 22	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
(b) The disclosure is for historical research and is in accordance with section 35 (research agreements)	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
(c) The information is about someone who has been dead for 20 or more years	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
(d) The information is in a record that has been in existence for 100 or more years	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>

If you have not answered “yes” to any of the above authorizations for disclosure you do not have the authority to disclose personal information. If you have any questions or require clarification, please contact VCC Privacy Officer.

VI ACCURACY AND CORRECTION OF PERSONAL INFORMATION
(Section 28 and section 29 of the FOIPP Act)

If an individual’s personal information will be used by a public body to make a decision that directly affects the individual, the public body must make every reasonable effort to ensure that the information is accurate and complete. An individual must also have the ability to access, or have corrected or annotated, their personal information for a period of one year after a decision has been made based upon the personal information.

		Yes	No	n/a
1.	Are there procedures in place to enable an individual to request/review a copy of their own personal information?	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
2.	Are there procedures in place to correct or annotate an individual's personal information if requested, including what source was used to update the file?	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
3.	If personal information is corrected, are there procedures in place to notify other holders of this information?	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
If yes, please provide the name of the policy and/or procedures, a contact person and phone number.				
	Policy/procedure:	Privacy policy		
	Contact person:	privacy@flywire.com		
	Phone number:			
Additional details as required				

If any of the questions above have been answered "no", please contact VCC Privacy Officer for further clarification.

VII SECURITY AND STORAGE FOR THE PROTECTION OF PERSONAL INFORMATION (Sections 30 and 30.1 of the FOIPP Act)

Note: For PIAs related to new or existing systems, this section should be completed by the Branch of the ministry responsible for systems maintenance and security, and signed off by this branch, in the [Signatures](#) section.

For PIAs that do not involve systems initiatives, this section should be completed by the program area completing the PIA. In this case, the signature of the systems representative is not required.

Section 30 of the Act requires a public body to protect personal information in its custody or under its control by making reasonable security arrangements against such risks as unauthorized access, collection, use, disclosure or disposal.

		Yes	No	n/a
1.	Is there reasonable technical security in place to protect against unauthorized access or disclosure?	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
2.	Is there reasonable physical security in place to protect against unauthorized access or disclosure?	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
3.	Are there branch policies and procedures in place for the security of personal information during routine collection, use and disclosure of the information?	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
If yes, please provide the name of the policy and/or procedures, a contact person and phone number.				
	Policy/procedure:	Security practices		

	Contact person:	security@flywire.com		
	Phone number:			
	Additional details as required			
4.	Have user access profiles been assigned on a need-to-know basis?	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
5.	Do controls and procedures exist for the authority to add, change or delete personal information?	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
6.	Does your system security include an ongoing audit process that can track use of the system (e.g., when and who accessed and updated the system)?	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
	Please explain the audit process and indicate how frequently audits are undertaken and under what circumstances Annual SOC I and SOC II			
7.	Does the audit identify inappropriate accesses to the system?	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
	Additional details			

If any of the questions above have been answered "no", please contact your Ministry's Security Officer. If you have any questions or require clarification please contact VCC Privacy Officer.

VII SECURITY ARRANGEMENTS FOR THE PROTECTION OF PERSONAL INFORMATION cont'd

Section 30.1 requires a public body to ensure that personal information in its custody or under its control is stored only in Canada and accessed only in Canada unless the individual the information is about has consented or the disclosure is otherwise allowable under the Act.

	Yes	No	n/a
Will the information be stored or accessed only in Canada?	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>

Personal information in a public body's custody or under its control must be stored and accessed only in Canada, unless one of the following applies:

	Yes	No	n/a
(a) Has the individual the personal information is about identified it and consented, in the prescribed manner, to it being stored in or accessed from another jurisdiction?	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Please explain Data is stored in Canada. Access to the data is viewed by the support team globally			

(b)	Will the personal information be stored in or accessed from another jurisdiction for the purpose of a disclosure that is authorized under the <i>Freedom of Information and Protection of Privacy Act</i> ?	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
	Please explain Global support 24/7			
(c)	Will the personal information be disclosed under section 33.1(1)(i.1)?	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
	Please explain			

If you have not answered "yes" to any of the above authorizations for storage or access of personal information outside Canada or if you require clarification, please contact Knowledge and Information Services.

VIII RETENTION OF PERSONAL INFORMATION - (Section 31 of the FOIPP Act)

If a public body uses an individual's personal information to make a decision that directly affects the individual, the public body must retain that information for at least one year after using it so that the individual has a reasonable opportunity to obtain access to it.

		Yes	No	n/a
1.	Do you have an approved records retention and disposition schedule?	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
2.	Is there a records retention schedule to ensure information used to make a decision that directly affects an individual is retained for at least one year after use?	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>

If you answered "no" to the above questions, your procedures may need to be revised. Please contact your Records Officer.

Note: Records of provincial public bodies and designated organizations/public bodies cannot be destroyed unless approval is granted under the authority of the *Document Disposal Act*. Please consult with your Records Officer to initiate the records scheduling process.



Comments:

X SIGNATURES

PUBLIC BODY APPROVAL:

Program Manager

Signature

Date

Barbara Cousins

Institutional Contact Responsible for
Systems Maintenance and Security

Signature

12/7/22

Date

Surinder Aulakh

VCC Privacy Officer



Signature

01/30/23

Date

GO TO: PERSONAL INFORMATION DIRECTORY (to add PIA)

University

Flywire

Students

Payment Networks

s. 15(1)(f), s. 21



