



Privacy Impact Assessment Checklist

(To be completed by the Academic or Business Area considering a new initiative*)

Note: An “Initiative” may be the use of a new software tool or any other planned program or activity that will involve the collection, use or disclosure of personal information

Name of UFV Department / Business Area	UFV Alumni Engagement
Initiative Lead name and Title	Whitney Fordham Director, Alumni Relations
Service / Initiative / Product name	Alumni Perks App
Vendor Name	Advantage Alumni and JWA Group

<p>Description & Purpose of Initiative:</p> <p>The Alumni Perks App, provided by Advantage Alumni and created by JWA Group, provides UFV Alumni users with easy access to perks provided by UFV Alumni Engagement and UFA Alumni Association, as well as many other features for engagement. Users will be able to use the app to store their alumni card, access information about events, share their stories, share their businesses, and look for jobs. These tools are available for iPhone, Android, and on the web.</p> <p>The app is produced by an all-Canadian developer in Ontario and has found success in several campuses across the Fraser Valley and Metro Vancouver area. The Alumni Engagement team, chiefly the Digital Engagement Strategist will handle management of the app, including updating information and approving users.</p>

Collection and Use of Personal Information				
1.	Will this activity or initiative collect personal information? <i>“Personal information is recorded information about an identifiable individual other than business contact information</i>	Yes	No	Don't Know
1.a	<p>If yes, please list the elements of personal information that will be collected (<i>i.e., name, email address, phone number, identification numbers, academic, health, employment or financial information, image, or voice</i>)</p> <p>Advantage Alumni collects data from alumni members, supplied either by the university or the user.</p> <p>They <i>may</i> collect: student ID, email, name, password (app account), date of birth, full mailing address, phone number, graduation year, graduation program, device user agent, IP address.</p> <p>(Source: Privacy Impact Assessment Question Q&A – from JWA Group)</p>			

1.c	<p>If personal information is to be collected directly from an individual, UFV is required to provide a collection notice at the time of collection. Please provide your draft collection notice below: (For Assistance see: https://www.ufv.ca/informationprivacy/quick-links/ufvs-standard-collection-notice/)</p> <p>See below for our standard Collection Notice. This may need to be modified to include JWA Group as a collecting agency.</p> <p>Collection notice Privacy Notification – Any Personal information that is provided to JWA Group will be provided to UFV and held by pursuant to section 26(c) of the Freedom of Information and Protection of Privacy Act ("FIPPA"). UFV will use your information to send you newsletters and other informational materials, and for statistical purposes. Your information will remain confidential, and will only be used or disclosed as authorized under the FIPPA. Should you have any questions about the collection of information, please contact the UFV Alumni Engagement office at B310b, 33844 King Rd, Abbotsford BC V2S 7M8 or 604-557-4008.</p>			
2.	<p>Does this activity or initiative use personal information that has already been collected by UFV?</p> <table border="1" data-bbox="1149 720 1451 793"> <tr> <td data-bbox="1149 720 1243 793">Yes</td> <td data-bbox="1243 720 1338 793">No</td> <td data-bbox="1338 720 1451 793">Don't Know</td> </tr> </table>	Yes	No	Don't Know
Yes	No	Don't Know		
2.a	<p>If yes, please describe the information that has already been collected by UFV that will be used by this initiative, (i.e., the elements of personal information and the source of it)</p> <p>The UFV Alumni database is currently housed in s. 15(1)(l), s. 17 and s. 15(1)(j), s. 17 and includes information such as: student ID, email, name, date of birth, full mailing address, phone number, graduation year, graduation program(s).</p> <p>This information is imported by the UFV Relationships & Fund Development team (previously Advancement) from graduation records from the Office of the Registrar at each major graduation intake period (3 times a year).</p> <p>That information (however complete), is what we have until alumni voluntarily update their information with us.</p>			
3.	<p>Please describe how this initiative uses the personal information identified above.</p> <p>Information gathered through the app will be used in a number of minor ways, such as to verify alumni status for the purpose of alumni benefits; update constituent records in s. 15(1)(j), s. 17 send contest winnings through mail or email; gather location-based statistical data for analytical purposes to track the usage of benefits through the app; for the app to provide a digital barcode that is used in place of a physical alumni card; track event registrations and send email or notifications as follow-up to event registration.</p>			
4.	<p>Will the initiative be mandatory?</p> <table border="1" data-bbox="1149 1745 1451 1818"> <tr> <td data-bbox="1149 1745 1243 1818">Yes</td> <td data-bbox="1243 1745 1338 1818">No</td> <td data-bbox="1338 1745 1451 1818">Don't Know</td> </tr> </table>	Yes	No	Don't Know
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Security / Storage of Personal Information		Yes	No	Don't Know
5.	Where will the personal information involved with this initiative be stored? (i.e. department drive, UFV's Azure/Sharepoint tenant, or external servers provided by a vendor) <input type="checkbox"/> UFV Department Drive <input type="checkbox"/> UFV's Azure/Sharepoint tenant <input checked="" type="checkbox"/> Cloud-based servers provided by a vendor. <input type="checkbox"/> Other. Please describe:			
5.a	If you indicated above that personal information will be stored in cloud-based servers provided by a vendor. Please provide the name of the vendor. s. 21, s. 15(1)(l)			
6.	Is any of the personal information to be stored outside of Canada?	Yes	No	Don't Know
7.	Please provide a link to any information published by the vendor detailing security measures in place to protect personal information: See attached document: Privacy-Impact-Assessment-Questions.pdf			
Disclosure				
8.	Will this initiative involve the disclosure of any personal information to an external organization?	Yes	No	Don't Know
9.	If yes, please describe proposed information sharing or provide a document or link that does so:	Yes	No	Don't Know
General Information				
10.	Will any software or cloud-based tool be used with this initiative?	Yes	No	Don't Know
11.	If yes, please provide a copy of the service agreement with the vendor? Service agreement has been supplied previous to the completion of this form.	Yes	No	Don't Know
12.	If yes, has UFV's Office of the Chief Information Officer/ IT Security completed a security assessment of any software or tool related to this initiative?	Yes	No	Don't Know

Privacy Office Review:

Meets privacy protection requirements

Provide the following additional information and re-submit:

Complete Privacy Impact Assessment (PIA)

Reviewed by: Stephen Gaspar

Review Date: March 1, 2024

PRIVACY IMPACT ASSESSMENT QUESTIONS

Please provide the following information:

- (i) Provide a listing of the category of individuals who will be providing personal information*, as well as all personal information or data elements that will be or are collected, used or disclosed in the proposed or existing information system, technology or program.

We collect data from alumni members.

Their data may come from a import supplied by the 'College' or is supplied by the user.

Data field that we may collect are

- Student ID
- Email
- Name
- Password
- Date of Birth
- Full Mailing Address
- Phone NUmber
- Graduating Year
- Graduating Program
- Device User Agent
- IP Address

- (ii) Provide an explanation and/or diagram depicting the flow of personal information in the proposed information system, technology or program (including any data processing by JWA Group or third parties).

Data supplied by the 'College' is used to match new users to the system and is presented back to the user to update.

Data collected from the users is stored in the database and available to the 'College' to download.

JWA does not use the data or share it with any third parties.

- (iii) Does consent from the individual provide the primary basis for the collection, use and disclosure of personal information for the proposed or existing information system, technology or program? How is consent recorded and

stored? Does the consent explicitly state why and how personal information will be or is collected, used, disclosed, or processed?

Users are required to agree to the Terms and Condition of the program before they are allowed to register.

- (iv) What are the purposes for which personal information will be or is collected, used, processed, or disclosed in the information system, technology or program? Is the personal information necessary in order to satisfy the purpose (i.e. are you collecting more personal information that absolutely necessary?)

Email address, student number and password are collected and needed for running the program. All other data is collected for the 'College' to use to update their own records.

- (v) Is personal information collected, used, disclosed or retained exclusively for the identified purpose?

Yes?

- (vi) Will personal information in the proposed or existing information system, technology or program be linked or cross-referenced to other information in other information systems, technology or programs?

No.

- (vii) Will personal information collected or used in the information system, technology or program be disclosed to any persons who are not employees or agents of JWA Group?

Only JWA Group, or the College will have access to the data.

- (viii) Does the proposed information system, technology or program involve the collection, use, disclosure or processing of any personal information beyond Ontario's borders? If so, where is it stored? If the personal information is collected, used, stored and/or processed in the European Union, does JWA Group comply with the provisions of the European Union's General Data Protection Regulation (GDPR)?

The program is open to Alumni members.

The servers that store the user data are located in s. 21, s. 15(1)(l)

- (ix) Does JWA Group use de-identified or aggregate information for any purposes? (E.g. data mining.)

No.

- (x) Have security policies or procedures been developed for various aspects of the operations for the proposed or existing information system, technology or program?

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

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

- (xi) Have privacy policies or procedures been developed for various aspects of the operations for the proposed or existing information system, technology or program? (i.e. is personal information only shared with staff having a genuine need to know?)

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

- (xii) Does JWA Group have a process in place for a data breach? How are individuals and/or the College informed in such circumstances? Does the proposed or existing information system, technology or program provide functionality for the logging of insertion, access, modification or disclosure of personal information as well as an interface to audit those logs for unauthorized activities?

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

(xiii) Does JWA Group have a process in place by which the College can access, delete and correct the personal information of individuals?

Yes. There is a full admin web site where the 'College' can access all the stored data.

* As per the Freedom of Information and Protection of Privacy Act (FIPPA), "personal information" means recorded information about an identifiable individual, including, (a) information relating to the race, national or ethnic origin, colour, religion, age, sex, sexual orientation or marital or family status of the individual, (b) information relating to the education or the medical, psychiatric, psychological, criminal or employment history of the individual or information relating to financial transactions in which the individual has been involved, (c) any identifying number, symbol or other particular assigned to the individual, (d) the address, telephone number, fingerprints or blood type of the individual, (e) the personal opinions or views of the individual except where they relate to another individual, (f) correspondence sent to an institution by the individual that is implicitly or explicitly of a private or confidential nature, and replies to that correspondence that would reveal the contents of the original correspondence, (g) the views or opinions of another individual about the individual, and (h) the individual's name where it appears with other personal information relating to the individual or where the disclosure of the name would reveal other personal information about the individual