

PRIVACY IMPACT ASSESSMENT (Short-Form)

PART 1: GENERAL INFORMATION

PIA file number:

Initiative title:	Eventbrite ticketing for 2023 Convocation
Organization:	University of the Fraser Valley
Business or Academic Unit	VP Community Engagement
Initiative Lead name and title:	David Johnston, Office of the Registrar
Privacy Officer:	Stephen Gaspar
Privacy Officer phone:	Ext. 4654
Privacy Officer email:	Stephen.gaspar@ufv.ca

General information about the PIA:

Is this initiative a data-linking program under FOIPPA? If this PIA addresses a data-linking program, you must submit this PIA to the Office of the Information and Privacy Commissioner.
No
Is this initiative a common or integrated program or activity? Under section FOIPPA 69 (5.4), you must submit this PIA to the Office of the Information and Privacy Commissioner.
No
Related PIAs, if any:
None

1. What is the initiative?

UFV through its Office of Community Engagement is wishing to use Eventbrite to issue tickets to UFV's June 2023 convocation ceremonies. As part of the convocation planning process, graduating students will be directed to the UFV Convocation webpage. On that webpage, they will be provided with the opportunity to reserve guest tickets to their graduation ceremony. UFV will use the information provided by the student to issue tickets through Eventbrite.

2. What is the scope of the PIA?

The use of Eventbrite for the purpose of issuing tickets to UFV's 2023 Convocation ceremonies.

3. What are the data or information elements involved in your initiative?

Please list all the elements of information or data that you might collect, use, store, disclose or access as part of your initiative.

Consider segmenting your response into the different categories of people who you will collect different types of information from (e.g. students, administrators, employees, alumni, etc.).

Step 1:

The following information is collected directly from student graduands:

1. First Name
2. Last Name
3. UFV Student Number
4. The program that the student will be graduating from
5. Email Address
6. Number of guest tickets requested (up to a maximum of 4)
7. Whether or not the student would like to be on a waitlist for additional tickets
8. If the student would like to be on the waitlist for additional tickets, the number that they would like to receive.

Step 2:

The purpose of using a form to collect the above information from graduands, as opposed to directing the students directly to Eventbrite, is to prevent a student from making multiple requests. However, by using this form, UFV will have to take this student information and manually provide it to Eventbrite using the “Manage Attendees/Add Attendees” function in order to issue tickets to the graduand.

3.1 Did you list personal information in question 3?

Personal information is any recorded information about an identifiable individual, other than business contact information. Personal information includes information that can be used to identify an individual through association or reference.

Yes.

4. How will you reduce the risk of unintentionally collecting personal information?

Some initiatives that do not require personal information are at risk of collecting personal information inadvertently, which could result in an information incident.

The questions have been limited to collect only the minimal amount of information required to issue a ticket. Also, UFV is not collecting any information (such as a name or email) about the guests of the graduand.

PART 2: COLLECTION, USE AND DISCLOSURE

This section will help you identify the legal authority for collecting, using and disclosing personal information, and confirm that all personal information elements are necessary for the purpose of the initiative.

5. Collection, use and disclosure

Use column 2 to identify whether the action in column 1 is a collection, use or disclosure of personal information. Use columns 3 and 4 to identify the legal authority you have for the collection, use or disclosure.

Use this column to describe the way personal information moves through your initiative step by step as if you were explaining it to someone who does not know about your initiative.	Collection, use or disclosure	FOIPPA authority	Other legal authority
Step 1: Graduand information is collected from students. Students will be notified of the purpose of collection and asked to provide consent for transfer of information to Eventbrite	Collection	Section 26(c), 27	
Step 2: UFV staff will enter Graduand information into Eventbrite	Use Disclosure	Section 32(a) Section 33(2)(c) and 33(2) (d)	

6. Collection Notice

If you are collecting personal information directly from an individual the information is about, FOIPPA requires that you provide a collection notice (except in limited circumstances).

Privacy Notification: Your personal information is collected under the authority of Section 26 (c) of the *Freedom of Information and Protection of Privacy Act* (British Columbia). This information will be used for the purposes of planning, managing attendance and issuing tickets to UFV Convocation 2023. Questions about the collection of this information may be directed to convocation@ufv.ca.

In addition, students will be asked to consent to the disclosure to Eventbrite. The consent language will be as follows:

“By submitting this form, I consent to UFV providing my name and email address to Eventbrite for the purpose of managing attendance and issuing tickets to UFV Convocation 2023. Information provided to Eventbrite will be handled in accordance with Eventbrite’s Privacy policy located [here](#). I confirm that I have reviewed and accept Eventbrite’s Privacy Policy.”

PART 3: STORING PERSONAL INFORMATION

If UFV is storing personal information outside of Canada, identify the sensitivity of the personal information and where and how it will be stored.

7. Is any personal information stored outside of Canada?

- Yes, information that is provided to Eventbrite for the purpose of issuing guest tickets will be stored on Eventbrite servers.
- The information that must be provided to Eventbrite for the purpose of issuing tickets is as follows:
 - A. First name
 - B. Last name
 - C. Email address

8. Does your initiative involve sensitive personal information?

- No. This information is unlikely to be considered sensitive. In any event, the students will be asked to provide a consent to authorize UFV to disclose the information to Eventbrite and the opportunity to review Eventbrite’s privacy policy.

9. Where are you storing the personal information involved in your initiative?

Eventbrite servers are located in the United States as described in section 13 of Eventbrite’s Privacy Policy (viewed May 2, 2023):

https://www.eventbrite.ca/support/articles/en_US/Troubleshooting/eventbrite-privacy-policy?lg=en_CA

After you answer this question go to [Part 4](#).

PART 4: SECURITY OF PERSONAL INFORMATION

In Part 4 you will share information about the privacy aspect of securing personal information. People, organizations or governments outside of your initiative should not be able to access the personal information you collect, use, store or disclose. You need to make sure that the personal information is safely secured in both physical and technical environments.

10. Does your initiative involve digital tools, databases or information systems?

- Yes

11. If the answer to question 10 is “yes”, has [UFV’s IT Security Office](#) completed a security assessment?

No. It was determined that a security assessment is not required as EventBrite does not integrate with any UFV systems.

However, information about Eventbrite’s IT security practices is located here:

<https://www.eventbrite.com/security/>

12. Has UFV’s Privacy Protection Schedule and/or Cloud Security Schedule been attached to the Contract?

No – UFV is using the free version of Eventbrite and therefore it is not practical to attach UFV’s Privacy Protection Schedule to the contract.

PART 5: ACCURACY, CORRECTION AND RETENTION

In Part 5 you will demonstrate that you will make a reasonable effort to ensure the personal information that you have on file is accurate and complete.

13. How will UFV make sure that the personal information is accurate and complete?

Student personal information for this initiative (issuing tickets and managing attendance through Eventbrite) is being collected directly from the individuals affected.

It is possible that the students may incorrectly input their personal information and that they may not receive a confirmation email containing their tickets. A contact email address will be provided (convocation@ufv.ca) to assist students with corrections to their information that may be necessary for the purpose of having tickets issued and other questions that they may have.

It is also possible that UFV staff may incorrectly enter a student's name or email address so that Eventbrite does not issue tickets to the correct individual. Students who require assistance with tickets that have been failed to be issued may reach out to the designated contact email address. Any corrections that may be required in Eventbrite can be made through the Manage Attendees feature.

14. Requests for correction

FOIPPA gives an individual the right to request correction of errors or omissions to their personal information. You must have a process in place to respond to these requests.

1.1 Do you have a process in place to correct personal information?

- Yes

15. Does your initiative use personal information to make decisions that directly affect an individual?

- No

16. Do you have an information schedule in place related to personal information used to make a decision?

FOIPPA requires that public bodies keep personal information for a minimum of one year after it is used to make a decision.

No

Part 6: ADDITIONAL RISKS

17. Has the vendor expressed, either through contract, communications with you, or their privacy policy, their agreement to notify UFV of a privacy breach?

Yes : https://www.eventbrite.ca/support/articles/en_CA/Troubleshooting/eventbrite-canada-data-protection?lg=en_CA

18. Risk Response (non-security risks)

Describe any additional risks that arise from collecting, using, storing, accessing or disclosing personal information in your initiative that have not been addressed by the questions on the template.

If you filled in the risk table at Q.14 for sensitive information stored outside of Canada, only include additional risks here.

Add new rows if necessary.

Possible (non-security) risk	Proportionate response / mitigation strategies
Risk 1: s. 15(1)(l), s. 17 [REDACTED]	s. 15(1)(l), s. 17 [REDACTED]
Risk 2: s. 15(1)(l), s. 17 [REDACTED]	s. 15(1)(l), s. 17 [REDACTED]

PART 7: SIGNATURES

You have completed a PIA. Submit the PIA to your Privacy Officer for review and comment, and then have the PIA signed by those responsible for the initiative.

Privacy Office Comments

There are no additional comments.

Privacy Office Signatures

This PIA is based on a review of the material provided to the Privacy Office as of the date below.

Role	Name	Electronic signature / Date signed
Privacy Officer / Privacy Office Representative	Stephen Gaspar	Stephen Gaspar  Digitally signed by Stephen Gaspar Date: 2023.06.06 09:59:02 -07'00'

Program Area Signatures

This PIA accurately documents the data elements and information flow at the time of signing. If there are any changes to the overall initiative, including to the way personal information is collected, used, stored or disclosed, the program area will engage with their Privacy Office and if necessary, complete a PIA update.

Program Area Comments:

Role	Name	Electronic signature / Date signed
Initiative lead University Registrar & VP Enrolment Management	David Johnston	David Johnston  Digitally signed by David Johnston Date: 2023.06.05 17:11:18 -07'00'

Role	Name	Electronic signature / Date signed	
<p>Contact Responsible for Systems Maintenance and/or Security</p> <p>Required to confirm a security assessment has been completed satisfactorily</p>	Not applicable		