

Part 1 – General

Name of Department/Branch:	Langara College, Theatre Arts (Studio 58)		
PIA Drafter:	Joanne Rajotte, Manager, Records Management and Privacy		
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Program Manager:	David Hudgins, Artistic Director, Theatre Arts (Studio 58)		
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1. Description of the Initiative

ASIMUT is a cloud-based scheduling management product specifically for use by theatre and drama schools and music academies developed by ASIMUT software ApS, a company based in Aarhus, Denmark.

Theatre Arts' faculty, staff and students will use ASIMUT for:

- Event management;
- Timetable and schedule coordination;
- Room booking; and
- Equipment booking (available in a future planned system upgrade).

2. Scope of this PIA

This PIA covers the collection, use and disclosure of the personal information of Theatre Arts faculty, staff and students in the ASIMUT scheduling management system.

3. Related Privacy Impact Assessments

Not applicable

4. Elements of Information or Data

Required data elements:

- First Name
- Last Name
- User Name (*an alphanumeric word to appear beside the individual's name to uniquely identify users in the case of name clashes*)
- User Account Name (*a unique name used to log in and/or authenticate an individual*)
- Email address
- Role, i.e., Student, Teacher, Staff

Optional data elements:

- Langara student identification number
- Langara employee identification number

Part 2 – Protection of Personal Information

5. Storage or Access outside Canada

According to the Software as a Service (SaaS) agreement between Langara College and ASIMUT software ApS, the service provider will store personal information in the ASIMUT scheduling management system only within Canada, and may access and use the personal information only for the purposes specified in the agreement and the Privacy Protection Schedule appended to the agreement. s.15(1)(l)

s.15(1)(l) ASIMUT software ApS will store information in ASIMUT in the Amazon Web Services (AWS) Canada (Central) Region data centre located in Montreal, Quebec.

s.15(1)(l)

6. Data-linking Initiative*

<p>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.</p>	
1. Personal information from one database is linked or combined with personal information from another database;	No
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
<p>If you have answered "yes" to all three questions, please contact your privacy office(r) to discuss the requirements of a data-linking initiative.</p>	

7. Common or Integrated Program or Activity*

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

8. Personal Information Flow Table

Personal Information Flow Table			
	Description/Purpose	Type	FOIPPA Authority
1.	Information Technology will complete a one-time import of Theatre Arts' faculty, staff and student personal information from an electronic file into ASIMUT prior to implementation.	Collection	26(c)
2.	Once ASIMUT is implemented, Theatre Arts will manually add new faculty, staff and students to the system at the beginning of each semester. Users may be able to enter their own personal information into the system.	Collection	26(c)
3.	Theatre Arts faculty, staff and students will use personal information to: <ul style="list-style-type: none"> • Create individual and group timetables • Invite individuals to events • Book classrooms and rehearsal spaces • Reserve equipment. 	Use	32(a)
3.	Only limited personal information, i.e., users' given names and unique User Name, will be disclosed when ASIMUT users undertake scheduling and booking activities. Only the designated system administrator(s) will be able to see all personal information about users.	Disclosure	33.2(a)

9. Risk Mitigation

Risk Mitigation Table				
	Risk	Mitigation Strategy	Likelihood	Impact
1.	Theatre Arts faculty, staff and students could access personal information and use or disclose it for a purpose other than the reason it was collected.	Physical and technical access to the system is restricted to authorized users. Users, other than designated system administrator(s), see only limited personal information of other employees and students.	Low	High
3.	Service provider's employees could access personal information and use or disclose it for a purpose other than the reason it was collected.	Privacy clauses in contractual agreement with service provider restrict access to personal information. s.15(1)(l)	Low	High
4.	Personal information could be compromised during transmission to the AWS data centre.	s.15(1)(l)	Low	High
5.	Personal information stored in the AWS data centre used by the service provider could be compromised.	Agreement between service provider and Langara requires the service provider to ensure that personal information stored in the third-party data centre it uses is protected by appropriate physical, technical and administrative security measures.	Low	High

10. Collection Notice

Langara College's Theatre Arts (Studio 58) department collects the personal information maintained in this system under the authority of the College and Institute Act [RSBC 1996, Ch. 52, Sec. 41.2(a)] and in compliance with the Freedom of Information and Protection of Privacy Act [RSBC 1996, Ch. 165, Sec. 26(c)]. The information is collected for the purpose of Studio 58 schedule coordination, event management and room booking. It is stored in an online scheduling management system located in Canada. For questions about the collection, use and disclosure of personal information contact the Artistic Director, Theatre Arts (Studio 58) at 604-323-5508.

Part 3 – Security of Personal Information

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

S. 15(1)(I)

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

S. 15(1)(I)

s.15(1)(l)

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

Langara College has a Privacy, Access and Confidentiality Policy and associated procedures that govern the collection, use, access, storage, disclosure and disposal of personal information.

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.

s.15(1)(l)

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

s.15(1)(l)

Part 4 – Accuracy/Correction/Retention of Personal Information

16. How is an individual's information updated or corrected? If information is not updated or corrected (for physical, procedural or other reasons) please explain how it will be annotated? If personal information will be disclosed to others, how will the public body notify them of the update, correction or annotation?

An individual's personal information will be updated or corrected either by making a request to the system administrator, or by making the change themselves if the department decides to offer this option to users.

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

No.

18. If you answered "yes" to question 16, please explain the efforts that will be made to ensure that the personal information is accurate and complete.

Not applicable.

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?

Although not used for decision-making, the College will establish a retention and disposition schedule for the personal information stored in ASIMUT. Once established, Theatre Arts can define the retention period in ASIMUT and the system will then automatically and irretrievably delete the data.

Part 5 – Further Information

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

No.

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

21. Does the program involve access to personally identifiable information for research or statistical purposes? If yes, please explain.

No.

Please check this box if the related Research Agreement (RA) is attached. If you require assistance completing an RA please contact your privacy office(r).

22. Will a personal information bank (PIB) result from this initiative? If yes, please list the legislatively required descriptors listed in section 69 (6) of FOIPPA. Under this same section, this information is required to be published in a public directory.

No.

Part 6 – Privacy Officer Comments

This PIA is based on a review of the information provided to the Manager, Records Management and Privacy by the Theatre Arts (Studio 58) department as of the date below. If in future any substantive changes are made to the scope of this PIA, a department Administrator will contact the Manager, Records Management and Privacy who will complete a PIA Update.

s.22(1)

Joanne Rajotte, Manager
Records Management and Privacy

June 5, 2019
Date

Part 7 - Program Area Signatures

s.22(1)

David Hudgins, Artistic Director
Theatre Arts (Studio 58)

July 5, 2019

Date

s.22(1)

Júlie Longo, Dean
Faculty of Arts

July 9, 2019

Date