

## Summary

In fall 2022, Records Management and Privacy and representatives of Langara Global, Registrar and Enrolment Services, and the Strategic Transformation Office collaborated to complete a privacy impact assessment of the Microsoft Dynamics 365 CRM software scheduled for implementation by Betach Solutions in 2023.

The primary information resources used to complete the PIA were vendor documentation, internally identified operational and technical requirements relating to Phase 1 of the CRM implementation, and Microsoft Azure data centre-related documentation.

The assessment identified moderate risks related to the collection, use and disclosure of high volumes of prospective Regular Studies and Continuing Studies students' personal information (as well as the email addresses of parents who register their children in the Mandarin School). It also identified moderate risks related to the transfer and storage of personal information in a cloud-based third-party data centre (Microsoft Azure). However, these risks are mitigated because no sensitive personal information will be collected, and the data centre is located in Canada. In addition, both Betach Solutions and Microsoft have comprehensive physical and technical security measures in place to protect clients' data both at rest and in transit.

As previously noted, this document assesses the privacy impacts of Phase 1 of the CRM implementation. A separate PIA must be completed prior to expanding the use of the CRM for student admissions or other activities that involve personal information. The co-leads will contact Records Management and Privacy to complete the assessment before implementation.

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## PART 1: GENERAL INFORMATION

<b>Initiative title:</b>	Microsoft Dynamics 365 Customer Relationship Management Software as a Service (SaaS)
<b>Organization:</b>	Langara College
<b>Branch or unit:</b>	Langara Global; Registrar and Enrolment Services (Regular Studies and Continuing Studies)
<b>Initiative Co-Lead contact information:</b>	<p>Arnold Clark, Registrar 605-323-5219; <a href="mailto:arnoldclark@langara.ca">arnoldclark@langara.ca</a></p> <p>Brad Van Dam, Director, Langara Global 604-323-5443; <a href="mailto:bvandam@langara.ca">bvandam@langara.ca</a></p> <p>Pablo Vargas, Associate Vice-President External 604-323-5889; <a href="mailto:pvargas@langara.ca">pvargas@langara.ca</a></p>
<b>Privacy Officer:</b>	Joanne Rajotte, Manager, Records Management and Privacy
<b>Privacy Officer phone:</b>	604-323-5660
<b>Privacy Officer email:</b>	<a href="mailto:jrajotte@langara.ca">jrajotte@langara.ca</a>

**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:**

Not applicable.

## 1. What is the initiative?

In 2021, Langara College initiated the replacement of its current on premise student customer relationship management platform. The objective of Phase 1 of this initiative is to better manage international and domestic Regular Studies and Continuing Studies student recruitment, international student agent management, and online communications as well as supporting Langara's shift to cloud-based platforms. After an extensive negotiated Request for Proposal process, Langara identified a preferred vendor, Betach Solutions (BSI), an integrator of the Microsoft Dynamics 365 (D365) suite of cloud-based customer relationship management products based in Calgary, Alberta. Betach has developed Enroll365, an enhanced student management system that it will deploy in addition to providing D365 integration and support.

Langara College will license Microsoft Dynamics 365 from Microsoft Inc. and in Phase 1 will obtain system integration services and support from Betach Solutions to:

- communicate with student\* prospects and leads;
- review international student study permits;
- produce and disseminate event invitations;
- publish and distribute newsletters; and
- manage relationships with international student education agents.

\*Continuing Studies communicates with the parents of children registered in the Mandarin School.

Microsoft hosts software, and will store Langara's data and information, in Microsoft Azure data centres **s.15(1)(l); s.21(1)**

## 2. What is the scope of the PIA?

This PIA covers the collection, use, and disclosure of the personal information of prospective students, education agents, and the collection and use of limited personal information of parents who register their children in Continuing Studies' Mandarin School.

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

Department	Purpose	Data or Information Elements
<ul style="list-style-type: none"> <li>Langara Global</li> <li>Registrar and Enrolment Services – Regular Studies</li> <li>Registrar and Enrolment Services – Continuing Studies</li> </ul>	<b>Prospective Student Management:</b> Collect and use data or information to manage communications with individuals who may apply for admission.	Name, email address, phone number. Optionally, country of origin, education history. <b>CS's Mandarin School:</b> email address of parents who register their children for classes.
	<b>Lead Management:</b> Collect and use data or information to manage communications with individuals who have applied for admission, but have not yet registered.	<b>All Leads:</b> Name, email address, phone number, date of birth, country of origin, education history, course or program applied for, physical address. <b>International Leads:</b> Study permit-related information. Optional: Test scores, .e.g., English Language Proficiency (LET)
	<b>Education Agent Management:</b> Collect and use data and information of agents who represent international students during the review and approval of contracts and agreements.	Agent and agency name, email address, position, physical address, phone number, contract/agreement details.  Listed elements may be personal information depending on the context of use.

#### 3.1 Did you list personal information in question 3?

Yes.

## PART 2: COLLECTION, USE AND DISCLOSURE

### 4. Collection, use and disclosure

Betach Solution – high-level solution architecture diagram (including data flows):

**s.15(1)(l); s.21(1)**

Personal Information Flow Table			
	Description/Purpose	Type	FOIPPA Authority
1.	<p><b>Prospective Students:</b> Langara employees and in-country contracted representatives will collect personal information directly from individuals who may apply for admission when they:</p> <ul style="list-style-type: none"> <li>a) request information about the College in person, by phone, or by email*; or</li> <li>b) enter their own information into the student-facing D365 portal</li> </ul> <p><b>Leads:</b> Langara employees and in-country contracted representatives will collect personal information directly from individuals when they apply to the College:</p> <ul style="list-style-type: none"> <li>a) through the Ministry of Advanced Education’s Education Planner BC portal;</li> <li>b) through Langara’s student-facing D365 portal;</li> <li>c) by submitting applications by mail or email, or in person; or</li> <li>d) have documentation sent on their behalf, and with their consent, from third parties, such as agents, authorized to represent them.</li> </ul> <p>*When employees and in-country contracted representatives interact with individuals in person, by phone, or by email they will enter contact information into D365 and document their interactions. Entries may contain biographical information and/or information about their educational or employment history, study permit status, application status, Langara academic history, or event participation.</p>	Collection	26(c)
2.	Langara’s IT department will import new student Applicant data from the student information system (Banner Student) to D365 according to a schedule that has yet to be determined.	Collection	26(c)
3.	<p>Langara employees will use personal information to:</p> <ul style="list-style-type: none"> <li>• answer questions and respond to other service requests;</li> <li>• review specific international student documentation as part of determining admission eligibility;</li> <li>• assign students to advisors;</li> <li>• email event invitations and reminders; and</li> <li>• distribute newsletters to constituents.</li> </ul>	Use	32(a)

4.	Langara employees may disclose students' personal information relating to their enrolment status to Canada Border Services Agency or Immigration, Refugees and Citizenship Canada without the individuals' consent.	Disclosure	33.3(d)
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Risk Mitigation Table				
	Risk	Mitigation Strategy	Likelihood	Impact
1.	Employees (including in-country contracted representatives) 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 platform is restricted to authorized employees who use personal information about individuals to provide services and manage relationships with leads, prospective and registered students, and agents. In addition, employees are expected to abide by College policies related to ethical conduct, computer and computing use, access to student computer records, and access to information and privacy.	Low	High
2.	The service provider's (Betach Solutions) employees could access personal information and use or disclose it for purposes other than the reason it was collected or disclosed.	As stated in the service provider's document, Betach: <ul style="list-style-type: none"> <li data-bbox="711 1144 1019 1186">• s.15(1)(l); s.21(1)</li> </ul>	Low	High

		Privacy clauses in agreement with service provider, which includes the Privacy Protection Schedule for Cloud Services, restrict their access to personal information.		
3.	Personal information could be compromised during transmission from Langara College to the Microsoft Azure data centre.	s.15(1)(l); s.21(1)	Low	High
4.	Personal information stored in the Microsoft Azure data centre used by the service provider could be compromised.	Agreement between service provider and Langara requires the service provider s.15(1)(l); s.21(1)	Low	High

## 5. Collection Notice

### Personal Information Collection, Use and Disclosure Notice

Langara College collects personal information under the statutory authority of the *College and Institute Act*, (s. 41.1). This information is collected and will be used for the purpose of recruitment and relationship management in compliance with the *Freedom of Information and Protection of Privacy Act*, (ss. 26(c) and 32(a)). Personal information is stored in an online customer relationship management system located in Canada. For questions about the collection, use and disclosure of your personal information, contact Registrar & Enrolment Services at 604.323.5241 or Continuing Studies at 604.323.5322.

<sup>1</sup> s.15(1)(l)

<sup>2</sup> s.15(1)(l)

## PART 3: STORING PERSONAL INFORMATION

### 6. Is any personal information stored outside of Canada?

No. Personal information in the Microsoft Dynamics 365 CRM platform will only be stored and accessed in Canada **s. 15(1)(l); s. 21(1)**

The service provider may access and use the personal information only for the purposes specified in the agreement and the Privacy Protection Schedule for Cloud Services appended to the agreement.

According to the Privacy Impact Assessment on Microsoft Azure completed by BCNET in March 2018<sup>3</sup>, **s. 15(1)(l); s. 21(1)**

### 7. Does your initiative involve sensitive personal information?

No.

### 8. Is the sensitive personal information being disclosed outside of Canada under FOIPPA section 33(2)(f)?

No.

### 9. Where are you storing the [sensitive] personal information involved in your initiative?

Information will be stored in Canada (see #6 for details).

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<sup>3</sup> **s. 15(1)(l)**

## **PART 4: ASSESSMENT FOR DISCLOSURES OF SENSITIVE PERSONAL INFORMATION OUTSIDE OF CANADA**

**10. Is the sensitive personal information stored by a service provider?**

Not applicable.

**11. Provide details on the disclosure, including to whom it is disclosed and where the sensitive personal information is stored.**

Not applicable

**12. Does the contract you rely on include privacy-related terms?**

Not applicable.

**13. What controls are in place to prevent unauthorized access to sensitive personal information?**

Not applicable.

**14. Provide details about how you will track access to sensitive personal information.**

Not applicable.

**15. Describe the privacy risks for disclosure outside of Canada.**

Not applicable.

## PART 5: SECURITY OF PERSONAL INFORMATION

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

Yes, Microsoft Dynamics 365 is a cloud-based customer relationship management platform.

#### 16.1 Do you or will you have a security assessment to help you ensure the initiative meets the security requirements of FOIPPA section 30?

IT staff reviewed the vendor's SOC 2 report, but did not conduct a further security assessment.

#### 16.2 Security and Privacy Certifications

According to the Privacy Impact Assessment on Microsoft Azure completed by BCNET in March 2018<sup>4</sup>, Microsoft claims the following certifications:

- **SOC 2 (Type II)** – a widely recognized auditing standard issued by the American Institute of Certified Public Accountants (AICPA).
- **ISO 27001** – standard for information security management
- **FedRAMP** – a US government-wide program that provides a standardized approach to security assessment, authorization, and continuous monitoring for cloud products and services.
- **General Data Protection Regulation (GDPR)** compliant

### 17. What technical and physical security do you have in place to protect personal information?

In using Microsoft Azure to store data, including personal information, Betach Solutions shares security and compliance responsibilities with Microsoft. Betach controls how it architects and secures the D365 service and the data put on the infrastructure, Microsoft Azure is responsible for providing services on its highly secure and controlled platforms and providing a wide array of additional security features.

#### 17.1 Technical security measures related to this initiative consist of:

According to Betach Solutions (BSI), technical security controls include:

- s.15(1)(l); s.21(1)

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<sup>4</sup> s.15(1)(l)

- s.15(1)(l); s.21(1)

According to Microsoft's s.15(1)(l); s.21(1)

technical security controls at

Microsoft Azure data centres include:

- s.15(1)(l); s.21(1)

## 17.2 Physical security measures related to this initiative consist of:

According to Betach Solutions (BSI), physical security controls at the service provider's premises include:

- s.15(1)(l); s.21(1)

- s.15(1)(l); s.21(1)

According to information available at s.15(1)(l); s.21(1)

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

Layers of physical security are:

- s.15(1)(l); s.21(1)

## 18. Controlling and tracking access

<b>Strategy</b>	
We only allow employees in certain roles to have access to information	s.15(1)(l)

<b>Strategy</b>	
Employees that need standing or recurring access to personal information must be approved by executive lead	No. See above.
We use audit logs to see who accesses a file and when	s.15(1)(l)  s.15(1)(l)

## PART 6: ACCURACY, CORRECTION AND RETENTION

### 19. How will you make sure that the personal information is accurate and complete?

Prospective students and their authorized agents provide personal information directly to Langara by entering it into the D365 student-facing portal. Employees may enter personal information provided by individuals by email, in person, or on forms, including the email address of parents who register their children in Continuing Studies' Mandarin School. If necessary, employees will verify that the information is accurate and complete by confirming it with the individual or their agent.

### 20. 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.**

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

Prospective students may update or correct information by entering data into the student-facing D365 portal. Registered students may update or correct their information stored in the student information system (Banner Student) by making a written request to Registrar and Enrolment Services.

#### 20.2 Sometimes it's not possible to correct the personal information. FOIPPA requires that you make a note on the record about the request for correction if you're not able to correct the record itself. Will you document the request to correct or annotate the record?

Yes. If it is not possible to correct the information itself, Langara employees will make a note in the individual's D365 file to document that the request was received.

**20.3** If you receive a request for correction from an individual and you know you disclosed their personal information in the last year, FOIPPA requires you to notify the other public body or third party of the request for correction. Will you ensure that you conduct these notifications when necessary?

Yes, Langara will notify other public bodies or third parties that disclosed personal information was corrected.

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

Yes, Langara Global and Registrar and Enrolment Services (Regular Studies/Continuing Studies) use personal information to make decisions about prospective students.

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

Yes, according to the College's Recorded Information Management Policy B5010, departments must establish and adhere to retention and disposal schedules that ensure that they retain records used to make a decision about an individual for at least one year. Departments' retention schedules must also meet operational and legislative requirements, which typically results in their retaining such records longer than one year. At this time, Langara intends to retain D365 indefinitely.

## PART 7: AGREEMENTS AND INFORMATION BANKS

**23. Does your initiative involve an information sharing agreement?**

No.

**24. Will your initiative result in a personal information bank?**

Yes. FIPPA-required personal information bank descriptors consist of:

**Name:** Microsoft Dynamics 365 customer relationship management platform

**Data elements:** Use of Microsoft Dynamics 365 includes all data and personal information as outlined in section 3 (above)

**Authority:** FIPPA section 26(c)

**Purpose:** Collected, used, and disclosed for marketing, managing prospects and leads, processing service requests, and managing agent relationships in the D365 platform

**Users:** Used by authorized Langara employees, prospects and leads, and authorized international student education agents.

## PART 8: ADDITIONAL RISKS

### 25. Risk response

**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.**

Not applicable.

## PART 9: SIGNATURES

### Privacy Office Comments

This PIA is based on a review of the material provided to the Manager, Records Management and Privacy by Langara Global and Registrar and Enrolment Services (RS/CS) or obtained from Betach Solutions and Microsoft as of the date below. If in future any substantive changes are made to the scope of this PIA, Langara Global and Registrar and Enrolment Services will contact the Manager, Records Management and Privacy who will complete a PIA Update.

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Joanne Rajotte, Manager  
Records Management and Privacy

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Date

**Program Area Signatures:**

Role	Signature	Date signed
<b>Initiative Co-Lead &amp; Department Manager:</b> Arnold Clark, Registrar	<b>s.22(1)</b>	January 17, 2023
<b>Initiative Co-Lead &amp; Department Manager:</b> Brad Van Dam, Director, Langara Global		
<b>Initiative Co-Lead &amp; Department Manager:</b> Pablo Vargas, Associate Vice-President, External		January 17, 2023
<b>Head of public body, or designate:</b> Marg Heldman, Vice-President Academic		January 20, 2023
<b>Head of public body, or designate:</b> Michael Koke, Vice-President, Administration and Finance		January 20, 2023