

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 (PIA) of the Microsoft Dynamics 365 CRM software scheduled for implementation by Betach Solutions in 2023. In October 2023, Canadian accounting and consulting services firm MNP (Meyers Norris Penny) acquired Betach.

When the team completed the PIA in January 2023, the project's co-leads affirmed that a separate assessment would be completed prior to expanding the use of the CRM for student admissions or other activities that involve the collection, use, and/or disclosure of personal information.

This document is an addendum to the original PIA to identify the personal information flows and privacy risks that result from individuals applying to full-time and part-time Continuing Studies programs, and does not necessarily repeat other sections of the original in their entirety. A link to the original PIA can be found on page three of this document. The primary information resource used to complete this PIA was the CRM Project Charter Implementation document.

This assessment identifies moderate risks related to the collection and use of high volumes of personal information of individuals applying to full-time and part-time Continuing Studies programs. The moderate risks related to the transfer and storage of personal information in a cloud-based third-party data centre (Microsoft Azure) identified in the original assessment remain the same.

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PART 1: GENERAL INFORMATION

Initiative title:	Microsoft Dynamics 365 Customer Relationship Management Software as a Service (SaaS) – Continuing Studies Applicant Portal
Organization:	Langara College
Branch or unit:	Continuing Studies; Registrar and Enrolment Services (Regular Studies and Continuing Studies)
Initiative Co-Lead contact information:	<p>Connie Chong, Dean, Continuing Studies 604-323-5889; cchong@langara.ca</p> <p>Arnold Clark, Registrar 604-323-5219; arnoldclark@langara.ca</p> <p>Brad Van Dam, Director, Langara Global 604-323-5443; bvandam@langara.ca</p>
Privacy Officer:	Joanne Rajotte, Manager, Records Management and Privacy
Privacy Officer phone:	604-323-5660
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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:

[PIA2022-0003 – Microsoft Dynamics 365 CRM completed January 2023.](#)

1. What is the initiative?

In 2023, Langara College implemented Phase 1 of an initiative to replace the current on-premise student customer relationship management platform 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. The objective of Phase 2 of the project is to implement an applicant portal for both domestic and international students applying to full-time or part-time Continuing Studies programs.

2. What is the scope of the PIA?

This PIA covers the collection and use of the personal information of individuals applying to Continuing Studies programs, and in some cases, authorized education agents.

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

Department	Purpose	Data or Information Elements
<ul style="list-style-type: none"> Continuing Studies 	Student Application Management: Collect and use data or information of individuals who apply to Continuing Studies full-time or part-time programs.	Required: Name, birthdate, gender, email address, physical address, phone number, emergency contact name and phone number, secondary and, if applicable, post-secondary education history. Optionally: <ul style="list-style-type: none"> Langara Student Identification Number - for previously registered students Personal Education Number (PEN) - for domestic students Aboriginal Identity For international students: <ul style="list-style-type: none"> Country of citizenship English Language Test score Authorized representative name, relationship, and contact information.
	Education Agent Management: Collect and use data and information of agents who represent international students.	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.
	Applicant Communication Management: Use information collected from applicants during the admission process to communicate with segmented audiences for specific programs.	Name, email address, Langara Student Identification number, and program description.

3.1 Did you list personal information in question 3?

Yes.

PART 2: COLLECTION, USE AND DISCLOSURE

4. Collection, use and disclosure

See PIA2022-0003 (page 6) for details.

Personal Information Flow Table			
	Description/Purpose	Type	FOIPPA Authority
1.	<p>Continuing Studies (CS) employees will collect personal information directly from individuals who apply for admission to Continuing Studies programs through the CS Applicant Portal of the D365 CRM system. Individuals either:</p> <ul style="list-style-type: none"> a) enter their own information; or b) authorize an education agent to enter information on their behalf. <p>CS employees manually update these application records throughout the admissions process.</p>	Collection	26(c)
2.	<p>CS employees will manually generate new Langara student identification numbers in the Banner student information system or copy existing Langara student numbers from Banner into a CRM staging application, which is then pushed to the CRM every day excluding weekends and statutory holidays.</p>	Use	32(a)
3.	<p>CS employees will use the information of international student applicants to generate:</p> <ul style="list-style-type: none"> • Continuing Studies International admissions Applicant Letter of Acceptance (LOA); • Continuing Studies admission Offer of Admission (OOA); and • Applicant fee payment notice through external Payment Card Industry (PCI) gateways. 	Use	32(a)
4.	<p>CS employees will use the personal information of applicants to create, schedule, and send emails, known as Journeys, to segmented audiences for specific programs based on triggers and inputs from applicants' contact information.</p>	Use	32(a)

Risk Mitigation Table				
	Risk	Mitigation Strategy	Likelihood	Impact
1.	<p>Employees could access personal information and use or disclose it for a purpose other than the reason it was collected.</p>	<p>Physical and technical access to the platform in general, and the CS Applicant Portal in particular, is restricted to authorized employees who use personal information about individuals to provide services and</p>	Low	High

		<p>manage relationships with leads, prospective and registered students, and agents.</p> <p>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.</p>		
2.	<p>The service provider's (MNP, formerly Betach Solutions) employees could access personal information and use or disclose it for purposes other than the reason it was collected or disclosed.</p>	<p>As stated in the service provider's document, MNP</p> <p>s.15(1)(l); s.21(1)</p> <p>Privacy clauses in agreement with service provider, which includes the Privacy Protection Schedule for Cloud Services, restrict their access to personal information.</p>	Low	High
3.	<p>Personal information could be compromised during transmission from Langara College to the Microsoft Azure data centre.</p>	<p>s.15(1)(l); s.21(1)</p>	Low	High

¹s.15(1)(l)

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) s.15(1)(l); s.21(1)	Low	High
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5. Collection Notice

Personal Information Collection, Use and Disclosure Notice

Langara College Continuing Studies 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 managing student applications 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 and use of your personal information, contact Continuing Studies at 604.323.5322.

² 20180327 Azure PIA – final.pdf

PART 3: STORING PERSONAL INFORMATION

6. Is any personal information stored outside of Canada?

No. See PIA2022-0003 (page 10) for details.

7. Does your initiative involve sensitive personal information?

Yes. Gender, Aboriginal Identity (applicant has the option to indicate their indigenous affiliation).

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 PIA2022-0003 (page 10) for details.

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

See PIA2022-0003 (pages 12-14) for detailed answers to the following sections:

- 16. Does your initiative involve digital tools, databases or information systems?**
- 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?**
- 16.2 Security and Privacy Certifications**
- 17. What technical and physical security do you have in place to protect personal information?**
- 17.1 Technical security measures related to this initiative consist of:**
- 17.2 Physical security measures related to this initiative consist of:**
- 18. Controlling and tracking access**

Strategy	
We only allow employees in certain roles to have access to information	s.15(1)(I)
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)(I)

PART 6: ACCURACY, CORRECTION AND RETENTION

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

Applicants and their authorized agents provide personal information directly to Langara by entering it into the CS Applicant Portal of the D365 CRM.

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?

Applicants may update or correct information by entering data into the CS Applicant Portal.

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, Continuing Studies uses personal information to make decisions about applicants.

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

See PIA2022-0003 (page 16) for details.

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 and used for processing applications submitted through the CS Applicant Portal of the D365 CRM by domestic and International students.

Users: Used by authorized Langara employees, applicants, and authorized international student education agents.

*Although additional personal information will be collected and used during the application process, for the purposes of FIPPA-related requirements the platform as a whole is designated as one single Personal Information Bank.

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 the Strategic Transformation Office and Continuing Studies. If in future any substantive changes are made to the scope of this PIA, the Strategic Transformation Office will contact the Manager, Records Management and Privacy who will complete a PIA Update.

s.22(1)

Joanne Rajotte, Manager
Records Management and Privacy

DEC. 19, 2023
Date

Program Area Signatures:

Role	Signature	Date signed
Initiative Co-Lead & Department Manager: Connie Chong, Dean, Continuing Studies	s.22(1)	December 21, 2023
Initiative Co-Lead & Department Manager: Arnold Clark, Registrar		December 20, 2023
Initiative Co-Lead & Department Manager: Brad Van Dam, Director, Langara Global		December 20, 2023
Head of public body, or designate: Marg Heldman, Executive Advisor to the President (former Provost and Vice-President Academic)		
Head of public body, or designate: Michael Koke, Vice-President, Administration and Finance		January 2, 2024

Program Area Signatures:

Role	Signature	Date signed
Initiative Co-Lead & Department Manager: Connie Chong, Dean, Continuing Studies	s.22(1)	December 21, 2023
Initiative Co-Lead & Department Manager: Arnold Clark, Registrar		December 20, 2023
Initiative Co-Lead & Department Manager: Brad Van Dam, Director, Langara Global		December 20, 2023
Head of public body, or designate: Marg Heldman, Executive Advisor to the President (former Provost and Vice-President Academic)		January 4, 2024
Head of public body, or designate: Michael Koke, Vice-President, Administration and Finance		