Langara.
THE COLLEGE OF HIGHER LEARNING.

Privacy Impact Assessment for Non-Ministry Public Bodies

Microsoft Office 365

PIA2019-0005

Part 1 – General

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1. **Description of the Initiative**

In 2014 Langara College (also referred to as Langara in this document) began migrating staff and faculty email accounts to Global Relay for two technologies, namely, Global Relay Mail Archive (7-year retention of all mail regardless of deletion) and Zimbra Mail, Calendar, Contacts, and Tasks. However, due to ongoing technical hurdles with Zimbra, migrations ceased and eventually Global Relay and Langara mutually agreed to walk away from contractual agreements. This necessitated the need to migrate users to a new platform by the end of September 2016.

Microsoft Office 365 (O365) software-as-a-service (SaaS) was the selected solution as an in-Canada data residency cloud solution had become available with datacentres located in Quebec City, QC and Toronto, ON. "Office 365" refers to the subscription plans that include access to Office applications plus other productivity services that are enabled over the internet (i.e. cloud services). Microsoft can provide these services in a variety of packages. This provided an opportunity for modernization and improvements to information security and privacy, while lowering the overall cost and complexity of Langara College's information technology services. Microsoft provides all the infrastructure from the foundational Azure cloud service fabric, (the complete applications stack) down to networking (i.e., all the applications, operating system, cloud management, and network software, including the server and storage hardware elements, required to support these software components).

Microsoft's Azure cloud-based computing architecture provides clear separation of roles, duties and controls related to access and management of the O365 SaaS. In-scope services within the Microsoft Cloud meet key international and industry-specific compliance standards, such as ISO/IEC 27001 and ISO/IEC 27018, FedRAMP, and SOC 1 and SOC 2 and Microsoft actively plans changes to help ensure continuous compliance with every evolving regulations and standards. Microsoft Office365 offers additional controls (such as the Customer Lockbox) on top of Azure's international standards-based security foundation, which are designed to maximize security and ensure privacy of user content. These safeguards coupled with a regular schedule of audits and attestations, results in a suite of in-Canada IT services capable of meeting or exceeding the Langara's privacy and security requirements.

A key premise of the model is that the customer, Langara, controls and owns their content. Microsoft has no standing access to the service components that Langara is responsible for (applications, configurations, and all application data) in their cloud SaaS solution. Explicitly, this applies to the Office 365 server applications: Exchange, Skype, SharePoint, OneDrive and related services; as well as the Azure Service Fabric including the Azure Active Directory and related services. Microsoft, as the cloud service provider, performs the role of data processor and has zero standing access to customer content. As a service provider Microsoft will only interact with Langara data under exceptional circumstances for the purpose of providing support services when a problem cannot be self-remedied by Langara College's own IT or in-house support teams.

Microsoft Office 365 consists of the following:

1. Office Pro Plus (desktop and cloud-based traditional Microsoft Office suite of software);
2. Unified Communications (Exchange email and Skype for Business, which includes audio and video conferencing, Voice over IP, etc.);
3. Office 365 SaaS fabric services (security and compliance management tools that overlay all application services);
4. OneDrive (conceptually like Shared File Service today); and,
5. SharePoint (Web-enabled collaboration services).

s.15(1)(l))

Approximately 1500 staff and faculty email accounts were migrated to O365's Exchange Online service in 2016, with the 7-year retention policy remaining in effect as the same Global Relay Archive system is used by the Microsoft solution. In conjunction with Exchange Online, Exchange Online Protection (EOP), an enterprise-class spam and malware filtering service, was also implemented. No risk assessment was conducted at that time.

s.15(1)(l))

s.15(1)(l)) . Subsequently Langara will be migrating all active student email accounts to Exchange Online, as well as the staff and faculty portion of the myLangara portal to SharePoint Online. OneDrive for Business, provided by O365's SharePoint Service, will also be implemented to provide a secure cloud storage location where users can store, share, and sync their work files between their different devices. Skype for Business Online (SfB), as well as Teams, will be implemented to enable collaboration in real-time for Langara users. SfB will be retired by Microsoft on July 31, 2021, at which time if Teams have not been implemented, a transition of Langara users will be required.

s.15(1)(l))

O365 services will be accessible directly via the Internet to all authorized users. Microsoft does offer Express Route which provides a dedicated secure route from the customer to Microsoft which could restrict data transmission within Canada, however it is not currently being used by Langara. Go live for these initiatives is planned for December 2019.

2. Scope of this PIA

The scope of this PIA is for Langara College's implementation of the following components of Microsoft Office 365, a SaaS cloud solution hosted in Canadian data centres:

- **Exchange Online** – an e-mail messaging system that runs on Windows servers. The server side is Microsoft Exchange Server and the featured client program is Microsoft Outlook, which includes email, calendar, contacts, and tasks. Exchange Online Protection is also included.
- **Office Pro Plus** – includes Outlook, Word, Excel and PowerPoint, OneNote, Publisher and Access (client and online versions);
- **OneDrive** – supports collaboration with Word, Excel, PowerPoint, and OneNote from a user's desktop, mobile device, and the web.
- **SharePoint Online** – a Microsoft platform used to create intranets (internal Web sites) for team collaboration, blogs, wikis and company news. It is also commonly deployed to extend certain information to customers via password-protected Web sites and includes OneDrive for Business.
- **Skype for Business Online (SfB)** – a communication service that includes instant messaging, audio and video calling, online meetings, and Web conferencing capabilities.
- **Teams** – similar to SfB but provides additional functionality that enable users to actively connect and collaborate in real time on documents, files and shared apps.

Out of scope of this PIA are:

- Microsoft Azure;
- Infrastructure-as-a-Service (IaaS);
- Microsoft Azure Platform-as-a-Service (PaaS);
- Microsoft CRM Online (CRM/Case, HR and Financial Management Software as a Service), and
- Any other services or applications not specifically noted as being in scope.

3. Related Privacy Impact Assessments

There are no related Langara College PIAs.

4. Elements of Information or Data

Microsoft will have custody of 3 basic categories of data, defined as follows:

a) Service or System Data

System or Service Data is data about, and generated by, an information system or cloud service. Typical examples of service data include remaining storage capacity, system health indicators, network traffic volume, and bandwidth consumption, all of which are examined or used solely for the purpose of providing the cloud service.

i. System data is not personal information and is distinct from user generated content. System data is used solely for the purpose of providing, operating and maintaining the service, or diagnosing and/or troubleshooting in the event of problems or system outages.

ii. This non-personal data is accessed by authenticated system administrators, service technicians and operators with the appropriate and minimized levels of access. As a rule, technicians are granted just-in-time[1] minimum privileges necessary to troubleshoot the system on an exceptional basis, and only for a fixed period of time. Upon completion of any maintenance task, administrative privileges and access to service data are revoked, and all associated data around these activities are logged.

b) *Employee Contact Data*

Employee Contact Data is basic information used to identify or differentiate users within the cloud service. Examples include User ID, Organizational ID and basic user contact information such as phone number or email address. This information may be accessed by Microsoft staff providing requested level 2 support in the event that Langara's IT help desk are unable to resolve an access issue. Microsoft is never provided with a user's password.

c) *Customer Content*

Customer (in this case, Langara College) content consists of data, information (including personal information of staff, students, alumni, and faculty), documents, spreadsheets and other artifacts that are authored, edited, communicated, maintained and eventually disposed of by Langara College users.

i. Content is considered sensitive in nature. In Microsoft Cloud Services, customers control their own content data. Microsoft's role is limited to that of data processor, a position that is further reinforced in the Microsoft Online Privacy Statement and their security audits, third party attestations and certifications.

ii. Specific content will range in type, volume and sensitivity according to the Langara College users that are making use of Microsoft Cloud Services.

iii. Customer content is not accessible or visible to Microsoft Cloud Services administrators, except in non-routine maintenance scenarios. In these cases, Microsoft, with explicit consent from Langara College, would be able to investigate and/or fix an ongoing problem with a cloud service.

Langara College users control their user-created content and the content which they receive from others, including the deletion of such content.

Appendix A provides a detailed list of data elements that may be involved in the O365 implementation, not including users' content.

[1] "Just-In-Time (JIT) access and elevation" refers to Microsoft's policy that limits staff access based on the actual time required to address an identified problem at a specified time.

Part 2 – Protection of Personal Information

5. Storage or Access outside Canada

With respect to storage and access of data, each of the three basic categories of data (System or Service Data, Employee Contact Data and Customer Content) in Microsoft Cloud Services are treated individually as follows:

1. System or Service Data comes from the ongoing operation of Office 365 and Microsoft Azure cloud services.
s.15(1)(l)) s.15(1)(l))

2. Employee Contact Data (not considered personal information under the *Freedom of Information and Protection of Privacy Act*) in Microsoft Cloud Services will be entered in Microsoft Azure active directory. s.15(1)(l))
s.15(1)(l))

3. For Microsoft's in-Canada Cloud Services, Customer Content, likely to contain personal information, is s.15(1)(l))

s.15(1)(l))

Office 365 uses both physical storage and Azure cloud storage. Exchange Online and Skype for Business Online use their own storage for customer (Langara) data. SharePoint Online leverages both its SQL Server storage and Azure storage, which necessitates the need for additional isolation of client data at the storage level.

There are three areas of concern regarding the potential disclosure, processing and storage of information outside of Canada with this implementation of O365. s.15(1)(l))
s.15(1)(l))

Subsequently, consent will be collected from all users every time they sign in to use O365 and other services offered by Langara. See question 10. Collection Notice for further details regarding consent.

The second relates to the Microsoft Online Services Terms[2] (OST) which appears to give Microsoft the discretion to transmit, store and process information at other locations beyond the chosen Canadian data centres. The third relates to the use of microservices, such as the spell check and translate functions, which requires information be sent outside of Canada for processing. In both cases the concern is that personal information could be disclosed, processed and retained by Microsoft outside of Canada in contravention of FIPPA. s.21(1)
s.21(1)
s.21(1)

The Online Services Terms states s.21(1)
s.21(1)
s.21(1) This applies to other cloud services where Microsoft does not have a contractual commitment to maintain that data in country, such as Sway, Yammer and some of the other non-core Office 365 services. As Microsoft enables more core services in the Canadian datacenters, the OST is updated. Teams has been the most recent service made available in the Canadian datacentres and the OST soon to reflect that contractually. Further in the OST, Microsoft stipulates that they maintain Office 365 core data in Canada and then go on to define exactly what services that entails (Exchange, SharePoint, OneDrive, etc.). Given this response, the discretion given to Microsoft in the OST to transmit, process and retain data outside of Canada does not appear to impact this initiative.

Regarding the concern related to O365 microservices, s.21(1)
s.21(1)
s.21(1) . This complex issue is one that Microsoft's BC Government team continues to work through with the BC Office of the Information and Privacy Commissioner (OIPC), as it has implications for all of BC public sector. Risk

Regarding access to personal information from outside of Canada, Langara authorized users can access data via the Internet so it is possible that this could occur. This access would primarily be users accessing their own created content, however, could also involve accessing personal information being used in a collaboration with other authorized users. Langara will be implementing consent process when logging in, but currently has no other administrative safeguards to mitigate this risk. Risk

s.21(1)

6. Data-linking Initiative*

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.	
1. Personal information from one database is linked or combined with personal information from another database;	yes
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
If you have answered "yes" to all three questions, please contact your privacy office(r) to discuss the requirements of a data-linking initiative.	

7. Common or Integrated Program or Activity*

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

8. Personal Information Flow Diagram and/or Personal Information Flow Table

Langara College users accessing Microsoft Office 365 services begins at internet-enabled locations and ends at a Microsoft Canadian-based datacentre. Connectivity to the Microsoft datacentre will be via the Internet. Microsoft will only access and use Langara College content to provide Langara College with the Microsoft Online Services, including purposes compatible with providing those services (i.e. service support).

As a contracted service provider, the flow of personal information between Microsoft and Langara College will be conducted under the following FIPPA authorities for collection and disclosure:

- **S. 26(c)** - Collection - *the information relates directly to and is necessary for a program or activity of the public body,*
- **S. 33.2(c)** - Disclosure - *to an officer or employee of the public body or to a minister, if the information is necessary for the performance of the duties of the officer, employee or minister;*
- **S. 33.1(1)(p)** (where applicable) - Disclosure Inside or outside Canada - the disclosure
  (i) is necessary for
  (A) installing, implementing, maintaining, repairing, troubleshooting or upgrading an electronic system or equipment that includes an electronic system, or
  (B) data recovery that is being undertaken following failure of an electronic system

that is used in Canada by the public body or by a service provider for the purposes of providing services to a public body, and

(ii) in the case of disclosure outside Canada,

(A) is limited to temporary access and storage for the minimum time necessary for that purpose, and

(B) in relation to data recovery under subparagraph (i) (B), is limited to access and storage only after the system failure has occurred;

Although Microsoft has physical/technical custody of client-generated data, the technical Infrastructure, as described at a high level in Part 3 of this document, substantiates that Microsoft may only access personal information when that information relates directly to, and is necessary for, a program or activity of Langara College. Langara College may disclose, and/or provision access to personal information if the information is necessary for the performance of the duties of a Microsoft employee as a Langara College service provider.

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

Once authenticated, data transactions occur directly between the user and Microsoft. The important differences between how Langara currently manages the services and features it uses that are currently within O365 on campus and MS O365 in the cloud is that s.15(1)(l))

s.15(1)(l))

s.15(1)(l))

Exchange Online

Outlook Exchange ActiveSync, and Outlook Web App are Microsoft O365 services a Langara College user would use in order to use their Exchange Online account (i.e. email, calendar) via their computer, their mobile device and their personal computer.

Exchange Online stores customer data within mailboxes that are hosted within mailbox databases. These mailboxes include user mailboxes, resource mailboxes (e.g. meeting rooms, vehicles), shared mailboxes and public folder mailboxes.

Their user mailbox data includes emails and email attachments, calendaring and "free/busy" information, contacts, tasks, notes, groups, and inference data.

s.15(1)(l))

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

Personal Information Flow Table #1 - Exchange			
	Description/Purpose	**Type**	**FIPPA Authority**
1.	*Exchange mailbox is established for an individual user.*	*n/a*	*n/a*
2.	*User sends/receives emails from mailbox that may/may not contain personal information.*	*Collection* *Use* *Disclosure*	*26(c)* *32* *33.2(c)*
3.	*Email is analyzed by Exchange Online Protection filters.*	*See Personal Information Flow Below for Exchange Online Protection*	
4.	*Summary of email transport activity is logged by Microsoft in tracking logs (containing fields sent by, sent to, subject heading, and time stamp).*	*Collection*	*26(c)*
5.	*Email is stored on Langara's tenancy within Microsoft's servers.*	*Disclosure*	*33.2(c)*
Note: All disclosures by Langara and collections by Microsoft are of encrypted data only. Langara retains the only encryption key and is the only party able to view the personal information.			

The table below (available on the Microsoft website[3]) provides an overview of the security and compliance features of Exchange Online, and links to additional information on each feature.

Feature & Links	Description
Archive mailboxes in Exchange Online	Archive mailboxes (called *In-Place Archiving*) let people in your Office 365 organization take control of messaging data by providing additional email storage. People can use Outlook or Outlook Web App to view messages in their archive mailbox and move or copy messages between their primary and archive mailboxes.
In-Place Hold and Litigation Hold	In-Place Hold and Litigation Hold allow you to preserve or *archive* mailbox content for compliance and eDiscovery.
In-Place eDiscovery	In-Place eDiscovery allows authorized compliance officers in your organization to search mailbox data across your Exchange organization, preview search results, copy them to a Discovery mailbox or export them to a .pst file.
Inactive mailboxes in Exchange Online	You can preserve the contents of deleted mailboxes indefinitely by using *inactive mailboxes*. You can make an inactive mailbox by placing an In-Place Hold or a Litigation Hold on the mailbox, and then deleting the corresponding Office 365 user account. In addition to preserving mailbox contents, administrators or compliance officers can use In-Place eDiscovery to search the contents of an inactive mailbox.
Data loss prevention (DLP)	Data loss prevention (DLP) helps you identify and monitor sensitive information, such as private identification numbers, credit card numbers, or standard forms used in your organization. You can set up DLP policies to notify users that they are sending sensitive information or block the transmission of sensitive information.
Exchange auditing reports	You can use the auditing functionality in Exchange Online to track changes made to your Exchange Online configuration by Microsoft and by your organization's administrators, and to audit mailbox access by persons other than the mailbox owner. In Exchange Online, audited actions are recorded and available to view in an online report or export to a file.
Messaging records management (MRM)	Messaging records management (MRM) helps your organization manage email lifecycle to meet business and regulatory requirements and reduce the legal risks associated with email. In Exchange Online, you can use In-Place Hold or Litigation Hold to preserve email and Retention tags and retention policies to archive and delete email.

[3] Refer to the Microsoft website for more information: https://technet.microsoft.com/en-us/library/jj200706(v=exchg.150).aspx

Feature & Links	Description
Information Rights Management in Exchange Online	Information Rights Management (IRM) helps you and your users control who can access, forward, print, or copy sensitive data within an email. IRM can use your on-premises Active Directory Rights Management Services (AD RMS) server or Azure RMS.
Office 365 Message Encryption	Office 365 Message Encryption allows you to send encrypted messages to people inside or outside your organization, regardless of the destination email service—whether it's Outlook.com, Yahoo, Gmail, or another service. Designated recipients can send encrypted replies.
S/MIME for message signing and encryption	Secure/Multipurpose Internet Mail Extensions (S/MIME) allows email users to help protect sensitive information by sending signed and encrypted email within their organization. As an administrator, you can enable S/MIME-based security for your organization if you have mailboxes in either Exchange 2013 SP1 or Exchange Online.
Journaling	Journaling can help you meet legal, regulatory, and organizational compliance requirements by recording inbound and outbound email communications. In Exchange Online, you can create journal rules to deliver journal reports to your on-premises mailbox or archiving system, or to an external archiving service.
Mail flow or transport rules	You can use mail flow rules, also known as Transport rules, to inspect messages sent or received by your users and take actions such as blocking or bouncing a message, holding it for review by a manager or an administrator or delivering a copy to another recipient if the mail flow rule is satisfied.

Exchange Online Protection (EOP)
Exchange Online Protection (EOP) is a SaaS based product from Microsoft that provides enterprise class reliability and protection against spam and malware for incoming and outgoing messages. The EOP system only scans information that is outbound or inbound: it does not scan internal content. These emails are scanned for malware by an internal spam/AV service on Exchange. Emails that are sent from one user to another within the same Office 365 tenant do not flow through EOP.

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

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

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

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

Personal Information Flow Table #2 – Exchange Online Protection			
	Description/Purpose	**Type**	**FOIPPA Authority**
1.	s.15(1)(l))	*Collection*	*26(c)*
2.	s.15(1)(l))	*Disclosure*	*33.1(1)(p) / 33.2(c)*
Note: s.15(1)(l)) s.15(1)(l))			

The table below s.15(1)(l)); s.21(1)

Category	Exchange Online Protection Features
Anti-spam protection	• s.15(1)(l)); s.21(1) • • • • •
Spam Management	• • s.15(1)(l)); s.21(1) • • • • • • • • • • • • • •
Anti-malware Protection	• • s.15(1)(l)); s.21(1) • • • •

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

Category	Exchange Online Protection Features
	•
Mail routing and connectors	•
Transport rules	•
Administration	•
Reporting and logging	•
Service Level Agreements (SLAs) and support	•
Other features	•

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

SharePoint Online
Microsoft SharePoint Online is a collection of cloud- and web-based technologies that makes it easy to store, share and manage digital information within an organization.

SharePoint Online is divided into three hubs:

- Newsfeed,
- OneDrive, and
- Sites.

A new microblogging feature allows users to engage in conversations, "like" posts, include pictures, videos and documents and mention other users in the Newsfeed. Sites can be easily customized or configured for mobile devices.

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

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

Document Records Management: This technology in Office 365 enables clients to control how long to keep items in users' SharePoint sites and define what action to take on items that have reached a certain age.

eDiscovery, Advanced eDiscovery and/or Data Loss Prevention: Microsoft provides a tool characterized as an "eDiscovery Center" for SharePoint. This tool can be delegated to specialist client users (e.g. compliance officers, human resources personnel) to search for and preserve records for litigation purposes. eDiscovery uses the content indexes created by SharePoint Search. Authorized client users can perform an eDiscovery search of mailboxes or SharePoint content by specifying search criteria such as keywords, start and end dates, etc. The function can also be used to proactively identify client-defined sensitive information for data loss prevention purposes. After the search is complete, authorized users can then:

- Obtain an estimate of the total size and number of items that will be returned by the search, based on the specified criteria;
- Preview search results
- Copy search results; and
- Export search results.

Advanced eDiscovery builds on the eDiscovery capabilities by enabling an initial search of all content sources to identify and collect data that may be relevant to a specific legal case. With it, the data set size that is relevant can be reduced before further review by applying text analytics, machine learning and Relevance/predictive coding.

An example SharePoint data flow is depicted in Figure 3.

s.21(1)

Personal Information Flow Table #4 - SharePoint			
	Description/Purpose	**Type**	**FIPPA Authority**
1.	*SharePoint Online sites are created within Langara's tenancy within Microsoft's servers*	*Disclosure (by Langara)*	*33.2(c)*
2.	*SharePoint Online sites are used for work units to collaborate. Collaboration could include conversations, surveys, documents (and revision), and work histories respecting a project.*	*Disclosure*	*33.2(a)/(c)*
3.	*Microsoft stores all data resting on a SharePoint Online site*	*Collection*	*26(c)*
Note: s.15(1)(l)) s.15(1)(l))			

Skype for Business Online (SfB)

Microsoft Skype for Business Online is a hosted communications service that connects people anytime and from virtually anywhere by delivering the collaboration capabilities of Skype as a cloud-based service. It gives users access to presence, instant messaging, audio and video calling, online meetings, and extensive web conferencing capabilities. It is scheduled for retirement by Microsoft on July 31, 2021, with Langara users anticipated to be transition to Teams prior to that date.

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

Personal Information Flow Table #5 – Skype for Business			
	Description/Purpose	**Type**	**FIPPA Authority**
1.	• *User information is imported into SfB from Active Directory (AD)* • *Langara discloses the Active Directory (AD) user information to SfB*	*Collection* *Disclosure*	*26(c), 27(1)(b)* *33.2(c)*

Personal Information Flow Table #5 – Skype for Business			
	Description/Purpose	**Type**	**FIPPA Authority**
2.	• *Free/busy calendar info (point in time only, not stored)* • *User (opts to) upload photo for purposes of employee/workplace engagement and familiarity*	*Collection* *Collection & Disclosure*	*26(c), 27(1)(b)* *26(c)* *33.2(a)/(c)*
3.	*SfB collects information from users directly:* • *when a user is not at their computer for x number of minutes;* • *when a user does not want to be disturbed;* • *when a user adds specific contact information;* • *when a user types in a status note.*	*Collection* *Disclosure*	*26(c)* *33.2(a)/(c)*
4.	*SfB users search the Skype directory and adds other users to their contacts list*	*Use*	*32(a)*
5.	*SfB users add external (outside of Langara) contacts to their contacts list*	*Collection*	*26(c)*
6.	*User activity logs are created when users communicate with each other using SfB*	*Collection*	*26(c)*
7.	*SfB users may share information in Skype meetings*	*Disclosure*	*Only when authorized to do so under section 33.1 of FIPPA.*
8.	*Microsoft Engineer accesses customer content for the purpose of requested service support.*	*Disclosure*	*33.1(1)(p)*
9.	*SfB logs and other data are stored on Langara's tenancy within Office 365.*	*Disclosure (by Langara)*	*33.2(c)*
Note: s.15(1)(l)) s.15(1)(l))			

Teams

Microsoft Teams is similar to SfB in regard to its audio, video, web conferencing, and chat functionality, but it differs in its integration with other O365 applications that enables enhanced collaboration between members of a Team. In contrast to SfB, Teams can integrate with over 140 Microsoft and third-party apps to further improve collaborative work.
As SfB will be retired by Microsoft on July 31, 2021, Langara has the option to integrate Teams between now and 2021, or transition users from SfB to Teams in 2021. A PIA Addendum will be completed to document that implementation of Teams.

Office 365 Customer Lockbox

In exceptional and rare instances, where a Langara is not able to self-remediate an issue using available resources a ticket may be opened in the service portal to have the problem resolved by Microsoft. The issuance of a ticket is the required first step in provisioning access to a Microsoft Engineer through the Customer Lockbox mechanism.

s.21(1)

Customer Lockbox Process:

Lockbox enforces access control through multiple levels of approval within Microsoft, providing just-in-time access with limited and time-bound authorization. s.15(1)(l)); s.21(1)
s.15(1)(l))

s.21(1)

- Automated support and Microsoft support without access have failed to address an issue, thus requiring Microsoft Engineer access. This process is initiated by Langara.
- The Microsoft Engineer, who has provided multi-factor authentication credentials, submits for dual approvals within Microsoft a request for access which details the purposes, duration and data location for the request.
- Once a Microsoft Engineer's request for access has been approved by a Microsoft Manager, Langara's Office 365 administrators are notified via email that there is a request for access.
- Microsoft can only proceed following approval of a Customer Lockbox request. If Langara rejects a Customer Lockbox request, no access to customer content will occur. If a user was experiencing a service issue that required Microsoft to access customer content in order to resolve (though such circumstances are expected to be extremely rare), then the service issue might simply persist. Microsoft would inform the customer of this outcome.
- Langara's Office 365 Administrators then have the option of either approving or rejecting the Customer Lockbox request for access. If the Administrators do not respond within 12 hours, the request will expire (by default). Expired requests do not result in access to customer content. If the Administrators approve the request, Microsoft will have access to relevant data.
- If the problem is not fixed within the specified time the Microsoft Engineer provided in the original request, the Microsoft Engineer must repeat the approval process outlined above where the fact that they have requested additional time will be scrutinized.
- After a service request has been completed, all access is logged, and a detailed record of all activities performed is available to Langara.
- Use of the Customer Lockbox feature ensures that the Microsoft Engineer does not get access to Langara's content without their explicit approval.

s.21(1)

Personal Information Flow Table #5 – Customer Lockbox			
	Description/Purpose	**Type**	**FIPPA Authority**
1.	*Langara user identifies or experiences an issue which they are unable to resolve on their own. User would contact Langara Service Desk for assistance.*	*Use*	*32(a)*
2.	*If unable to resolve the problem, Langara Service Desk initiates a service request with Microsoft. Microsoft Engineer submits a request with both a Microsoft Manager and Langara Office 365 administrators for access to the Customer Lockbox, which contains only the data required to perform the required troubleshooting.*	*n/a*	*n/a*
3.	*Microsoft Engineer accesses customer content for the purpose of remedying a technical issue. Once the predetermined time limit has expired, the Engineer will be locked out of the Customer Lockbox and cannot access the Customer Lockbox again without receiving approval from both Microsoft and Langara administrators.*	*Disclosure*	*33.1 (p)(i)(a)*

Personal Information Flow Scenarios

Scenario # 1:	**A Microsoft Support Engineer requires elevated privileges for a non-routine maintenance activity**
Scenario Description	A customer finds that one of their documents in Office 365 is either corrupted or unusable. In exceptional and rare instances that a cloud service customer is not able to self-remediate using available resources or with the assistance of a Langara Service Desk, the user registers a trouble ticket in the service portal to fix the problem. This scenario applies to Microsoft Office 365 (Exchange, SharePoint).

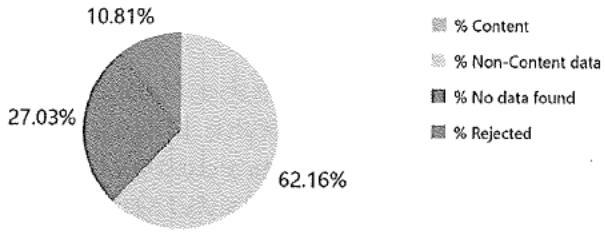
Scenario # 1:	A Microsoft Support Engineer requires elevated privileges for a non-routine maintenance activity
Microsoft Remediation Activity	Nearly all service operations performed by Microsoft are fully automated and human involvement is highly controlled and abstracted away from customer content. Therefore, Microsoft Engineers do not need, and do not have, standing access to any service operation. If automated support and support without access to customer content fails, Microsoft requires explicit consent from Langara in order to be granted access. This consent is practically managed through a rigorous access control technology called Lockbox.

Scenario #2:	Standard Notification of Breach
Scenario Description	A breach occurs within Office 365 and Langara is notified via the standard Microsoft process for notification of a breach, or Langara is the victim of a breach within its own implementation. Scenario applies to Microsoft Cloud Services, Azure and Office 365.
Microsoft Remediation Activity	Microsoft has a global, 24/7 incident response service that works to mitigate the effects of attacks and malicious activity. Breach Incidents and corresponding responses are a shared responsibility of both Langara and Microsoft. The incident response team follows established procedures for incident management, communication, and recovery, and uses discoverable and predictable interfaces with internal and external partners alike. If Microsoft becomes aware of any unlawful access to any Langara data stored on Microsoft's equipment or in Microsoft's facilities, or unauthorized access to such equipment or facilities resulting in loss, disclosure, or alteration of Langara data, Microsoft will promptly: 1. **Identify:** If an event indicates a privacy or security issue, the incident is assigned a severity classification and appropriately escalated within Microsoft. 2. **Notify:** Notify Langara of the incident. 3. **Contain**: The immediate priority of the escalation team is to ensure the incident is contained and data is safe. 4. **Eradicate:** After the situation is contained, the escalation team moves toward eradicating any damage caused by the incident and identifies the root cause of the issue.

	5. **Recover:** Software or configuration updates are applied to the system and services are returned to full working capacity. 6. **Prevent:** Each incident is analyzed to ensure the appropriate mitigations are applied to protect against future recurrence.

Scenario #3:	**Microsoft receives a government court order for information contained in the Langara tenant of Office 365**
Scenario Description	A US court order is received for email information from Langara's Office 365 or Microsoft Azure implementation. Scenario applies to Microsoft Cloud Services
Microsoft Remediation Activity	Notification of lawful requests for information. Langara data will be stored on servers located in Canada. Since early 2013, Microsoft has published a Law Enforcement Requests Report twice yearly detailing the legal demands for customer data they receive from law enforcement agencies around the world. This report is available at https://www.microsoft.com/about/csr/transparencyhub/lerr/. Every year, Microsoft rejects a number of law enforcement requests. In many of these cases, Microsoft informed the requesting government that they were unable to disclose the requested information and explained their reason for rejecting the request. In addition, when appropriate, Microsoft will challenge requests in court. For example, in December 2013, Microsoft formally challenged the geographic reach of a U.S. search warrant, arguing that email should receive the same treatment as physical documents or other property, where the U.S. Government cannot obtain a search warrant to search and seize property located outside the U.S. For more information on that case, go to https://digitalconstitution.com. In July 2016, a US federal appeals court stated that the US government cannot force Microsoft, and other companies, to turn over customer emails stored on servers outside the U.S. Judge Susan Carney said communications held by U.S. service providers on servers outside the United States are beyond the reach of domestic search warrants issued under the Stored Communications Act, a 1986 federal law.

Scenario #3:	**Microsoft receives a government court order for information contained in the Langara tenant of Office 365**
	If a non-governmental party requests customer data, it must serve Microsoft with a valid subpoena or court order for content, or subscriber information, or other non-content data. For content requests, Microsoft requires specific lawful consent of the account owner, and for all requests they provide notice to the account owner unless prohibited by law from doing so. Microsoft requires that any requests be targeted at specific accounts and identifiers. Their compliance team reviews civil proceeding legal requests for user data to ensure the requests are valid, rejects those that are not valid, and only provides the data specified in the legal order. Microsoft believes that customers should control their data whether stored on their premises or in a cloud service. Microsoft will not disclose customer data to law enforcement except as a customer directs or where required by law. When a government makes a lawful demand for customer data from Microsoft, Microsoft strives to be principled, limited in what they disclose, and committed to transparency. • Microsoft does not provide any third party with direct or unfettered access to customer data. Microsoft only releases specific data mandated by the relevant legal demand. • If a government requests access to customer data—including for national security purposes—it needs to follow the applicable legal process. It must serve Microsoft with a warrant or court order for content or subpoena for account information. If compelled to disclose customer data, Microsoft will promptly notify the customer and provide a copy of the demand unless legally prohibited from doing so. • Microsoft will only respond to requests for specific accounts and identifiers. There is no blanket or indiscriminate access to Microsoft's customer data. Every request is explicitly reviewed by Microsoft's legal team, who ensures that the requests are valid, rejects those that are not, and makes sure Microsoft only provides the data specified in the order.
Law Enforcement Request Report 2018	**Canadian Law Enforcement Requests received for all Microsoft Services from July – December 2018:**

Scenario #3:	Microsoft receives a government court order for information contained in the Langara tenant of Office 365
	2018 (Jul-Dec) - Canada **Requests** Total number of requests 74 Accounts/users specified in request 112 **Disclosures**  For additional information on the Law Enforcement Request Report, reference: https://www.microsoft.com/about/csr/transparencyhub/lerr/

9. Risk Mitigation Table

Risk Mitigation Table				
	Risk	**Mitigation Strategy**	**Likelihood**	**Impact**
1.	Personal information is compromised when transferred between Langara and Microsoft.	• s.15(1)(l)) •	Low	High

2.	s.15(1)(l))	Recommend that the following administrative safeguards be implemented asap for existing users of O365 and prior to go live with additional users: • s.15(1)(l)) • • •	High	High
3.	s.15(1)(l))	s.15(1)(l))	High	High

10. Collection Notice

As Microsoft will not be collecting any personal information directly, they will not be providing any collection notices. Any direct collection of personal information is conducted by Langara College using existing collection notices compliant with FIPPA S. 27(2). As noted in question 5. Storage or Access outside Canada, there is storage of limited personal information when using O365. As obtaining "written" consent from all users is not practicable, and a past finding (F07-10[5]) by the Office of the Information Privacy Commissioner of BC has found electronic consent acceptable, consent for use of O365 (as well as other online services offered by Langara) will be obtained at point of sign in by all users, including employees who may log into O365 via microsoftonline.com. The following will be displayed to users prior to their logging in.

> *Use of this service may result in limited personal information (i.e. name, Langara email address) being transmitted through or stored in jurisdictions outside of Canada. Your use of this service is your consent and acknowledgement that you have read and understood this statement.*

Login of users is auditable so if needed, confirmation that a user saw the consent is available.

Part 3 – Security of Personal Information

11. Please describe the privacy and security safeguards related to the initiative (if applicable).

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

[5] Available online at: https://www.oipc.bc.ca/orders/912

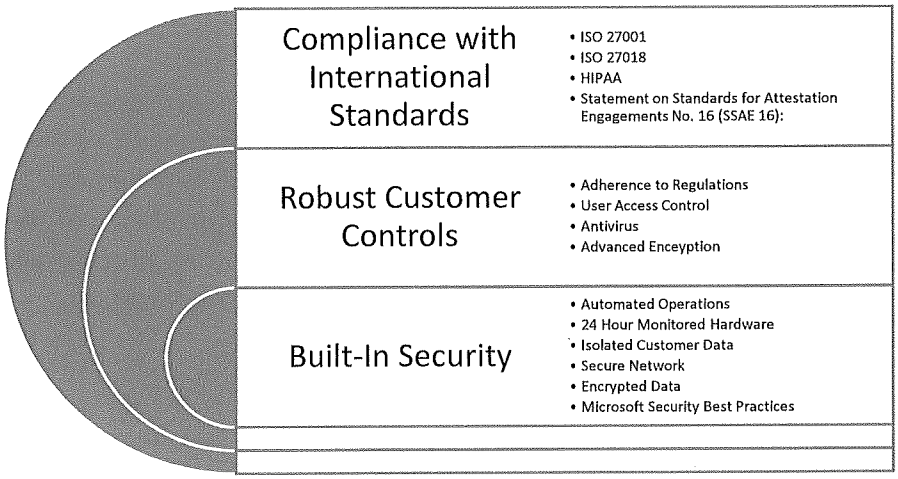


Figure 6: Examples of Microsoft's safeguards

Compliance with International Standards

Many international, industry, and regional organizations independently certify that Microsoft cloud services and platforms meet rigorous security standards[6] and are trusted. Although not all the standards apply to the Langara's implementation of Office 365, they are a good indicator of the depth and breadth of Microsoft's compliance.

The standards most applicable to Langara's implementation are as follows:

- ISO27001 - ISO27001 is one of the best security benchmarks available in the world. Many products in Office 365 have been verified to meet the rigorous set of physical, logical, process and management controls defined by ISO 27001:2013. This also includes ISO 27018 Privacy controls in the most recent audit. Inclusion of these new ISO 27018 controls in the ISO assessment will further help Office 365 validate to customers the level of protection Office 365 provides to protect the privacy of customer data
- ISO27018 - Microsoft is the first major cloud service provider to be independently verified as complying with ISO 27018, which establishes a uniform, international approach to protecting the privacy of personal information stored in the cloud. Microsoft's compliance with ISO27018 means that they only process personal information in accordance with customer instructions, are transparent about what happens to customer data, provide strong security protections for personal information in the Microsoft cloud, do not use customer data for advertising, and they inform customers about government access to their data
- Statement on Standards for Attestation Engagements No. 16 (SSAE 16) - Office 365 has been audited by independent third parties and can provide SSAE16 SOC 1 Type I and Type II and SOC 2 Type II reports on how the service implements controls

[6] Additional information is available on-line at: Microsoft Trust Center http://www.microsoft.com/trustcenter and https://www.microsoft.com/en-us/TrustCenter/Compliance/complianceofferings

Robust Customer Controls

Office 365 combines the Microsoft Office suite with cloud-based versions of their next-generation communications (Exchange Online) and collaboration services (SharePoint Online and One Drive). Each of these services offers individualized security features that Langara controls including:

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

Office 365 Built-in Security

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

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

Data Privacy		
Safeguard	**Description**	**Additional Information**
Auditing	By using Office 365 auditing policies, customers can log events, including viewing, editing, and deleting content such as email messages, documents, task lists, issues lists, discussion groups, and calendars. When auditing is enabled as part of an information management policy, administrators can view the audit data and summarize current usage.	Administrators can use these reports to determine how information is being used within the organization, manage compliance, and investigate areas of concern.
Data access	The customer is in control of their data including where data is stored and how it is securely accessed and deleted. Depending on the service, the customer can choose where their data is stored geographically.	**Transparency:** • Clear Data Maps and Geographic boundary information provided • The "Ship To" address determines Datacentre Location • Microsoft notifies customers of changes in datacentre locations.

[7] Information from the document: MSFT Cloud Architecture Security for Enterprise Architects - http://www.google.ca/url?sa=t&rct=j&q=&esrc=s&source=web&cd=1&cad=rja&uact=8&ved=0ahUKEwjf7L2r5-7OAhUJ4GMKHWooALcQFghFMAA&url=http%3A%2F%2Fdownload.microsoft.com%2Fdownload%2F6%2Fd%2Ff%2F6dfd7614-bbcf-4572-a871-e446b8cf5d79%2Fmsft_cloud_architecture_security.pdf&usg=AFQjCNH76W5uCisHLVw7DVyShgLTfC6Kiw

Data Privacy		
Safeguard	**Description**	**Additional Information**
Data Ownership	Microsoft defines customer data as all the data (including all text, sound, software, or image files) that a customer provides, or that is provided on a customer's behalf, to Microsoft through use of the Online Services.	
Data portability	If a customer decides to cancel their service with Microsoft, they can take their data and have it deleted permanently from the Microsoft servers	**Privacy – Office 365**: • Office 365 Customer Data belongs to the customer. • Customers can export their data at any time.
Data Use	Microsoft does not use customer data for purposes unrelated to providing the service, such as advertising. They have a No Standing Access policy — access to customer data by Microsoft personnel is restricted, granted only when necessary for support or operations, and then revoked when no longer needed.	**Transparency:** • Core Customer Data accessed only for troubleshooting and malware prevention purposes • Core Customer Data access limited to key personnel on an exception basis. **Privacy – Office 365:** • No advertising products out of Customer Data. • No scanning of email or documents to build analytics or mine data.
Disclosure of Government Request for Data	If a government approaches Microsoft for access to customer data, they redirect the inquiry to the customer, whenever possible. Microsoft has and will challenge in court any invalid legal demand that prohibits disclosure of a government request for customer data.	
Isolated Customer Data	Office 365 is both scalable and low cost through use of a multi-tenant service	**Built-In Security:** s.15(1)(l)): s.21(1)

Data Privacy		
Safeguard	**Description**	**Additional Information**
	(that is, data from different customers shares the same hardware resources). Office 365 is designed to host multiple tenants in a highly secure way through data isolation.	s.15(1)(l)): s.21(1)
Privacy reviews	As part of the Microsoft development process, privacy reviews are performed to verify that privacy requirements are adequately addressed. This includes verifying the presence of privacy-related features that allow customers to control who can access their data and configure the service to meet the customer's regulatory privacy requirements.	
SPAM	s.15(1)(l)): s.21(1)	Administrators can use the Office 365 Administration Center to manage antimalware/antispam controls, including advanced junk mail options and organization-wide safe and blocked sender lists. Individual users can manage their safe and blocked senders from within their inboxes in

Data Privacy		
Safeguard	**Description**	**Additional Information**
	s.15(1)(l)): s.21(1)	Microsoft Outlook or Microsoft Outlook Web App.

Data Encryption and Rights Management		
Safeguard	**Description**	**Additional Information**
Data in Transit	s.15(1)(l)): s.21(1)	s.15(1)(l)): s.21(1)
Data at Rest	s.15(1)(l)): s.21(1)	

Identity and Access		
Safeguard	**Description**	**Additional Information**
Langara controls access to their data and applications	Microsoft offers comprehensive identity and access management solutions for customers to use across Azure and other services such as Office 365, helping them simplify the management of multiple environments and control user access across applications.	s.15(1)(l)): s.21(1)
Two-Factor Authentication	Two-factor authentication enhances security in a multi-device and cloud-centric world. s.15(1)(l)): s.21(1)	

Software and Services		
Safeguard	**Description**	**Additional Information**
Secure Development Lifecycle (SDL)	Privacy and security considerations are embedded through the SDL, a software development process that helps developers build more secure software and address security and privacy compliance requirements. The SDL includes: • Risk assessments • Attack surface analysis and • reduction • Threat modeling • Incident response • Release review and certification	**Service Security:** Secure engineering (SDL), access control and monitoring, anti-malware
Secure development across the Microsoft cloud	Microsoft Azure, Office 365, Dynamics CRM Online, and all other enterprise cloud services use the processes documented in the Secure Development Lifecycle.	

Proactive Testing & Monitoring		
Safeguard	**Description**	**Additional Information**
Microsoft Digital Crimes Unit	Microsoft's Digital Crimes Unit (DCU) seeks to provide a safer digital experience for every person and organization on the planet by protecting vulnerable populations, fighting malware, and reducing digital risk.	
Prevent Breach, Assume Breach	s.15(1)(l)): s.21(1)	s.15(1)(l)): s.21(1)

Proactive Testing & Monitoring		
Safeguard	**Description**	**Additional Information**
	• s.15(1)(l)): s.21(1) •	s.15(1)(l)): s.21(1)

Proactive Testing & Monitoring		
Safeguard	**Description**	**Additional Information**
		s.15(1)(l)): s.21(1)
s.15(1)(l)): s.21(1)		

Datacentre Infrastructure & Networking Security		
Safeguard	**Description**	**Additional Information**
Operational Security for Online Services (OSA)	OSA is a framework that focuses on infrastructure issues to help ensure secure operations throughout the lifecycle of cloud-based services	s.15(1)(l)): s.21(1)

Datacentre Infrastructure & Networking Security		
Safeguard	**Description**	**Additional Information**
		s.15(1)(l)): s.21(1)
Secure Network	s.15(1)(l)): s.21(1)	s.15(1)(l)): s.21(1)

Physical Datacentre Security		
Safeguard	**Description**	**Additional Information**
s.15(1)(l)): s.21(1)		

Physical Datacentre Security		
Safeguard	**Description**	**Additional Information**
		s.15(1)(l)): s.21(1)
s.15(1)(l)): s.21(1)	s.15(1)(l)): s.21(1)	

Physical Datacentre Security		
Safeguard	**Description**	**Additional Information**
		s.15(1)(l)): s.21(1)
Data Destruction	When customers delete data or leave a service, they can take their data with them and have it deleted permanently from Microsoft servers. s.15(1)(l)): s.21(1)	

Contractual Protections

BCNET has entered into an Online Services Terms (OST) for Education Solutions (Appendix C) with Microsoft, and it is through this agreement that Langara has obtained licensing for O365. BCNET did not include the standard Provincial Privacy Schedule as part of their agreement, however the contents of the OST does serve as one means of ensuring an appropriate level of protection for personal information to enable compliance with the *Freedom of Information and Protection of Privacy Act* section 30, to protect personal information in its custody or under its control by making reasonable security arrangements against such risks as unauthorized access, collection, use, disclosure or disposal.

The OST reinforces that:

- Microsoft will provide the physical storage of, and processing power for, any personal information that Langara stores within the Office 365 system;
- Langaras.15(1)(l)) the only party that can view the information; and
- Microsoft will not disclose Langara data to law enforcement agencies unless required by law. Microsoft will attempt to redirect any law enforcement requests to Langara and, in doing so, may provide basic contact information to the law enforcement agency. If compelled to disclose Langara data to law enforcement, Microsoft agrees to use commercially reasonable efforts to notify Langara in advance of a disclosure and provide a copy of the demand, unless legally prohibited from doing so.

With Langara's information located in Canada, under the control of Langara, s.15(1)(l)) s.15(1)(l)) the risk that personal information could be disclosed in response to a foreign demand without Langara being aware and able to challenge such a request, would be low.

Langara Privacy Controls

Langara has the following policies on the proper use of computing resources, security, privacy and access to information, which will apply to this initiative, however reviews and updates are required to ensure accuracy with the use of the new cloud environment:

- Electronic Communications[8]
- Access to Information policy[9]
- Computer and Computing System Use policy[10]

s.15(1)(l))

[8] https://langara.ca/about-langara/administration/pdf/B4002.pdf
[9] https://langara.ca/about-langara/administration/pdf/B5001.pdf
[10] https://langara.ca/registration-and-records/pdf/B5002.pdf

12. 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))

Microsoft Cloud Services offers the following access controls:

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

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

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

s.15(1)(l))

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

s.15(1)(l))

Part 4 – Accuracy/Correction/Retention of Personal Information

14. **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?**
Langara College Policy *B5001 – Access to Information* includes processes for individuals to request corrections to their personal information. Authorized users of the O365 applications and services are responsible for their own content, which would include updates and corrections. Personal information disclosed to Microsoft for service support purposes would be the most current information, thus presumed to be correct, so no notifications would be done.

    Microsoft can provide assurances that the accuracy and completeness of the data resting on their systems is not affected by data integrity issues, for which they would have responsibility. Microsoft will take all necessary, reasonable steps to aid Langara in complying with its accuracy and completeness requirements.

15. **Is there a records retention and/or disposition schedule for personal information being retained?**
Langara College's policy B5010 – Records and Information Management does exist, however was last updated in 2009 so a review and update to ensure appropriate retention and disposal of personal information in the cloud environment is required. Currently email is being archived and retained for 7-year period as noted earlier. Risk

    Microsoft can provide assurances that the data resting on their systems will not be retained beyond 90 days following contract termination or expiration. Microsoft will provide at least 90 days for administrators to confirm all data migrations have been completed, at which point the data will be destroyed to make it unrecoverable. Further, Microsoft provides guidelines to administrators to personally destroy data if that is the preferred approach. Langara data would not be destroyed by Microsoft without a specific request from them to do so. Microsoft will take all necessary, reasonable steps to aid Langara in complying with its retention and disposition requirements.

Part 5 – Further Information

16. Does the initiative involve systematic disclosures of personal information? If yes, please explain.
No there is no systematic disclosure of personal information. Disclosure to Microsoft will only occur when necessary to enable services (i.e. Azure active directory) and for support purposes.

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).	

17. Does the program involve access to personally identifiable information for research or statistical purposes? If yes, please explain.
There is currently no planned research or statistics involving personally identifiable information from this initiative. In future it is possible that data may be used internally for statistical purposes, however this would be only in aggregate form, and in compliance with existing Langara policies and procedures. Should access to personally identifiable information be requested for research purposes in future, Langara has a Research Ethics Board that reviews research proposals by faculty and others. When research involves human subjects, it must conform to the provisions of *Policy-B5007 Ethical Conduct for Research Involving Humans*. This policy applies to all research involving human participants and covers all the following situations:

- Research conducted by members of the College acting in their College capacity (this includes faculty, staff, administrators, students, paid or unpaid associates and any other person associated with the College and identifying their association with the College in connection with the research or engaging in the research as part of their non-instructional duty.);
- Where the research is conducted on any College premise or participants are recruited on College premises or using College facilities (e.g. by sending Emails to College students.);
- Where the research is administered by the College;
- Where ethics approval is required pursuant to any agreement the College might have with any other institution or agency.

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).	

18. 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.

Yes, a PIB will result from this initiative and as per Langara College policy *B5001 – Access to Information*. The College maintains a Directory of Personal Information Banks which is accessible to the public.

Personal Information Bank Name:
Microsoft Office 365 Solution

Personal Information Location:
Microsoft Datacentre – Primary datacentre in Toronto; secondary datacentre in Quèbec City

Purpose for the Collection, Use and Disclosure of Personal Information:
To support:

- Day-to-day operations and collaborations
- Student academic career administration
- Student, faculty, staff, and alumni communications

Authority for Collection of Personal Information:

- FIPPA, s. 26 (c) - information relates directly to and is necessary for a program or activity of the public body
- *College and Institute Act,* RSBC 1996, c. 52, s. 41.1(2)(a) – Board may require a student to provide the institution with the personal information that relates directly to and is necessary for an operating program or activity of the institution

Collected Personal Information is About:
Prospective, current and former students, faculty and staff

Type(s) of Personal Information Collected will include:
Demographic information (i.e. name, email, address, phone)
User content (i.e. content put in to emails, documents, etc.)

In accordance with FIPPA and other applicable laws and policies, personal information may be used by and/or disclosed to:

- Langara College staff, faculty, and students for communication, day-to-day operations and collaborations
- Microsoft for service support purposes

Part 6 – Privacy Office(r) Comments

This PIA is based on a review of the material provided to the consultant by Information Technology and the vendor 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.

JOANNE RAJOTTE s.22(1) Oct. 29/2019

Joanne Rajotte, Manager, Records Management and Privacy — Signature — Date

Part 7 – Program Area Signatures

DAVID CRESSWELL David Cresswell, Chief Information Officer	s.22(1) Signature	Oct 30/2019 Date
CHRIS ARNOLD-FORSTER Chris Arnold-Forster, Director, Risk and Internal Controls	s.22(1) Signature	Oct 31/2019 Date
Viktor Sokha Viktor Sokha, Vice-President, Administration and Finance	s.22(1) Signature	Oct 31/2019 Date

APPENDIX A - Data Elements

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

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

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

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

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

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

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

APPENDIX B – Communication with Microsoft

s.22(1) <shelly@privacyworks.ca>		Fri, Aug 16, 11:52 AM (3 days ago)
to greg.milligan, David		

Hi Greg
David Cresswell at Langara College provided me your email information as i am contracted to complete a Privacy Impact Assessment for their Office 365 implementation. I am seeking information regarding the micro services available associated with O365 and details regarding what information is being transmitted / stored outside of Canada.

Unfortunately, I have not been able to find any information regarding this so am requesting your assistance as Langara has raised this as a concern and we need to address it in the risk assessment.

Also, i recently heard from a colleague that there is something in the MS online terms of service that says MS can move data (including personal information) at their discretion out of Canada. This obviously would be a concern so would appreciate any clarification on this issue as it pertains to the Langara's implementation of O365 and the MS Azure AD.

Appreciate your assistance on this matter!

Regards
s.22(1) IPP/C, CIPP/E, CIAPP-M, MAPP

Aug 16, 2019, 1:02 PM (3 days ago)

Greg Milligan
to David, me, David

Hi Shelly – I'd be happy to help. As you can imagine, this is something Microsoft is working on with the BC Government and the OIPC, as it has implications in healthcare, municipal governments, core BC government ministries, as well as education. I'll do my best to explain it from an EDU perspective.

s.21(1)

I'll address the second question first, as it's the most straightforward: On page 11, we stipulate that

s.21(1)

The other question about Microservices is more complex.

When the BC-FIPPA legislation was drafted 20 years ago, it was in a world of outsourced datacenters, where a hosting company would run effectively the same workloads as a customer would in their own datacenter. Microsoft Exchange was a good example of this. BC-FIPPA has concerns about data residency and data access, which were really about where the data was written to a disk, and who could access that data. Microsoft's contractual obligations are focused on data residency, meaning data at rest, as this is a common requirement in lots of geographies. As such, we point to the OST and assert that we meet the data residency (or data at rest) requirements of BC-FIPPA.

Recently, the OIPC started to look into where electronic processing of data takes place. In our world, we categorize that as "processing" and differentiate it from "data residency", because we don't persist that data to disk or other form of persistent storage. The challenge is that the world of cloud computing has changed drastically in the last 20 years and workloads are no longer run on a set of VMs running in one single datacenter. s.15(1)(l))

s.15(1)(l))

. Modern SaaS apps like Office 365, D2L Brightspace, Salesforce, etc. use these microservice APIs to scale out their applications. In our world, Azure microservices run in any datacenter, but because it's a machine-to-machine API call with no data persisted to disk, we don't view that as a data residency violation (nor do our European customers, by the way). The OIPC, however, looked at these microservices as an opportunity for data access, even though our understanding of the data access concerns of BC-FIPPA were about humans having access.

Some of the examples of where Office 365 uses microservices are s.21(1)

s.15(1)(l))

I think that the OIPC wanted Microsoft to find every place where any of our tools use microservices and allow institutions to disable them. s.21(1)
s.21(1) - all SaaS apps under consideration or use by BCNET members will need to be examined to understand how the vendors used the underlying microservices capabilities of the cloud they run on.

In the consumer world, we ask the user to opt-in before we enable these features. In a corporate world, IT does that effectively on behalf of their users, s.21(1)

s.21(1)

As you can see, this is a complex topic and one that I generally turn to the BC Government team within Microsoft to work through with the OIPC, as it has implications for all of BC public sector.

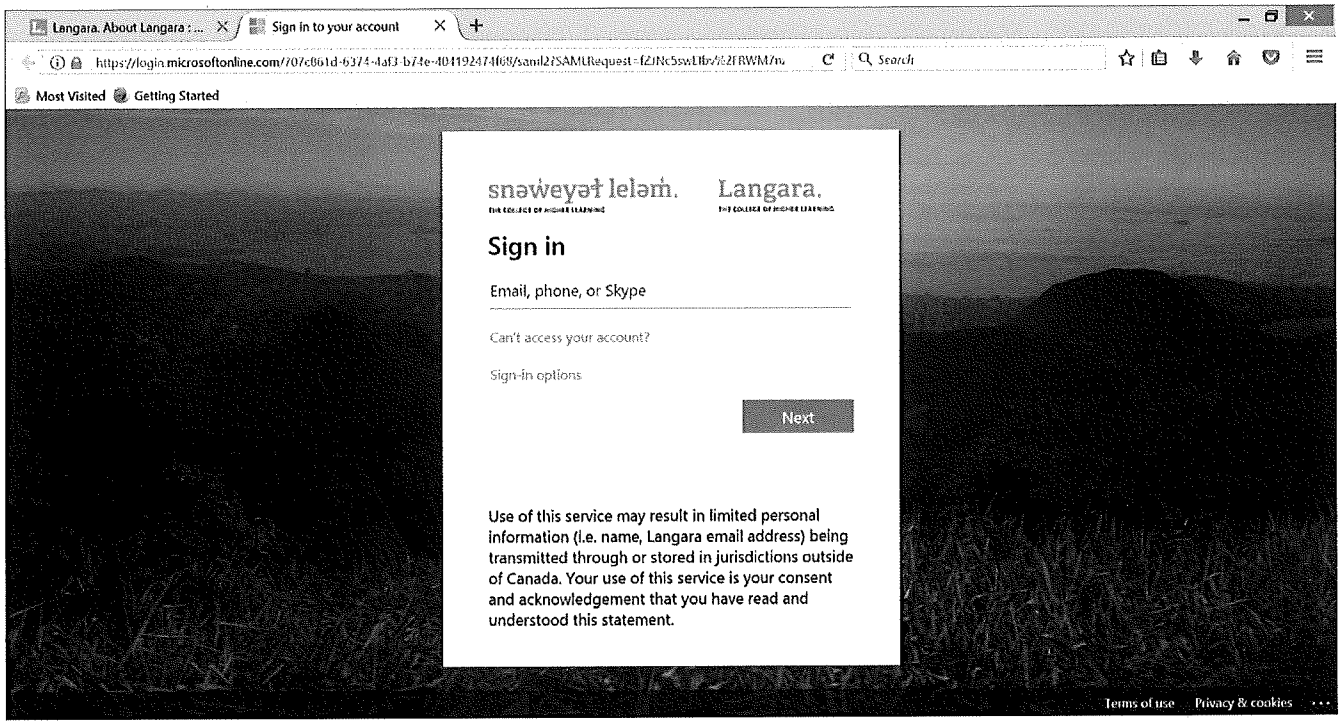
Hope that helps.

Cheers,
Greg

APPENDIX C – Online Service Terms

Microsoft Online Services Terms for Ed

APPENDIX D – Sign In Screen



Screen shot of current federated sign in page (captured October 21, 2019).

REFERENCES

- Security in Office 365 Whitepaper, January 2016
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[12] MTICS (Ministry of Technology, Innovation and Citizen's Services) PIAs – unknown if content has changed

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