

**Part 1 – General**

Name of Department/Branch:	Langara College, Financial Services		
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**1. Description of the Initiative**

Langara College plans to offer students the ability to make payments for non-tuition services, such as transcript requests, graduation fees and homestay fees, using a hosted Ecommerce solution – Shopify. This platform will allow students to select a service, upload the relevant request form and make a payment.

Shopify is a Canadian company with servers distributed throughout the world.

**Background:**

Currently, students have several options to make payments for non-tuition fee services. One of the current processes allows students to submit (by email), a request for service along with credit card payment information. This process is not PCI compliant. Many students cannot attend in person to submit their request and make payment, so there is a need to offer an online payment alternative.

The Shopify site redirects students (cardholders) to a secure Moneris Hosted Pay Page to enter the payment information. Moneris collects and submits cardholder data (account number, expiry date and security code).

## **2. Scope of this PIA**

This PIA covers the collection, use and disclosure of students' personal information in the Shopify platform, accessed through a web browser.

## **3. Related Privacy Impact Assessments**

This PIA is an update to PIA2017-0006 dated January 12, 2018. Since Shopify has not yet been fully implemented, the College decided to issue a new PIA number to avoid confusing the original PIA with the updated PIA.

## **4. Elements of Information or Data**

- Student name
- Langara student identification number
- Student email address
- Student mailing address
- Student date of birth
- Other personal information contained on supporting documents uploaded by the customer/student

**Part 2 – Protection of Personal Information**

**5. Storage or Access outside Canada**

Yes.

The student will be asked to acknowledge Terms and Conditions for using the eCommerce platform by ticking a box prior to selecting items to purchase. The Terms and Conditions will read:

I understand that my personal information will be stored outside of Canada for the purpose of processing payments, and will be handled according to Shopify’s privacy policy.” [link to the policy]. For a full list of Shopify's Terms of Services please click here [link to the Terms of Service].

Information is also stored on Langara College servers for a period consistent with the retention policy of Registrar and Enrolment Services. For more information about Langara College's Privacy Statement, please click here [link to the statement]. For questions about the collection, use and disclosure of your personal information, contact Registrar and Enrolment Services at 604-323-5241.

**6. Data-linking Initiative\***

<p><b>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.</b></p>	
<p>1. Personal information from one database is linked or combined with personal information from another database;</p>	<p>No</p>
<p>2. The purpose for the linkage is different from those for which the personal information in each database was originally obtained or compiled;</p>	<p>No</p>
<p>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.</p>	<p>No</p>
<p><b>If you have answered "yes" to all three questions, please contact your privacy office(r) to discuss the requirements of a data-linking initiative.</b></p>	

**7. Common or Integrated Program or Activity\***

<p>In FOIPPA, “common or integrated program or activity” is strictly defined. Answer the following questions to determine whether your initiative qualifies as “a common or integrated program or activity” under the Act. If you answer “yes” to all 3 of these questions, you must comply with requirements under the Act for common or integrated programs and activities.</p>	
<p>1. This initiative involves a program or activity that provides a service (or services);</p>	<p>Yes</p>
<p>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;</p>	<p>No</p>
<p>3. The common or integrated program/activity is confirmed by written documentation that meets the requirements set out in the FOIPP regulation.</p>	<p>No</p>
<p><b>Please check this box if this program involves a common or integrated program or activity based on your answers to the three questions above.</b></p>	

**8. Personal Information Flow Table**

Personal Information Flow Table			
	Description/Purpose	Type	FOIPPA Authority
1.	<p>Students enter their personal information (e.g., name, student ID and date of birth) in the Shopify platform. Students must upload a supporting document providing information about the requested service. Students will acknowledge Terms and Conditions as noted in Section 5 on page 3.</p> <p>Students will be re-directed to a secure Moneris site to enter cardholder payment information (credit card number, expiry date and security code).</p>	Collection	26(c)
2.	<p>Registrar and Enrolment Services, International Education, and Financial Services use the student information to match the payment to the requested service. In many cases, the student information already exists in the Banner Student Information System (SIS). The service request is noted in the SIS.</p>	Use	32(a)
3.	<p>Registrar and Enrolment Services, International Education, and Financial Services do not disclose the information to anyone other than fellow Langara employees.</p>	Disclosure	33.2(a)

**9. Risk Mitigation Table**

Risk Mitigation Table				
	Risk	Mitigation Strategy	Likelihood	Impact
1.	Employees in Registrar and Enrolment Services, International Education, and Financial Services could access personal information and use or disclose it for purposes other than the reason it was collected.	Access to the student information will be restricted to only those Langara employees authorized to process or support the student service request.	Low	High
2.	The service provider's (Shopify) employees could access personal information and use or disclose it for purposes other than the reason it was collected.	<b>s. 15(1)(I)</b>	Low	High
3	Client's personal information stored on service provider's server could be compromised.	<b>s. 15(1)(I)</b>	Low	High

## 10. Collection Notice

Prior to initiating a purchase, users will see the following text -

I understand that my personal information will be stored outside of Canada for the purpose of processing payments, and will be handled according to Shopify's privacy policy." [link to the policy]. For a full list of Shopify's Terms of Services please click here [link to the Terms of Service].

s.15(1)(l)

s.15(1)(l)

For more information about Langara College's Privacy Statement, please click here [link to the statement]. For questions about the collection, use and disclosure of your personal information, contact Registrar and Enrolment Services at 604-323-5241.

**Part 3 – Security of Personal Information**

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

**s. 15(1)(I)**

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

**s. 15(1)(I)**

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

Langara College has a Privacy, Access and Confidentiality Policy and associated procedures that govern the collection, use, access, storage, disclosure and disposal of personal information. The College also has a Computer and Computing System Use Policy and an Electronic Communication Policy.

14. Please describe any access controls and/or ways in which you will limit or restrict unauthorized changes (such as additions or deletions) to personal information.

We will restrict access to the platform **s. 15(1)(I)**

**s. 15(1)(I)**  
**s. 15(1)(I)**

. Staff will not be allowed to change personal information.

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

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

**Part 4 – Accuracy/Correction/Retention of Personal Information**

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

There is no capability to update or correct an individual's information.

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

Yes. The supporting documents that are uploaded by the student relate to a service request. Registrar and Enrolment Services, International Education, and Financial Services staff review the service request to determine if the request meets College criteria to satisfy the request.

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

N/A

**19. If you answered "yes" to question 17, do you have a records retention and/or disposition schedule that will ensure that personal information is kept for at least one year after it is used in making a decision directly affecting an individual?**

Yes. RES will delete the supporting documents uploaded to Shopify as soon as possible after transactions are completed, but no later than every semester. Prior to deletion, the department will download the same supporting documents to a College server, import them into its document imaging system, and retain them for at least one year.

**Part 5 – Further Information**

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

No.

<i>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).</i>	<input type="checkbox"/>
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21. Does the program involve access to personally identifiable information for research or statistical purposes? If yes, please explain.

No.

<i>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).</i>	<input type="checkbox"/>
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**22. Will a personal information bank (PIB) result from this initiative? If yes, please list the legislatively required descriptors listed in section 69 (6) of FOIPPA.**

Yes, There will be an information bank containing student names and other identifiers. Authorized Registrar and Enrolment Services, International Education, and Financial Services staff will be able to search and retrieve this information.

**Personal Information Bank Name:**

Non-Tuition Fee Payment Service Requests

**Personal Information Location:**

Shopify hosted ecommerce solution server

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

To document requests made by students for non-tuition fee related services.

**Authority for Collection of Personal Information:**

Freedom of Information and Protection of Privacy Act [RSBC 1996] c. 165,  
Section 26 (c) – the information relates directly to and is necessary for a program or activity of the public body

**Collected Personal Information is About:**

Current and former students.

**Type(s) of Personal Information Collected:**

Biographical

**Persons Information is Used By and/or Disclosed To:**

Used by:

Registrar and Enrolment Services

International Education

Financial Services

**Record Classification and Retention Schedule:**

**SS-100-016** Student Services : Student Records Administration – Non-Tuition Fee Payment Service Requests

Retain online until reference use ended.

**Part 6 – Privacy Office(r) Comments**

This PIA is based on a review of the material provided to the Manager, Records Management and Privacy as of the date below. If, in future any substantive changes are made to the scope of this PIA, Information Technology will complete a PIA Update and submit it to the Manager, Records Management and Privacy.

**s.22(1)**

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Joanne Rajotte, Manager  
Records Management and Privacy

July 23, 2019

Date

**Part 7 – Program Area Signatures**

**s.22(1)**

Michael Koke, Director  
Financial Services

JUL 23 2019

Date

**s.22(1)**

Jan Smith, Registrar

July 23, 2019

Date

**s.22(1)**

Terri Rear, Associate Director  
IT Project Portfolio Management

July 24, 2019

Date