



Privacy Impact Assessment for Non-Ministry Public Bodies

[Envoke Email Marketing Platform]

PIA#[assigned by your privacy office(r)]

Why do I need to do a PIA?

Section 69(5.3) of the *Freedom of Information and Protection of Privacy Act* (FOIPPA) requires the head of a public body to conduct a privacy impact assessment (PIA) in accordance with the directions of the minister responsible for FOIPPA. Public bodies should contact the privacy office(r) for their public body to determine internal policies for review and sign-off of the PIA. Public bodies may submit PIAs to the Office of the Information and Privacy Commissioner for BC (OIPC) for review and comment.

If you have any questions about this PIA template or FOIPPA generally, you may contact the Office of the Chief Information Officer (OCIO) at the Privacy and Access Helpline (250 356-1851). Please see our [PIA Guidelines](#) for question-specific guidance on completing a PIA.

What if my initiative does not include personal information?

Public bodies still need to complete Part 1 of the PIA and submit it along with the signatures pages to their privacy office(r) even if it is thought that no personal information is involved. This ensures that the initiative has been accurately assessed.

Part 1 – General

Name of Department/Branch:	Northern Lights College		
PIA Drafter:	Romeo Macabuhay III, IT Infrastructure Manager		
Email:	rmacabuhay@nlc.bc.ca	Phone:	250-219-5934
Program Manager:	Lorelee Mathias		
Email:	lmathias@nlc.bc.ca	Phone:	250-784-7555

In the following questions, delete the descriptive text and replace it with your own.

1. Description of the Initiative

Northern Lights College is set to enhance its email communication strategies by adopting Envoke, aimed at streamlining the dissemination of information about webinars, events, and workshops to our current student body. Moreover, this robust tool will empower various departments to effectively reach out to potential and incoming students. To facilitate this process, we will develop customizable standard templates that can be swiftly modified and dispatched to targeted student groups as needed.



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2. Scope of this PIA

The project's scope encompasses deploying Envoke for use by the student engagement facilitator and authorized department representatives at Northern Lights College, enabling them to leverage this tool for college-related communications.

3. Related Privacy Impact Assessments

Not Applicable

4. Elements of Information or Data

Student Basic Data:

- First Name
- Last Name
- Student ID
- E-mail Address
- Status
- Program

If personal information is involved in your initiative, please continue to the next page to complete your PIA.

If no personal information is involved, please submit Parts 1, 6, and 7 to your privacy office(r). They will guide you through the completion of your PIA.



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Part 2 – Protection of Personal Information

In the following questions, delete the descriptive text and replace it with your own.

5. Storage or Access outside Canada

This section does not apply because Envoke's storage and access infrastructure, including backup servers, is located entirely within Canada. These servers are internally managed and hosted by Envoke in Ontario and Quebec, Canada.

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;	No
2. The purpose for the linkage is different from those for which the personal information in each database was originally obtained or compiled;	No
3. The data linking is occurring between either (1) two or more public bodies or (2) one or more public bodies and one or more agencies.	No
If you have answered "yes" to all three questions, please contact your privacy office(r) to discuss the requirements of a data-linking initiative.	



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7. Common or Integrated Program or Activity*

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

**** Please note: If your initiative involves a “data-linking initiative” or a “common or integrated program or activity”, advanced notification and consultation on this PIA must take place with the Office of the Information and Privacy Commissioner (OIPC). Contact your public body’s privacy office(r) to determine how to proceed with this notification and consultation.***

For future reference, public bodies are required to notify the OIPC of a “data-linking initiative” or a “common or integrated program or activity” in the early stages of developing the initiative, program or activity. Contact your public body’s privacy office(r) to determine how to proceed with this notification.



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

Personal Information Flow Table			
	Description/Purpose	Type	FOIPPA Authority
	Envoke for Northern Lights College		
1.	Information is collected directly from students to communicate webinars, events, and workshops to current students.	<i>Collection</i>	26(c)
2.	Information is used to enhance engagement with potential and incoming students by informing them about educational opportunities.	<i>Use</i>	32(a)
3.	Information is used for the development and dissemination of customizable email templates to ensure relevant and personalized communication.	<i>Use</i>	32(a)
	Contact Information of Students and Prospects		
4.	Student contact details are collected to enable the sending of informational emails regarding college events and opportunities.	<i>Collection</i>	26(c)
5.	Email engagement and effectiveness are monitored to optimize communication strategies and content relevance.	<i>Use</i>	32(a)
	Automated Information Collection via Envoke		
6.	Information about device and interaction is collected to improve the effectiveness of email campaigns through analytics.	<i>Collection</i>	26(c)
7.	Service performance and user engagement with emails are analyzed to provide insights into campaign success and areas for improvement.	<i>Use</i>	32(a)
	Purpose of Information Collection		
8.	Personal information is collected to provide students with timely and relevant information on educational opportunities and college events.	<i>Collection</i>	26(c)
9.	Collected information is used to manage and personalize communications, tailoring messages to meet student preferences and needs.	<i>Use</i>	32(a)
10	Personal information may be disclosed to comply with legal requirements, as necessary and when permitted by law.	<i>Disclosure</i>	33(e)



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9. Risk Mitigation Table

Risk Mitigation Table				
	Risk	Mitigation Strategy	Likelihood	Impact
1.	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
2.	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
3.	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]

10. Collection Notice

If your initiative is collecting personal information directly from individuals you must ensure that all individuals involved are told the following:

- 1. The purpose for which the information is being collected*
- 2. The legal authority for collecting it, and*
- 3. The title, business address and business telephone number of an officer or employee who can answer questions about the collection.*

This information is collected by Northern Lights College under section 27(2) of the Freedom of Information and Protection of Privacy Act and will be used accordingly. Should you have any questions about the collection of this personal information please contact:



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Ryan Moran, CIO

rmoran@nlc.bc.ca

250-784-7505

Part 3 – Security of Personal Information

If this PIA involves an information system, or if it is otherwise deemed necessary to do so, please consult with your public body's privacy office(r) and/or security personnel when filling out this section. They will also be able to tell you whether you will need to complete a separate security assessment for this initiative.

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

[Redacted]

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

[Redacted]

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

[Redacted]

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.

[Redacted]

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

[Redacted]



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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?

Data will be populated via one way, automated and scheduled daily transfer from SIS. Students will correct their information by notifying the NLC Registrar.

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

No personal information that can directly affect an individual is captured through this initiative.

18. If you answered "yes" to question 17, please explain the efforts that will be made to ensure that the personal information is accurate and complete.

Not applicable.

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

Not applicable.

Part 5 – Further Information

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

No such systematic disclosure of personal information will take place with this initiative.



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

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

No disclosure of personal individual information is provided for research or statistical purposes.

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

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

No disclosure of personal individual information is provided for any purpose and will be held confidential and securely.

Please ensure Parts 6 and 7 are attached to your submitted PIA.



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Part 6 – Privacy Office(r) Comments

This PIA is based on a review of the material provided to the Privacy Office(r) as of the date below. If, in future any substantive changes are made to the scope of this PIA, the public body will have to complete a PIA Update and submit it to Privacy Office(r).

Tara Hyland-Russell

Privacy Officer/Privacy Office
Representative

Signature

April 15/2024

Date



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Part 7 – Program Area Signatures

LORELEE MATHIAS

Program/Department Manager

[Redacted Signature]

Signature

Apr 17/2024

Date

Ryan Moran

Contact Responsible for Systems Maintenance and/or Security
(Signature not required unless they have been involved in this PIA.)

[Redacted Signature]

Signature

April 16, 2024

Date

Todd Bardawoff

Head of Public Body, or designate

[Redacted Signature]

Signature

April 18/2024

Date

A final copy of this PIA (with all signatures) must be kept on record.

If you have any questions, please contact your public body's privacy office(r) or call the OCIO's Privacy and Access Helpline at 250 356-1851.