

Privacy Impact Assessment for:

BONFIRE – CONTRACT MANAGEMENT TOOL

Part 1 - General

Name of Department:	Procurement / Contract Services / University Secretariat / General Counsel		
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1. Description of the Initiative

This initiative is for the administration of contracts using Bonfire, a contract management tool. The metadata of contracts presently housed in decentralized departments will be ported into Bonfire's system, as will that of new contracts going forward.

2. Scope of this PIA

As a rule, contracts for goods/services, real estate (including leases), educational agreements and research collect contact information and not personal information. Contracts which likely collect personal information when drafted, include those between VIU and identifiable students. This PIA is conducted on the premise that there are categories of contracts we know contain personal information and those that may now or at some point collect personal information. This PIA is being conducted on the basis that contracts containing personal information will be anonymized prior to being ported into the Bonfire system.

3. Related Privacy Impact Assessments

If Bonfire is connected to another enterprise system (such as Unit4), or if anonymizing contracts containing personal information prior to entry into the Bonfire system becomes overly burdensome or impossible, a further PIA should be conducted at that time to assess the associated increased privacy risk.

4. Elements of Information or Data

Information Type	Information Collected
Personal Information	From Students: N/A From Third Party Vendors: N/A From VIU Employees: N/A
Contact details	From Students: Yes From Third Parties: Yes From VIU Employees: Yes (for account access purposes)
Account information	User login information and IP address.
Commercial information	Business financial information of vendors / service providers.

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 unsigned to fippa@viu.ca. A privacy advisor will be assigned to your file and will guide you through the completion of your PIA.

Part 2 – Protection of Personal Information

5. Storage or Access outside Canada

6. Sensitive Personal Information: Does the project/initiative involve very sensitive personal information? Examples of sensitive personal information include personal health information, genetic and biometric data, personal financial information, geolocation data, criminal records, counselling records, HR records and payroll records. If so, will the sensitive personal information collected be stored outside of Canada?

No

7. Data-linking Initiative*

This is not considered a data-linking initiative as contemplated in s.36.1 of FIPPA.

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. If so, you will need to 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;	
2. The purpose for the linkage is different from those for which the personal information in each database was originally obtained or compiled;	
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.	

If you have answered "yes" to all three questions, please contact a PCT Privacy Advisor to discuss the requirements of a data-linking initiative.



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8. Common or Integrated Program or Activity*

This initiative is not considered a common or integrated program or activity as defined in Schedule 1 of FIPPA.

In FIPPA, “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.	
This initiative involves a program or activity that provides a service (or services);	
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;	
The common or integrated program/activity is confirmed by written documentation that meets the requirements set out in the FOIPP regulation.	
Please check this box if this program involves a common or integrated program or activity based on your answers to the three questions above.	

RECOMMENDATIONS: In advance of implementing Bonfire, VIU should:

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

s. 13(1)