Privacy Impact Assessment for:

Education: Bulb ePortfolios

Part 1 - General

Name of Department:	Education		
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1. Description of the Initiative

NOTE: The use of Bulb is by consent only and students who do not want to use Bulb are provided an alternative means to developing an eportfolio via a PowerPoint template developed within the department and using of Microsoft Office PowerPoint. This alternative is made clear during the process of obtaining informed voluntary consent.

Bulb (https://my.bulbapp.com/) has been in use in the Faculty of Education for several years now. The creation of a teacher education eportfolio is a graduation requirement for B.Ed. candidates in the Faculty of Education at Vancouver Island University (VIU). This eportfolio is created in a developmental manner—often over 2 or more years in the program until it is presented prior to graduation. Creating a web accessible eportfolio provides significant educational advantages for teachers and learners for continuous collaboration and feedback, within and across classes, while students demonstrate their attainment of the 9 professional standards required for credentialing in British Columbia.

Bulb provides a proven platform for the creation of eportfolios as well as key mechanisms for development and sharing of eportfolio materials, within and across courses, and among instructors and students. As this is an eportfolio tool, it is expected students will contribute some personally identifiable information with, and through, Bulb: this will include user account information, profile information, and other pages, collections, or content created, embedded, or linked by the student.

Students can establish privacy settings for all content uploaded including images, audio, video, document, and links. However, no online software can guarantee that personal identifiable data will be 100% secure; there will always be an element of risk when placing personal information online and outside of Canada where the data is subject to the laws of the United States, including US governmental access without notice. Additional privacy challenges arise if students choose to access their Bulb accounts from a country other than Canada or the US (eg. an international student accessing Bulb at home in India during a visit or a student on vacation in Mexico). **BulbApp privacy policy available: https://my.bulbapp.com/privacy-policy/**

2. Scope of this PIA

3. Related Privacy Impact Assessments

A prior consent form with background information was drafted. It is attached with this document.

BulbApp privacy policy available: https://my.bulbapp.com/privacy-policy/

4. Elements of Information or Data

Information Type	Information Collected
Personal Information	**From Students:** Data collected by Bulb or uploaded by users will include personal identifiable information as understood under British Columbia's Freedom of Information & Protection of Privacy Act (BC FIPPA). This personal information is reasonably expected to be accessed by the instructor, people working in some administrative or technical support capacity for Bulb—as well as the VIU Education Bulb administrator--the instructor and the Dean. Students may also choose to share their content with members of their VIU Education cohort group on Bulb and may use their Bulb eportfolio for live or remote presentations. **From Third Parties:** **From VIU Employees:**
Contact details	**From Students:** an active email address **From Third Parties:** **From VIU Employees:** an active email address from instructors who wish to activate a user account on the organizational account.
Account information	
Commercial information	

*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

Data collected by Bulb or uploaded by users will include personal identifiable information as understood under British Columbia's Freedom of Information & Protection of Privacy Act (BC FIPPA). This data will be stored external to Canada on Amazon Web servers in the United States.

Bulb does not sell or rent user data. If a service provider needs to access information about users to perform services on Bulb's behalf, they do so under instruction from Bulb, including abiding by policies and procedures consistent with Bulb policies designed to protect user information.

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?

We do not anticipate the use of "sensitive personal information".

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;	**No: Students are specifically directed NOT to use 3rd party logons**
2. The purpose for the linkage is different from those for which the personal information in each database was originally obtained or compiled;	N/A
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.	N/A

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

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);	N/A
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;	N/A
The common or integrated program/activity is confirmed by written documentation that meets the requirements set out in the FOIPP regulation.	N/A
Please check this box if this program involves a common or integrated program or activity based on your answers to the three questions above.	N/A

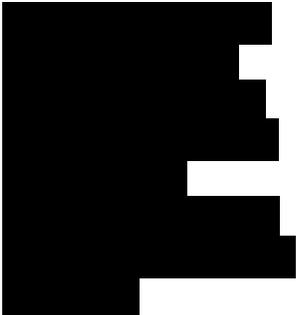## 9. Personal Information Flow Diagram and/or Personal Information Flow Table

	Description/Purpose	Personal Information	Type (Collection, Use or Retention)	FIPPA Authority
	Personal Information Flow Table			
1.	**Data collected for accounts:** **Parties Collecting Data:** Bulb and in case of direct contact for support, Zendesk. **Use:** Information collected by Bulb will be used to authenticate users, to personalize Bulb accounts, to provide customer support and to process user operations. Access to Bulb features and functionality will be based on users'	• first name, last name, username, password; Students are directed "Do not add an email address when creating an account. This is not required at this time. If you wish to retain a free Bulb	Collection Use Retention until organizational accounts terminated or off-boarded within 1 year after program withdrawal or graduation.	S. 32 (b) S. 33(2) (c) & (d) S. 34

	account status (Student, Teacher, Administrator), to provide appropriate interactions with other Bulb users based on user preferences or Bulb administrator settings; detect any areas of suspected fraudulent activity or examine violations of Bulb policies.	account later, an email will be requested for off-boarding from the VIU Education organization. • Do not use third party sign-ins such as Google or Microsoft. It is not required and only allows vendors to share user account information. "		
2.	**Data contributed by the user**	"As the user, you will decide what content and media you will upload for your eportfolio. This may include videos, audio, and images where you are identifiable. NOTE: • Any materials including personal information of 3rd parties (people other than you—e.g. project member, faculty member), that is not otherwise publicly available (e.g. published in an		S. 32 (b) S. 33(2) (c) & (d) S. 34

		online newspaper, etc.) requires their consent. It is best to obtain consent through an email or other documentation for your records."		
3.	**Collaborators and user interaction:**	"The content you create can be shared with other VIU Education Bulb service users to whom you give permission (within limits an administrator may set). This information may include your profile information, content on your pages and comments shared with other service users. For example, in a cohort group you may have the ability to share comments with other users, and your display name and profile image will be shown in that context. Keep in mind pages you make publicly available may be indexed by search engines and made available in search results."		S. 32 (b) S. 33(2)(c) & (d) S. 34

| 4 | **Organization Administrators** | "When you join Bulb through an organizational account, functions may be provided to administrators to view and access your profile and content for the purposes of fulfilling contractual obligations, providing help and support, and managing violations to our terms of use or organization policies. ███████████ ████████████ ████████████ ███████████ | | S. 33(2) (c) & (d) S. 33 (2)(t) S. 33(2)(u) S. 33(2)(v) S. 34 |
| 5 | **COLLECTION & USE OF INFORMATION FOR ANALYTICS** | **Device Information:** Bulb collects, in aggregated format, information about users' device types, screen sizes, browsers and operating systems. Bulb also collects IP addresses to approximate users' location. Google Analytics collects location for tracking and evaluating usage of the Bulb app. Bulb will only know the general location of the user, such as city or town. **Party Collecting:** This data is collected through a 3rd party | | S. 33(2) (c) & (d) S. 33(2) (t) S. 33(2)(u) S. 33(2)(v) S. 34 |

s.15(1)(l)

		analytics provider, Google Analytics. **Use:** This user data is collected to understand how account holders interact with the Service. In some cases, Bulb will use the information to make decisions about new features or improvements based on account holders' usage patterns. **Data Collected:** Cookies & tracking **Party Collecting:** Bulb collects its own data from cookies for validation of login and active session, to determine if they have presented system alerts, and to prevent Cross-Site Request Forgery (CSRF) incidents. CSRF incidents hijack authenticated user accounts to attack web applications. **Use**: Cookies are used for login & session data; trackers are used for site analytics to assess usage and performance of the website; Bulb may collect general location information for geographical purposes of tracking and evaluating usage of the app. Bulb will only know the general location, such as city or town. Where users use a 3rd party sign-ins such as Google or Microsoft, information will be exchanged between Bulb and the 3rd parties according the settings		

		on the 3rd party account (e.g. Google, or Microsoft). NOTE: VIU students will not use 3rd party logons.		
6	**Additional 3rd Party Service Providers Used by Bulb**	• ████████████████ ████████████████ ████████████████ ████████████████ ████████████████ ████████████████ ████████████████ • ████████████████ ████████████████ ████████████████ • ████████████████ ████████████████ ████████████████ ████████████████ ████████████████ ████████████████		S. 33(2) (c) (d) S. 34

s. 21(1)

10. Risk Mitigation Table

	Risk Mitigation Table			
	Risk	**Mitigation Strategy**	**Likelihood**	**Impact**
1.	**DATA SECURITY & NOTICE OF BREACHES**	• All system data █████ ████████████████ ████████████████ ████████████████ ████████████████ █ ██████████████ ████████████████		

s. 15(1)(l)

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2.	**DATA RETENTION**	Bulb retains personal information for as long as needed to provide services to subscribed users to comply with Bulb's legal obligations, resolve disputes, and enforce agreements. User data will be retained as long as the student is subscribed as a user via their VIU Faculty of Education account for service provision. To comply with US privacy law under Family Educational Rights and Privacy Act (FERPA) standards, Bulb may be required to keep user data if a FERPA request is pending. When that data is no longer legitimately needed, Bulb will either delete or anonymize it; where this is not possible "(for example, because your personal information has been stored in backup archives)" Bulb will securely store the personal information and "isolate it from any further processing until deletion is possible". It should also be noted that if students publish or share user content with others, others may		

		retain a copy of that content. Furthermore, user content may continue to appear after users remove it when it has been "cached by third parties, incorporated into RSS feeds, user profiles or other features, or archived on servers".		
3	**DISPOSITION OF USER DATE IN CASE OF SALE, ACQUISITION, MERGER, OR BANKRUPTCY**	Bulb may transfer any information collected during a sale, merger or acquisition of our services, and will do so in a way consistent with their stated principles protecting user privacy. In such an event, Bulb will either contact users by email or make announcements through the Bulb service to inform users of the process, and what options and rights they have, including the right to not send information forward.		
4	**USER ACCESS OUTSIDE OF CANADA**	If users choose to access Bulb from outside Canada, they are made aware that any data accessed or transferred through additional countries will be subject to the laws of those other countries as well as the United States where the data is stored by Bulb. Those countries will have different privacy laws than Canada and the United States.		
5	**ALTERNATIVE TO BULB PROVIDED IN CONSENT PROCESS**	"The eportfolio is a requirement of the VIU B.Ed. program and may be used in a variety of courses for assessment purposes. Creation of the eportfolio requires the use of personal information. Eportfolios created with Bulb will be transmitted and stored outside of Canada in the United States. For this reason, the Bulb eportfolio data is reasonably expected to be		

		accessible to humans and machine learning or AI outside of Canada. Personal information outside of Canada is beyond the protection of Canadian privacy laws. In respect of privacy rights, PowerPoint is being offered an alternative for students that do not wish to use Bulb. A free PowerPoint version is available to VIU students (see https://technology.viu.ca/help/free-office). Should you have concerns regarding the use of Bulb, you may use PowerPoint as an alternative. A template approximating the Bulb experience is available for use. "		

11. Collection Notice

Students are provided a consent form and the privacy policy is read as part of an in-class assignment in EDTE 431 and EDPB 530.

Part 3 – Security of Personal Information

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

- All of the bulb data is stored within AWS data centers which are governed by AWS's robust security policies and procedures.

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

- All system data is transferred through web browsers encrypted in transit ████████

- All user passwords ████████████████████

    s. 15(1)(l)

- Bulb's database is encrypted at rest, as part of the service provided by ████████

- ████████████████████████████████

- In case of a privacy breach, users will be informed via email.

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.

"When you join Bulb through an organizational account, functions may be provided to administrators to view and access your profile and content for the purposes of fulfilling contractual obligations, providing help and support, and managing violations to our terms of use or organization policies. As of the date of this consent, ███████████ ████████████████ have organizational administrative access to the VIUEd Bulb user accounts."

s. 15(1)(l)

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

The users with administrative organizational access are approved by the Dean. Bulb tracks the use on the back end.

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 DEPARTMENT OR INSTITUION? ~~ministry~~ notify them of the update, correction or annotation?

Students are responsible for maintaining the personal information shared with Bulb. They can update, edit, and request termination of their accounts. Accounts are off-boarded from the organizational account within a year after graduation.

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

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.

19. If you answered "yes" to question 17, do you have approved records retention and 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?

Part 5 – Further Information

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

21. Access for Research or Statistical Purposes: 21. Will the information collected be used for research or statistical purposes?