

RE: FullyPrepped PIA - VIU Career Services

FIPPA

Fri 2022-08-12 8:41 AM

To: Jonah Ferguson <Jonah.Ferguson@viu.ca>; FIPPA <fippa@viu.ca>;

Cc: Paula Deering <Paula.Deering@viu.ca>;

Hi Jonah:

I've reviewed the below and think the language provided clearly lays out how information will be used and provides users the opportunity to make an informed choice.

Please consider this email, along with the previous ones, as confirmation that from a Privacy Standpoint we have done an assessment of the privacy risks and are ok to proceed with this initiative.

Regards and thanks,
Bill

From: Jonah Ferguson <Jonah.Ferguson@viu.ca>
Sent: Monday, August 8, 2022 1:24 PM
To: FIPPA <fippa@viu.ca>
Cc: Paula Deering <Paula.Deering@viu.ca>
Subject: Re: FullyPrepped PIA - VIU Career Services

Good afternoon Bill,

Please find below the privacy language from the FullyPrepped Terms and Conditions that students will have to consent to before using this service:

Privacy; Information we collect and how we use it.

[NOTE FOR MINORS: we will not use your personal information for any of the optional uses described below in the "Other uses of your personal information" section. This means we will not use your personal information to promote our products and services to you or products and services from other companies. Also, we will not share your personal information with other RBC companies for the purpose of referring you to them.]

Collecting your personal information

We may and Third Parties may, from time to time, collect personal information about you in the course of delivering the Services such as:

information establishing your identity (for example, name, email address, date of birth, social media profiles, etc.); and
information about your work history, skills, traits and capabilities, educational background and areas of work or career interest that you may have. We may collect and confirm this information during the course of our relationship.

We may obtain this information from a variety of sources, including from you, from service arrangements you make with or through us, from references you provide to us and from other sources, as is necessary for the provision of the Services and any products and services.

Using your personal information

This information may be used from time to time by Third Parties and us for the following purposes:

- to create, maintain, customize and secure your account with us;
- to personalize your Website experience;
- to help us better understand the current and future needs of our users, including to develop and improve our Website;
- to fulfill or meet the reason you provided the information;
- to communicate to you any benefit, feature and other information about products and services;
- to help us better manage our business and your relationship with us;
- as otherwise described to you when collecting your personal information; and
- as required or permitted by law.

For these purposes, we may:

make this information available to our employees, our agents and independent contractors and Service Providers, all of whom are required to maintain the confidentiality of this information in accordance with these Terms and applicable laws.

In the event a Service Provider is located outside of Canada, the Service Provider is bound by, and the information may be disclosed in accordance with, the laws of the jurisdiction in which the Service Provider is located.

Upon your request, we may give this information to Third Parties and other persons.

We may also use this information and share it with RBC companies: (i) to manage our risks and operations and those of RBC companies; (ii) to comply with valid requests for information about you from regulators, government agencies, public bodies or other entities who have a right to issue such requests; and (iii) to let RBC companies know your choices under “Other uses of your personal information” for the sole purpose of honouring your choices.

Connecting your Fully Prepped Account with the Career Coach Portal

As a Fully Prepped user, if your profile is connected to the Career Coach Portal, you are consenting to your personal information being shared with the educational institution or company that is using Career Coach Portal. RBC will not be held liable for any claims, damages, or losses resulting from the sharing of your personal information with the Career Coach Portal. If you decide at any point to stop sharing information with the Career Coach Portal, please contact the educational institution or company directly.

Other uses of your personal information.

We may use this information to promote our products and services, and promote products and services of Third Parties we select, which may be of interest to you. We may communicate with you through various channels, including telephone, computer or mail, using the contact information you have provided.

We may also, where not prohibited by applicable laws, share this information with RBC companies for the purpose of referring you to them or promoting to you products and services which may be of interest to you. We and RBC companies may communicate with you through various channels, including telephone,

computer or mail, using the contact information you have provided. You acknowledge that as a result of such sharing, RBC companies may advise us of the products or services they provide to you.

If you also deal with any RBC companies, we may, where not prohibited by applicable laws, consolidate this information you provide to us with information RBC companies have about you to allow us and RBC companies to manage the relationship with you.

Other than to provide you with the Services or with your express written consent, we will not share your information with Third Parties for the purposes of these promotions, but you may choose to do so.

You understand that we and RBC companies are separate, affiliated corporations. RBC companies include our affiliates which may be engaged in the business of providing any one or more of the following services to the public: deposits; loans and other personal financial services; credit, charge and payment card services; trust and custodial services; securities and brokerage services; and insurance services.

You may choose not to have your information shared or used for any of these "Other uses" by contacting us as set out below, and in this event, you will not be refused credit or other services just for that reason. We will respect your choices and, as mentioned above, we may share your choices with RBC companies for the sole purpose of honouring your choices regarding "Other uses of your personal information".

Your right to access your personal information

You may obtain access to the personal information we hold about you at any time and review its content and accuracy, and have it amended as appropriate; however, access may be restricted as permitted or required by applicable laws. To request access to such information, to ask questions about our privacy policies or to request that the information not be used for any or all of the purposes outlined in "Other uses of your personal information" you may do so now or at any time in the future by contacting us at info@fullyprepped.ca or info@fullyprepped.com.

Our privacy policies

You may obtain more information about our privacy policies by visiting www.rbc.com/privacysecurity.

Your California Privacy Rights

If you are a California resident, California law may provide you with additional rights regarding our use of your personal information. To learn more about your California privacy rights, www.fullyprepped.com/california-privacy-notice.pdf.

Is this language sufficient to approve the PIA, or would you like to see language that our team would share with students on our end before they reach FullyPrepped?

Have a great day

Jonah Ferguson
Program Assistant

Office of Co-Curricular Engagement and Learning / Career Services
Vancouver Island University

From: Jonah Ferguson
Sent: August 3, 2022 8:58 AM
To: FIPPA
Cc: Paula Deering
Subject: Re: FullyPrepped PIA - VIU Career Services

Good morning Bill,

Would the privacy clause (#4) contained in FullyPrepped's terms and conditions (<https://www.fullyprepped.ca/en/terms-and-conditions>) be sufficient?

Students would need to check the box to consent to the terms and conditions before using the service, and this clause outlines the information gathered, as well as the parties that the information might be shared with.

Is using their terms and conditions okay, or would you like us to include a more visible disclaimer on our side as well before providing them with access to FullyPrepped and directing them to the website?

Have a great day,

Jonah Ferguson
Program Assistant

Office of Co-Curricular Engagement and Learning / Career Services
Vancouver Island University

From: FIPPA
Sent: August 2, 2022 3:48:38 PM
To: Jonah Ferguson
Cc: Paula Deering
Subject: RE: FullyPrepped PIA - VIU Career Services

Hi Jonah:

Thanks for the reminder. I have reviewed the materials and am satisfied that we have sufficient information management protocols in place for this initiative to proceed. I would, however like to see a copy of the consent/notice of collection text that will be put in front of users so they can make informed choices around using this application. Specifically they need to know that in using this application – they will be sharing some personal information - and that this is a condition of use. We also need to alert them to the fact that if they upload personal information (IE their name/address/phone number on a resume) they understand that this is personal information that could be shared by other users of the platform.

Let me know if you have questions,
Bill

From: Jonah Ferguson <Jonah.Ferguson@viu.ca>
Sent: Tuesday, August 2, 2022 2:13 PM
To: FIPPA <fippa@viu.ca>
Cc: Paula Deering <Paula.Deering@viu.ca>
Subject: Re: FullyPrepped PIA - VIU Career Services

Good afternoon Bill,

Have a great long weekend,

Jonah Ferguson
Program Assistant

Office of Co-Curricular Engagement and Learning / Career Services
Vancouver Island University