



Privacy Impact Assessment for

Centre for Experiential Learning & Student Engagement: Student Affairs/ Vancouver Island University:

Why do I need to do a PIA?

Section 69 (5) of the *Freedom of Information and Protection of Privacy Act* (FOIPPA) requires the head of a ministry to conduct a privacy impact assessment (PIA) in accordance with the directions of the minister responsible for FOIPPA. Section 69 (5.1) requires the head to submit the PIA to the minister responsible for FOIPPA for review, during the development of any new system, project, program or activity, or proposed enactment, or when making changes to an existing one. The Privacy, Compliance and Training Branch (PCT) is the representative of the Minister for these purposes. Ministries must submit PIAs to PCT at pia.intake@gov.bc.ca for review and comment prior to implementation of any initiative. If you have any questions, please call the Privacy and Access Helpline (250 356-1851) for a privacy advisor. Please see our PIA Guidelines for question-specific guidance on completing a PIA.

What if my initiative does not include personal information?

Ministries still need to complete Part 1 of the PIA and submit it, along with the signatures pages, to PCT 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 Ministry:	Centre for Experiential Learning & Student Engagement: Student Affairs/ Vancouver Island University		
PIA Drafter:	Paula Deering		
Email:	Paula.Deering@viu.ca	Phone:	250-729-5277
Program Manager:	Fully Prepped		
Email:		Phone:	

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

1. Description of the Initiative

One of the operational goals of the Centre for Experiential Learning / Career Services at Vancouver Island University is to deliver career development education within the Career Studio. The Career Studio is a physical and virtual hub offering employment readiness supports including resume, cover letter and interview skills. VIU supports approximately 11,000 students. The Career Studio staff is comprised of 1 Career Services Officer, 1 Student and Employer Engagement Officer and 4 Career Peer Facilitators. In order to provide adequate support to students, the use of a Resume optimizer is required. Fully Prepped <https://www.fullyprepped.ca/> is an RBC Ventures Inc. company that will allow students to get real-time feedback to optimize their resumes and help to perfect their interview skills. The platform also includes coaching and elevator pitch features allowing VIU to reach more students. This initiative supports VIU’s Strategic Plan Commitments of Building Potential: Expand life-enriching and career building experiences, allowing us to increase students confidence as they prepare for job search and in building lifelong career development skills.



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The Ministry of Advanced Education and Skills Training (the Ministry) also has provided a one-time contribution to supporting Engaging VIU Students in WIL and will provide Vancouver Island University with a one-time contribution. The Brazen platform supports VIU in meeting some of the goals we set in the proposal.

2. Scope of this PIA

The Scope of this PIA includes the Career Fair and Employee Panel Initiatives utilizing the Brazen Platform.

3. Related Privacy Impact Assessments

Brazen has not done this type of PIA before.

4. Elements of Information or Data

Below is Brazen's common list regarding information and data that is collected.

- first name and last name-Required
- email address-Required
- resume
- profile picture
- chat transcripts
- job history
- certifications
- external id like employee number or student id number
- all other registration data could be PII

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 PCT at pia.intake@gov.bc.ca. A privacy advisor will be assigned to your file and 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

Data is stored in Brazen’s databases, which are hosted on Amazon Web Services in the US [REDACTED]. This region consists of data centers in [REDACTED]. All data stored in the database is encrypted on disk and backed up to multiple data centers in the region.

Data is accessed from the US; all support teams are based in the US.

s. 15(1)(l)

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. 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
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 a PCT Privacy Advisor 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;	yes
3. The common or integrated program/activity is confirmed by written documentation that meets the requirements set out in the FOIPP regulation.	
<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>	

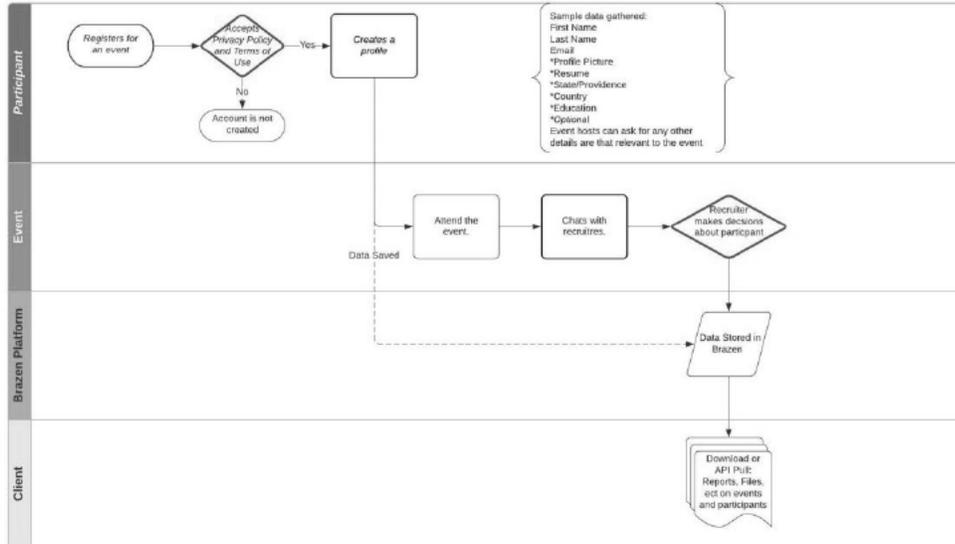
** Please note: If your initiative involves a “data-linking initiative” or a “common or integrated program or activity”, consultation on this PIA must take place with the Office of the Information and Privacy Commissioner (OIPC). PCT will facilitate the consultation with the OIPC.*

For future reference, ministries 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. PCT will help facilitate this notification.

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

Event Participants Data Mapping

Role: Personnel | November 2, 2022



9. Risk Mitigation Table

Risk Mitigation Table				
	Risk	Mitigation Strategy	Likelihood	Impact
1.	Employees could access personal information and use or disclose it for personal purposes	Role-based access	Low	High
2.	Client's personal information is compromised when transferred to the service provider	Transmission is encrypted and over a secure line	Low	High

10. Collection Notice

The language Brazen uses for collecting information.

Information You Voluntarily Provide Us: We may obtain information about you that you submit voluntarily, including when you call or email us or communicate with us through social media, submit a website form requesting information about Brazen or our Service, or when you participate in an Event. An "Event" is an online gathering that includes registration before the event begins, activities between the event's start and end time, and after the event's end time. This information is "Personal Information" since it identifies you. Our legal basis for processing this information is your consent.

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Centre for Experiential Learning & Student Engagement: Student Affairs/ Vancouver Island University:

<https://www.brazen.com/privacy-policy>

DPO: Katie Perciballi DPO@brazen.com (703) 879-8029

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 Ministry Information Security Officer (MISO) when filling out this section. Your MISO will also be able to tell you whether you will need to complete a separate assessment called a Security Threat and Risk Assessment (STRA) for this initiative.

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

Access Control: Prevention of unauthorized access to data processing systems

Physical access control systems (Badge access control, Security event monitoring); Alarm system; Intrusion detection system; Video surveillance; Visitors only when accompanied by an employee permitted; Verifiable key control; Locking of office doors in absence / outside working hours; Visitor Access Management determination of authorized persons (employees and non-employees); Third party companies always under supervision; Security areas defined

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

Server Access Control

Data importer (Brazen) implements suitable measures to prevent its data processing systems from being used by unauthorized persons. This is accomplished by:

Access Control: Prevention of unauthorized system use

s. 15(1)(l)



Data Access Control

Data importer (Brazen) ensures that the persons entitled to use its data processing systems are only able to access the data within the scope and to the extent covered by their respective access



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permission (authorization) and that personal data cannot be read, copied or modified or removed without authorization. This is accomplished by:

Access Control: User control; Prevention of unauthorized reading, copying, modification or removal within the system

[Redacted content]

s. 15(1)(l)

Pseudonymization: for reasons of data minimization

Pseudonymization/ obfuscation takes place at Brazen where appropriate and possible on request in which case the processing of the personal data takes place in such a way that the data can no longer be assigned to a specific person without the need for additional information

Transfer Control

Data importer (Brazen) implements suitable measures to prevent the personal data from being read, copied, altered or deleted by unauthorized parties during the transmission thereof or during the transport of the data media. This is accomplished by:

Transfer Control / Transmission Control: Prevention of unauthorized reading, copying, modification or deletion during electronic transmission

Use of an up-to-date firewall; Use of up-to-date virus protection; Data protection compliant deletion /

[Redacted content]

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Enter Control

Data importer (Brazen) implements suitable measures to ensure that it is possible to check and establish whether and by whom personal data have been input into data processing systems or removed. This is accomplished by:



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s. 15(1)(l)

Data Processing Control

Data importer (Brazen) implements suitable measures to ensure that, in the case of commissioned processing of personal data, the data are processed strictly in accordance with the instructions of the principal. This is accomplished by:

s. 15(1)(l)

Established internal privacy policies, agreements and conduct regular privacy trainings

Privacy and confidentiality terms in place within employee contracts; Regular data privacy and security trainings for employees and contractors; Appropriate contractual provisions to the agreements with sub-contractors to maintain instructional control rights; Regular privacy checks for external service providers; Regular security audits

Change & Release Management

Change and release management process including (impact analysis, approvals, testing, security reviews, staging, monitoring etc.); Role & Function based (Segregation of Duties) access provisioning on production environments

Loss Control

Data importer (Brazen) implements suitable measures to ensure that personal data are protected from accidental destruction or loss. This is accomplished by:

Protection of accidental or intentional destruction or loss



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[Redacted]

s. 15(1)(l)

Backup and Recovery

[Redacted]

Separation Control

Data importer (Brazen) implements suitable measures to ensure that data collected for different purposes can be processed separately. This is accomplished by:

[Redacted]

s. 15(1)(l)

13. Does your branch rely on security policies other than the Information Security Policy?

Please describe any specific policies and procedures and provide contact details for someone who could answer further questions regarding these policies and procedures.

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.

There are few access levels available in the Brazen Platform:

- Administrator: Those who create virtual events or utilize plugin solutions
- Booth Owners: Those assigned to build and brand booths, including assigning Representatives
- Representatives: Those who represent a booth or QuickChat (Recruiters, presenters, hiring managers, faculty)



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- Attendees: Those who attend the event as a registrant

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

Audit trails

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 ministry notify them of the update, correction or annotation?

Users have access to update their own information in the Brazen profile.

How to documents:

- [How to edit account information](#)
- [How to update resume.](#)

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

Brazen: Yes, the information that is provided by event participants will be used to make hiring decisions.

VIU: No

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.

Information is provided directly from the individual. Representatives will be using information provided to conduct interviews.

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?

Brazen maintains all records for the life of the contract plus 12 months. User records are kept 18 months after they are no longer active.



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Part 5 – Further Information

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

Brazen only makes participants personal information available to client. VIU would only use information to track participation rates and trends in employment sectors and student engagement.

Please check this box if the related Information Sharing Agreement (ISA) has been prepared. If you have general questions about preparing an ISA, please contact the Privacy and Access Helpline.

no

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

Please check this box if the related Research Agreement (RA) is attached. If you require assistance completing an RA please contact a PCT advisor.

no

22. Will a personal information bank (PIB) result from this initiative?

No

If yes, please complete the fields in the table below by deleting the descriptive text in the right-hand column and replacing it with your own.

Personal Information Bank – Required Information	
Description	<i>Personal contact information of branch staff in case of emergency</i>
Primary ministry/government agency involved	<i>MADMIN</i>
All other ministries/government agencies and public bodies involved	<i>None</i>
Business contact title	<i>Office Manager, Administration Services</i>
Business contact telephone number	<i>250-555-5555</i>

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

Part 6 – PCT Comments and Signatures

This PIA is based on a review of the material provided to PCT as of the date below. If, in future any substantive changes are made to the scope of this PIA, the ministry will have to complete a PIA Update and submit it to PCT.

Privacy Advisor
Privacy, Compliance and Training
Branch
Ministry of Finance

Signature

Date

Director or Manager
Privacy, Compliance and Training
Branch
Corporate Information and
Records Management Office
Ministry of Finance **(if Personal
Information is involved in this
initiative)**

Signature

Date



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Part 7 – Program Area Comments and Signatures

_____ Program Manager	_____ Signature	_____ Date
_____ Ministry Contact Responsible for Security (Signature not required unless MISO has been involved.)	_____ Signature	_____ Date
_____ Assistant Deputy Minister or Designate (if Personal Information is involved in this initiative)	_____ Signature	_____ Date
_____ Executive Director or equivalent (if no Personal Information is involved in this initiative)	_____ Signature	_____ Date

A final copy of this PIA (with all applicable signatures and attachments) must be provided to PCT for its records to complete the process. PCT is the designated office of primary responsibility for PIAs under ARCS 293-60.

PCT will publish the ministry name, business contact details and a brief summary of the PIA to the Personal Information Directory (PID) as required by section 69(2) of FOIPPA. If you have any questions, please contact your privacy advisor at PCT or call the Privacy and Access Helpline at 250 356-1851.