



**VANCOUVER ISLAND
UNIVERSITY**

VANCOUVER ISLAND UNIVERSITY

PRIVACY IMPACT ASSESSMENT

Preliminary Microsoft BOOKINGS

Version #:	V0.1 - Draft
Date:	March 22, 2023

PIA REFERENCE #	
INITIATIVE TITLE:	Microsoft BOOKINGS
ORGANIZATION:	Vancouver Island University (VIU)
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<p><i>Is this initiative a data-linking program under FOIPPA? If this PIA addresses a data-linking program, you must submit this PIA to the Office of the Information and Privacy Commissioner.</i></p>
NO
<p><i>Is this initiative a common or integrated program or activity? Under section FOIPPA 69 (5.4), you must submit this PIA to the Office of the Information and Privacy Commissioner.</i></p>
NO
<p><i>Related PIAs, if any:</i></p> <ul style="list-style-type: none"> • Microsoft Office 365 • Microsoft BI

VERSION CONTROL

Date	Version	Author(s)	Version Notes
March 22, 2023	Draft	Moira Connor Use of Province of BC, PIA template for non-ministry public bodies. ¹	Initial draft released for review by Brad Moran.

INPUT AND REVIEW TABLE

Privacy Impact Assessment				
Name	Position Title	Author	Contribute	Review
Bill Boyte	Privacy Officer, Vancouver Island University			✓
Brad Moran	IT Business Architect, Vancouver Island University			✓
Moira Connor	Sr. Privacy Analyst, PrivacyWorks	✓		
Other?				

¹ [Complete a Privacy Impact Assessment - Province of British Columbia \(gov.bc.ca\)](https://www2.gov.bc.ca/gov/content/privacy/complete-a-privacy-impact-assessment)

DEFINITIONS

Acronym or Term	Description
Contact Information	<p>Definition from FIPPA:</p> <p><i>means information to enable an individual at a place of business to be contacted and includes the name, position name or title, business telephone number, business address, business email or business fax number of the individual.</i></p>
FIPPA	<p><i>Freedom of Information and Protection of Privacy Act</i></p> <p>https://www.bclaws.gov.bc.ca/civix/document/id/complete/statreg/96165_00</p>
Personal Information	<p>means recorded information about an identifiable individual other than contact information and includes, but is not limited to:</p> <ul style="list-style-type: none"> • Name, age, sex, weight, height • Home address and phone number • Race, ethnic origin, sexual orientation • Medical information • Health care history, including physical or mental disability • Number or symbol assigned to the individual • Income, purchases and spending habits • Blood type, DNA code, fingerprints • Marital or family status • Religion • Education • Financial information • Criminal information • Employment information • Personal views or opinions, except if they are about someone else • <p><u>Personal Information - Province of British Columbia (gov.bc.ca)</u></p>
PI	Personal Information
PIA	Privacy Impact Assessment
SOC 2	System and Organization Controls, Type 2
VIU	Vancouver Island University

MICROSOFT REFERENCE DOCUMENTS

- [Add custom and required questions to the Booking page - Microsoft Support](#)
- [Bookings with me: setup and sharing - Microsoft Support](#)
- [Canada privacy laws - Azure Compliance | Microsoft Learn](#)
- [Choose the Right Azure Region for You | Microsoft Azure](#)
- [Compliance offerings for Microsoft 365, Azure, and other Microsoft services. | Microsoft Learn](#)
- [Customize and publish your booking page | Microsoft Learn](#)
- [Customize your booking page - Microsoft Support](#)
- [Data Residency for Other Microsoft 365 Services - Microsoft 365 Enterprise | Microsoft Learn](#)
- [Get access to Microsoft Bookings | Microsoft Learn](#)
- [ISO/IEC 27018 Code of Practice for Protecting Personal Data in the Cloud - Microsoft Compliance | Microsoft Learn](#)
- [Microsoft 365 data locations - Microsoft 365 Enterprise | Microsoft Learn](#)
- [Microsoft Bookings | Microsoft Learn](#)
- [Microsoft Bookings | Scheduling App for Appointment Bookings](#)
- [Microsoft Bookings behind the scenes - Microsoft Community Hub](#)
- [Overview of the Bookings app in Teams - Microsoft Support](#)

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PART 1: GENERAL INFORMATION

1 Initiative Overview

1.1 Microsoft Bookings

Vancouver Island University (VIU) is looking to use Microsoft Bookings as an online scheduling application. Bookings integrates with other Microsoft applications and has three primary components:

1. A booking page where internal or external users can schedule appointments with the staff member. This web-based scheduling page can be shared via a direct link on a public-facing web page.
2. A web app that contains a set of web-based, business-facing pages where Bookings calendar owners and administrators within an organization can define appointment types and details, manage staff schedules and availability, set business hours, and customize how appointments are scheduled.
3. A business-facing mobile app where Bookings calendar owners and administrators can see all of their appointments, access customer lists and contact information, and make manual bookings on the go.

When a user creates a Bookings calendar, a scheduling mailbox is automatically created. All Bookings data is stored in the mailbox and access to the Bookings calendar is controlled by the calendar owner.

1.2 Assessment Approach

This assessment uses the Province of BC's *Privacy Impact Assessment for Non-Ministry Public Bodies* template (as of March 2023).

Information included in the body of this assessment was compiled from a variety of Microsoft documents and web pages. Links to key material is included in the front-matter of this PIA.

This assessment is to be considered a general review of Microsoft Bookings. In order to prepare a specific PIA of VIU use of Bookings, VIU will need to:

- determine/document their proposed Bookings use cases;
- define what user/customer data they will be collecting, using and disclosing;
- define who will have access to Bookings, and how that access will be managed; and
- define what configurations will be put in place to maximize privacy safeguards (including a "consent" box).

For purposes of this preliminary assessment of Microsoft Bookings, it has been assumed that VIU does not intend to collect Personal Information, and that information required to make a booking (internal to VIU users) is business contact information.

1.3 Microsoft Bookings Summary Table

The following table provides summary information on Microsoft Bookings.

Category	Bookings
Description	Microsoft Bookings as an online scheduling application which allows for the scheduling of customizable appointments.
Platforms:	Windows, Mac, Android, iOS, and web platforms.
Key Data Inputs:	Appointment scheduling data, including customer contact information, service details, staff members, and availability.
Collection of Diagnostic Data by Microsoft	<p>Diagnostic collect by Microsoft includes:</p> <ul style="list-style-type: none"> • Device, connectivity, and configuration data: This includes information about the device, operating system, browser, and installed applications or updates. Data about the device's network connection, like IP address and network provider, may also be collected. • Product usage data: This includes data about the features and functionalities used within the applications, how often they are used, and the duration of use. This data helps Microsoft understand user engagement and improve product features. • Error reports and performance data: Microsoft collects data about application crashes, hangs, and other errors, along with performance metrics like response times and resource usage. This data helps Microsoft identify and fix issues and improve application performance. • Service usage data: This includes data about the usage of connected cloud services, such as authentication, storage, and data synchronization. • Support data: When users contact Microsoft for support, additional data may be collected to help resolve the issue, such as error logs, troubleshooting data, and user feedback. <p><i>Note that data collected by Microsoft is typically anonymized, aggregated, and stripped of any personally identifiable information (PII). VIU end users and administrators can also configure privacy settings and diagnostic data collection preferences to limit the amount of data shared with Microsoft.</i></p>
Collection of Customer Data by Microsoft	Customer data collected by Microsoft includes:

Category	Bookings
	<ul style="list-style-type: none"> • Personal information: This may include the customer's name, email address, phone number, and any other personal details required for the booking process. • Appointment details: This includes information related to the appointment, such as the date, time, service requested, staff member assigned, and any additional notes or requirements provided by the customer. • Communication data: Microsoft Bookings may collect data from email confirmations, reminders, and other communications sent to customers regarding their appointments. • Customer preferences: This may include the customer's preferred time zone, language, and accessibility settings. • Usage data: Microsoft Bookings may collect data about how customers interact with the booking page, such as the pages they visit, the duration of their visit, and the device and browser used. <p><i>Note: VIU administrators and end users can configure privacy settings, data retention policies, and sharing permissions to ensure that VIU's data is handled in accordance with VIU's privacy requirements.</i></p>
<p>Customer Data Storage Location</p>	<p>In Canada, Microsoft has two data center regions:</p> <ul style="list-style-type: none"> • Canada Central: Located in Toronto, Ontario • Canada East: Located in Quebec City, Quebec <p>Bookings calendar data and other information is stored in the scheduling mailbox in Microsoft Exchange Online.</p> <p>A scheduling mailbox is the mailbox that gets automatically created in Exchange Online as soon as a user creates a Bookings calendar in Office 365. Scheduling mailbox is where all the relevant information/data about Bookings calendar is stored. This includes:</p> <ul style="list-style-type: none"> • business information, logo, and working hours added when the booking calendar was created; • relevant staff and services added when the booking calendar was created; and • all bookings and appointments added to the Booking Calendar once it was created. <p><i>Note: Once the booking calendar is deleted, the data is permanently lost and cannot be retrieved.</i></p>

Category	Bookings
Built-In Integrations	<ul style="list-style-type: none"> • Microsoft 365 • Outlook • Teams <ul style="list-style-type: none"> ○ To use the integration with Microsoft Teams, enable the Teams meeting option when creating a new booking service. This will automatically generate a Teams meeting link for the scheduled appointment, which will be included in the booking confirmation sent to the participants. ○ <i>Note that in Windows 11, Skype has been replaced by Microsoft Teams.</i>
Optional Integrations/Connections Requiring Configuration	<p>Integration with popular calendar systems such as:</p> <ul style="list-style-type: none"> • Google Calendar, • Apple Calendar, <p>and integration with:</p> <ul style="list-style-type: none"> • third-party scheduling tools, • CRM systems.
Activity Logging - End-user controls	<p><i>Note that controls and features available to end-users may vary depending on the settings and permissions configured by the VIU Microsoft administrator.</i></p> <p><u>End-User Controls & Features:</u></p> <ul style="list-style-type: none"> • Personal information management: End-users can provide their contact information, such as name, email, and phone number, when scheduling an appointment. This information can be updated or removed if needed. • Self-service scheduling: End-users can schedule, reschedule, or cancel appointments directly through the Bookings page without having to contact the service provider. They can view available time slots and choose the most suitable option. • Notifications: End-users receive email confirmations and reminders about their appointments. They can also choose to add the appointment to their personal calendar, such as Outlook, Google Calendar, or Apple Calendar. • Time zone preferences: End-users can set their preferred time zone when booking appointments, ensuring that appointment times are displayed accurately. • Accessibility: Microsoft Bookings supports screen readers and other assistive technologies, allowing end-users with disabilities to access and interact with the booking interface.

Category	Bookings
	<ul style="list-style-type: none"> • Language support: Bookings pages can be displayed in multiple languages, allowing end-users to view and interact with the interface in their preferred language
User Activity Reports	Bookings does not provide User Activity Reports.
Bookings Audits	<p>The Microsoft 365 Audit Log includes the following Bookings activities:</p> <ul style="list-style-type: none"> • calendar creation, • calendar update, • appointment creation, • appointment modification, • appointment cancellation, and • staff assignment updates. <p><i>Note that the actual activities logged may vary depending on VIU's audit logging settings.</i></p>
Security Compliance	<p>Relevant Microsoft compliance:</p> <ul style="list-style-type: none"> • ISO/IEC 27001: Microsoft has achieved ISO/IEC 27001 certification for its Information Security Management System (ISMS), which covers Bookings. • SOC 1, SOC 2, and SOC 3: Microsoft 365 services undergo Service Organization Controls (SOC) audits and have achieved SOC 1, SOC 2, and SOC 3 compliance, demonstrating strong internal controls and security practices. • NIST Cybersecurity Framework: Microsoft aligns with the NIST Cybersecurity Framework and implements its guidelines across applications and services to ensure a robust security posture.

Figure 1 - Microsoft Booking Summary Table

1.4 Diagram of Bookings Calendar

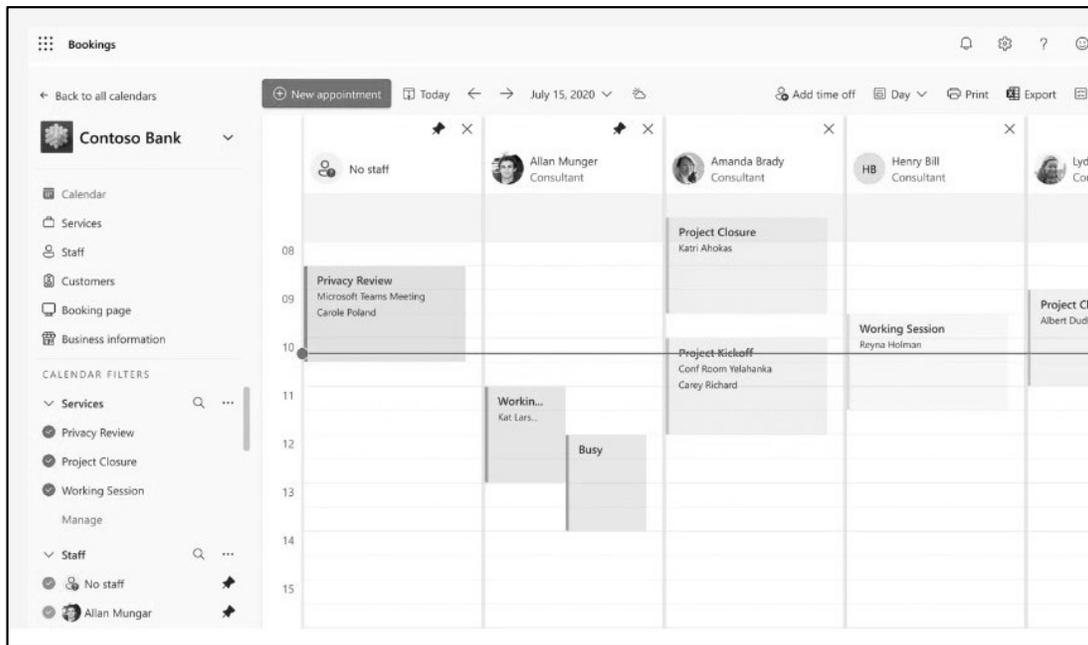


Figure 2- Example of Bookings Calendar

2 PIA Scope

2.1 In Scope

This privacy impact assessment (PIA) is specific to Microsoft Bookings, a web-based application accessible through a browser.

2.2 Out of Scope

This PIA assesses the Microsoft Bookings as is part of the Microsoft 365 suite (formerly known as Office 365) but does not assess specific use cases of Bookings.

This assessment does not include the following Microsoft apps or services:

- Editor,
- Forms,
- Intune,
- Lists,
- OneNote,
- Planner,
- Power Apps,
- Power Automate,
- Power BI Pro,
- Project,
- Publisher,
- Stream,
- Sway,
- To Do,
- Translator,
- Visio,
- Viva,
- Whiteboard, and
- Yammer.

3 Data or Information Elements Included

Bookings collects appointment scheduling data, including customer contact information, service details, staff members, and availability.

As a scheduling tool, Bookings may collect names, email addresses, and phone numbers of users. If this information is used for business purposes only, it may not be considered Personal Information and would not be subject to the specific safeguards identified in the *Freedom of Information and Protection of Privacy Act* (FIPPA).

3.1 Personal Information

If VIU intends to use Bookings to schedule meetings with private citizens, the collected information would be considered Personal Information and a Privacy Impact Assessment defining this use will be required to comply with the *Freedom of Information and Protection of Privacy Act* (FIPPA). This would

4 Reducing Risk of Unintentional PI Collection or Disclosure

4.1 General

To minimize the risk of collecting or disclosing VIU Personal Information in Bookings, the following safeguards will be in place:

- VIU privacy training to ensure all staff and contractors are aware of, and comply with, the *Freedom of Information and Protection of Privacy Act* (FIPPA);
- general privacy and security policies and procedures are in place;
- VIU's assigned administrators will:
 - provisioning and deprovisioning VIU access to Bookings;
 - enable or disable calendar sharing (as appropriate to specific use cases once identified);
 - establish and monitor data sharing restrictions;
 - validate user access to Bookings at least annually.
- administrative contractual requirements for VIU Microsoft administrators (e.g., confidentiality agreements) and contractors (contractual agreements) to take privacy and security seriously and to comply with FIPPA;
- VIU administrator access to Booking (and/or other Microsoft applications and services), to be reviewed by the VIU privacy officer on an annual basis.

4.2 Privacy Related Configurations Available to Bookings

In addition to the general safeguards noted above (s. 4.1), Microsoft Bookings provides various configuration settings that VIU administrators and users can utilize to minimize the risk of privacy breaches. These include:

- **Access controls:** Restrict access to the Bookings calendar by allowing only specific users or groups within VIU to view or manage appointments, staff, and customer information.

- **Customer information:** Limit the amount of personal information collected from customers during the booking process to the **bare minimum** required to fulfill the appointment.
- **Customer Data Usage Consent:** Text requesting the user's or customer's consent for VIU to use their data will appear on the Self-Service page. The box will have to be checked by the user in order to complete the booking.
- **Appointment buffer:** Add a buffer time between appointments to prevent overlapping or back-to-back bookings that could lead to unintentional disclosure of customer information.
- **Data retention policies:** Configure data retention policies within your Microsoft 365 tenant to automatically delete customer data from Microsoft Bookings after a specific period, in accordance with VIU's, and FIPPA, requirements.
- **Sharing permissions:** Control **sharing permissions** for booking pages, ensuring that only authorized users can share or access the page.
- **Email notifications:** Customize email notifications to **avoid including sensitive customer information** in appointment confirmations, reminders, or cancellation emails.
- **Integration with other Microsoft 365 apps:** Be cautious when integrating Bookings with other Microsoft 365 apps, such as Teams or Outlook, and ensure that customer data is shared only with necessary individuals or groups within VIU.

PARTS: 2 – 8 – NOT APPLICABLE

For purposes of this general Bookings PIA, it has been assumed that VIU will not collect Personal Information, thereby completion of parts 2-8 of the PIA template are not required. Note that an additional Bookings PIA will be required if further VIU analysis determines a use case that may include Personal Information.

Disclaimer

This document contains analysis at a point-in-time based on information made available to the author. Nothing in this document shall be construed as legal advice, opinion or an engagement in the practice of law.

PART 9: SIGNATURES

5 PRIVACY OFFICE

Privacy Office Comments

Privacy Office Signatures

This PIA accurately documents Microsoft Bookings at the time of signing.

If there are any changes to the overall initiative, including if Personal Information will be collected, used, stored, or disclosed, the Vancouver Island University program area lead will engage with the privacy officer, and complete a PIA update.

Role	Name	Electronic signature	Date signed
Privacy Officer or designate	Bill Boyte		

6 PROGRAM AREA SIGNATURES

This PIA accurately documents Microsoft Bookings at the time of signing.

If there are any changes to the overall initiative, including if Personal Information will be collected, used, stored, or disclosed, the Vancouver Island University program area lead will engage with the privacy officer, and complete a PIA update.

Program Area Comments

Role	Name	Electronic signature	Date signed
Program Lead	Brad Moran		May 10, 2023
Contact Responsible for Systems Maintenance and/or Security Only required if they have been involved in the PIA			

s. 22(1)

END