



**Part 1 – General**

Name of Department/Branch:	Vancouver Island University (VIU)		
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**1. Description of Proposed Changes**

This Addendum is to document changes related to VIU’s use of Microsoft Azure Active Directory (AAD) originally assessed in the Office 365 PIA and STRA. Specifically, the changes are as follows:

*a) Syncing of VIU’s Active Directory (AD) with AAD*

The Office 365 PIA documented that VIU’s onsite Active Directory (AD) domain was not synchronized to Azure’s Active Directory (AAD), however was anticipated to be in future. AAD is a component of the Infrastructure as a Service (IaaS) and Platform as a Service (PaaS) Microsoft Cloud Service and is used to provide identity and access management services for Office 365. It combines core directory services, advanced identity governance, and security and application access management.

Currently only student number, email address ([studentnumber@viu.ca](mailto:studentnumber@viu.ca)) and password hash along with most recent login time and password reset time are recorded in VIU’s AD. When syncing between VIU AD and AAD is implemented, additional personal information of students (name and possibly their personal email) will be involved.

The staff data elements that will be synced with AAD are as follows:

- User login ID
- password hash
- Account status (disabled/enabled/deleted)
- Last password reset time
- User first and last names
- Department
- Job Position
- Office phone
- Office room number
- Work Email Address



- b) *Syncing of AAD with Jamf Pro* for purposes of mobile device management (MDM) and user account management. A separate PIA has been conducted on Jamf Pro.
  
- c) *Use of Apple Business Manager (ABM)* to automate iOS device registration with Apple. At this time ABM will not be synced with AAD thus no personal information is involved. It is possible that syncing with ABM may be done in future, at which time a PIA for ABM will be conducted.

It should further be noted that in November 2021, the data residency provisions of the Freedom of Information and Protection of Privacy Act (FIPPA) were amended to remove the prohibition (with certain exceptions) on disclosure of personal information outside of Canada. FIPPA section 33.1 states: *A public body may disclose personal information outside of Canada only if the disclosure is in accordance with the regulations, if any, made by the minister responsible for this Act.*

The new legislative framework permits the disclosure of personal information outside of Canada in accordance with B.C. Reg. 294/2021, with public bodies' obligations under s. 30 of FIPPA to implement reasonable security measures continue to apply to any disclosure of personal information outside Canada. The personal information involved in syncing of VIU's AD with Azure AD is not sensitive information and a STRA was conducted on Microsoft Office 365.

As was recommended in the original PIA, VIU should implement a collection notice compliant to FIPPA requirements and mechanism for staff/students to be informed of how their information is collected, used, shared and retained prior to VIU collecting any personal information from individuals. VIU staff and students<sup>1</sup> are required to read and accept policy 45.01 Use of Information Technology as part of their onboarding process, so it is recommended that a notice of collection be incorporated into that policy as a mitigation strategy.

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<sup>1</sup> [https://isapp.viu.ca/acct\\_maint/stu\\_accounts/student\\_accounts.asp](https://isapp.viu.ca/acct_maint/stu_accounts/student_accounts.asp)



**Part 6 – Privacy Office(r) Comments**

*This PIA Addendum is based on a review of the material provided to the Privacy Office(r) as of the date below. If, in future any substantive changes are made to the scope of this PIA, the public body will have to complete a PIA Addendum and submit it to Privacy Office(r).*

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Bill Boyte, General Counsel, University  
Secretary, and Privacy Officer

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Signature

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Date



**Part 7 – Program Area Signatures**

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Darren Eveleigh, IT Chief  
Information Officer

\_\_\_\_\_  
Signature

\_\_\_\_\_  
Date

\_\_\_\_\_  
Karl Childress, IT Infrastructure  
Manager

\_\_\_\_\_  
Signature

\_\_\_\_\_  
Date

\_\_\_\_\_  
Marlene Kowalski, VP  
Administration & Finance

\_\_\_\_\_  
Signature

\_\_\_\_\_  
Date

A final copy of this PIA Addendum (with all signatures) must be kept on record.

***If you have any questions, please contact your public body's privacy office(r) or call the OCIO's Privacy and Access Helpline at 250 356-1851.***



VANCOUVER ISLAND  
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PIA Addendum

*Microsoft Office 365 – Updates*

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