



**VANCOUVER ISLAND
UNIVERSITY**

VANCOUVER ISLAND UNIVERSITY

PRIVACY IMPACT ASSESSMENT

Microsoft Power BI

Version #:	V0.1 - Draft
Date:	March 14, 2023

PIA REFERENCE #	
INITIATIVE TITLE:	Microsoft Power BI
ORGANIZATION:	Vancouver Island University (VIU)
BRANCH OR UNIT:	IT
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<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>
NO
<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>
NO
<i>Related PIAs, if any:</i>
<ul style="list-style-type: none"> • Microsoft Office 365

VERSION CONTROL

Date	Version	Author(s)	Version Notes
March 14, 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)

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PART 1: GENERAL INFORMATION

1 Initiative Overview

1.1 Power BI

Vancouver Island University (VIU) is looking to use Power BI to visualize, analyze, and report on data in their custody and control. Power BI is expected to provide insights into the university’s data to support decision making and assist in reporting.

Power BI is a collection of software services, apps, and connectors that work together to turn unrelated sources of data into coherent, visually immersive, and interactive insights. Data sources could include an Excel spreadsheet, or a collection of cloud-based and on-premises hybrid data warehouses.

Power BI consists of several elements that work together, starting with these three basics:

- a Windows desktop application called Power BI Desktop;
- an online software as a service (SaaS) service called the Power BI service; and
- Power BI Mobile apps for Windows, iOS, and Android devices.

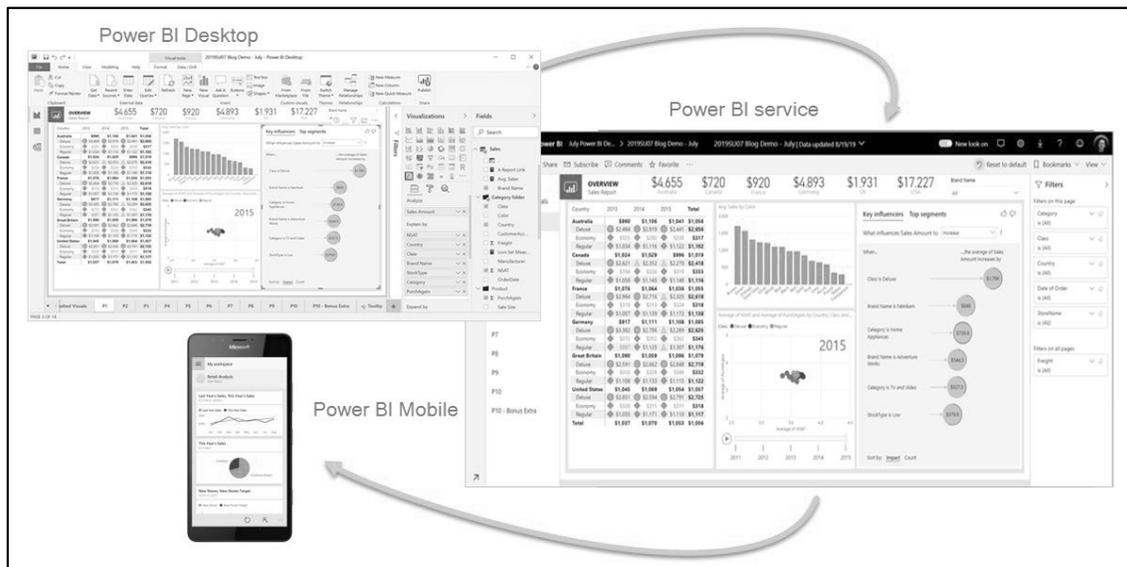


Figure 1 - Power BI Elements Diagram

Power BI Desktop

Power BI Desktop is an application that is downloaded to a local computer. It is a complete data analysis and report creation tool that is used to connect to, transform, visualize, and analyze data. It includes the Query Editor, in which the user can connect to many different sources of

data and combine them into a data model. This data can then be used in a report and shared with others directly or by publishing to the Power BI service.

Power BI service

The Power BI service is a software as a service (SaaS). It supports report editing and collaboration for teams and organizations and can be used to create dashboards, create and share apps, analyze and export data and more.

1.2 Power BI Summary Table

The following table provides summary information on Power BI.

Category	PowerBI
Description	<p>Microsoft Power BI is a business analytics tool used to structure and analyze data from various source systems to create reports in easily interpreted illustrations, graphs, and charts. When Power BI is used to access data, it must first authenticate the user using Azure AD to determine if the user has sufficient rights to view the data.</p> <p>Reports can be shared with others directly or by publishing to the Power BI service, a cloud-based service that supports report editing and collaboration for teams and organizations, as well as connections to data sources, but modeling is limited. Typically, the Power BI Desktop is used to create Power BI reports, then the Power BI service is used for distribution and collaboration with other users.</p> <p>Power BI reports must be explicitly shared with authorized users in order for them to have access. Administrators can configure a custom message to be displayed prior to users publishing reports to mitigate the risk of sharing reports with unauthorized users.</p>
Platform:	Desktop
Data Inputs:	Various data sources that the user has authorization to access

Category	PowerBI
Collection of Diagnostic Data by Microsoft	<p>In accordance with privacy practices stated in their Privacy Statement², Microsoft collects information about Power BI usage for product improvement and to help diagnose problems. This may include data on the operating system, Power BI information, and Internet Explorer versions.</p> <p>Users can opt out of this data collection by setting configurations not to send usage data.</p>
Collection of Customer Data by Microsoft	<p>Users may also choose to send error reports and additional information to help resolve issues they encounter using Power BI³. This may include the collection of data on the state of the Power BI file being used, such as document locale, preview features that are enabled, and storage mode.</p> <div data-bbox="581 856 1253 1138" data-label="Image"> </div> <p>Power BI Desktop also collects information about the state of the file before the error occurred, such as document locale, preview features that are enabled, and storage mode. The collected information can include screenshots, error messages, and formulas from the user's model. These items might include the contents of files the user was using when an error occurred, so users should be reminded to review them before sending. Before sending the error report, the user can choose which information is sent to Microsoft.</p>
Customer Data Storage Location	<p>MS Cloud (Canada - Quebec City, Toronto)</p> <p>Microsoft 365 data locations - Microsoft 365 Enterprise Microsoft Docs</p> <p>Dynamics 365 availability and data locations Microsoft Learn</p>

² <https://docs.microsoft.com/en-us/power-bi/admin/desktop-privacy>

<https://privacy.microsoft.com/en-US/privacystatement>

³ <https://docs.microsoft.com/en-us/power-bi/fundamentals/desktop-diagnostics>

Category	PowerBI
Optional connected services	N/A
Activity Logging - End-user controls	Activity logging is set by Administrators, not end-users
User Activity Reports	Reports of a user's use of the product are available to the IT admin. Microsoft 365 admin center activity reports - Microsoft 365 admin Microsoft Docs
Audits	Power BI auditing must be enabled and configured in the Office 365 Security & Compliance center
Security Compliance	Microsoft online services in scope are shown in the Azure SOC 2 Type 2 attestation report and include Power BI. <ul style="list-style-type: none"> • https://learn.microsoft.com/en-us/compliance/regulatory/offering-soc-2 • https://azure.microsoft.com/mediahandler/files/resourcefiles/microsoft-azure-compliance-offerings/Microsoft%20Azure%20Compliance%20Offerings%20March%202023.pdf

2 PIA Scope

2.1 In Scope

This privacy impact assessment (PIA) is specific to Microsoft Power BI Desktop and Microsoft Power BI Service.

2.2 Out of Scope

This PIA assesses the Microsoft Power BI, but does not assess specific use cases of that tool.

Power Platform is a suite of Microsoft cloud-based business productivity/process automation tools and a developer platform for organizations to create apps and automated workflows that leverage the M365 cloud solution set. Power Platform includes the following components:

- Power Apps
- Power Automate
- Power BI
- Power Pages

- Power Virtual Agents
- Connectors
- Environments, and
- Dataverse.

This PIA does not include the Power Platform, only the Power BI tool.

3 Data or Information Elements Included

It is not intended that VIU Personal Information will be accessed, used, stored or disclosed in/by the VIU use of Power BI.

Since each use-case would be different, it is impossible to identify specific data elements that could, or would be collected, used and/or disclosed using Power BI.

3.1 Personal Information

For purposes of this Power BI assessment, it is assumed that **NO** Personal Information, including sensitive Personal Information, will be involved.

4 Reducing Risk of Unintentional PI Collection or Disclosure

To minimize the risk of collecting or disclosing VIU Personal Information in Power BI, 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;
- development of specific Power BI administrator guidelines to address privacy and security safeguards during configuration;
- access controls to limit Power BI access to a few developers. VIU will control Power BI usage to ensure that developed apps, reports and automations are completed within one team so that there is a consistent method for developing, testing, releasing and supporting their use;
- administrative requirements for Power BI developers (e.g., confidentiality agreements) and contractors (contractual agreements) to take privacy and security seriously and to comply with FIPPA;
- use of external Microsoft connections (e.g., to Facebook) will not be enabled;
- before sending the error report to Microsoft, the user **must** review the content and ensure that the message does not include PI;
- regular logging and monitoring of VIU databases that contain Personal Information;
- separation of duties between Power BI developers and Power BI administrators; and
- access to Power BI to be reviewed by the VIU privacy officer on an annual basis.



PARTS: 2 – 8 – NOT APPLICABLE

PART 9: SIGNATURES

5 PRIVACY OFFICE

Privacy Office Comments

Privacy Office Signatures

This PIA accurately documents Microsoft Power BI usage at the time of signing.

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

Role	Name	Electronic signature	Date signed
Privacy Officer or designate			

6 PROGRAM AREA SIGNATURES

This PIA accurately documents Microsoft Power BI usage at the time of signing.

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

Program Area Comments

Role	Name	Electronic signature	Date signed
Program Lead	Brad Moran	[REDACTED]	March 15, 2023
Contact Responsible for Systems Maintenance and/or Security Only required if they have been involved in the PIA			

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END