



VIU - PRIVACY IMPACT ASSESSMENT

<Studiosity Pilot Study>

This form is used by VIU to determine if a proposed new initiative or significant changes to an existing initiative (policy, system, project, program or activity) meets or will meet the protection of privacy requirements under Part 3, Section 69 (5.3) of the British Columbia *Freedom of Information and Protection of Privacy Act* (FIPPA). The Act makes it a legal requirement that VIU conduct a PIA in accordance with the directions of the minister responsible for the Act. The PIA is a risk management tool to identify potential privacy issues and impacts, allowing correction and mitigation, thus avoiding costly system, program, service, or process redesign; privacy complaints or breaches; and harm to personal, professional, and institutional reputation.

PART 1 - GENERAL INFORMATION

1.1. Unit and Program Area

Identify the Department and Program submitting this PIA.

Department:	Academic and Career Preparation
Program:	Pathways to Post Secondary (ABE and ESL)

1.2. Contact Information

Identify the individuals best positioned to speak to the contents of this PIA.

Name of PIA drafter:	Roberta Jenkins		
Position Title:	Coordinator, Pathways to Post Secondary		
Phone:		Email: Roberta.Jenkins@viu.ca	
Name of Program Manager:	Roberta Jenkins		
Position Title:	Coordinator, Pathways to Post Secondary		
Phone:		Email: Roberta.Jenkins@viu.ca	

1.3. Overview of the Initiative

Provide as background a general description of the initiative and the context in which it functions. Describe what you are doing, how it works, who is involved and when or how long the initiative runs. This could include the purpose of the initiative and its benefits, what larger process it is part of, how it aggregates and stores together information that was previously maintained separately, how it



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converges different record keeping systems, the parties involved, how it will automate or otherwise change the existing business workflow, etc. If this is a change to an existing program or system, describe the current system or program and the proposed changes.

To deliver on-demand academic support to improve attainment and retention for Vancouver Island University (VIU). By providing students with a scalable 24/7, 365 days a year support service, students will create a closer affiliation with their program and the University, and increase their confidence levels when preparing for assignments and examinations.

We anticipate a demonstrable increase in student experience and learning outcomes above the current baseline from the number of active users as part of this cohort of students. Based on the findings from the initial six months (of class) period from September 12th - March 31st, the scale of the services described below can be adapted in line with student demand to further develop the effectiveness of the support available to VIU students.

University staff will have access to a dedicated Partner Portal that will provide real-time metrics regarding the usage of the service by your students including feedback, the nature of engagement, and usage statistics. The Portal provides complete transparency for monitoring the usage of minutes, whereby the amount of minutes (thus the availability of the service to students) can be increased if there is a higher than expected demand in order to avoid a reduction in service for learners. In addition, if installed by the campus business intelligence unit, use our application programming interface (API) to integrate daily usage data into your business analytics tool or data warehouse, to facilitate reporting and impact analysis.

Studiosity will provide access to Writing Feedback and Connect Live services for all students within the defined cohort. The aforementioned students will have access to the services outlined below for the duration of the term identified.

As a result of using Writing Feedback and Connect Live, Studiosity partners measure a range of improvements to student retention and experience with up to 60 percent of service engagement taking place at evenings, weekends, and holiday periods.

Product Descriptions

Writing Feedback

"Here's my file, I'll check back later." This part of the Studiosity service offers constructive academic writing feedback in less than 24 hours.

Feedback here is a spotlight, showing students where they might focus attention and add more thought. Whether for future accountants, nurses, or aeronautical engineers, English language skills



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are critical to success and part of the integrity of a university. CVs and resumes are also accepted and feedback provided on grammar, spelling, structure and readability.

Within the feedback, students also receive highlights flagging citation and referencing issues (“Citation Assist”) for their understanding and action, and engagement with the university’s other referencing guidelines and resources, all well before submitting their work.

Connect Live

"I need help right now!" This part of the Studiosity service offers one-to-one, personal study help in real time.

A student formulates their own question, then works with one of our Subject Specialists in the interactive classroom - with chat, collaborative whiteboard, and file sharing. Because timely feedback drives confidence and perseverance. Students can ask for help with core literacy, numeracy, science, and study skills; view the full subject list.

Synchronous, 24/7 on-demand help with “Connect Live”

1.4. Specific Actors Involved

Thinking back to how you described the background in the previous section, provide specific details with respect to the individual actors involved in the process, focusing on how personal information will be collected, accessed, used, disclosed and retained.

1.4.a. Student Information

Collection:	Studiosity will collect Students personal information like First name, Last name, Email, Year level to create their unique service account. All the personal information is managed openly, transparently and measures are taken to keep personal information safe. Please find our privacy policy available here: https://studiosity.com/connect/policy_agreements/6/privacy
Access:	When students first access their service account, they are presented with a Welcome page containing links to the published Terms & Condition, Acceptable Use Policy and Privacy Policy. Once they accept the policies, their unique account is created and their details are stored in the system. If they disagree with the policy, any of their details are removed from the system.
Use:	It will ensure students have a unique account to access 24/7 study service and to provide for robust reporting on the use of Studiosity back to Vancouver Island University.
Disclosure:	Access to Personal Information will be limited to only those employees which require it and only for the stated purpose which has been agreed upon by the Person to whom the Information relates.



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	Please find more information in Studiosity Data Security and Protection Policy.
Retention:	Personal information is retained for the provision of the service and robust reporting of service usage. Personal information is de-identified automatically after 15 months of inactivity by the student.

1.4.b. Employee Information

Collection:	n/a
Access:	n/a
Use:	n/a
Disclosure:	n/a
Retention:	n/a

1.4.c. Other Parties' Information

Collection:	n/a
Access:	n/a
Use:	n/a
Disclosure:	n/a
Retention:	n/a

1.5. Scope of this PIA

Where applicable, explain exactly what part or phase of the initiative the PIA covers and, where necessary for clarity, what it does not cover.

This PIA covers the entire scope of the pilot running from September 12th 2022 to March 31st 2023 including use of our Writing Feedback and Connect Live services accessed via the campus Learning Management System via LTI integration with applicability beyond should VIU choose to move forward with Studiosity services beyond the duration of the pilot.

1.6. Related Privacy Impact Assessments

Identify PIAs for other parts of the initiative or any PIAs that were previously completed for this initiative.



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n/a

1.7. Elements of Information or Data

List the types of personal information involved in the initiative, if applicable. This could include the individual's name, age, address, work/home email, work/home phone number, educational history, employment history, work status, health information, financial information, photos, comments, or opinions about third parties. See Schedule A for a partial list of types of personal information.

If the initiative does not involve personal information, go ahead to Part 8 Signatures.

1.7.a. Student data elements:

- First name
- Last name
- VIU email address
- Year Level

1.7.b. Employee data elements:

n/a



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1.7.c. Other Parties' data elements:

n/a

1.8. Storage of Access Outside of Canada

Provide a brief description of whether the personal information can be accessed from outside Canada. For example, by a service provider that is repairing a system, or if the information is being stored outside Canada, for example, in the “cloud”. If the data is stored within Canada and only accessible within Canada, please indicate this and describe with whom and where it is stored.

<p>Studiosity utilizes the cloud infrastructure of Amazon Web Services (AWS). Where possible any application data and or client facing services have been physically located within [REDACTED]. This is housed in [REDACTED]. Personal information can be accessed outside of Canada by relevant Studiosity employees carrying out the functions of their role, for example providing technical support or making system updates/running reports.</p>

s. 15(1)(l)

1.9. Data-linking Initiative

<p>In FIPPA, “data-linking” and a “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 three questions, your initiative may be a data-linking initiative. If so, you must comply with requirements under the Act for a data-linking initiative.</p>	
<p>1. Personal information from one database is linked or combined with personal information from another database.</p>	<p><input type="checkbox"/> Yes</p> <p><input checked="" type="checkbox"/> No</p>



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2. The purpose for the linkage is different from those for which the personal information in each database was originally obtained or compiled.	<input type="checkbox"/> Yes <input type="checkbox"/> 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	<input type="checkbox"/> Yes <input type="checkbox"/> No
If you answered 'yes' to all three questions, please contact the Information and Privacy Coordinator or Privacy Officer to discuss the requirements of a data-linking initiative.	

1.10. Common or Integrated Program or Activity

In FIPPA, "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 three questions, you must comply with requirements under the Act for common or integrated programs and activities.	
1. This initiative involves a program or activity that provides a services or services	<input type="checkbox"/> Yes <input type="checkbox"/> No
2. Those services are provided through: 1) a public body and at least one other public body or agency working collaboratively to provide that service; or 2) one public body working on behalf of one or more other public bodies or agencies.	<input type="checkbox"/> Yes <input type="checkbox"/> No
3. The common or integrated program or activity is confirmed by a written agreement that meets the requirements set out in section 12 of the FIPPA Regulation.	<input type="checkbox"/> Yes <input type="checkbox"/> No
If you answered 'yes' to all three questions, please contact the Information and Privacy Coordinator or Privacy Officer to discuss the requirements of a common or integrated program or activity.	

1.11. Data Flow

Provide a description (either a narrative, flow chart, or table) of the linkages and flows of personal information collected, used, and/or disclosed.

See attached architecture flowchart.



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PART 2 – COLLECTION, USE AND DISCLOSURE OF PERSONAL INFORMATION

2.1. Personal Information Flow Diagram/Table

Complete the table(s) below, if applicable. Include a personal information data flow diagram (if one exists) as well as completing the table(s).

2.1.a. Student Personal Information Data Flow

Personal Information Flow Table			
	Description /Purpose of Activity	Privacy Rule	Legal Authority
1.	Student data	Collection	Student agreement
2.	Authenticated access to the Studiosity service.	Use	Student agreement
3.	Limited, relevant personnel to operate the Studiosity service	Disclosure	Student agreement

2.1.b. Employee Personal Information Data Flow

Personal Information Flow Table			
	Description /Purpose of Activity	Privacy Rule	Legal Authority
1.	N/A	Collection	
2.	N/A	Use	
3.	N/A	Disclosure	

2.1.c. Other Parties' Information Data Flow

Personal Information Flow Table			
	Description /Purpose of Activity	Privacy Rule	Legal Authority
1.	N/A	Collection	
2.	N/A	Use	
3.	N/A	Disclosure	

2.2. Risk Mitigation Table

Complete the table(s) below. Describe the risk and the mitigation strategy. Use the terms 'High', 'Med' or 'Low' to rate the "Likelihood" and "Impact" of each risk. In cases where the risks are substantially different for the individuals whose personal information is in VIU's custody or under its control, complete a table for each group. In cases where the risks are substantially similar or the same, complete only one table.

2.2.a. Risks to Student Personal Information Data

Risk Mitigation Table			
	Risk	Mitigation Strategy	Likelihood Impact



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1.	Long term retention	Personal data is removed after inactivity	Low	Low
2.	Incorrect / corrupted data	Data is encrypted in transit for security and verification	Low	Low
3.	Data is unintentionally disclosed	Encryption is employed for data storage. Access controls in place	Low	Med
4.				
5.				
6.				
7.				

2.2.b. Risks to Employee Personal Information Data

Risk Mitigation Table				
	Risk	Mitigation Strategy	Likelihood	Impact
1.	N/A			
2.				
3.				
4.				
5.				
6.				
7.				
8.				

2.2.c. Risks to Other Parties' Personal Information Data

Risk Mitigation Table				
	Risk	Mitigation Strategy	Likelihood	Impact
1.	N/A			
2.				
3.				
4.				
5.				
6.				
7.				
8.				

2.3. Collection Notice

In order to allow individuals the ability to exercise their information rights with knowledge of how their information will be used, they must be notified at or prior to the time of collection. Section 27(2) of the Act requires that the individual from whom personal information is collect be told: a) the purpose for



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collecting it, b) the legal authority for collecting it, and c) the title, business address and business telephone number of an officer or employee of VIU who can answer the individual's questions about the collection.

Describe below how and when notice will be given to individuals. Include the specific collection notice(s) that will be used.

2.3.a. Student Personal Information Collection Notice

Students initially log into the campus LMS and find the Studiosity link, most likely found on the student portal homepage.

They click on the Studiosity link. Students then need to create a pin and click the check box that they agree to the Studiosity Cookie and Privacy Policy and Terms of Use. Every time students access Studiosity after they just need to their PIN to confirm their identity.

Complete Studiosity Cookie and Privacy Policy that students can read through is directly below. In the context of VIU, the relevant and only user is 'student'.

https://studiosity.com/connect/policy_agreements/6/privacy

Our Privacy Commitment

At Studiosity Pty Limited ("Studiosity"; also referred to as "we", "us" and similar terms throughout this Policy), we believe that you should understand the way in which we collect, use, disclose and protect your personal information. For the purposes of this Policy, "personal information" means any identifiable information about an individual, including but not limited to an individual's name, home address, telephone number, social insurance number, gender, income and family status, except any other information otherwise exempted by the applicable laws of Canada. This policy is intended to explain clearly and in plain language some of the key processes and procedures that we have implemented to manage personal information, to protect the privacy of individuals and to comply with the applicable privacy laws in Canada.

What Personal Information Do We Collect?

The personal information we collect may depend upon the type of Studiosity user you are:

- Student – a user of our services ("Services");
- Student Mentor – a user and provider of our Services;
- Subject Specialist – a provider of our Services;



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- Partner Representative – an administrator, teacher or similar representative from an organization who contracts for our Services; and/or
- General Contact – an individual interested in learning more about our services.

Most of the personal information that we collect will be via our website, located at <https://studiosity.com/>.

The type of personal information we collect from Students may include:

- your name;
- your contact information, including email addresses, phone number;
- your year of study; and
- your education status, including entity/institution name;

We may collect the following additional information from Student Mentors:

- financial information and banking information;
- degree information, including individual units of study and results;
- identity verification documentation such as a passport, birth certificate or drivers licence; and
- your Social Insurance Number;

We may collect the following additional information from Subject Specialists:

- financial information and banking information;
- degree information, including individual units of study and results;
- identity verification documentation such as a passport, birth certificate or drivers licence; and
- your Social Insurance Number;

For Partner Representatives, we will collect your name and contact information, including your email address, phone number and your role within your institution.

For General Contacts, we will usually collect your name, email address, the type of Service you are interested in and the country you live in. General Contacts may choose to provide any other information that they consider relevant in learning about our Services. We encourage you to not provide sensitive information such as medical or financial information unless necessary.

Why Do We Collect Personal Information?

The main reason that we collect your personal information is to provide our Services.

Our Services relate to the provision of individualised, one-to-one educational support to students and families in circumstances where Students are either our direct consumer clients or are the end users of our



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commercial clients (i.e., schools, tertiary institutions, other educational institutions, libraries and corporations).

For Students, our Services will include assisting with homework, study, assignment research, revision and exam preparation. To do so, we match Students with Student Mentors and Subject Specialists for discussion, feedback and responses in respect of study queries and other aspects of study. Our Services are delivered through the Internet.

Student Mentors and Subject Specialists will assist in providing and facilitating our Services to Students. They provide guidance based on specific queries around areas of study or general feedback on academic work that students have engaged in.

We use information only for the purposes for which we collected it, including:

- to consider a request for our Services;
- to coordinate the setup and activation of our Services;
- to facilitate, process and respond to the educational or study queries of Students, Student Mentors and Subject Specialists;
- to facilitate online chats between Students and Student Mentors and/or Subject Specialists;
- to understand the progress of, and Services required by, Students;
- to facilitate Student Mentor and Subject Specialist training;
- to facilitate and process payments for our Services;
- to assist us in providing and improving our Services (including analysing usage of our Services and industry trends and developing, improving and marketing our Services);
- for regulatory reporting and compliance with our legal obligations;
- to ensure the safety of individuals (e.g., if we believe the personal safety of a Student or any other person is at risk and it is a reasonable action to take to protect that Student or any other person from possible injury);
- to perform administrative and operational tasks;
- marketing our Services to all User types to show how our Services can help them;
- to seek feedback in relation to partner satisfaction; and
- to consider any concerns or complaints made against us.

There is no obligation to provide personal information for use by us but if you do not provide us with the personal information that we require, we may not be able to provide the Services that you require.

How do we collect personal information?

The means by which we collect personal information may depend on the Services we are providing, and whether you are a Student, Student Mentor, Subject Specialist, Partner Representative or General Contact.



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For example, we may collect personal information:

- directly from Students, Student Mentors, Subject Specialists, Partner Representatives or General Contacts;
- indirectly, when Students, Student Mentors or Partner Representatives access the Services via a third-party software platform from our commercial clients who have obtained the express consent of the individual Student (collectively, “Partners”), Student Mentor or Partner Representative to disclose their personal information to us for its relevant use; or
- from publicly available sources (e.g., from Partner websites);

We will collect personal information directly from the relevant individual where ever possible.

Studiosity has contractual measures in place to ensure that proper consent has been collected from Partners prior to personal information being transferred to Studiosity.

Cookies

Personal information will not be collected where a person is only browsing our website, but we do use cookies to improve our Services. A cookie is a small file sent to your browser from a web server to be stored on your computer. Cookies are used to enhance interaction and convenience in using our website and we do not use cookies to record any personal information. Cookies do not allow access to your computer or any data / files contained in your computer. We use a variety of different types of cookies on our website. Some of the purposes of different cookies we use are described as follows:

- Some cookies are essential to the Site in order to enable our log-in process and let you to move around it and to use its features. Without these cookies, we may not be able to provide certain services or features, and our website will not perform as smoothly for you as we would like.
- We may use cookies to receive and record information about your computer, device and browser, including your IP address, browser type and other software or hardware information. If you access our website from a mobile or other device, we may collect a unique device identifier assigned to that device (“UDID”), geo-location data or other transactional information for that device.
- We may use analytics cookies to collect information about your use of the Service and enable us to improve the way it works. Analytics cookies collect information about how you use our website; for instance, which pages you go to most. The information allows us to see the overall patterns of usage on our website and help us record any difficulties you have with the website.
- Social plug-in tracking cookies can be used to track both members and non-members of social networks for additional purposes, such as behavioural advertising, analytics and market research.
- We also use the Google AdWords Remarketing service, which advertises across the Internet to previous visitors to our website. Google AdWords Remarketing displays relevant advertising content based on which sections of The Website you have visited. Google AdWords Remarketing



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allow us to tailor our advertising and marketing content so it is relevant and suits your needs. Any data collected as part of our use of Google AdWords Remarketing will be in accordance with this Policy and Google's Privacy Policy, which we encourage you to review <https://policies.google.com/privacy>. If you do not wish to be a part of our Google AdWords Remarketing, you can opt out by visiting Google Ads Preference Manager by following the instructions at <https://support.google.com/accounts/answer/2662856>

Information derived from these cookies may be combined with other information you provide when signing up to use any element of our Services including, but not limited to, filling out a general inquiry on our website. We do this only for the purpose of analysing data in order to improve the Website services.

Is Personal Information Shared or Disclosed?

Yes, we share personal information with certain third parties, as outlined below.

1. Student reports to Partners

Studiosity will share personal information regarding the usage of its services by its Students, Student Mentors and Subject with its commercial clients by way of periodic usage reports. Where commercial clients (e.g., universities, schools) have purchased a licence to use our Services, those commercial clients will have access to, and knowledge of the usage patterns of their students. Such usage patterns will include the content of student learning sessions and any comments left in post-session surveys. We may also share transcripts and audio recordings with our commercial clients for the purpose of quality control of our services. Other information, as noted above, about the Student, Student Mentor or Subject Specialist is also shared in order to provide for analysis on the effectiveness of the Service.

2. Third party service providers

We may share your personal information with other companies that are necessary in the provision of the Services.

We deal with third party service providers who may assist us with a variety of functions including with marketing, research, mail and delivery, security, insurance, professional advisory (including legal, accounting and auditing advice), banking, payment processing, credit reporting or technology services. Where we engage third party service providers to perform services for us, those third parties may be required to handle personal information. Under these circumstances, those third parties must safeguard this information and must only use it for the purposes for which it was supplied and we will make all reasonable enquiries to try to ensure that this is the case.

We will limit personal information provided to independent third parties to that information required for those third parties to properly perform their functions. Further, our contracts with these third parties



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include provisions for the protection of personal information at or exceeding the standards identified in this Policy.

Third party service providers we use are located in other countries including Australia, United States, United Kingdom and countries of the European Union.

How Do We Protect Personal Information?

We protect personal information using physical, technological and organisational safeguards (collectively, the “Safeguards”). We regularly review our practices to ensure they align with reasonable industry practices appropriate to the level of sensitivity to safeguard personal information against loss or theft, unauthorized access, alteration or disclosure.

Despite using the Safeguards outlined above, “perfect security” does not exist, particularly online. We cannot guarantee the security of information posted or transmitted via our website or online. It is possible that third parties may unlawfully intercept or access such information. If you think someone is impersonating Studiosity, that there has been a breach of your privacy, or you believe that you are the victim of fraud, please contact us as soon as possible.

How Do We Obtain Consent to Collect, Use and Disclose Personal Information?

When you choose to provide us with your personal information, you are consenting to our collection, use and disclosure of your personal information in accordance with this Policy. We may seek additional consent where required by law or in situations where we consider further consent to be necessary or appropriate.

Further consent will be sought from Students and Student Mentors after they first access Studiosity to confirm that Studiosity is permitted to handle their personal information. This will be gained by an explicit agreement to this Privacy Policy.

You are free to refuse or withdraw your consent to the collection, use or disclosure of your personal information by Studiosity at any time upon reasonable notice in writing to Studiosity, subject to certain restrictions as may be permitted by applicable laws.

How Do We Retain Personal Information?

We generally keep personal information for only as long as it is needed to accomplish the purposes for which it was collected, or as needed for authorized or legitimate purposes. More specifically, we retain



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personal information as long as necessary for the fulfillment of the identified purposes for its collection or as otherwise necessary to comply with applicable laws or protect our interests. When personal information is no longer necessary or relevant for the identified purposes (in general this is 15 months after the last access of the service by an individual), or is required to be retained by applicable laws, Studiosity will take steps to have it deleted, destroyed, erased, aggregated or made anonymous. Studiosity uses reasonable industry practices to ensure we have adequate controls, schedules and practices for information and records retention and destruction which apply to your personal information.

How Do We Maintain Accuracy and Allow Individual Access to Personal Information?

You may request access to and review of your personal information in the possession of Studiosity. However, access may be declined where permitted or required by applicable law, which may include (without limitation) the following circumstances:

- the information is protected by solicitor-client privilege;
- disclosure of the personal information would compromise the confidentiality of another individual or threaten the safety of another person; or
- non-disclosure of the personal information is required or permitted by law.

You may request that we change or delete your personal information in the possession of Studiosity. Note that deletion requests are subject to certain limitations, for example, we may retain personal information as permitted by law, such as for record-keeping purposes, to maintain an active account and to process transactions and facilitate customer requests. If we do not agree that personal information is inaccurate or outdated, we will still maintain a record of any alternative text that the individual concerned believes appropriate.

Where a request for access, alteration, or deletion of personal information is declined, we will provide reasons for declining the request.

Contact Us

You can contact us at any time, for reasons such as:

- To access, correct or update your personal information;
- To ask questions or express concerns about this Policy or any other matter related to our collection, use, protection or disclosure of personal information;
- To obtain additional information about our use of third party services providers; or
- To withdraw consent to continued use and disclosure of personal information.



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You can contact us by email at privacy@studiosity.com

Changes to this Privacy Policy

This Privacy Policy was last updated in January 2021. We will occasionally update this Policy and revise the “last updated” date appearing in this paragraph.

We will generally notify you of material changes to the Policy, where we are able to do so, which involve new or revised uses or disclosure of personal information that may not be reasonably expected by you at the time that you register for our Services. However, we encourage you to review our Policy from time-to-time, in order to check for updates and refresh your understanding of our personal information handling policies and practices.

2.3.b. Employee Personal Information Collection Notice

N/A

2.3.c. Other Parties’ Personal Information Collection Notice

N/a - we do not collect Other Parties’ Personal Information



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PART 3 – SECURITY OF PERSONAL INFORMATION

Describe below the specific measures that will be used to protect the personal information from unauthorized collection, access, use, disclosure, retention and disposal. See Schedule C for a list of common types of security measures.

3.1. Security Measures

3.1.a. Physical Security Measures

The personal information is stored within the Amazon Web Services infrastructure which has physical controls as outlined here:

<https://aws.amazon.com/compliance/data-center/controls/>

3.1.b. Technical Security Measures

Studiosity leverages a combination of host-level firewalls, ACLs, monitoring and alerting systems, and real time log monitoring to restrict access to services, and to detect unusual usage.

3.1.c. Security Policies, Procedures and Standards

This can be found in our Data Security and Protection Policy - ATTACH



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PART 4 – ACCURACY, CORRECTION AND RETENTION OF PERSONAL INFORMATION

4.1. Updating and Correcting Personal Information

Describe here, if applicable, the procedure to allow individuals to routinely update or correct their personal information using regular channels (e.g., a student uses the SRS to update a home address or telephone number, an employee uses the HIS system to update emergency contact information, etc.)

Students can manage different elements of their profile, including first name, last name, email address time zone., via the 'Account Details' link from the right hand side of their logged in account homepage

4.2. Decisions That Directly Affect an Individual

Describe here, if applicable, how the information will be used to make decisions that directly affect an individual.

The main reason that we collect your personal information is to provide our Services.

Our Services relate to the provision of individualized, one-to-one educational support to students and families in circumstances where Students are either our direct consumer clients or are the end users of our commercial clients (i.e., schools, tertiary institutions, other educational institutions, libraries and corporations).

For Students, our Services will include assisting with homework, study, assignment research, revision and exam preparation. To do so, we match Students with Student Mentors and Subject Specialists for discussion, feedback and responses in respect of study queries and other aspects of study. Our Services are delivered through the Internet.



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- to consider a request for our Services;
- to coordinate the setup and activation of our Services;
- to facilitate, process and respond to the educational or study queries of Students, Student Mentors and Subject Specialists;
- to facilitate online chats between Students and Student Mentors and/or Subject Specialists;
- to understand the progress of, and Services required by, Students;
- to facilitate Student Mentor and Subject Specialist training;
- to facilitate and process payments for our Services;
- to assist us in providing and improving our Services (including analysing usage of our Services and industry trends and developing, improving and marketing our Services);
- for regulatory reporting and compliance with our legal obligations;
- to ensure the safety of individuals (e.g., if we believe the personal safety of a Student or any other person is at risk and it is a reasonable action to take to protect that Student or any other person from possible injury);
- to perform administrative and operational tasks;
- marketing our Services to all User types to show how our Services can help them;
- to seek feedback in relation to partner satisfaction; and
- to consider any concerns or complaints made against us.

There is no obligation to provide personal information for use by us but if you do not provide us with the personal information that we require, we may not be able to provide the Services that you require.



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PART 5 – FURTHER INFORMATION

5.1. Systematic Disclosures of Personal Information

Describe here, if applicable, any usual disclosures inside the University between the office with primary responsibility for the personal information and other VIU departments and programs. Also, describe any usual disclosures outside the University between VIU and another public or private body (e.g., provincial, territorial or federal government ministry, department or agency; university or college, transit authority; law enforcement agency).

If VIU and one or more other parties have signed an Information Sharing Agreement, include a copy with this completed PIA. An Information Sharing Agreement sets terms and conditions on the collection, use, disclosure and protection of personal information by the parties to the agreement.

N/A

Access for Research or Statistical Purposes

Describe here, if applicable, any usual disclosures of the personal information made by your department for a research purpose, including statistical research, and how you comply with Section 35 of the Act.

N/A



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PART 6 – INFORMATION AND PRIVACY COMMENTS

6.1. Information or Materials Reviewed

The Privacy Officer will describe here any additional resources and authorities consulted when reviewing and commenting on the completed PIA.

I have reviewed and considered this PIA. As this involves a supplier who will store Data outside of Canada I have also conducted a further assessment of the risks of non-resident data. Given that VIU plans to use this for students only, the information being stored outside Canada is limited to student’s name, contact information, year of study and education status. This is not highly sensitive personal information, and the vendor has provided robust assurances about its data management practices confirming this information will be encrypted and destroyed when no longer needed.

6.2. Conditions of Approval

The Information and Privacy Coordinator will describe here any recommended conditions to be considered by the Privacy Officer with delegated decision-making authority under the Act, who approves the completed PIA.

Recommended Conditions:	
1.	VIU Program Area needs to create an information sheet or user guide for VIU students outlining what private information will be collected. As we are introducing them to this platform, we need to make sure they understand what is involved. The guidance should include what options they may have if they do not wish to use the platform.
2.	
3.	



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4.	
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PART 7 – APPROVAL AND SIGNATURES

The undersigned confirm that the [REDACTED] the contents of the PIA are accurate and complete.

Bill Boyte

VIU Privacy Officer



September 6
2022

Date

s. 22(1)

Roberta Jenkins

*Insert position title of Program
Manager (if applicable)*

Signature

September 2,
2022

Date

Insert Name

*Insert position title of Project
Manager, Information Technology
Services (if applicable)*

Signature

Date

SCHEDULE A

DEFINITION OF TERMS



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Access	Disclosure of personal information by the provision of access to personal information.
Anonymize	Present the results of a process in such a way that individuals whose personal information is contained in the records cannot be identified, and no linkages can be made between any personal information found in the records and personal information that is publicly available from other sources.
Authorized access	Occurs when a person has access to personal information in the custody or control of the University that is authorized by the Act.
Consistent purpose	<p>A use of personal information is consistent with the purpose for which the information was obtained or compiled if the use:</p> <ol style="list-style-type: none">1. has a reasonable and direct connection to that purpose, and2. is necessary for performing the statutory duties of, or for operating a program or activity of, the public body that uses or discloses the information.
Contact information	Information that enables an individual at a place of business to be contacted; includes name, position title, business telephone number, business address, business email or business fax number of the individual.
Data linking	<p>The linking or combining of personal information in one source with personal information in one or more other sources if the purpose of the linking or combining is different from:</p> <ol style="list-style-type: none">1. the purpose for which the information in each database was originally obtained or compiled, and2. every purpose that is consistent with each purpose referred to in paragraph (a).
Disclose	<p>Reveal, show, expose, provide copies of, sell, give or tell.</p> <p>VIU may disclose personal information in its custody or under its control only as permitted under section 33.1, 33.2 or 33.3 of the Act.</p>
Employee	A person employed for wages or salary by the University. In relation to VIU, includes: (a) a volunteer and (b) a service provider (see also the definitions for each of the latter terms).
Individual identifier	Information that would enable a third party to deduce the identity of the person concerned; examples include a person's name, Social Insurance Number, student number, employee number, address, date of birth (usually used in combination with other identifiers).
Instructor	Individuals responsible for the teaching of credit and non-credit courses including professors, associate professors, assistant professors, professors emeritus, adjunct professors, visiting faculty, practitioner faculty, post-retirement appointees, lecturers,



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instructors, teaching assistants, tutors and markers, faculty associates, in-service associates, associate members and program coordinators.

Personal information

Recorded information about an identifiable individual, other than business contact information, including but not limited to:

1. names, home addresses and telephone numbers;
2. age;
3. sex;
4. marital or family status;
5. identifying number;
6. race, national or ethnic origin;
7. colour;
8. religious or political beliefs or associations;
9. educational history;
10. medical history;
11. disabilities;
12. blood type;
13. employment history;
14. financial history;
15. criminal history;
16. images;
17. anyone else's opinions about an individual;
18. an individual's personal views or opinions; and,
19. name, address and phone number of parent, guardian, spouse or next of kin.

Record

Includes books, documents, maps, drawings, photographs, letters, vouchers, papers and any other thing on which information is recorded or stored by graphic, electronic, mechanical or other means, but does not include a computer program or any other mechanism that produces records.

Service provider

A person retained under contract to perform services for VIU or a person with whom an employee automatically enters into an agreement by virtue of using their product or service and in so doing accepts the service provider's terms of use.

Unauthorized collection, use, disclosure and disposal

Occurs when a person who has access, whether authorized or unauthorized, to personal information in the custody or control of the University, collects, uses, discloses and disposes of that information and it is not authorized by the Act.

Use

Employ information to accomplish a specific purpose.

Volunteer

A person who provides a service to the University without being paid.