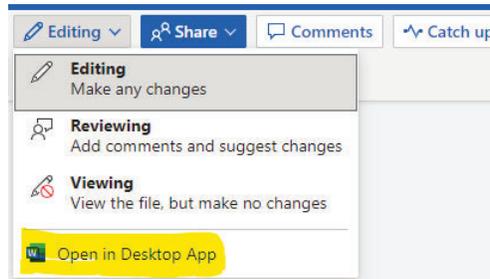## INSTRUCTIONS (READ BEFORE STARTING)

Use the Microsoft Word desktop app rather than the SharePoint online version of Word. Access the Desktop App from the Editing button drop down on the main ribbon beside Help on the upper right side of your screen. Checkbox functionality does not work reliably on the web-based versions of Word.



Submit a completed privacy impact assessment (PIA) before starting a new College Initiative or significantly changing an existing College Initiative that directly collects Personal Information, or results in the collection of Personal Information by CNC or a CNC service provider.

BC's Freedom of Information and Protection of Privacy Act (FIPPA) defines an "Initiative" as any enactment ("policy/procedure"), system (conceptual or technical), project, program, or activity.

Contact the Privacy Office at foipp@cnc.bc.ca to receive support determining whether any change in how College employees are completing their duties to the College may require a Privacy Impact Assessment.

**Read through this form entirely before starting to populate it. Each question is designed to capture specific information for review.**

**Some information recorded in the PIA may be confidential or proprietary and not intended for distribution. Before you share the draft or completed PIA (internally or externally), please contact CNC's privacy office at foipp@cnc.bc.ca for guidance.**

# PART 1: GENERAL INFORMATION

| | |
|---|---|
| **Initiative Title:** | Application Packaging Management |
| **Department:** | IT Services |
| **Initiative Lead (PIA Drafter) Name and CNC Email Address:** | Nick Sarabyn <br> sarabynn@cnc.bc.ca |
| **Dean or Director Name, Title, and Email:** | Dave Lampron, CIO <br> lamprond1@cnc.bc.ca |
| **Privacy Officer Assigned:** | |
| **If initiative involves a third-party (i.e. vendor, consultant, partner), provide** | |
| **Third Party Name:** | Patch My PC |
| **Product Name (if applicable):** | Patch My PC |
| **Third Party Contact Name and Email:** | s. 22(3)(d) <br> ▮▮▮▮▮▮▮▮▮▮ |
| **Third Party URL:** | https://patchmypc.com/ |

1. In three to five sentences, describe the Initiative including:
   a) what you are doing,
   b) an overview of the process,
   c) who is involved,
   d) and when and/or how long your Initiative runs.

This initiative will allow IT Services to make use of a library of pre-packaged applications instead of manually packaging applications for deployment though Microsoft Intune at CNC.  This process will apply to all new and updated software at CNC which is deployed through Intune.  Once in place, this process will be used for as long as we use Intune.

2. In a few sentences, explain the scope of this PIA. For example, is this initiative limited to specific individuals or departments at CNC? Is this PIA covering the full initiative or just one phase of a larger project? Are there exceptions to how the Initiative will be implemented?

This software will be used only by IT Services.  It's implementation is a smaller part of an IT initiative to improve our utilization of Microsoft Intune.

3. Is this an administrative/operational, teaching and learning, or research Initiative?  Select all that apply.

☒ Administrative/Operational

☐ Teaching and Learning

☐ Research **(Contact Privacy Office before continuing this PIA)**

**4.** Has a PIA previously been completed for this Initiative?

☐ Yes  ☒ No  ☐ Not sure

**5.** What activities will occur within the Initiative?  Use the bullet points below to make action statements. Replace the example action statement.   Add or delete bullets as necessary.

- A new software is identified as needing deployment.
- IT staff will login to check the library of packaged software to find the required package.
- The package will be transferred to Intune for deployment

**6.** In a bulleted list, please list all the types of data or information you might collect, use, store, disclose, or access in your Initiative - even if they are not Personal Information. Replace the bullet points below with the actual elements of information or data.

- Software names and versions
- Login usernames for IT staff

**7.** Did you list Personal Information in question 6? Personal Information is any recorded information about an identifiable individual, other than business contact information. Personal information includes information that can be used to identify an individual through association or reference.

☐ Yes  ☒ No

**8.** If you answered "No" to question 7, in three to five sentences explain how will you ensure that you do not unintentionally collect Personal Information?

There are no fields in which to record or save any personal information.

**9.** Does the Initiative involve integration between CNC IT systems and Third-Party systems?

☒ Yes  ☐ No  ☐ N/A

If yes, list below: (put N/A on the first row if you answered No or N/A above. Add or delete rows)

CNC IT system: Microsoft Intune          Third party system integrated: PatchMyPC

If there is Personal Information involved in this Initiative, continue to complete the remaining sections of the PIA. If there is not any Personal Information involved in this Initiative, please submit questions 1-9 to the Privacy Officer along with the completed signatures page.

# PART 13: PRIVACY OFFICE(R) COMMENTS

This PIA is based on a review of the material provided to the Privacy Office(r) as of **August 22, 2024**  If, in the future, any substantive changes are made to the scope of this PIA, the College will have to complete a PIA Update and submit it to Privacy Office(r).

There is not any personal information that is being managed in this initiative.  If personal information is managed in this initiative in the future, a Privacy Impact Assessment will need to be completed.

**Privacy Office Signature**

This PIA is based on a review of the material provided to the Privacy Office as at the date in Part 13 Privacy Officer Comments above.

| Name and Title | Signature | Date signed |
|---|---|---|
| Adam Cullum – Manager, Privacy & Records | As per email chain | August 22, 2024 |

# PART 14: APPROVAL SIGNATURES

## Institution Signatures

This PIA is compliant with FIPPA when it accurately documents information management practices and information flow at the time of signing. If there are any changes to the overall Initiative, including to the way Personal Information is collected, used, stored, or disclosed, the Department will inform the Privacy Office, and if necessary complete a PIA update.

By signing where required below, the signatories acknowledge and confirm their declarations as noted.

**Declaration of Initiative Lead:** I confirm that I understand the privacy impacts of this College Initiative and I am committed to my FIPPA obligations related to the collection and management of Personal Information involved in the Initiative. If there are any changes to the Initiative, including to the way Personal Information is collected, used, stored, or disclosed, I understand that the department will need to inform the Privacy Office and if necessary, complete a PIA update. I will establish and document information management guidelines for the Personal Information and ensure these are followed. I will ensure employees are trained on and able to comply with their obligations under FIPPA; related College policies and procedures; and CNC Privacy Office recommendations relative to this Initiative.

**Signature of Initiative Lead or PIA Drafter**

| Name and Title | Signature | Date signed |
|---|---|---|
| Nick Sarabyn – Manager, Information Architecture | s. 22(1) | Aug 16, 2024 |

**Declaration of Dean / Director / One-Over-One Signatory**: I confirm that I have reviewed this PIA and I acknowledge the residual privacy risks identified. I support the department by providing required time and operational resources to comply with FIPPA, related College policies and procedures, and CNC Privacy Office recommendations relative to this Initiative.

**Signature of Dean / Director**

| Name and Title | Signature | Date signed |
|---|---|---|
| Dave Lampron, CIO | s. 22(1) | August 18 2024 |

**Declaration of Information Security:**  I confirm that I am satisfied that the Information Security safeguards employed in this college Initiative meet reasonable requirements relative to the amount or sensitivity of the Personal Information or CNC business information described in this PIA.

**Signature of Information Security** (Required only when college Initiative involves Information Security considerations)

| Name and Title | Signature | Date signed |
|---|---|---|
| N/A | N/A | N/A |

**Declaration of Information Technology:**  I confirm that I understand and approve of the proposed use-case of CNC IT systems described in this PIA, where applicable. I understand and approve of the Third Party's integration with CNC's IT systems for the College Initiative described in this PIA, where applicable.

**Signature of Information Technology** (Required when College Initiative involves use of CNC IT systems or integration of Third-Party technology with CNC IT systems.)

| Name and Title | Signature | Date signed |
|---|---|---|
| Jordan Martens – Systems Administrator | s. 22(1) | Aug 22, 2024 |

**Declaration of Head of Public Body or Designate:**  I have reviewed this PIA carefully and accept and will be accountable for the residual privacy risks identified for this College Initiative. I am satisfied with the completion of this PIA under FIPPA.

**Signature of Head of Public Body or Designate Under FIPPA** (Required only if Personal Information is involved in the Initiative as indicated in Question 7.

| Name and Title | Signature | Date signed |
|---|---|---|
| N/A (No personal information) | N/A | N/A |