



COLLEGE OF  
THE ROCKIES



## Assessment

Name of Initiative:  
Bongo Learn Video Platform

PIA Number:  
2024.06-15

## INSTRUCTIONS (READ BEFORE STARTING)

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 COTR or a COTR 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 COTR Privacy Officer ([PrivacyOfficer@cotr.bc.ca](mailto:PrivacyOfficer@cotr.bc.ca)) to receive support determining whether any change in how COTR 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 COTR'S Privacy Officer, at [PrivacyOfficer@cotr.bc.ca](mailto:PrivacyOfficer@cotr.bc.ca) for guidance.**



## PART 1: GENERAL INFORMATION

Initiative Title:	Bongo Learn Video Assessment Platform
Department:	Nursing Department Centre for Innovation in Teaching and Learning
Initiative Lead (PIA Drafter) Name and COTR Email Address:	Shaun Longstreet <a href="mailto:slongstreet@cotr.bc.ca">slongstreet@cotr.bc.ca</a> Norma Sherret <a href="mailto:nsherret@cotr.bc.ca">nsherret@cotr.bc.ca</a>
Dean or Director Name, Title, and Email:	Robin Hicks <a href="mailto:rhicks@cotr.bc.ca">rhicks@cotr.bc.ca</a>
Privacy Officer Assigned:	Delegated – Nathan Skretting, Chief Information Officer
If initiative involves a third-party (i.e. vendor, consultant, partner), provide	
Third Party Name:	Bongo Learn
Product Name (if applicable):	Bongo "Application" – hosted SaaS
Third Party Contact Name and Email:	
Third Party URL:	<a href="https://bongolearn.com/privacy-policy/">Privacy Policy - Bongo Learn https://bongolearn.com/privacy-policy/</a>

1. In three to five sentences, describe the Initiative including:

**Bongo is a proposed replacement for WeVu - it's a hosted video assessment and feedback product. Students submit video projects and receive assessment/feedback through the product. Initially, use will be limited to Health Programs, but there may be opportunity to use the product more broadly through exposure through our LMS, Moodle.**

**It is anticipated use of the platform could begin as early as October 2024, and we anticipate ongoing use of the product.**

2. In a few sentences, explain the scope of this PIA. For example, is this initiative limited to specific individuals or departments at COTR? 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 PIA is intended to capture institutional use, so the use by Health Care programs may be expanded to other areas of use where the product demonstrates value for specific student assessment modes.**

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

- Administrative/Operational                       Research (**Contact COTR Privacy Officer before continuing this PIA**)
- Teaching and Learning

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.

Students view training videos.

Students submit video assets (assignments) to Bongo, whereby peer-to-peer and instructor feedback can be provided back to the student to foster collaboration, mentoring, and enhancing team skills. Assessments may be completed on student submissions.

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.

CoTR username, First Name, Last Name  
 email address  
 Institution name  
 Video/Audio submitted to the platform  
 Peer comments, Assessment comments  
 contractual agreement  
 access times, viewed pages, clicked links  
 search terms entered  
 device information such as IP address, location, browser type and language  
 referral URLs

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?

9. Does the Initiative involve integration between COTR 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)

S. 17(1)(c)
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**If there is Personal Information involved in this Initiative, continue to complete the remaining sections of the PIA.**

## PART 2: COLLECTION

FIPPA sets out rules for public bodies and their employees to collect Personal Information. Unauthorized collection is prohibited. This section will help you identify the legal authority for **collecting** Personal Information and confirm that all Personal Information elements collected are necessary for the purpose of the initiative.

10. Whose Personal Information is collected in this initiative? Check all that apply.

- |   |   |
|---|---|
| <input checked="" type="checkbox"/> Students  | <input type="checkbox"/> Former employees             |
| <input type="checkbox"/> Prospective students | <input type="checkbox"/> Service provider employees   |
| <input type="checkbox"/> Former students      | <input type="checkbox"/> Donors or other constituents |
| <input type="checkbox"/> Alumni               | <input type="checkbox"/> Volunteers                   |
| <input checked="" type="checkbox"/> Employees | <input type="checkbox"/> Other community members      |

11. How frequently will the Initiative collect Personal Information?

- Single instance of collection within one semester or quarter
- Ongoing collection up to a single year
- Ongoing collection over more than one year

12. How many individuals' Personal Information will be collected?

- 1 - 50                       51 – 500                       Over 500

13. If the Initiative involves a Third Party, are you able to test the product to see what personal information it collects?

- Yes                       No                       N/A (No Third-Party product involved)

Vendor commentary: Third parties would only have access to data necessary for their services - the relevant third parties are listed below with access descriptions:

### Third party infrastructure - Rackspace, AWS, Azure, and OpenAI

AWS cloud infrastructure is used to store customer data and our contracts with AWS are handled through Rackspace. OpenAI either direct or through Azure is only used for AI API calls to support AI features in Bongo with no data stored there. These companies do not have direct access to data, but rather the supporting infrastructure used by Bongo and are SOC2/ISO27001 compliant ensuring their processes are aligned with standard data access and privacy controls.

## Third party testing or support services

XBOSoft is utilized for some QA and support services without direct access to any customer data except when needed for troubleshooting a specific customer support issue. That access is controlled and audited according to our SOC2 policies.

### 14. Why is the Personal Information being collected? (check all that apply)

- Personal Information is necessary and directly related to college operations. The collection of this Personal Information is directly related to the college's documented strategic directives, goals, or mandate letter directions.
- Personal Information is necessary and directly related to requirements explicitly stated in college bylaws, policy, and procedure.
- Personal Information is collected because collection is required or authorized under local, provincial, or federal law. Be prepared to directly cite the section of a particular law that applies if asked.
- Personal Information is collected for determining suitability for an honour or award including a scholarship, prize, or bursary.
- Personal Information is being collected for a quality assurance or improvement Initiative that has been approved by the college Executive.

### 15. How will you reduce the risk of collecting unnecessary Personal Information? (Check all that apply.)

- The Initiative will only collect specific information deemed necessary for and directly related to the initiative
- The Initiative will use forms with primarily closed-ended questions and minimal open-ended questions
- The Initiative will use forms with drop-down menus
- The Initiative will have documented data gathering and aggregation processes for open ended submissions or fields
- The Department needs Privacy Officer review and support because none of the above apply

### 16. FIPPA Collection Notice: When collecting Personal Information, FIPPA requires that you provide a collection notice (except in limited circumstances). Please fill in the template collection notice below and remove bold and square brackets.

*The College of the Rockies ("COTR") collects your Personal Information in accordance with section 26 of the Freedom of Information and Protection of Privacy Act ("FIPPA"), R.S.B.C. 1996, c.165 for the purposes of **video training, video submission assessment and feedback**. If you have any questions about the processing of your Personal Information, please Norma Sherret at [nsherret@cotr.bc.ca](mailto:nsherret@cotr.bc.ca).*

Please ask the Privacy Officer for assistance drafting your collection notice if your Initiative requires indirect collection of Personal Information (i.e. if a service provider collects Personal Information from students or employees on behalf of COTR). The Privacy Officer may recommend changes to the FIPPA Collection Notice that you draft above.

The Privacy Officer may also provide additional options for the FIPPA Collection Notice that would be required when collecting personal information. Please speak with them directly for this portion of the form before final submission.

## PART 3: USE

FIPPA sets out requirements and restrictions related to use of Personal Information. This section will help you identify the legal authority for **using** Personal Information and ensure that the use of Personal Information is limited to the original purpose for collection.

17. What is the intended use of the Personal Information collected? (check all that apply)
- The Personal Information will be used for the purposes checked off in Question 14
  - The Personal Information will be used for secondary purposes, and I have a consent notice attached as an appendix to this PIA that meets the requirements found in FIPPA regulations. I will work with the COTR Privacy Officer to determine if secondary use is appropriate and compliant with FIPPA.
  - The Personal Information will be used for a purpose for which the information may be disclosed to the public body under [section 33](#). The COTR Privacy Officer will attach the relevant section number to this selection if it applies.
18. How will you ensure that parties using the Personal Information will use it only for the purposes stated in 17 above? Check all that apply.
- Documented department information management practices and training
  - Documented use restrictions communicated from your department to another COTR department
  - Written contract between COTR and a Third Party including explicit conditions
  - The Department needs Privacy Officer review and support because none of the above apply
19. Does your Initiative use Personal Information to make decisions that directly affect an individual?
- Yes  No

20. What is the intended impact of the decisions that are being made that directly affect an individual? (check all that apply).

- Directly affects academic status or grades
- Directly affects how an individual accesses their courses, campus activities, or student supports
- Directly affects employment status, employee remuneration, or contract opportunities, and pay
- Directly affects how employees and service providers will complete their work
- Directly affects how employees access campus activities and support services
- Directly affects the College's capacity to protect individuals from harm
- Directly affects the College's capacity to interact with and support external parties
- N/A – The decisions are not intended to have a direct impact on individuals

21. Who will be using the Personal Information collected by this Initiative? (Check all that apply and provide details.)

Your department:	Health Care Program instructors for assessment Students for peer-feedback (Video Submissions)
Other departments at COTR:	Instructors for assessment CoTROnline staff for support of LMS platform Students for peer feedback (Video Submissions)

## PART 4: STORAGE

22. Is all Personal Information involved in your Initiative stored within standard COTR storage locations, technologies, or services?

Yes

S. 15(1)(l), s. 17(1) and s. 19(1)

No

S. 15(1)(l), s. 17(1) and s. 19(1)

If you answered yes, please list the approved standard COTR storage locations, technologies and/or services.

S. 15(1)(l), s. 17(1) and s. 19(1)

23. Is any Personal Information involved in your Initiative stored outside of Canada?

Yes

No (if Canada stored as hosted location)

24. Where is the Personal Information stored? Please identify applicable geographic locations for primary storage and backups. If Personal Information is stored in more than one primary location, the COTR Privacy Officer can expand the response field in this question. S. 15(1)(l), s. 17(1) and s. 19(1)

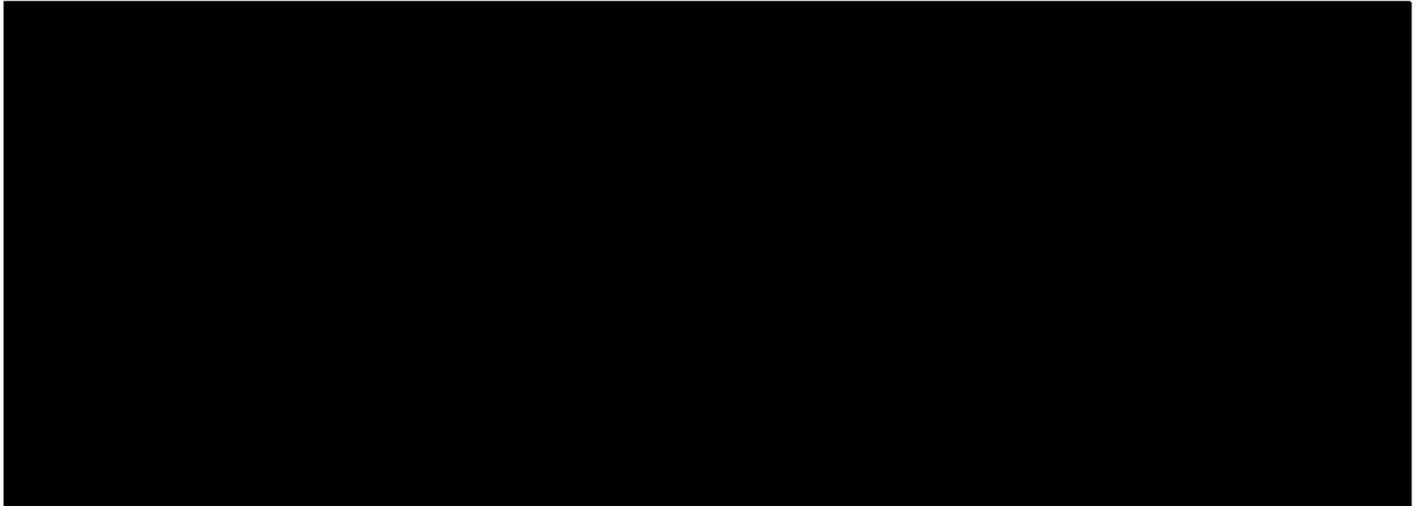
25. Does your Initiative involve Sensitive Personal Information? (Any Personal Information can be Sensitive Personal Information in different contexts. Please contact the COTR Privacy Officer to discuss.)

Yes   No

26. Is any of the Sensitive Personal Information stored outside of Canada?

Yes   No

27. Where is the Sensitive Personal Information stored? Please identify applicable geographic locations for primary storage and backups. Type N/A in the cells on the first row if Sensitive Personal Information is not stored outside of Canada as indicated in Question 26.



## PART 5: DISCLOSURE

FIPPA sets out requirements and restrictions related to disclosure of Personal Information. This section will help identify the legal authority for **disclosing** Personal Information, and consider risks related to that disclosure. **Fill out this section if Question 26 was answered "Yes"**

Complete this section if you are disclosing Sensitive Personal Information to be stored outside of Canada. You may need help from the COTR Privacy Officer.

28. Is any Personal Information being disclosed outside of Canada under FIPPA section 33(2)(f)? This section allows for information to be made available to the public under an enactment that authorizes or requires the information to be made public.

Yes  No

29. Is any of the Personal Information being disclosed outside of Canada under FIPPA section 33(2)(p)? This section allows disclosure for the purposes of (i) a payment to be made to or by COTR, (ii) authorizing, administering, processing, verifying, or cancelling a payment, or (iii) resolving an issue regarding a payment.

Yes  No  
 The payment processor is out of scope of this PIA



30. Describe the privacy risks for disclosure of Personal Information (PI) outside of Canada.

**Use the table to indicate the privacy risks. For each privacy risk you identify, describe the potential impact to individuals or COTR, and describe a privacy risk response that is proportionate to the level of risk posed.**

S. 15(1)(l), s. 17(1) and s. 19(1)

Privacy risk	Impact to individuals or COTR	Risk response

## PART 6: PROTECTION

Please share how the initiative will secure Personal Information to protect personal privacy. People, organizations, or governments outside of your Initiative should not be able to access the Personal Information you collect, use, store or disclose. You need to make sure that the Personal Information is safely secured in both physical and technical environments.

31. Does your Initiative involve digital tools, databases, or information systems?

Yes S. 15(1)(l), s. 17(1) and s. 19(1)  No S. 15(1)(l), s. 17(1) and s. 19(1)

32. What physical security safeguards are in place to protect Personal Information in this Initiative? Identify the elements of physical security that protect where the records for your Initiative are stored (Check all that apply. Specify, "Other" if applicable) S. 15(1)(l), s. 17(1) and s. 19(1)

Safeguard	At COTR	At Third Party



33. What technical security safeguards are in place to protect Personal Information in this Initiative?

S. 15(1)(l), s. 17(1) and s. 19(1)

Describe the elements of technical security that protect where the records for your Initiative are stored (e.g. secure passwords, encryption, firewalls, etc.) (More options on the following page)

Safeguard	At COTR	At Third Party
[Redacted content]		



34. What administrative safeguards are in place to protect Personal Information?

Describe the elements of administrative security that protect where the records for your Initiative are stored (e.g., aliasing, aggregation, policies/procedures, standards of practice, etc.)

S. 15(1)(l), s. 17(1) and s. 19(1)

Safeguard	At COTR	At Third Party
[Redacted content]		

35. If the Initiative involves a Third Party, please indicate what type of Agreement governs the relationship between COTR and the Third Party. Please select one.

[Redacted content]

S. 15(1)(l), s. 17(1) and s. 19(1)

36. If the Initiative involves a Third Party, does an End User License Agreement ("EULA") apply to the individuals whose Personal Information is involved?

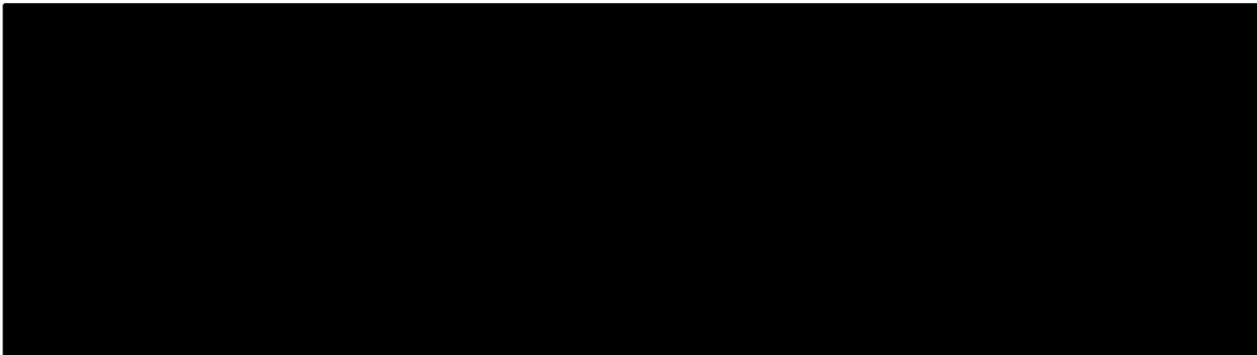
Yes S. 15(1)(l), s. 17(1) and s. 19(1)  No S. 15(1)(l), s. 17(1) and s. 19(1)

37. The Privacy Officer will need to review all draft/proposed Contracts/Agreements (and related materials, i.e. contract appendices/schedules; Third Party privacy policies or online terms and conditions, if any) involved in the Initiative. Have you ensured these have been provided? Check only one.

Yes S. 15(1)(l), s. 17(1) and s. 19(1)  No S. 15(1)(l), s. 17(1) and s. 19(1)  N/A (No Third Party involved) S. 15(1)(l), s. 17(1) and s. 19(1)

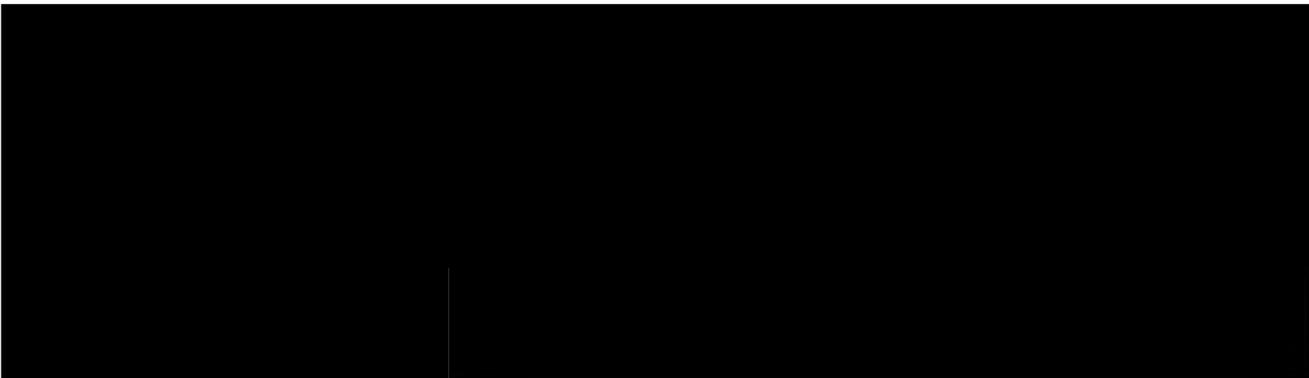
38. Where are the privacy related terms referenced in the contract or agreement if applicable? (Check all that apply)

S. 15(1)(l), s. 17(1) and s. 19(1)



39. Controlling and tracking access

Review each strategy below that describes how to limit or restrict who can access Personal Information and how to keep track of who has accessed Personal Information in the past. Check all that apply. Specify "Other" if applicable. S. 15(1)(l), s. 17(1) and s. 19(1)



## PART 7: ACCURACY AND CORRECTION

FIPPA section 28 states that a public body must make every reasonable effort to ensure that an individual's Personal Information is accurate and complete. FIPPA also gives an individual the right to request correction of errors or omissions to their Personal Information.

In this section, please demonstrate how you will make a reasonable effort to ensure the Personal Information you have on file is accurate and complete.

40. How will COTR ensure that the Personal Information is accurate and complete? (Check all that apply)
- Individuals input their own Personal Information
  - Individuals update their own Personal Information
  - Employee verifies that information is accurate and complete before processing
  - Documented processes to ensure accurate and complete data entry and maintenance
  - The Third Party manages the accuracy and completeness of Personal Information under the direction of COTR
  - Software or service uses automated processes to enter and manage Personal Information
  - Other: *(fill in details)*
  - Other: *(fill in details)*
41. Is there a documented process in place to correct Personal Information?
- Yes  No
42. Sometimes it is not possible to correct the Personal Information. FIPPA requires a process to make a note on the record about the request for correction if it isn't possible to correct the record itself. Is there a documented process in place to annotate the record?
- Yes  No  N/A (Corrections possible)

43. If there is a request for correction from an individual and COTR or the Third Party disclosed that individual's Personal Information in the last year, FIPPA requires that COTR or the Third Party provide the applicable other public body or Third Party about the request for correction. Will COTR or the Third Party ensure that these notifications are done when necessary?
- COTR will forward correction notifications
  - Third Party will forward correction notifications
  - COTR and Third Party will split responsibility based on who was authorized to disclose Personal Information to third parties before a correction request was made.

## PART 8: RETENTION AND DISPOSITION

FIPPA requires that public bodies keep Personal Information for a minimum of one year after it is used to make a decision. Personal Information needs to be disposed of to limit privacy risk after legal retention timelines.

44. How long will COTR need to retain the records containing Personal Information? If there are different retention timelines for different types of records, please state each retention timeline based on record type.

[REDACTED]

S. 17(1)(c)

45. How long will the Third Party need to retain the records containing Personal Information? If there are different retention timelines for different types of records, please state each retention timeline based on record type.

S. 17(1)(c)

[REDACTED]

46. How will you ensure that the records containing Personal Information are disposed of in accordance with the retention schedule noted in questions above? (Check all that apply)

[REDACTED]

S. 17(1)(c)

47. What methods will be used to dispose of Personal Information following retention period? (Check all that apply.)

S. 17(1)(c)

[REDACTED]



S. 17(1)(c)

## PART 9: INFORMATION FLOW

### 48. Complete the Information Flow Table

Use column 1 to describe the way Personal Information moves through your Initiative step by step. Describe the steps as if you were explaining it to someone who does not know about your Initiative.

Use column 2 to identify whether the action in column 1 is a collection, use, or disclosure of Personal Information.

The Privacy Officer will complete column 3 to identify the legal authority you have for the collection, use, or disclosure.

S. 17(1)(c)

Information Management Steps	Collection, use, or disclosure	FIPPA and other legal authorities
This area is intentionally left blank for the user to complete the table		

**Optional:** Insert a drawing or flow diagram here or in an appendix if you think it will help to explain how each different part is connected.

## PART 10: TRAINING

49. Identify which of the following activities all employees and Third Party (as applicable), will be trained on when collecting and managing the Personal Information for the College Initiative.
- Collection: Limit the collection to only what is explicitly necessary
  - Use: Use the Personal Information only for the purpose for which it was originally collected
  - Access: Only authorized employees (and, where applicable, service providers) may access the Personal Information
  - Disclosure: Not to disclose the Personal Information inside or outside COTR unless authorized under FIPPA
  - Storage: To store the Personal Information only in COTR-provided or approved storage locations and not to store unnecessarily in multiple locations
  - Retention: to keep the Personal Information for a minimum of one year – with longer retention periods only when necessary
  - Disposal: To dispose, when applicable, in a secure method that renders the Personal Information permanently irretrievable



**PART II: PERSONAL INFORMATION BANKS**

50. Will your Initiative result in a Personal Information Bank ("PIB")? A PIB is a collection of Personal Information searchable by name or unique identifier. If yes, please complete the table below. If more than one PIB will result, copy and paste an additional copy of the table below and fill out a separate table for each PIB.

Yes

S. 15(1)(l), s. 17(1) and s. 19(1)

No

S. 15(1)(l), s. 17(1) and s. 19(1)

Title	
Location	
Personal Information Types	
Categories of Individuals Included	
Collection Authority	
Purpose of Personal Information	
Categories of Persons Managing Information	

S. 15(1)(l), s. 17(1) and s. 19(1)

## PART 12: PRIVACY OFFICE(R) COMMENTS

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).

This PIA is based on a review of the material provided to the COTR Privacy Office(r) as of **(November 15<sup>th</sup>, 2025)**.

The details provided in this PIA, indicates the Bongo service can be delivered in compliance with FIPPA legislation, provided:

- a) **A College of the Rockies employee be duly designated by the proponent to request the deletion of Personal Information older than 12 months (unless the subject of academic review) in compliance with recently amended College Policy 2.4.11.**
- b) **A FIPPA collection statement is drafted by the proponent and displayed prominently to all users the first time they access Bongo, consistent with the language indicated in question 16.**

Should there be a change in scope to this part of the initiative, further assessment and/or a PIA update may be required as new related or expanded service is considered, or the privacy policies for the College change in the future.

Any substantive changes made to the scope of this PIA would need to be included in a PIA update and submitted to the Privacy Office(r).

- [https://www.bclaws.gov.bc.ca/civix/document/id/complete/statreg/96165\\_00](https://www.bclaws.gov.bc.ca/civix/document/id/complete/statreg/96165_00)
- [https://www.bclaws.gov.bc.ca/civix/document/id/complete/statreg/96165\\_03#section26](https://www.bclaws.gov.bc.ca/civix/document/id/complete/statreg/96165_03#section26)

Privacy Office Signature



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

Name and Title	Signature	Date signed
Delegate – Nathan Skretting, Chief Information Officer		11/15/2024

S. 22(1)

## PART 13: 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 COTR Privacy Officer, 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 COTR Privacy Officer 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 COTR Privacy Officer recommendations relative to this Initiative.

#### Signature of Initiative Lead or PIA Drafter

Name and Title	Signature	Date signed
Shaun Longstreet - Dean, Innovation in Teaching and Learning, Norma Sherret - Dean - Health and Human Services		

**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 COTR Privacy Officer recommendations relative to this Initiative.

#### Signature of Dean / Director

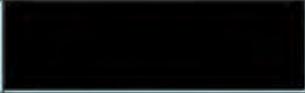
Name and Title	Signature	Date signed
Robin Hicks, Vice-President - Academic		

Name of Initiative:

PIA Number:

**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 COTR business information described in this PIA.

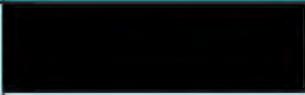
**Signature of Information Security** (Required only when college Initiative involves Information Security considerations)

Name and Title	Signature	Date signed
Nathan Skretting, Chief Information Officer		11/15/2024

S. 22(1)

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

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

Name and Title	Signature	Date signed
Nathan Skretting, Chief Information Officer		11/15/2024

S. 22(1)

**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
Paul Vogt, President and CEO		