



Privacy Impact Assessment

Emily Carr University of Art + Design

ChatGPT Team

PIA# 2024-04

Part 1 – General Information

Name of Department/Unit	Research and Graduate Studies	Project ID	2024-04
PIA Drafter	Kaitlyn Gutteridge		
Email	kgutteridge@ecuad.ca	Phone	778-833-0628
Project Sponsor	Justin Langlois, AVP Research + Dean, Graduate Studies		
Email	jlanglois@ecuad.ca	Phone	N/A
Project Manager	Justin Langlois, AVP Research + Dean, Graduate Studies		
Email	jlanglois@ecuad.ca	Phone	N/A

In the following questions, delete the descriptive text and replace it with your own.

1. What is the initiative?

Emily Carr University (ECU) is developing an institution-wide approach to the implementation of Generative AI (GAI). GAI is artificial intelligence that can create original content—such as text, images, video, audio or software code—in response to a user’s prompt or request. It relies on sophisticated machine learning models called deep learning models, which are algorithms that simulate the learning and decision-making processes of the human brain. These models work by identifying and encoding the patterns and relationships in huge amounts of data, and then using that information to understand users’ natural language requests or questions and respond with relevant new content.¹

Recently, ECU published a set of [guidelines](#) for the responsible use of GAI, which have been adopted by all members of the ECU community. With this move toward the use of GAI, ECU is exploring the use of GAI tools.

One prominent tool that is based on GAI is ChatGPT, an AI-powered chatbot developed by OpenAI. ChatGPT’s first model (ChatGPT 3.5) can respond to questions and compose written content, including articles, social media posts, essays, code and emails. The most recent model, GPT-4o, accepts as input any combination of text, audio, image, and video and generates any combination of text, audio, and image outputs.

ChatGPT offers various account and enterprise models, including ChatGPT Team, which is specifically designed for team collaboration and communication. ChatGPT Team allows team members to have interactive conversations with the chatbot, generating responses and facilitate discussions on various

¹ <https://www.ibm.com/topics/generative-ai>



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topics. It can be used to streamline communication, share files, manage tasks, and improve overall team productivity.²

ECU is in the process of testing a ChatGPT Team account with a subset of staff within the Research and Graduate Studies Office. Given the widening gap between staff availability and tasks requiring completion, the prominent use cases being tested focus on using ChatGPT Team to gain extra capacity in the role of an information analyst / program manager. This includes using ChatGPT Team to:

1. Support the development of grant applications
2. Gather and synthesis information (i.e., background research)
3. Edit internal and external-facing documents and media, including a review for equity, diversity and inclusion (EDI) considerations

At the time of writing, approximately six users from the Research and Graduate Studies Office held accounts, with the AVP Research and Dean, Graduate Studies (referred to herein as AVP Research) providing oversight of the ChatGPT Team account as the account holder. The future intent is to increase the number of users to approximately 20, and depending on the conclusions drawn from testing ChatGPT Team, there may be interest in expanding access to staff and faculty outside the Research and Graduate Studies Office. Use of ChatGPT Team is invoiced monthly based on the number of seats held by the account, which allows for easy scalability should additional ECU employees require access.

Overview of ChatGPT Team

The following section will provide an overview of ChatGPT Team and ECU's Implementation of ChatGPT Team to date

Step 1: Setting Up ChatGPT Team

To get started with ChatGPT Team, the account holder must sign up for an account via the OpenAI website. To register, the user must provide the following information: first name, email address and a password (12 characters; cannot contain user information e.g., name provided in email address but no other requirements). They also need to agree to OpenAI's Privacy Policy and Terms of Use.

In the case of ECU, to create the initial ChatGPT Team account, the account holder used a non-ECU personal email address and provided information as required to set-up the account, including their date of birth.

Step 2: Inviting Team Members

After the account holder's account is set-up, they can invite other users (referred to by ChatGPT as "team members" to join ChatGPT Team). To do so, the account holder opens the team management dashboard and click on the "Invite Members" option. The account holder enters the email addresses of the individuals and sends them an invitation. Once they accept the invitation, they become part of the team.

² <https://openai.com/chatgpt/team/>

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In the case of ECU, a mix of personal and ECU email addresses have been used to create accounts and to accept invites. If the team member already has a personal ChatGPT account, there is the possibility of using the personal account to accept the Team account. If they do not, they will have to create an account (see Step 1) before accepting the invite.

To note, once the team member accepts the invite, they can also invite others to join the ChatGPT Team, which could result in non-ECU users on the Team platform and the additional disclosure of personal information to OpenAI and potential collection and use by ECU (depending on how team members have created their accounts and what is provided in their Team files).

Step 3: Using ChatGPT to Support Team-Based Work

A workspace is a unique ChatGPT environment with its own settings, members, and resources. You can either have a personal workspace or join a collaborative workspace on ChatGPT Team. For the purposes of this PIA, the workspace is a ChatGPT Team workspace.

Team members interact with ChatGPT in the Team workspace by uploading prompts, which are instruction or queries that are entered into the chat interface to illicit a response. This may be in the form of written information, uploaded documentation, images and/or audio.

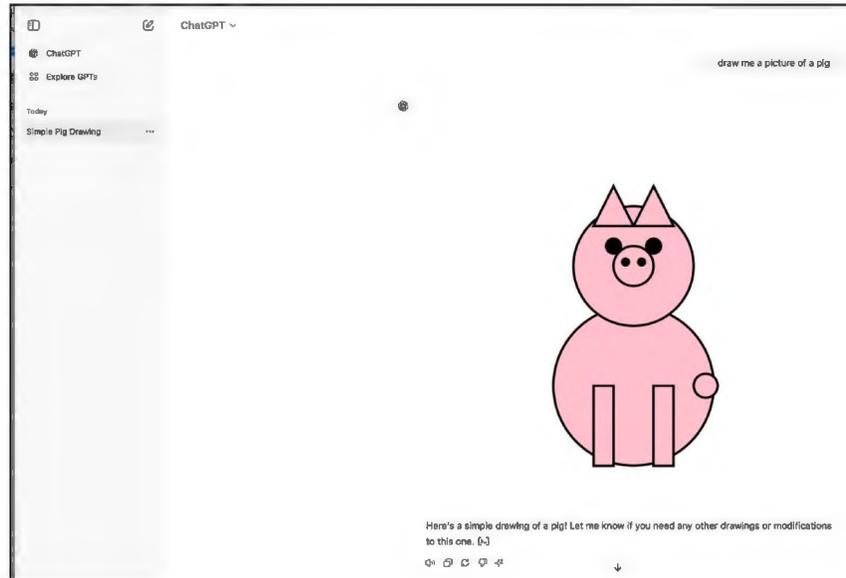
For example, the team member can enter a prompt in the chat for ChatGPT to write a social media post for them (Figure 1) or draw pictures (Figure 2).

Figure 1 – Example of ChatGPT chat when used for writing a social media post³



³ <https://blog.hubspot.com/marketing/gpt-3-examples>

Figure 2 – Example of ChatGPT chat when used for drawing a basic picture⁴



As described above, ECU team members predominately use the ChatGPT Team functionalities to support initial content generation and editing. At the time of writing, no personal information from ECU staff, faculty or students was included in any of the past prompts provided to ChatGPT or information uploaded or created by ECU.

Furthermore, while the ECU ChatGPT Team account is intended to be used only for ECU business purposes, at the time of writing, ECU did not perform any audits scanning for employees' use of ChatGPT Team for non-ECU business purposes / personal activities.

Step 4: Utilizing ChatGPT Memory Functionalities

In addition to interacting with ChatGPT, it can remember details from a user's chat and carry it over into future chats to enhance the details and personalization of the interaction and the content created. OpenAI calls this feature "Memory" and as OpenAI describes it, "*Memory works similarly to custom instructions...which means that when a user shares information that might be useful for future conversations, ChatGPT can add a summary of that information to a notepad. Like custom instructions, memories are added to the conversation such that they form part of the conversation record when generating a response.*"⁵

⁴ Created by the PIA drafter for demonstrating uses of ChatGPT

⁵ <https://help.openai.com/en/articles/8590148-memory-faq>



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ChatGPT has been trained to also manage memories by intelligently updating pre-existing memories, consolidating memories where appropriate, and forgetting memories when instructed by the user.

In the ChatGPT Team version of Memory, team members must opt-in to the use of ChatGPT's Memory functionalities as it is turned off by default. Where Memory is turned on, the team member can reset it, clear specific or all memories, or turn the feature off entirely in their settings.

The "notepad" of memories, the summary of all the instructions ChatGPT has been requested to retain, is kept separately from a team member's chat history. This means that even if a chat is over or has been deleted, the memories created during that conversation can still be used in future interactions. Should the team member request the model to forget a memory, that memory will be removed from the "notepad" and will not be used when responding to conversations moving forward. OpenAI may retain a log of forgotten memories for up to 30 days for safety and debugging purposes.

In comparison to the free ChatGPT account, OpenAI does not train on any memories submitted by any team members in the ChatGPT Team workspace.

At the time of writing, there was no guidance in place regarding the use of Memory by ECU team members.

Step 5: Creating and Managing Channels

Channels in ChatGPT Team are similar to chat rooms or discussion boards where team members can collaborate on specific topics. Any team member can create a new channel and determine whether the channel is public (visible to all team members) or private (requires an invitation to join). Once channels are active, team members can interact with others, and ChatGPT Team can help generate responses and facilitate discussion engagement.

Currently, any channels created by ECU team members are private; no guidelines are in place regarding the use of channels, channel sharing permissions and what information can be shared in them.

Step 6: Utilizing ChatGPT Team's Features

ChatGPT Team comes with several features to enhance collaboration. Some key features include:

File Sharing: Seamless Collaboration with Shared Documents

ChatGPT Team simplifies file sharing among team members. Team members can easily share documents, images, or other relevant files within channels and chats.

At the time of writing, there was no guidance in place regarding file sharing requirements for ECU team members.

Integrations: Connecting Workflows with Productivity Tools

ChatGPT Team offers integrations with popular productivity tools such as Trello, Asana, and Google Calendar. These integrations allow teams to connect their workflows and manage tasks efficiently within



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the chat interface. For example, team members can create and assign tasks, set deadlines, and track progress without leaving the ChatGPT Team environment.

At the time of writing, integration with productivity tools was turned off; however, the ability to link a team member's account to other tools (e.g., Microsoft) was available upon sign-in.

DALL-E and GPT-4

The ChatGPT Team leverages the power of DALL-E and GPT-4 to extend its capabilities beyond text generation. DALL-E is specifically designed for image creation, and GPT-4 goes beyond text and comprehends images, allowing it to analyze visual data and offer insights.

2. What is the scope of this PIA?

In scope

- Provisioning and deprovisioning of ChatGPT Team accounts for use by ECU staff and faculty.
- Use of ChatGPT Team including all OpenAI models and tools offered by ChatGPT Team (e.g., DALL-E, team channels) by ECU staff and faculty who have been provisioning an account for ECU business purposes.
- Information uploaded to and subsequently generated by ChatGPT for ECU business purposes.
- Future expanded use of ChatGPT Team by ECU that extends outside of Research and Graduate Studies Office (max of 149 seats under the ChatGPT Team account).
- Completion of ECU's supplementary AI privacy assessment (Appendix A).

Out of scope

- Use of ChatGPT Team or other ChatGPT accounts (e.g., ChatGPT Pro) by ECU students for academic purposes or personal purposes.
- Use of ChatGPT Team by ECU staff and faculty for non-ECU business purposes.
- Integration of ChatGPT with other productivity tools such as Google Calendar.

3. What are the data or information elements involved in the initiative?

Account signup

- Email address (either ECU email address or personal address in the past; ECU email address only as of September 2024)
- Password
- First name
- Phone number – required for first-time verification if an individual is sharing a GPT (not provided to date)
- Date of birth – was required for the account owner at the time of sign-up, but as of June 2024 it is no longer required to sign up for an account.



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Within the ChatGPT Team platform

- IP address and location
- Device information
- Inputs: Any information that is provided by ECU staff and faculty with accounts
- Outputs: Information generated by ChatGPT in response to prompts, which may create new information
- Message channels: information provided by ECU team members in ChatGPT team channels when conversing with other ECU team members, whereby they may accidentally disclose personal information in the course of their interactions.

4. Does the initiative include personal information?

As per ECU’s Guidelines, personal information and sensitive personal information are not permitted to be used / disclosed to any external Generative AI products. However, OpenAI will collect IP addresses, and the PIA is being written in a manner that considers the potential unforeseen disclosure of personal information by an employee while using ChatGPT Team.

Part 2 – Collection, Use and Disclosure

Use this column to describe the way personal information moves through the initiative step by step as if you were explaining it to someone who does not know about your initiative.	Collection, use, disclosure	FOIPPA authority	Personal Information
1. AVP Research creates ChatGPT Team account for use by Research and Graduate Studies Office	Use	N/A – business contact information	First and last name; ECU email address
2. ECU account holder uses employee information to send invite to ChatGPT Team account	Use	N/A – business contact information	First name; ECU email address
3. ECU employee accepts invite and creates account using ECU email address	Collection; Use	N/A – business contact information	First name; ECU email address



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4. ECU employee uses ChatGPT Team workspace to complete deliverables / activities for ECU business purposes	Use	N/A – no personal information uploaded to ChatGPT Team	Non-personal and non-confidential information only
5. OpenAI collects and uses device information from ECU employee’s device to support employee’s use of ChatGPT	Collection; Use	s.332(v)	IP address
6. OpenAI collects and uses employee information to support troubleshooting requests	Collection; Use	N/A – business contact information	First name; ECU email address

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.

5. Collection Notice

A separate collection notice is not required for the ChatGPT Team; the standard ECU collection notice applies in this scenario. Employees are also required to accept OpenAI’s [Terms of Use](#) and [Privacy Policy](#) upon initial account creation.

Part 3– Storing Personal Information

6. Is any personal information stored outside of Canada?

Yes – as per OpenAI’s overview of its data infrastructure - content is stored on OpenAI systems and trusted service providers’ systems in the US and around the world. OpenAI may also send select portions of content to trusted service providers (subject to confidentiality and security obligations) for data annotation and safety purposes.

7. Where and how are you storing the personal information involved in the initiative?

Yes - subservice providers used by OpenAI are, at the time of writing:

- Microsoft for providing cloud infrastructure
- OpenAI affiliates for services and support
- Snowflake for data warehousing
- TaskUS for user support and human annotation of data for service improvement.



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Microsoft and TaskUS are located worldwide and Snowflake and OpenAI are located in the US.

8. Does the initiative involve sensitive personal information? If yes, where and how are you storing the personal information involved in the initiative?

No – as per ECU’s Guidelines, sensitive personal information is not permitted to be used / disclosed to any external Generative AI products.

Part 4 – Assessment of Disclosure Outside of Canada

Complete this section if you are disclosing sensitive personal information to be stored outside of Canada. Otherwise continue to Part 5.

No sensitive personal information will be stored outside Canada; continue to Part 5

9. Is the sensitive personal information stored by a service provider?

Yes, I am disclosing sensitive personal information to a service provider:

Service ID, service provider		

10. Describe the contractual terms (if any) that govern:

the collection, use, disclosure, retention, and disposal of sensitive personal information;

access to sensitive personal information;

11. Are you/you are an existing contract (such as a sensitive information form (SIF))?

12. What controls are in place to prevent unauthorized access to sensitive personal information?

13. Provide details about how you will track access to sensitive personal information.

14. Describe the privacy and disclosure outside of Canada?

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Part 5 – Security of Personal Information

15. Does the initiative involve digital tools, databases, or information systems? Yes / No

Yes – it involves ChatGPT, a generative AI tool.

16. Do you or will you have a security assessment to help you ensure the initiative meets the reasonable security requirements? Yes / No

No independent review by ECU will be completed for ChatGPT’s security at this time; assurance of OpenAI’s security controls is established by ECU’s acceptance of OpenAI’s third-party certifications.

- The ChatGPT Team subscription adheres to SOC 2 compliance standards, ensuring rigorous data security measures are in place. This includes encryption of all conversations both in transit and at rest.
- The OpenAI API, ChatGPT Enterprise/Teams and DALL·E have achieved a CSA STAR Level 1 listing; CSA’s Security, Trust & Assurance Registry Level 1 demonstrates an organization’s commitment to securing cloud infrastructure and customer data.
- OpenAI has completed and provided a copy of its HECVAT for ChatGPT Team / Enterprise for ECU’s review.

17. Controlling and tracking access - Please check each strategy that describes how you limit or restrict who can access personal information and how you keep track of who has accessed personal information in the past. Insert your own strategies if needed.



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Strategy	Yes / No and please describe
We allow employees only in certain roles access to information	Yes – the AVP Research will oversee account provisioning and privileges. See additional information about roles below. To note, given how ChatGPT Team is set-up, anyone with an active Team account could send an invite link for a new individual (inside or outside ECU) to be added to the Team.
Employees that need standing or recurring access to personal information must be approved by the appropriate authority	Yes – the AVP Research will provide approval for all accounts. ECU employees with a Team account will be informed that they cannot upload personal information (ECU staff, faculty, students) to the Team account.
We use audit logs to see who accesses a file and when	Yes – see below for additional information re. auditing accounts.
Additional strategies:	Yes – see below.

ChatGPT Team Account Roles and Privileges

There are three different roles and associated privileges available in a ChatGPT Team workspace:

- Member
 - Current status: all ECU employees who have been provisioned an account
- Admin
 - Current status: AVP Research; AVP Research’s Executive Assistant
- Owner
 - Current status: AVP Research; AVP Research’s Executive Assistant

Permissions assigned to a Member, Admin, or Owner are outlined in the table below and can only be modified by the Owner.



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ChatGPT Team: Permissions by Role			
	<i>Member</i>	<i>Admin</i>	<i>Owner</i>
Core chat functionality	✓	✓	✓
View all users	✓	✓	✓
Invite new Members	✓	✓	✓
Invite new Admins/Owners			✓
Cancel an invitation		✓	✓
Remove a user		✓	✓
Modify a user's role			✓
View plans and invoices under Billing			✓
View and toggle features within Settings			✓

Access to Chats and Files within ECU ChatGPT Team Workspace

Access by ECU team members

Access to chats and files are limited to each unique team member; however, there is the option to share files, chats and other work products (e.g., custom developed GPTs) within the workspace with all ECU ChatGPT Team members or select members only. With the ChatGPT Team subscription, chats can be shared with workspace team members only. Team members can clear specific chat conversations one at a time from their chat history or clear all history at once. Cleared chats are deleted from OpenAI systems within 30 days. A similar process is in place for files. To note: chats and other data cannot be exported from the ChatGPT Team workspace.

Access by OpenAI

OpenAI does not perform any type of model training activities using chats, files, or other data generated in the ChatGPT Team workspace; nor does it control the ChatGPT Team workspace data. Access to chats stored on OpenAI systems by OpenAI is limited to (1) authorized employees that require access for engineering support, investigating potential platform abuse, and legal compliance and (2) specialized third-party contractors who are bound by confidentiality and security obligations, solely to review for abuse and misuse. Access to content is subject to technical access controls and limited only to authorized personnel on a need-to-



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know basis. Additionally, OpenAI monitors and logs all access to user content and authorized personnel must undergo security and privacy training prior to accessing any user content.

Merging ChatGPT Personal Workspace with Team Workspace

ChatGPT Team allows ChatGPT Team members to migrate data from their Personal workspace to their Team workspace to become one unified workspace and deletes the Personal workspace after migration. All of the existing chat history and GPTs from the Personal workspace will be moved to the Team workspace. Any plugins or custom instructions that have been set up in the Personal workspace will be deleted upon merging. After the merger, all Personal workspace data is considered part of the Team workspace.

In the case of ECU, this would result in ECU collecting and using additional information from ECU employees that may be considered personal information. ECU must ensure that employees are informed that they are prohibited from merging their Personal workspace with their Team workspaces.

Part 6 – Accuracy, Correction + Retention

18. Do you have a process in place to correct personal information?

ECU employees with a ChatGPT Team account can update their account details at any time to ensure information is accurate and up-to-date; no additional processes are required for the purpose of the ChatGPT Team account. ECU employees will be reminded to not add any personal information to their account details page other than their business contact information.

19. Does your initiative use personal information to make decisions that directly affect an individual(s)?

No, this initiative does not use personal information to make decisions that directly affect an individual.

20. Do you have a retention schedule in place related to personal information used to make decisions? Retention and/or disposition schedule that will ensure that personal information is kept for at least one year after it is used in making a decision directly affecting an individual?

Deactivation of ChatGPT Team Account

If a Team workspace is deactivated (given missed payment or decision to pause use of the workspace), data within the workspace will remain intact, but ECU team members will not be able to access the workspace. Only workspace account holders (role: owner) will have access to the workspace settings to reactivate the Team workspace.

Removal of ChatGPT Team Account

Where an account is removed from ChatGPT Team and its workspace, the team member will lose access to their chat history and files and any ECU team members who had accepted to share chats, files, links, and other data with the team member will also lose access. However, if the team member is re-added to the workspace, access to chats, files, link and other data will be restored.



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Deletion of ChatGPT Team Workspace

The account holder (role: owner) holds authority to delete the ChatGPT Team workspace, which completely erases all data saved within the workspace (including chats, files, links etc.). All deleted data is deleted from OpenAI systems within 30 days unless there is a legal requirement to otherwise retain it.

Part 7 – Additional Risks

Possible risk	Response
<p>Risk 1: ChatGPT Team workspace account was originally created using account holder’s non-ECU email address (personal email) and the account holder had to provide their date of birth. Subsequent employee accounts were generated using a mix of ECU and non-ECU email addresses. As per the Guidelines, personal information must not be disclosed to generative AI tools, including personal email addresses and date of birth.</p>	<p>Where personal email addresses were used, new accounts for those users to be created using ECU email address, and the personal email account to be removed from ChatGPT Team workspace. Account holder to determine if new workspace must be established given account holder / owner account uses personal email address or if account holder’s ECU email can be added and account switched over (personal email address account removed).</p> <p>Accounts to be set-up using ECU email address only moving forward.</p> <p>Date of birth is no longer collected by OpenAI (as of June 2024), and no employee accounts were set-up using date of birth.</p> <p>Should the use of ChatGPT Team expand to other departments in the institution, ECU to investigate the use of ChatGPT Education or Enterprise as both offer SSO capabilities. Initiating SSO will reduce the likelihood of personal email address being used moving forward and provide better capabilities for account provisioning and deprovisioning and access audits. It is also recommended that administration and maintenance of the ChatGPT Team workspace is transferred to IT Services at that time.</p>
<p>Risk 2: Any individual who has access to the ChatGPT Team workspace can invite new users to the workspace, including individuals outside of ECU.</p>	<p>Monthly access audit to be performed by account holder synced with payment of ChatGPT Team invoice to ensure all individuals with access to the</p>



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Possible risk	Response
<p>This increases the risk of unauthorized access to ECU information and platforms and the potential collection and use of personal information from non-ECU employees.</p>	<p>workspace need to have access and have the appropriate privileges.</p> <p>Upon account provisioning, ECU employees to be advised that they are prohibited from directly inviting individuals to the workspace and all requests must be processed by the AVP Research. Notification to be provided as per Risk 5 below.</p>
<p>Risk 3: ChatGPT Team allows ChatGPT Team members to migrate data from their Personal workspace to their Team workspace to become one unified workspace and deletes the Personal workspace after migration. After the merger, all Personal workspace data is considered part of the Team workspace.</p> <p>This would result in ECU collecting and using additional information from ECU employees that may be considered personal information. ECU must ensure that employees are informed that they are prohibited from merging their Personal workspace with their Team workspaces.</p>	<p>Upon account provisioning, ECU employees to be advised that they are prohibited from merging Personal and Team workspaces. Notification to be provided as per Risk 5 below.</p>
<p>Risk 4: No guidance on the use of Memory functionalities has been provided to date. This could lead to “Memories” being stored that may indirectly link back to a team member when accessing ECU’s ChatGPT Team workspace, and subsequently be considered personal information.</p>	<p>It is recommended that the Memory function is toggled “off” for all accounts on a day-to-day basis. If there is a time-limited scenario where Memory would enhance productivity (e.g., grant application), Memory may be initiated for that period. After the deadline, the user must clear the Memory store.</p>
<p>Risk 5: No standardized guidance specific to the use of ChatGPT Team has been developed for ECU employees, which could lead to inappropriate use of ChatGPT Team.</p>	<p>Upon account creation, employees to be notified via email of the following:</p> <ol style="list-style-type: none"> 1. Requirement to review Generative AI Guidelines, which apply to their use of ChatGPT Team. 2. Prohibition of inviting new members to the ChatGPT Team workspace.



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Possible risk	Response
	<ol style="list-style-type: none">3. Memory to be toggled off unless the time-limited scenario is approved by the workspace admin or owner.4. Personal information including any information related to ECU staff, faculty or students, to be uploaded to the workspace.5. Prohibition from merging personal and team workspaces.

Please ensure Parts 7 and 8 are attached to your submitted PIA.





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Part 8 – Program Area Signatures

This PIA is based on a review of the material provided to the Privacy Office as of the date below. If, in future any substantive changes are made to the scope of this PIA, a PIA Update must be completed and submit it to Privacy Office.

_____	_____	_____
<i>Department Manager</i>	Signature	Date
_____	_____	_____
Sandeep Sidhu <i>Chief Information Officer</i>	Signature	Date
_____	_____	_____
Adrian Tees <i>Privacy Officer</i>	Signature	Date
_____	_____	_____

A final copy of this PIA (with all signatures) must be delivered to privacy@ecuaad.ca for record keeping.



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APPENDIX A – SUPPLEMENTARY AI ASSESSMENT

OVERVIEW

1. Is AI technology used in this initiative (whether standalone technology or integrated into a larger offering)?
Yes
2. Type of AI technology that will be used (select all that apply):
 - Machine Learning: learns patterns from data, e.g., email automation and spam filtering
 - Deep Learning: intricate pattern recognition, e.g., automated cars
 - Generative AI: creates new content, e.g., ChatGPT**
 - Natural Language Processing: language recognition and processing, e.g., spellcheck
 - Other
3. What is the purpose/function of the AI technology (select all that apply):
 - Prediction modelling**
 - Other record abstraction**
 - Chatbots**
 - Social media sentiment analysis**
 - Translation or Speech-to-text**
 - Image recognition - identifiable images**
 - Image recognition - non-identifiable images**
 - Image classification**
 - Object detection**
 - Voice recognition**
 - Automation**
 - Other:
4. How will the AI technology be used (select all that apply)?
 - Existing AI technology will be used to generate or collect data**
 - Existing AI technology will be evaluated/will be the focus of this work**
 - New AI technology will be created and validated
 - New AI technology will be created, validated and used to generate or collect data
5. Who created the AI technology and why was it selected? Is the AI developed in-house by the vendor or supplied by a third party?
OpenAI created ChatGPT; it was developed by the vendor and will be cloud-hosted. ChatGPT is the leading generative AI tool to date that provide the range of functionalities needed to support ECU's business activities.

DATA

6. What type of information will be inputted into to the AI technology (select all that apply)?



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- Directly identifying information
- Indirectly identifying information
- Non-identifiable data**
- Identifiable images/videos
- Non-identifiable images/videos**
- Audio
- Biometric data
- Location data
- IP address**
- Web tracking data**
- Other

To generate the account, user's first name and ECU email address will be used. These are considered business contact information. ChatGPT collects IP and device information when using the software. When engaging in ECU business activities, team members may submit non-identifiable data and image.

7. Will the input data be retained by the AI technology (e.g., for future re-training)? Y/N
No, ChatGPT does not train on information submitted by ChatGPT Team account holders.
8. Will the use of the AI technology generate any new identifiable information (output data)?
 - a. If so, what type of information will be generated?
 - Directly identifying information
 - Indirectly identifying information
 - Non-identifiable data
 - Identifiable images/videos
 - Non-identifiable images/videos
 - Audio
 - Biometric data
 - Location data
 - IP address
 - Web tracking data
 - Other

No, it should not result in the generation of any new identifiable information.

9. Provide an overview and technical documentation of the AI infrastructure and data flows
Please see <https://trust.openai.com> for additional technical documentation
10. Where will the data be stored? Where will the log files, backups and other transitory files be stored?
Data will be stored in the USA and replicated worldwide.



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11. How long is the data, log files, back-ups, and transitory files retained and how is it securely disposed of when no longer needed? What controls are in place to ensure data is not used beyond its original purpose?
Any data submitted to OpenAI is retained unless the user explicitly deletes the data; upon deletion it some data may be retained for a limited time period (30 days) to comply with any legal or business obligations.
12. How will the data be de-identified or anonymized? Is there any risk of de-anonymization?
N/A
13. What controls are in place to limit who has access to input and output data, and all other files (log, back-up, transitory etc.)? Describe the access controls and authentication processes in place.
See Question 17 of the PIA
14. What audit controls are in place to capture trails of how the data and files are moved and stored from one location to another during the information lifecycle.
 - a. How does the vendor ensure that data or files are not misused by those who have access?
 - b. Who has access to the data or files and under what conditions (including third-parties)?**See Question 17 of the PIA**
15. Is the AI technology auditable from ECU's endpoint? Can ECU customize the audit process?
See Question 17 of the PIA
16. What agreements are in place between the vendor and ECU? Is a privacy protection schedule included?
The OpenAI Terms of Use and Privacy Policy are accepted upon creation of a new team member account. ECU has also entered into a ChatGPT Team subscription agreement which governs ECU's ChatGPT Team account.
17. How does the vendor respond to privacy incidents or breaches? Is there a robust incident response plan in place?
OpenAI's breach management response policy is available here: <https://trust.openai.com>

AI TECHNOLOGY



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SECURITY

31. Assess and document the security risks of the AI technology. How is data protected during transmission? Does the vendor use encryption protocols like Transport Layer Security (TLS) to protect data in transit?
All data is encrypted in transit and at rest.
32. Does the vendor have third-party security certifications (like ISO 27001, SOC2, etc.) that verify their security posture? How regularly are these certifications reviewed and renewed?
Yes, SOC 2 and CSA Star Level 1 certifications in place for ChatGPT Team subscription.
33. How does the vendor protect against vulnerabilities in the AI, including adversarial attacks? What is the patch management policy and how quickly are vulnerabilities resolved?
Additional information available here: <https://trust.openai.com>
34. How does the vendor respond to security/cybersecurity incidents? Is there a robust incident response plan in place?
Yes, additional information available here: <https://trust.openai.com>
35. Is there a possibility of the AI making uncontrolled, unsupervised decisions that could impact security?
No, for the purposes of ECU's ChatGPT Team account, there is no significant possibility of the AI making uncontrolled, unsupervised decisions that could impact security.

TRAINING

36. How will the AI technology be trained in advance of use and will it require ECU data? If so, what type of data will be inputted?



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- a. Document the data collected to train the AI technology and assess its identifiability, whether it is accurate, adequate, relevant, and limited to the purpose(s).

No, the model will not be trained using any data submitted by ECU ChatGPT Team account.

- 37. What external data sources were used to train the AI technology? How or from whom was the data obtained? To what extent is the vendor relying on scraping publicly available data from the Internet to train model(s) and from which websites?

OpenAI considers this propriety information; it is assumed that the model has been trained using any publicly available information that could be scraped from the internet or other electronic sources.

- 38. What controls are in place to limit who has access to training data, training code, and deployment code.

N/A – ECU data is not used to train the model.

- 39. How will the training data be de-identified or anonymized? Is there any risk of de-anonymization?

N/A – ECU data is not used to train the model

- 40. What audit controls are in place to capture trails of how personal data is moved and stored from one location to another during the training and testing phase. How does the vendor ensure that data isn't misused by those who have access? Who has access to the data and under what conditions? Are there strong access controls and authentication processes in place?

Audit controls are in place and have been validated via third-party certifications (SOC 2; CSA Star Level 1); additional information available here: <https://trust.openai.com>.

FIPPA ACCESS, CORRECTION, DECISION MAKING

- 41. How transparent is the AI technology's decision-making process?

ChatGPT is not transparent in its decision-making process.

- 42. Will any decisions be made about a person based on the AI technology? If so, how will they be validated?

No decisions about an individual will be made using ChatGPT.

- 43. Assess and document the explainability of the AI technology and consider what supplementary tools that can used to help explain decisions made by the AI technology to individuals who will be affected.

N/A

- 44. Document how ECU will facilitate individual rights requests throughout the lifecycle of the AI technology where personal information will be processed.

N/A