Part 1 – General Information

Name of Department/Unit	University Advancement	Project ID	
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In the following questions, delete the descriptive text and replace it with your own.

1. **What is the initiative?**
Describe your initiative in enough detail that a reader who knows nothing about your work will understand the purpose of your initiative and who your partners and other stakeholders are. Describe what you're doing, how it works, who is involved and when or how long your initiative runs.

Gravyty is a higher education software company that provides tools directed towards alumni engagement, donor stewardship, and university development. Within their product suite, there are two web-based software tools utilized by the Emily Carr University (ECU) Alumni Relations (AR) and University Advancement (UA) offices: Graduway and Gratavid.

Graduway is utilized by AR and is a white label social and professional networking platform intended for use by alumni, students, staff, faculty, and employers (public facing platform name is "The Leeway"). The purpose of Graduway is facilitation of peer-to-peer and mentor-mentee relationships, job postings, resources, and general networking. It is operated in collaboration between AR and Career Development + Work Integrated Learning (CDWIL). Information Technology (IT) department provides IT oversight and holds administrative access permissions to the platform.

Users can sign up for a Graduway account via email or Single Sign-On (SSO) through preexisting social networking sites such as Facebook (FB) and LinkedIn (LI) or SSO via Google and Apple. Platform signup is entirely voluntary for all users. Upon sign up for an account, users can network with their peers, seek employment or collaboration opportunities, find individuals with similar interests by joining groups, seek or offer mentorship, share their accomplishments, invite ECU community members to their events, and hire people from the ECU community.

Graduway connects to ECU's Raiser's Edge NXT (RENXT) platform, which houses our alumni and donor database and Gratavid for video automation through platform triggers such as creating a profile or joining a group. There is an admin email accessible only by the departmental administrators of the platform. This platform has been in place at ECU since 2020 and is intended to form part of ECU's IT infrastructure in perpetuity at the drafting of this PIA on March 20, 2024.

Gratavid is a donor stewardship and alumni engagement video messaging tool. The purpose of Gratavid is to leverage personalized video content to help reach ECU's community building and philanthropic goals in advance of the 100th Anniversary. Gratavid is utilized by both AR and UA. AR utilizes Gratavid among the alumni community to welcome them to Graduway, celebrate their milestones, and for event outreach. UA utilizes Gratavid for relationship building with donors, stewardship, and event outreach. Gratavid connects to RENXT and Graduway for both automation and data storage. There is an admin email accessible only by the departmental administrators of the platform. Gratavid is in use for a two-year contract from March 2024 to March 2026 to encompass the 100th Anniversary goals and events with the possibility of being retained beyond the initial contract.

2. What is the scope of this PIA?

In scope:
- The collection, use, disclosure, storage and access of personal information via ECU's use of two platform offered by Gravyty's product suite: Gratavid and Graduway
- Controls established by ECU to manage the flows of personal information between the two platforms and other ECU systems/platforms
- Use of the platform by any ECU students, staff, faculty, external employers (limited access)

Out of scope:
- Comprehensive assessment of the privacy and security controls of ECU platforms integrated with Gravyty product suite (e.g., RENXT) as those require separate PIAs
- Assessment of the privacy and security controls of third-party platforms utilized for SSO or other information exchange functionalities
- Human Resources-related policies, practices and controls for collection, use, disclosure, and storage of student personal information for the purposes of student employment
- Alumni Relations-related policies, practices and controls for the collection, use, disclosure and storage of donor personal information for the purposes of processing donations to ECU
- Historical use of Gravyty's product suite as covered in previously approved PIAs

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

Graduway collects, stores, uses, and transfers data from alumni, students, staff, faculty, and employers from internal and external sources, depending on the activity requested (e.g., SSO from Facebook, sign-on validation information collected from Facebook; alumni status pulled from RENXT). Further information is provided in the sections below.

Gratavid uses data collected by RENXT and Graduway to distribute videos to constituents and records opens, views, sends, and unsubscribes back into RENXT and Graduway.

4. Does the initiative include personal information?

Yes, all personal information elements are listed in the tables below.

Alumni	Students	ECU Employees	Employers	Platform	Mandatory
Name	Name	Name	Name	Graduway	Yes
Email	Email	Email	Email	Graduway	Yes
Affiliation	Affiliation	Affiliation	Affiliation	Graduway	Yes
Class Year	Class Year			Graduway	Yes
Degree	Degree			Graduway	Yes
Major	Major			Graduway	Yes
Minor	Minor			Graduway	No
Additional Educational Information[1]	Additional Educational Information	Additional Educational Information		Graduway	No
Professional Information[2]	Professional Information	Professional Information	Professional Information	Graduway	No
Social media profile data[3]	Social media profile data	Social media profile data	Social media profile data	Graduway	No
Location[4]	Location	Location	Location	Graduway	No
Phone	Phone	Phone	Phone	Graduway	No
DOB	DOB			Graduway	No
ECU Student Number	ECU Student Number			Graduway	Depends*
Maiden Name	Maiden Name			Graduway	No
Pronouns	Pronouns	Pronouns		Graduway	No
			Job information	Graduway	Yes
			Company	Graduway	Yes
Application Information**	Application Information**		Application information	Graduway	Yes

[1] Additional Educational Information refers to other educational institutions an affiliation may have attended. They can include the name of the institution, their degree type, major, minor, and location.

[2] Professional Information includes items generally described on a resume, such as industry worked in, company worked for, duration of experience or employment.

[3] Social Media Profile Data is collected if a user chooses to use Facebook or LinkedIn to sign in to the platform as prepopulated profile data. Users can choose to edit or alter the information. For those that choose LinkedIn, it also allows for the import of the Professional Information and creates a profile badge linking to their external LinkedIn profile.

[4] Location data is not IP address collection but typed in by the user, ie: Vancouver, Vancouver Island, Lower Mainland, etc.

Alumni student numbers are added manually to facilitate a sync between Graduway and RENXT but it is not mandatory for them to disclose this upon signup. Students will be required to include their student number upon sign up. Both affiliations are welcome to use an alias or artist name during sign up. Student numbers are not visible to anyone but admins.

**Only collected if a student or alumni elects to apply for a job via Graduway. Application information would be a cover letter, resume, CV, and/or portfolio based on what the posting requests and is up to the discretion of the applicant.*

Alumni	Donors	Students	Platform	Mandatory
Name**	Name**	Name*	Gratavid	Yes
Email	Email	Email*	Gratavid	Yes
Sent Video	Sent Video		Gratavid	Yes
Opened Email	Opened Email		Gratavid	Yes
Watched Video	Watched Video		Gratavid	Yes
Watch Count	Watch Count		Gratavid	Yes
Click Thru Rate	Click Thru Rate		Gratavid	Yes
Response Email	Response Email		Gratavid	Yes
Unsubscribe	Unsubscribe		Gratavid	Yes
		Student Number*	Gratavid	Yes
		Address and personal information*	Gratavid	Yes
		Vertical video content	Gratavid	Yes
	Donation information***	Donation information	Gratavid/RENXT	Yes

Student information is collected for the purpose of paying them to create Gratavids. It is not stored within Gratavid nor is it transmitted with the exception of the videos they create. However, the procurement of videos from students is part of this initiative and is therefore included. Data collected for student employment is housed with HR and under their policies.

**Alumni and Donor first names will be distributed to students or UA/AR employees to create highly personalized videos for key philanthropic stakeholders and distinguished alumni.*

***Limited information regarding the donation is provided to students creating Gratavids on behalf of UA and AR. Donation information from RENXT can trigger automatic Gratavids. Limited information could*

include but does not extend beyond: area of funding, amount of donation, frequency of donation, length of time as a donor.

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
User registration on Graduway via email	Collection, Use	26(c); 32(a)	First name, last name, degree type, major, year of graduation, email address
User registration on Graduway via social media	Collection, Use	26(c); 32(a)	First name, last name, degree type, major, year of graduation, email address, work history (LinkedIn), login connected to social media account
Registration on Graduway via SSO	Collection, Use	26(c); 32(a)	First name, last name, degree type, major, year of graduation, email address, login connected to SSO
Alumni affiliations are linked to RENXT and data is transferred into RENXT when a profile is updated	Use	32(a)	First name, last name, email, employment data

Student and alumni affiliations connect with one another via in-platform messaging system, messages are stored in a Safeguarding Report in perpetuity which is accessible by administration on platform	Collection, Use	26(c), 32(a)	Messages that can include personal information disclosed between users including but not limited to phone number, email address, social media profiles, and website links
Student and alumni affiliations choose to apply for a job either via on platform upload function or via external link which in both cases are accessible to the employer	Collection, Use, Disclosure	26(c); 32(a); 33(2)(d)	First name, last name, contact information, resume, cover letter
Stagnant profiles (all affiliations) and employer or internal employee remain on Graduway and on AWS servers	Storage, Retention	31	All profile data provided at registration
Registration prompts automatic Gratavid welcome email where data flows through AWS to produce email and is recorded back as being sent	Collection, Use	26(c); 32(a)	Email and merge tag profile information (first name, affiliation)
RENXT updates triggers Gratavid video to constituent	Use	32(a)	First name, email, giving history
Gratavid is watched, opened, or responded to by constituent and message is recorded back in CRM	Collection, Use	26(c); 32(a)	First name, email, message, watch time, views
ECU and/or Gravyty support staff collect and process information to help troubleshoot and resolve issues from users / ECU admin	Collection, Use, Disclosure	26(c); 32(a); 33(2)(t)	Contact details

Graduway and Gratavid Data Flow Diagram

ECU 2026-10 -000000005
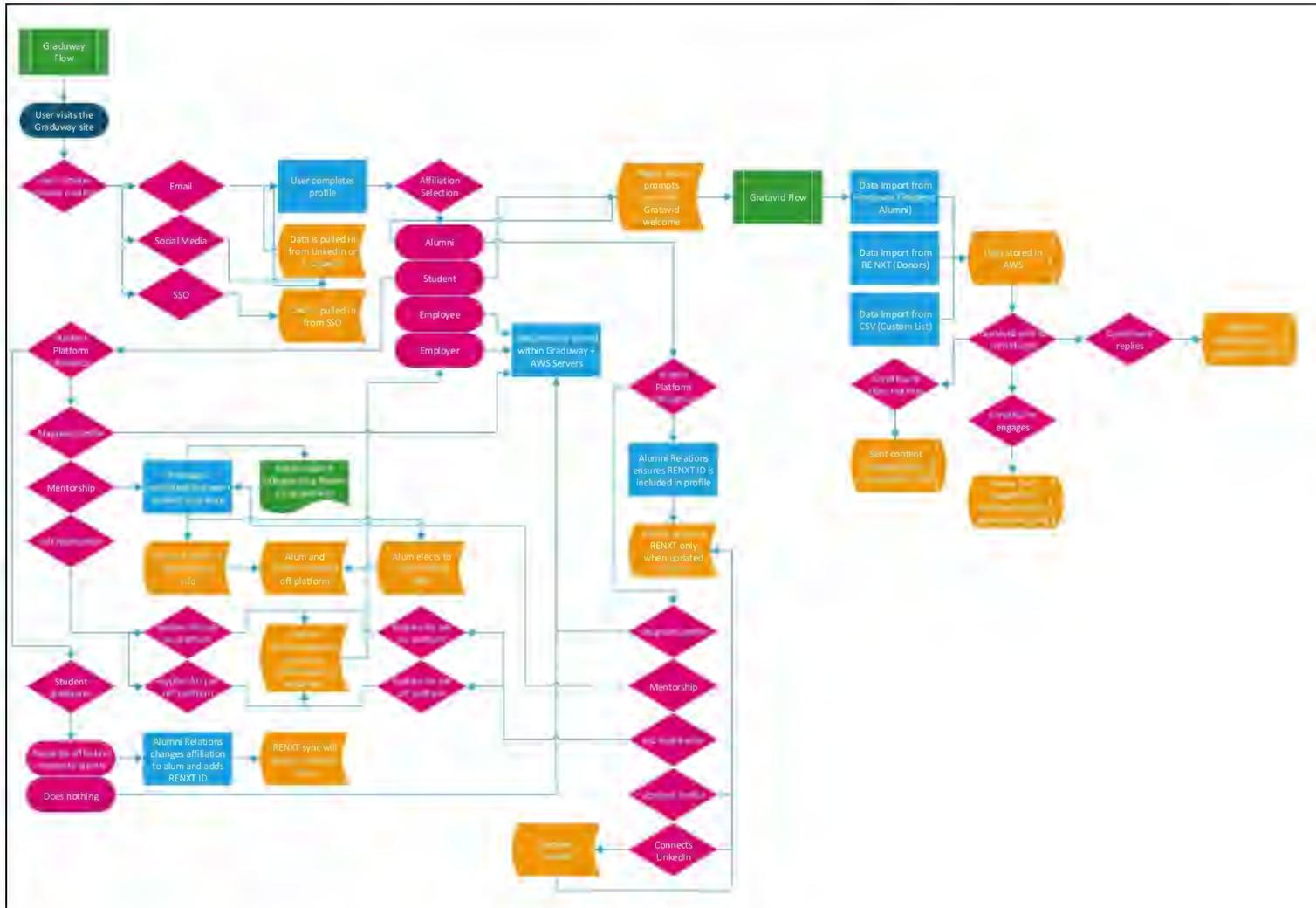
5. Collection Notice

Graduway ("The Leeway") is a networking platform available to the Emily Carr University (ECU) community of alumni, faculty, staff and students for the purposes of connecting with other users, networking, and supporting university programs and activities, including but not limited to fundraising, fostering alumni engagement, updating Advancement mailing lists, and updating donor databases. The personal information you provide upon signing up and creating a profile (e.g., your name, contact information, education and employment history) is collected by ECU under section 26(c) of the Freedom of Information and Protection of Privacy Act. By using The Leeway, you recognize you are signed up to receive information about university developments, invitations to events and fundraising activities via email. You understand that ECU will keep your personal information secure and that you can access information held about you or ask ECU to stop contacting you and storing your data at any time.

The Leeway is a voluntary service provided by ECU, and it is your decision whether you choose to participate in it. ECU uses a third-party provider, Gravyty, to make Graduway's services available to you. Prior to signing up for an account, please review the Terms of Use and Privacy Policy to confirm your agreement with how Gravyty will use and disclose the information you provide when engaging with The Leeway. Where you decide to use a third-party to sign-on to your user account (e.g., Facebook SSO), the verification process including collection and use of your personal information by the third party is governed under their Terms of Use and Privacy Policy. By linking your Leeway account to a third-party account, you acknowledge that you are accepting the risks associated with this type of verification process.

Where you decide to create a new user account via the Leeway (and do not connect to a SSO provider), **please note that the Leeway's password strength requirements do not meet ECU's password standard**. We strongly recommend creating a password that complies with ECU's requirements: at least (13) characters, including at least (1) uppercase letter, (1) lowercase letter, (1) number and (1) non-alphanumeric character.

If you have any questions about the collection, use and disclosure of your personal information, please contact the Leeway Team at leeway@ecuad.ca

Code of Conduct
The use of The Leeway is primarily intended for professional networking, informal mentorship, and career advice from the ECU community and to provide a professional opportunities board. All parties using this platform are governed by applicable ECU policies. The user bears the primary responsibility for the material that is displayed, accessed, or sent.

For ECU students and alumni, please refer to the following policies for conduct (policy 4.6 and policy 4.17). For staff and faculty, please refer to the Employee Code of Conduct and University Policies.

Users who breach policies may have their accounts removed without notice.

Opportunities Board
Employers advertising opportunities as an individual, on behalf of a company, or an organization must:

1. Have permission to advertise on behalf of the company or organization.
2. Include key information such as a company title, location, position title, employment type, position description, link to the company or organization website, and primary contact for the advertised position.
3. Work Opportunities posted must have a defined *Scope of Work* and list of duties and hours included in the posting. The Career Development + Work Integrated Learning Office is unable to provide professional services such as job development, estimates on project work, timelines, and cost estimates.
4. Demonstrate transparent wage information in order to be compliant with the BC Wage Transparency Act. **Postings without listed wages will be removed.**
5. Opportunities must align with the university's areas of study which allow students to utilize design, media, or visuals arts skills.
6. The Leeway admins may remove, without notice, any opportunities from the platform that do not meet the guidelines. If you believe that any opportunities listed on The Leeway do not comply with the stated guidelines or demonstrate any other reason for concern, please contact the Career Development + Work Integrated Learning office with a link to the specific posting at creativecareers@ecuad.ca.

Emily Carr University only supports volunteer opportunities postings for registered charitable organizations, and not-for-profit organizations.

For detailed guidelines, please visit our Information for Employers + Hiring Managers.

Disclaimer (for students and alumni signing up)

Career Development + WIL Office does not pre-screen employers or endorse their products or services. Applicants for any job postings are responsible for ascertaining and verifying the terms and conditions of the employment.

For information about your rights and responsibilities as an employee in British Columbia call:
* The Employment Standards Branch 1.800.663.3316
* The Council of Human Rights 1.800.663.0876

Job posting scams are on the rise. Therefore, applicants must exercise caution and common sense when responding to any job posting, even after accepting a job offer. Please click here for tips on how to avoid job scams.

If you suspect a job posting on the Opportunities Board is fraudulent, please contact us immediately at creativecareers@ecuad.ca or 604-844-3843.
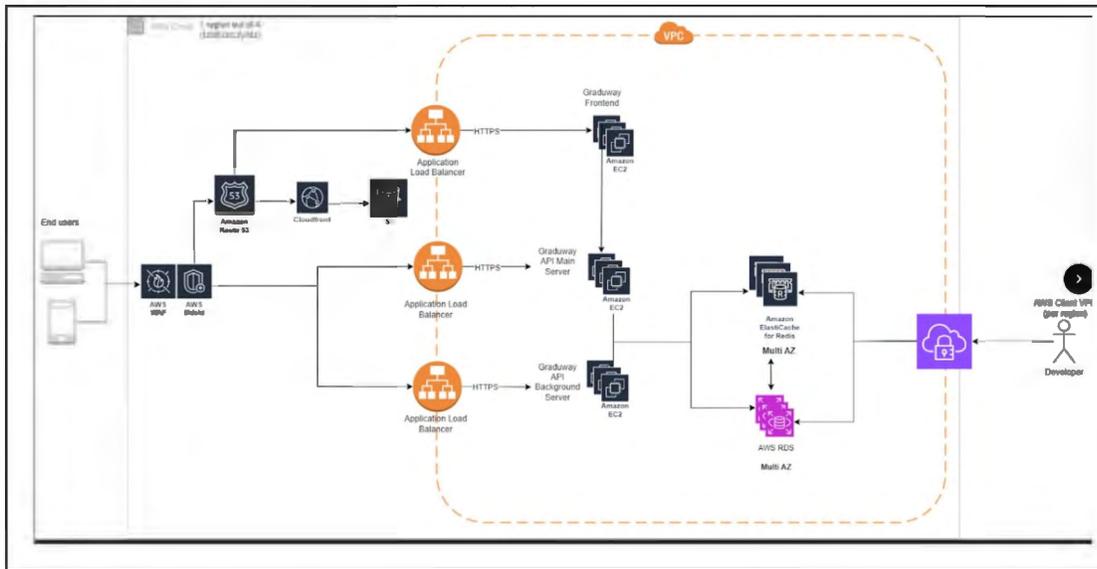
Part 3– Storing Personal Information

6. Is any personal information stored outside of Canada?

No

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

Both Gratavid and Graduway instances are hosted in AWS- Canada Central cloud infrastructure located in Montreal. This infrastructure hosts all ECU data, including back-ups, log files and transitory files. All information is encrypted in transit (TLS 1.3) and at rest (AES 256).

Graduway is a single tenant database and Gratavid is a multi-tenant database with a logical separation of customers (based on geographical location). Network infrastructure diagram from Graduway provided below.

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

Yes, it involves sensitive information; however as noted above, all information is stored either in Gravyty's AWS servers located in Canada or ECU's locally managed RENXT database (donors).

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.

Part 4 is not applicable for the purposes of this PIA.

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

If yes, fill in the table below (add more rows if necessary)

Name of service provider	Name of cloud infrastructure and/or platform provider(s) (if applicable)	Where and how is the sensitive personal information stored (including backups)?

10. Describe the contractual terms in place (if applicable).

If you wish to modify the Privacy Protection Schedule, email privacy@ecuad.ca.

Describe the contract details including duration.

11. Are you relying on an existing contract, such as an enterprise offering from BCNet?

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 risks for disclosure outside of Canada?

Privacy risk	Impact to individuals	Likelihood of unauthorized collection, use, disclosure, or storage of the sensitive personal information (low, medium, high)	Level of privacy risk (low, medium, high)	Risk response (this may include contractual mitigations, technical controls and/or procedural and policy barriers)	Is there any outstanding risk? If yes, please describe
1.					

Part 5 – Security of Personal Information

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

Yes

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

Yes – HECVATs completed from both Graduway and Gratavid.

Additional information about security controls in place for both Gratavid and Graduway are described in detail here: https://trust.gravyty.com/

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.**

Strategy	Yes / No and please describe
We allow employees only in certain roles access to information	Yes, only ECU administrative accounts can access information within Graduway, Gratavid and RENXT.
Employees that need standing or recurring access to personal information must be approved by the appropriate authority	Yes, access to any of the 3 areas will require approval by the appropriate authority within University Advancement.
We use audit logs to see who accesses a file and when	Yes, RENXT is accessed via username and includes log records. Gratavid and Graduway are discussed in the section below.

Additional strategies:

Administrative accounts for Graduway and Gratavid are limited to Alumni Relations, University Advancement, CD+WIL, and IT. AR is assigned the super user / admin account for both Graduway and Gratavid, and sets permissions, oversees commissioning and de-commissioning activities for the remaining administrative accounts.

RENXT accounts are limited to University Advancement and Alumni Relations.

Additional Privacy Controls:

User Accounts

Graduway - Employer Accounts
For employers, once they select "employer" status when they are creating their profile, the account is locked out of all areas of the platform other than the job board. Employers do not have access to personal information of students applying for jobs posted by the employer via Graduway, and as such, students must ensure they have the appropriate info available in their submitted documents for the employer to contact them. ECU does not release any student personal information to the employer on the student's behalf.

Gratavid – Student Creator Accounts
Where hired by ECU to support the creation of donor videos via Gratavid, students are not provided with an account to access Gratavid. Rather, select ECU AR employees will be assigned account permissions for Gratavid, and then they can create video requests where access permissions are assigned to a specific user / email link. This can be for (1) one video from one person (2) multiple videos from one person (3) one video per one person for multiple people. Students are then sent a link to access Gratavid with their access limited to the video request assigned to them.

Data Retention and Destruction

Graduway – User Accounts and Chats
Users can deactivate and delete their account at any time. All user data is destroyed upon deletion of the user account including any transitory messages such as chats. No user account information is retained by Graduway; it can take 1-4 months for full overwrite to be completed. Graduway does not retain any backups, log files or transitory documents.

Gratavid – Videos
Videos are retained per the length of the contract and can be deleted by the admin/user who has access to the Gratavid dashboard. Videos can be downloaded if that ability has been toggled on by ECU admins (at the time of writing, ECU planned to have downloads toggled on). Once deleted Gratavid does not have access to the videos. It can take 1-4 months for complete overwrite to be completed. Gratavid does not retain any backups, log files or transitory documents.

For users outside ECU (e.g., donors who receive a video), they will need to request deletion via ECU as direct deletion is not available to the recipient.

Contract Expiry
Upon expiry of the contracts for both platforms, ECU sites will be disabled by Gravyty. Initial closure of sites is estimated to take 2-3 weeks, and full overwrite can take 1-4 months. As noted above, no backups, log files or transitory documents are retained.

Logging and Auditing

General Overview
Gravyty utilizes AWS CloudWatch via DataDog for its platforms, which is configured to track all access, change and activity logs, including login, logout, actions performed, and source IP address, and this log can be provided on an ad-hoc basis. Additional details about Gravyty's proactive and reactive monitoring and detection activities are outlined in the respective HEVCATs and via trust.gravyty.com/security and aws.amazon.com/compliance/data-center/data-centers.

ECU Users - Graduway
ECU admin accounts have permission to access audit logs in the Graduway administrator dashboard. The audit logs capture details outlined above (login, logout, actions performed, and source IP address). No proactive monitoring and auditing processes has been developed to date for general activities recorded on the Graduway platform.

ECU admin accounts are also provided access to the Safeguarding Report in the administrator dashboard, which provides a log of all chat interactions between users on the platform. AR has developed a process to audit interactions between users to ensure interactions adhere to the platform's Code of Conduct. The AR super admin account is appointed oversight of the report and auditing activities (including escalation processes).

ECU Users - Gratavid
ECU admin accounts have permission to access audit logs in the Gratavid administrator dashboard. The audit logs capture details outlined above (login, logout, actions performed, and source IP address). No proactive monitoring and auditing processes has been developed to date for general activities recorded on the Gratavid platform.

Gravyty Staff
Gravyty support and onboarding teams have access to ECU sites for training and support purposes. In addition to the logging activities noted above changes to the ECU database are also logged and audited; however, for Gratavid, the auditing mechanism is pending implementation as ECU is currently in the process of setting up its Gratavid platform.

In terms of the Safeguarding Report, only specific Gravyty employees (support and onboarding teams) have access to the platform and can, if needed, download the Safeguarding Report for troubleshooting/testing purposes, although this is rare. The report cannot be edited or deleted.

Breach Reporting
Gravyty has a breach reporting process in place that meets requirements of the GDPR; however, no FIPPA privacy protection schedule was included with the contracts for either Graduway or Gratavid. Gravyty has demonstrated willingness to consider amendment of the contracts to include the FIPPA privacy protection schedule.

<div style="background:#ec1c7e">Part 6 – Accuracy, Correction + Retention</div>

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

Users can update their profile information and any information they wish to share in Graduway at any time via their account settings.

The only information collected by ECU AR and UA via Graduway to update other databases is the alumni data in RENXT, which is collected from alumni who choose to create an account and complete their profile. The information is limited to first name, last name, email, employment data.

No information correction process required for Gratavid given no personal information is being generated by Gratavid. The information being used to create videos are governed by AR policies and processes that are subject to ECU's standard privacy and information access requirements.

At any point, current students, alumni and staff can request access to and correction of any personal information held by ECU via ECU's standard information request process.

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

No – not directly using information collected from Gratavid or Graduway. However, employers will make decisions about a person with consideration to their employment application. This may include ECU HR making decisions where the employment opportunity is an internal position (either via a job posting on the Leeway or student employment for Gratavid video creation).

Where ECU is the employer, the applicant's personal information will be retained by HR for minimum of one year as per FIPPA requirements and ECU's privacy, HR, and information access policies.

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?

Yes – ECU has a retention schedule and process in place for HR applications and related employment decisions.

<div style="background:#ec1c7e">Part 7 – Additional Risks</div>

Possible risk	Response
Risk 1: No privacy-specific contractual controls in place for protection of personal information for either Gratavid or Graduway.	ECU to request contract to be amended to include FIPPA privacy protection schedule for both platforms.

Possible risk	Response
Risk 2: Previous privacy notice provided on the Leeway used incorrect FIPPA authorities and did not provide appropriate level of transparency re. ECU and Gravyty's collection, use and disclosure of information.	Compliant privacy notice provided in this PIA; The Leeway to be updated with revised notice ASAP and a revised notice to be circulated to all active users to remind advise them of the amended notice and ECU's privacy authorities and practices via the Leeway.
Risk 3: No ECU-specific password creation requirements in place for ECU users when creating a user account. Currently Gravyty requires passwords to include: 8 characters, including upper/lowercase and numbers.	Advise users that the password requirements to not align with ECU's standard in the Privacy Notice. Encourage users who create an account (rather than using SSO) to use ECU password requirements for enhanced privacy and security.
Risk 4: Gravyty in the process of setting up specific monitoring and auditing capabilities for ECU at the time of writing, limiting controls for the protection of personal information hosted on the platform.	ECU to work closely with Gravyty to ensure Gratavid auditing controls are in place prior to ECU's activation of the platform for internal use.
Risk 5: No PIA completed on other integrated systems (internal such as RENXT or external such as third party SSO).	ECU to complete PIA for RENXT; privacy notice updated to remind users that it is their decision to voluntary sign-on via external third parties and accept the risk of the third-party services.

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

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.

		May 31, 2024
Sára Molčan	Signature	Date
Department Manager		
Sandeep Sidhu	Signature	Date
Chief Information Officer		
		24 June 2024
Adrian Tees	Signature	Date
Privacy Officer		June 4, 2024

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