

**PRIVACY IMPACT ASSESSMENT (PIA)
CLOSURE SUMMARY**

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|----------------------------|---|
| Initiative | Constant Contact – Email Marketing & Outreach Platform (RSAW) |
| PIA Reference # | 2025-006 |
| PIA Completion Date | August 20, 2025 |
| Project Sponsor | Joan Glover |
| Unit | Justice and Public Safety Division |

The purpose of a PIA is to determine whether an initiative complies with the *Freedom of Information and Protection of Privacy Act* (“**FIPPA**”) and JIBC’s policies and procedures. This document is to advise that the PIA review of this initiative has been completed. The following outlines the scope, issues, legal basis and conclusions associated with this PIA.

Initiative Description & Scope

This initiative involves replacing the Campaigner platform with Constant Contact for the purposes of external communication and outreach managed by the Road Safety at Work (RSAW) program. The system will be used to distribute newsletters, eBlasts, and program information, and to gather feedback that may inform future RSAW offerings. All operations are managed externally to JIBC, with the exception of a single online course hosted internally.

Information Reviewed

This review is based on the completed PIA Questionnaire (attached as Schedule A), with additional context provided by Joan Glover, RSAW staff and Technology Services.

Legal Basis - Privacy

The platform will be used to collect and manage contact information from individuals who voluntarily sign up to receive RSAW communications and resources. The information collected is generally limited to names, business email addresses, job titles, and organization names. Based on current guidance under FIPPA, this type of information would qualify as “business contact information” rather than “personal information”, and thus would fall outside the scope of protected personal information under FIPPA.

However, if any individuals choose to provide personal (non-business) contact information (for example, personal email addresses), then the information would be considered personal information under FIPPA. In such cases:

- Collection would be authorized under section 26(c) of FIPPA, as it relates directly to and is necessary for the RSAW program; as well as section 26(d) of FIPPA, which permits collection with the individual’s consent;



- Individuals must be notified of the purpose of collection, legal authority, and a contact for questions in accordance with section 27(2).
- Use of the personal information must be limited to the purpose for which it was collected or a use consistent with that purpose, in accordance with section 32(a) and section 34.
- Disclosure, if any, must also align with the original purpose or be consistent with it under section 33(2)(d) and section 34.

Currently, no sensitive personal information is being collected, no new disclosures are anticipated, and the communications are not intrusive. The purpose remains consistent with previous use under the Campaigner platform, and no material change to the risk profile is anticipated.

The system does not aggregate information from separate systems, nor does it involve new or intrusive contact with individuals. The personal information classification is considered public or low sensitivity, and the intended use remains consistent with the current Campaigner system.

Constant Contact is a US-based platform that stores information outside of Canada. Section 33.1 of FIPPA requires additional analysis be conducted when personal information will be stored outside of Canada. In particular, we are required to consider factors such as whether the personal information is sensitive, where and how the information is stored, the likelihood of unauthorized access, and the impact to the individual of such an event.

Current guidance from the Province of British Columbia suggests that sensitive personal information includes, but is not limited to:

- Personal health information
- Genetic and biometric data
- Personal financial information
- Geolocation data
- Criminal records
- Racial or ethnic origin
- Sexual orientation
- Religious, philosophical or political beliefs

Given the nature of the data (primarily public-facing business contact information, and in some potential cases personal email addresses, in each case voluntarily submitted), the personal information, if any, is not inherently sensitive, as it does not include medical, biometric, financial, or other high-risk personal information. Accordingly, a supplementary assessment is not required under section 33.1.

Legal Basis - Security

Under section 30 of FIPPA, JIBC must ensure reasonable security measures are in place. While the platform does not support single sign-on (SSO) through Extra ID (which would be JIBC's preferred security standard), the system is managed externally by RSAW personnel who do not have JIBC accounts, so our Technology Services team considers this to be an exception to our general preference towards SSO.

Constant Contact publishes a comprehensive Information Security Policy outlining administrative, technical, and physical safeguards. Based on a review by Technology Services, these safeguards appear consistent with reasonable expectations for platforms of this nature.

Importantly, the platform supports multi-factor authentication (MFA), which should be enabled for all administrator accounts. As the system is not integrated with JIBC infrastructure, RSAW is responsible for managing user lifecycle (onboarding and offboarding) and ensuring access is restricted to authorized users only.

No JIBC email domain (@jibc.ca) will be used in conjunction with the platform, so no SPF configuration changes are required.

Conclusions

Based on the information provided, our review has concluded that this initiative may proceed as planned, provided that:

- Contact information is collected and used only for the purposes outlined, and ideally with clear consent of the individual;
- RSAW ensures appropriate configuration of access controls for users and contractors;
- Any material changes to the platform's scope, data classification, or collection practices trigger a renewed PIA review.

Although a collection notice is not strictly required for business contact information, it is encouraged due to the potential for personal contact details being provided. Here is a sample form of collection notice that could be used:

“Your personal information is collected under the authority of section 26(c) of the Freedom of Information and Protection of Privacy Act. This information may be used by JIBC to provide updates about RSAW programs, services, and events. If you have any questions about the collection of this information, please contact privacy@jibc.ca.”

Responsibilities

RSAW is responsible for ensuring that all individuals providing contact information are appropriately informed about the purpose of collection and how their information will be used. Any material changes in data use or platform function should be reported to the General Counsel, and a new or updated PIA submitted as required.

RSAW system administrator must manage the lifecycle of accounts as people get onboarded and offboarded, and enable MFA and other appropriate account management practices for all users.

If you have any questions or concerns about this PIA, please contact the General Counsel.

**SCHEDULE A
PIA QUESTIONNAIRE**

Please see attached.

PRIVACY IMPACT ASSESSMENT QUESTIONNAIRE

for

Constant Contact

1. Purpose of the Privacy Impact Assessment Questionnaire

This form is used by JIBC to provide a high-level overview of the potential privacy risks of a current or proposed policy, system, project, program or activity. The results of these screening questions help judge the level of potential risk, the extent to which risk mitigation strategies may be needed and when completion of a privacy impact assessment is required under the *Freedom of Information and Protection of Privacy Act* (British Columbia) (the “Act”).

2. Privacy Questions

| Questions | Answers |
|---|----------------|
| Does the program involve personally identifiable information (PII) (as defined by the Act)? [Y/N] | no |
| Will the program involve the collection or creation of new information about individuals? [Y/N] | no |
| Will personal information about individuals be disclosed to organizations, programs, processes or people who have not previously had routine access to the information? [Y/N] | no |
| Will personal information about individuals be used for a purpose it is not currently used for, or in a way it is not currently used? [Y/N] | no |
| Will the program require contacting individuals in ways that they may find intrusive? [Y/N] | no |
| Does the program have a collection notice or use policy? [Y/N] | yes |

3. Technology Questions

| Questions | Answers |
|--|----------------|
| Does this program involve the implementation of a new electronic system or use of a new application or software to support the creation, collection, updating or storing, backing-up or disposition of personal information? [Y/N] | yes |
| Does this program require any modifications to existing information technology (IT) systems (e.g., integration with or consolidation of other IT systems)? [Y/N] | yes |
| Will a new or modified electronic system change the existing business workflow? [Y/N] | no |
| Does the program involve the use of new technology that might be perceived as being privacy intrusive? [Y/N] | no |

4. Impact Questions

| Questions | Answers |
|--|--|
| <p>What are the purpose of collection, use and/or disclosure of the personal information? [Internal/External/Both]</p> | <p>Contact information will be collected by Express consent.</p> <p>The purpose of collection will be to inform contacts, through newsletters and eBlasts, about RSAW services, resources, programs, and illicit feedback about the same.</p> <p>Feedback will be used to provide direction of the program, services, resources and offerings.</p> |
| <p>Will personal information about the same individual that was previously maintained separately now be aggregated and stored together? [Y/N]</p> | <p>n</p> |
| <p>How would you describe the information classification level of the personal information? (Select all that apply)</p> <ul style="list-style-type: none"> • Highly Confidential • Confidential • Public | <p>Public</p> |
| <p>What are the type(s) of personal information? (Select all that apply)</p> <ul style="list-style-type: none"> • Bio/demographic information • Academic/education Information • Employment information • Medical/health Information • Financial Information • Criminal information • Images • Opinions about individuals • Individuals' personal views and opinions • Business contact information • Personal contact information • Other | <ul style="list-style-type: none"> • Individuals' personal views and opinions • Business contact information |
| <p>What are the type(s) of individuals? (Select all that apply)</p> <ul style="list-style-type: none"> • Prospects | <p>Prospects - We help improve the safety of people who drive for work or work at the</p> |

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|---|--|
| <ul style="list-style-type: none"> • Applicants • Students • Employees • Donors/alumni/other 3rd parties • Volunteers • Service providers • Other | <p>roadside. We do this by raising awareness and providing free online tools and resources that help organizations and drivers prevent work-related motor vehicle injuries and crashes.</p> <p>We serve BC employers, supervisors, and employees by providing:</p> <ul style="list-style-type: none"> • Online occupational road safety resources such as tool kits, policy and procedures templates, tailgate meeting guides, checklists, and a monthly planner and newsletter • Training and educational resources including online courses, webinars, and workshops • Practical road safety tools such as RiskCheck™, SkillCheck™, and TripCheck™ • Presentations and outreach at conferences, association meetings, and similar events • Advisory services to employers and supervisors who have road safety questions <ul style="list-style-type: none"> • Road safety campaigns and media information |
| <p>How many records documenting individuals will be stored, accessed, used or disclosed?</p> <p>[1-1000], [1001-5000], [5,001-50,000], [50,001-100,000], [100,000+]</p> | <p>[5,001-50,000],</p> |
| <p>How many JIBC employees, volunteers and service provider employees will be able to access, collect, use or disclose the information?</p> <p>[1-10], [11-50], [51-100], [101-250], [251-500], [501-1,000], [1,000+]</p> | <p>2</p> |
| <p>Is any of the information owned by another organization? [Y/N]</p> | <p>no</p> |

5. Probability Questions

| Questions | Answers |
|---|--|
| Where will the information be stored? (Select all that apply) <ul style="list-style-type: none"> • On campus – JIBC servers • On campus – other • Off-campus – inside Canada • Off-campus – outside Canada | Off-campus – outside Canada Cloud-based storage Constant Contact uses a US based data warehouse. |
| Is any of the information accessed from outside of Canada? [Y/N] | no |
| Will personal information be transmitted? (Select only one) <ul style="list-style-type: none"> • Personal information is used in a closed system (i.e., no connections to the Internet, Intranet or any other system and the circulation of hardcopy documents is controlled) • Personal information is used in a system that has connections to at least one other system • Personal information is transferred to a portable device (i.e., USB key, diskette, laptop computer), transferred to a different medium or is printed • Personal information is transmitted using wireless technologies | <ul style="list-style-type: none"> • Personal information is used in a system that has connections to at least one other system |
| Will a third party (e.g., vendor or service provider) have access to the information? [Y/N] | Yes |
| Will the program result in different record keeping systems converging? [Y/N] | no |