

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

Initiative	OverDrive digital content platform
PIA Reference #	2025-008
PIA Completion Date	November 26, 2025
Project Sponsor	April Haddad – Director, Library Services
Unit	VP, Academic

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

The initiative involves transitioning JIBC’s existing digital audiobook holdings to the OverDrive content delivery platform. OverDrive provides a cloud-based service used widely by public and post-secondary libraries to enable users to borrow and access licensed digital content.

The platform will be used for library services delivered to students, faculty, and staff. The initiative does not introduce any new types of highly sensitive personal information. It relies on standard library-related identifiers and user activity information required to authenticate users and track digital loans.

Information Reviewed

Our review is based on materials provided by the program area, which include:

- Email correspondence with the vendor
- The published OverDrive Privacy Policy and related statements
- Confirmation that the platform’s functionality is consistent with common library systems

Legal Basis - Privacy

OverDrive collects limited personal information necessary to authenticate users and manage digital loans, including:

- Library credentials (student ID and password)
- Email address (optional, for notifications)
- IP address and device information
- Borrowing history and reading/listening activity
- Basic usage and interaction data

This information is considered “personal information” under FIPPA. Collection is authorized under section 26(c) of FIPPA, as it relates directly to and is necessary for the operation of JIBC’s library services. Under section 27(2), individuals must be informed of the purpose and authority for collection. The library already provides general collection notices for library systems; however, a brief notice linked from the library website or platform access page is recommended.

Use and disclosure of personal information for authentication, access to materials, and loan management is permitted under:

- Section 32(a) – use for the purpose for which the information was obtained
- Section 33(2)(d) – disclosure for a consistent purpose
- Section 34 – consistent purpose means a reasonable and direct connection to the original purpose and necessary for operating the library program

OverDrive may access limited personal information for technical support or troubleshooting. This is consistent with the purpose for which the information was collected and is common for licensed digital content platforms.

OverDrive’s infrastructure may involve storage or support access outside of Canada. The personal information involved is not sensitive for the purposes of section 33.1, as it does not include medical, financial, biometric, or similarly high-risk categories. Borrowing history is moderately sensitive but is standard for library platforms. Given the limited risk profile and widespread governmental and institutional use of OverDrive, a supplementary risk assessment is not required.

Legal Basis - Security

Under section 30 of FIPPA, JIBC must ensure reasonable security measures are in place. As of current, the vendor’s privacy policy states the following:

“OverDrive takes information security very seriously. We have implemented measures to protect against the loss, misuse, and alteration of your information. Your information is protected by physical, electronic, and procedural safeguards to prevent unauthorized disclosure. We encrypt the transmission of information using secure sockets layer (SSL) technology. We use computer safeguards such as firewalls and data encryption and physical access controls to our buildings and files. We authorize access to PII only for those employees who require it to fulfill their job responsibilities.”

No system integration with internal JIBC systems is currently contemplated, and no highly sensitive personal information or data is involved.

Conclusions

Based on the information provided, our review has concluded that the OverDrive digital content platform may be used for its intended purpose, provided that:

- A compliant collection notice is implemented in the system



- Access controls are properly configured (i.e., access to OverDrive-related user information is appropriately limited to library staff with a need to know, if at all)
- Any material changes to scope or data sensitivity trigger a renewed PIA review

Responsibilities

The Library is responsible for ensuring users are informed about the collection and use of their personal information. A sample notice is:

“Your personal information is collected under the authority of section 26(c) of the *Freedom of Information and Protection of Privacy Act*. This information is used to authenticate access to digital library resources and manage borrowed materials. If you have any questions, please contact privacy@jibc.ca.”

The Library must notify the General Counsel if there are any significant changes to the platform’s operation or to the nature of personal information processed.

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