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Summary

In summer 2024, Privacy and Records Management, Athletics and Student Engagement (Athletics), and IT Cyber Security collaborated to complete a privacy impact assessment of the Privit Profile student athlete health information app to be licensed under an agreement with Privit Inc. Athletics will use Privit Profile to provide student athletes with a secure platform to enter demographic information, Personal Health Number (PHN), emergency contact information, and primary physician's name (if applicable), and upload intake documents.

The primary information resources used to complete the PIA were vendor documentation and questionnaire responses, and internally identified operational requirements.

The assessment identified low risks related to the collection, use, and disclosure of personal information, and to the transfer to and storage of personal information in a cloud-based third-party data centre (AWS). However, these risks are mitigated because the data centre is located in Canada, and both Privit Inc. and AWS have comprehensive physical and technical security measures in place to protect clients' data both at rest and in transit. S. 15 (1)(l)

S. 15 (1)(l)

PART 1: GENERAL INFORMATION

Initiative title:	Privit Profile (Student Athlete Information)
Organization:	Langara College
Branch or unit:	Athletics and Student Engagement
Initiative Lead contact information:	Sean Shook, Manager, Athletics and Student department 605-323-5308; sshook@langara.ca
Privacy Officer:	Joanne Rajotte, Manager, Privacy and Records Management
Privacy Officer phone:	604-323-5660
Privacy Officer email:	jrajotte@langara.ca

Is this initiative a data-linking program under FOIPPA? If this PIA addresses a data-linking program, you must submit this PIA to the Office of the Information and Privacy Commissioner.

No.

Is this initiative a common or integrated program or activity? Under section FOIPPA 69 (5.4), you must submit this PIA to the Office of the Information and Privacy Commissioner.

No.

Related PIAs, if any:

Not applicable.

Privit Profile

PIA#: PIA2024-0001

Langara College’s Athletics and Student Engagement department (Athletics) has identified the need to improve its existing methods for collecting, managing, and processing data and documents provided by student athletes. Currently, student athletes submit completed forms and other documents or information to Athletics in paper format or by email with attachments. Paper records are scanned and filed along with born-digital records in the department’s file server directory. The department primarily uses email to communicate with groups of student athletes or ask their head coaches to pass information along.

In 2024, Athletics identified Privit Profile, a cloud-based Software as a Service (SaaS) student athlete health information platform, as a possible solution to securely collect, manage, process, and store forms, demographic and emergency contact information, Personal Health Number (PHN), and primary physician’s name (if applicable). Athletics does not intend to use Privit’s health profile handling feature at this time.

Privit Inc. is a US company with offices in Ohio and London, England. Privit Inc. will store Langara’s data, including personal information, S. 15 (1)(l) hosted in the Amazon Web Services (AWS) Canada S. 15 (1)(l) data centres located in S. 15 (1)(l)

Athletics will use the Privit Profile app under an Application Service Provider Agreement between Privit Inc. and Langara College to:

- support intake, tracking, and completion status of all required forms electronically;
- collect required signatures from both athletes and parents;
- communicate with student athletes en masse; and
- improve the workflow of the Athletics department.

1. What is the scope of the PIA?

This PIA covers the collection, use, and disclosure of the personal information of student athletes who enter personal information and upload forms to Privit Profile.

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

Department	Purpose	Data or Information Elements
<ul style="list-style-type: none"> • Athletics and Student Engagement 	<p>Demographic and Other Information: Use personal information to register student athletes into the Athletics program and communicate with student athletes, or with their emergency contact and physician, as necessary.</p>	<p>First Name, Last Name Birthdate Gender Personal Health Number (PHN) Physical address Telephone number Email address Password</p>

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		Emergency Contact's Name, Telephone Number If applicable: Primary Physician's Name
Coaches in Athletics and Student Engagement Department	Emergency Contact: Use limited personal information to contact parents, guardians, and physicians in emergency situations, including when travelling.	Emergency Contact's Name, Telephone Number Personal Health Number (PHN) If applicable: Primary Physician's Name

3.1 Did you list personal information in question 3?

Yes.

PART 2: COLLECTION, USE AND DISCLOSURE

3. Collection, use and disclosure

Personal Information Flow Table			
	Description/Purpose	Type	FOIPPA Authority
1.	Student athletes will create an account in the Privit Profile app to uniquely identify them. Student athletes will also complete forms required by the Athletics department that will be pre-loaded by Privit Inc.	Collection	26(c)
2.	Demographic information and forms uploaded to Privit Profile by student athletes will be disclosed to and used by authorized department employees to register student athletes into the Athletics program.	Use Disclosure	32(a) 33.2(d)
3.	Contact information uploaded to Privit Profile by student athletes will be disclosed to and used by authorized department employees and coaching staff to contact student athletes as a group.	Use Disclosure	32(a) 33.2(d)
4.	Emergency contact information, Personal Health Number (PHN) and primary physician's name as applicable provided by student athletes will be used by coaching staff in emergency situations, including when teams are travelling.	Use Disclosure	32(a) 33.2(d)

Risk Mitigation Table				
	Risk	Mitigation Strategy	Likelihood	Impact
1.	Langara employees and coaching staff (who are contractors) could access personal information, and use it or disclose it for a purpose other than the reason it was collected.	Employees and coaching staff are expected to abide by College policies related to ethical conduct, computer and computing use, and access to information and privacy.	Low	Medium
2.	The service provider's (Privit) employees could access personal information and use or disclose it for purposes other than the	As stated in the service provider's Privacy Policy, <ul style="list-style-type: none"> S. 15 (1)(I) 	Low	Medium

	reason it was collected or disclosed.	<ul style="list-style-type: none"> • S. 15 (1)(I) • S. 15 (1)(I) 		
3.	Personal information could be compromised during transmission between Privit and the Amazon Web Services (AWS) data centre.	S. 15 (1)(I)	Low	Medium
4.	Personal information stored in the Amazon Web Services (AWS) data centres used by the service provider could be compromised.	S. 15 (1)(I)	Low	Medium

4. Collection Notice

Langara College’s Athletics and Student Engagement department collects personal information entered into and stored in the Privit Profile app under the statutory authority of the *Freedom of Information and Protection of Privacy Act*, s. 26(c) for the purpose of registering and contacting student athletes. Personal information is stored in an online system located in Canada. For questions about the collection, use and disclosure of your personal information, contact the Manager, Athletics and Student Engagement at sshook@langara.ca.

PART 3: STORING PERSONAL INFORMATION

5. Is any personal information stored outside of Canada?

No. Personal information in Privit will only be stored and accessed in Canada in the AWS Canada West (Calgary) Region data centre and AWS Canada (Central) Region data centre located in Quebec. The service provider will be able to access and use the personal information only for the purposes specified in its Application Service Provider Agreement with Langara College.

6. Does your initiative involve sensitive personal information?

Yes. Student athletes' unique Personal Health Number (PHN) will be collected and stored in Privit Profile.

7. Is the sensitive personal information being disclosed outside of Canada under FOIPPA section 33(2)(f)?

No.

8. Where are you storing the [sensitive] personal information involved in your initiative?

Information will be stored in Canada (see #5 for details).

PART 4: ASSESSMENT FOR DISCLOSURES OF SENSITIVE PERSONAL INFORMATION OUTSIDE OF CANADA

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

Not applicable.

10. Provide details on the disclosure, including to whom it is disclosed and where the sensitive personal information is stored.

Not applicable

11. Does the contract you rely on include privacy-related terms?

Not applicable.

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

Not applicable.

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

Not applicable.

15. Describe the privacy risks for disclosure outside of Canada.

Not applicable.

PART 5: SECURITY OF PERSONAL INFORMATION

16. Does your initiative involve digital tools, databases or information systems?

Yes, Privit Profile is a cloud-based student athlete personal information app.

16.1 Do you or will you have a security assessment to help you ensure the initiative meets the security requirements of FOIPPA section 30?

Yes. Langara’s IT Cybersecurity department has reviewed the service provider’s full HECVAT submission along with its responses to Langara’s Enterprise Software Checklist.

16.2 Security and Privacy Certifications

AWS has following certifications:

- **SOC 2 (Type II)** – a widely recognized auditing standard issued by the American Institute of Certified Public Accountants (AICPA).
- **ISO 27001** – a standard for information security management.
- **SSAE 18** – the Statements on Standards for Attestation Engagements (SSAE) which provides a set of standards and guidance for attestation reporting on organizational controls and processes at service organizations. It is used in SOC 1 reports (along with SOC 2 and SOC 3 reports).

Privit conforms with industry standard security frameworks such as:

- **COBIT 5** – the overarching business and management framework for governance and management of enterprise IT.
- **NIST SP800-53 Rev. 4** – an optional tool for information security and privacy programs to identify the degree of collaboration needed between security and privacy programs.
- **ISO/IEC 27001: 2013** – an international standard to manage information security.

17. What technical and physical security do you have in place to protect personal information?

17.1 Technical security measures related to this initiative consist of:

Safeguard	At Langara College	At Third Party
S. 15 (1)(I)		



17.2 Physical security measures related to this initiative consist of:

Safeguard	At Langara College	At Third Party

17.3 Administrative security measures related to this initiative consist of:

Safeguard	At Langara College	At Third Party

17.1 Technical security measures related to this initiative consist of:

According to information in Privit's Privacy Policy, technical security controls include:

- S. 15 (1)(I)
-
-
-
-
-
-

According to information provided by AWS to BCNET for its AWS Privacy Impact Assessment:

- S. 15 (1)(I)
- S. 15 (1)(I)

17.2 Physical security measures related to this initiative consist of:

According to Privit's Information Access and Data Security Policy, physical security controls at the service provider's premises include:

- S. 15 (1)(I)

According to information provided by AWS to BCNET for its AWS Privacy Impact Assessment:



18. Controlling and tracking access

Strategy	
We only allow employees in certain roles to have access to information	Yes. Only authorized employees and coaching staff in the Athletics and Student Engagement department will be authorized to access demographic information.
Employees that need standing or recurring access to personal information must be approved by executive lead	No. See above.
We use audit logs to see who accesses a file and when	S. 15 (1)(I)

PART 6: ACCURACY, CORRECTION AND RETENTION

19. How will you make sure that the personal information is accurate and complete?

Student athletes provide personal information when they enter information and complete forms in the Privit Profile app. If necessary, employees will verify that the information is accurate and complete by confirming it with the individual.

20. Requests for correction

FOIPPA gives an individual the right to request correction of errors or omissions to their personal information. You must have a process in place to respond to these requests.

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

Student athletes log on to Privit Profile to update their own demographic information.

20.2 Sometimes it's not possible to correct the personal information. FOIPPA requires that you make a note on the record about the request for correction if you're not able to correct the record itself. Will you document the request to correct or annotate the record?

Not applicable.

20.3 If you receive a request for correction from an individual and you know you disclosed their personal information in the last year, FOIPPA requires you to notify the other public body or third party of the request for correction. Will you ensure that you conduct these notifications when necessary?

Yes, Langara will notify other public bodies or third parties that disclosed personal information was corrected.

21. Does your initiative use personal information to make decisions that directly affect an individual?

Yes, Athletics and Student Engagement use information provided by student athletes to confirm that they have fulfilled certain requirements to maintain their eligibility to play.

22. Do you have an information schedule in place related to personal information used to make a decision?

Yes, according to the College's Recorded Information Management Policy B5010, departments must establish and adhere to retention and disposal schedules that ensure that they retain records used to make a decision about an individual for at least one year. Departments' retention schedules must also meet operational and legislative requirements, which typically

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results in their retaining such records longer than one year. At this time, Langara has not established a retention period for these records, but it is likely that they will be retained indefinitely.

PART 7: AGREEMENTS AND INFORMATION BANKS

23. Does your initiative involve an information sharing agreement?

No.

24. Will your initiative result in a personal information bank?

Yes. FIPPA-required personal information bank descriptors consist of:

Name: Privit Profile app

Data elements: Use of Privit Profile includes all data and personal information as outlined in section 3 (above)

Authority: FIPPA section 26(c)

Purpose: Collected, used, and disclosed to support the intake, tracking, and completion status of all required forms and activities maintained electronically in the Privit Profile app.

Users: Used by employees and coaches in the Athletics and Student Engagement department.

PART 8: ADDITIONAL RISKS

25. Risk response

Describe any additional risks that arise from collecting, using, storing, accessing or disclosing personal information in your initiative that have not been addressed by the questions on the template.

Not applicable.

PART 9: SIGNATURES

Privacy Office Comments

This PIA is based on a review of the material provided to the Manager, Privacy and Records Management by Athletics and Student Engagement or obtained from Privit Inc. and AWS as of the date below. If in future any substantive changes are made to the scope of this PIA, Athletics and Student Engagement will contact the Manager, Privacy and Records Management who will complete a PIA Update.

S. 22 (1)

Joanne Rajotte, Manager
Privacy and Records Management

August 30, 2024

Date

Program Area Signatures:

Role	Signature	Date signed
Initiative Lead & Department Manager: Sean Shook, Manager, Athletics and Student Engagement	S. 22 (1) S Shook (Aug 30, 2024 12:29 PDT)	Aug 30/24
Contact Responsible for Systems Maintenance and/or Security: Charles Boname, Associate Director, Cyber Security	S. 22 (1)	SEPT. 3, 2024
Head of public body, or designate: Debbie Schachter, Associate Vice-President, Students	S. 22 (1)	September 3, 2024