Privacy Impact Assessment (PIA) for Offstreet (via Impark)

Before you start

- This Privacy Impact Assessment (PIA) form is used by VCC to assess whether a new initiative, or proposed significant change to an existing initiative, meets the privacy protection requirements of the B.C. *Freedom of Information and Protection of Privacy Act.* FIPPA's protection of privacy requirements. A PIA is a legislative requirement (FIPPA s. 69(5.3)) and mandatory before implementing an initiative.
- You/Your refers to the individual responsible for drafting this PIA, who should be an individual from the relevant department or program area with sufficient knowledge to do so. The PIA must be signed by the role within the program area with the appropriate position to hold accountability for this initiative.
- Please include references to other documents when applicable, but do not insert or embed any documents to/in this assessment form.
- Please review the initial assessment questions and contact the Privacy Office at privacyandfoi@vcc.ca before you begin the form, if you have not already. See more guidance about the PIA process, including the supplementary Guidance Document, on the myVCC Privacy website.

PART 1: GENERAL INFORMATION

PIA file number: 2025-013

Initiative title:	Offstreet Technology (via Impark)
VCC Department / Program Area:	Safety, Security, Risk & Privacy
Link to VCC initiative website:	https://www.offstreet.io/ https://dashboard-login.offstreet.io
Link to vendor website:	https://joinoffstreet.com/
Link to vendor privacy policy:	https://www.joinoffstreet.com/privacy-policy
Your name and title:	Mary Corbett, Privacy Coordinator
Your work phone and email:	Marcorbett@vcc.ca
Initiative Lead name and title:	Gurp Sandhu, Manager, Safety & Security
Initiative Lead phone and email:	604-443-8753 / gsandhu@vcc.ca

General information about the PIA:

Is this initiative a data-linking program under FIPPA? See the definition in **Schedule 1 of FIPPA**. If this PIA addresses a data-linking program, the Privacy Officer must submit this PIA to the **Office of the Information and Privacy Commissioner**.	No
Is this initiative a common or integrated program or activity? See the definition of **Schedule 1 of FIPPA**. Under section **FIPPA 69 (5.4)**, the Privacy Officer must submit this PIA to the Office of the Information and Privacy Commissioner.	No
Does this initiative involve a regular or systematic exchange of personal information between organizations? If yes, this initiative may require an **Information Sharing Agreement**.	No
Related PIAs, if any: N/A	

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. If this is a change to an existing initiative, please also explain the change and the benefits of the change.

Offstreet is an online parking validation software provider. Offstreet offers parkers a simple online portal where users can easily register their parking spot and receive confirmation of parking, and a dashboard where administrators can manage and monitor the availability of parking, active vehicles, and create and assign parking permits, guest, and event parking. Offstreet is a Canadian company based in Regina, Saskatchewan.

VCC's vendor for parking management, Impark, is providing Offstreet to VCC to assist in VCC's parking management services through the Safety, Security, Risk & Privacy department and in turn, this will assist Impark with managing available parking stalls and to assist with ticketing. Impark has a partnership with Offstreet and will provide VCC access to Offstreet through this partnership. VCC's Offstreet cost will be deducted from any parking revenue that Impark issues to VCC.

VCC's instance of Offstreet is separate from any other instance and administered by VCC Safety & Security staff (Parking Admin). Impark is not permitted to access VCC's instance of Offstreet. VCC intends to use Offstreet to manage parking permits for parking pool members (employees) and one-time guest parking, in order to digitalize the parking management and streamline it, through ensuring that are enrolled and using the parking system appropriately and eliminating the need for users to have and display static stickers. Any user who does not need to pay while in a VCC parking lot (guests and parking pool members) will have a profile in Offstreet and their parking credentials will be managed through the platform. Offstreet will:

- Eliminate current pink/green static stickers: Parking Admin will manage the online Offstreet dashboard and all parking pool member information, based on employees' enrollment in the parking pool membership.
- Eliminate paper parking passes for VCC guests: Parking Admin can create temporary guest registration with name, licence plate, and the duration of a guest's visit in Offstreet.

VCC will not use Offstreet to manage one-time parking payments, including parking for events; those payments will still happen through existing Impark systems and parkers will not register with Offstreet in those instances.

Parking Admin will be able to view and use all features of the administrator dashboard in Offstreet (via https://dashboard.offstreet.io/dashboard), including viewing active vehicles, setting up and reviewing locations/lots, reviewing reports, and creating and assigning parking permits through Offstreet. Offstreet can create different Registration settings that include duration, dates, and whether they can be accessed through the user-facing portal, as well as types of permits.

Offstreet integrates with and communicates via API with Impark's parking enforcement system (Pay-By-X). Offstreet discloses active permit data (licence plate numbers and the time that plate is permitted to park) to Impark's system's Valid Parker List (VPL). Impark (Vendor) uses handheld enforcement devices that access the VPL data during parking enforcement. Any ticketing will happen through existing Impark systems and will not involve Offstreet. Permit data will be automatically removed from VPL when the permit data in Offstreet is no longer active. (See: Pay-By-X (REEF) Integration Guide)

Adopting Offstreet offers the following benefits to VCC & its Parking Vendor:

- Digitalizing the parking payment/parking pool moving forward.
- Switching the existing paper-based platform to a digital platform.
- Removing distribution and current use of paper parking permits/passes, pink static stickers and green static stickers.

- Benefits the parking manager and solidifies the procedures in assisting members and guests with parking.
- Increase Revenue. Currently, there are many employees who display parking stickers on their vehicles, as well as old parking passes, and don't pay for parking. This system will clean up the database and have a solid hold of who can and cannot park in the parking lot(s)
- Will assist and simplify guest parking

2. What is the scope of the PIA?

Your initiative might be part of a larger initiative or might be rolled out in phases. What part of the initiative is covered by this PIA? (An initiative may require multiple PIAs.) What is out of scope of this PIA?

This PIA covers the collection, use, and disclosure of personal information by Offstreet parking management system, as used by VCC and its parking vendor, Impark. VCC intends to implement this new system for its current parking lots and to expand it to the new parking lots following the completion of VCC's Broadway Campus expansion.

VCC will not be using the Payment features available in Offstreet as Impark will still manage ticketing payment and parking revenue, and VCC People Services collects payment for employees who are parking pool members via a monthly payroll deduction. Payment is not within the scope of this PIA. VCC will also not use the Events features at this time; parkers who are attending events are one-time payers who will register and pay directly through the Impark system.

Google Maps API is outside the scope of this PIA. Google Maps API can be integrated with Offstreet to identify parking locations and provide directions for users. Users may voluntarily use Google Maps' location services with their phone's location services and personal information for directions, and are bound by Google's Terms of Service if they choose to do so ([Terms of Use](#)). VCC is not currently using the Offstreet Events features and likely users will not access the Maps features because of this.

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

*Please list **all** the elements of information or data that you might **collect, use, disclose, store, or access** as part of your initiative (**including but not limited to personal information**). Please:*

- *include where the information is coming from (e.g. collected directly from users, pulled from existing databases, etc.);*
- *group different categories of people together (e.g. students, employees, alumni, etc.) if your initiative involves large quantities of information or datasets.*

People	Data/information elements	Collection
Employees (Employee parking pool)	**Required by Offstreet:** Permit tenant (Location of permit) Licence plate(s) number and State/Province (additional licence plates if permitted) Start date and time **Additional information:** Name Email (VCC) Phone number (optional)	Provided by VCC Parking Admin after collection via employee parking pool member registration.

	Start date and time Expiry date and time (optional) Schedule (valid days of week) (optional) Status of permit (upcoming, active, expired) Notes Permit number (Optional – may be invalid when static stickers are discontinued)	
Guests (one-time, temporary parking for members of public visiting VCC on business)	**Required by Offstreet:** Licence plate number Licence plate state/province Start date and time **Additional information:** Name Email; phone (optional) Make and colour of code Registration code (optional; may be implemented)	Provided by VCC Parking Admin after collection upon request for temporary guest parking permit.
Parking Admin	Name, email, password (account creation)	Collected directly from user or registered by another Admin member.

Other data elements:

- Cookies: Privacy Policy states that Offstreet employs cookies for tracking visits and preferences but these should not directly identify users. VCC is not currently using Offstreet's user-facing portal.

- Google Maps API(s): Offstreet offers administrators the option to use Google Maps integration in Offstreet to set a location for parking lots and to assist users in getting directions from their location to the lot. Users may choose whether to use location services on their phone and to permit this function to access their location information, and if so, are agreeing to Google's Terms of Use. VCC is not using Offstreet's user-facing options at this time and parkers will likely not access this feature.

3.1   Did you list personal information in question 3?

Personal information is any recorded information about an identifiable individual, other than business contact information. Personal information includes information that can be used to identify an individual through association or reference. This includes, but is not limited to:

- *Names, home addresses, emails, and telephone numbers of the individual or their guardians and family members (this includes student names and emails!);*
- *Images of an individual;*
- *Identifying number (e.g. student number, employee number, health care number);*
- *An individual's personal views or opinions, or anyone else's opinions about an individual;*
- *Educational, medical, medical, criminal, financial, or employment history.*

Yes

- If yes, are all of the personal information elements **necessary** for your initiative?
  - Yes with some information optional (e.g. contact information)

4. If you answered "no" to question 3.1: How will VCC reduce the risk of unintentionally collecting personal information?

Some initiatives that do not require personal information are at risk of collecting personal information inadvertently, which could result in a privacy breach or other privacy incident. <u>After you answer this question, submit this PIA to the Privacy Office. You do not need to complete the rest of the PIA template.</u>

N/A

PART 2: COLLECTION, USE, AND DISCLOSURE

This section will help you identify the legal authority for collecting, using, and disclosing personal information, and confirm that all personal information elements are necessary for the purpose of the initiative.

5. Collection, use, and disclosure flow

Describe the information flow of your initiative in the chart below. The table explains the movement of personal information throughout your initiative (column 1) and identifies each time personal information is collected, used, or disclosed (column 2) and under which corresponding FIPPA authority (column 3).

- *__Collection:__ Describe the steps in collecting personal information from individuals by VCC and/or the vendor (clarify which party is collecting the information).*

- *__Use:__ How does VCC and/or the vendor use personal information (clarify which party is using the information)?*

- *__Disclosure__: When, if ever, would VCC and/or the vendor provide the personal information to an internal or external third party that does not normally have access to the personal information?*

Use column 4 if there are any specific potential risks related to each step. <u>Change the information flow and add more rows as necessary</u>. The red text below is an example – input the steps and relevant authorities to reflect your initiative's flow.

Use this column to describe the way personal information moves through your initiative step by step as if you were explaining it to someone who does not know about your initiative.	Collection, use or disclosure	FIPPA authority or other legal authority	Specify any potential risks
Parking Admin collects required parking employee pool member information (Employees) directly from employees or one-time guests (Guests).	Collection	26(c)	
Parking Admin creates permits for Employees and temporary one-time parking permits for Guests in Offstreet with required information, using information collected through pool or request for guest parking.	Use	32(a)	
Parking Admin can view active vehicles, add vehicles to a Deny List, and otherwise manage VCC parking locations and individuals. Parking Admin can look up Employees and Guests by licence plate number, additional number (name), permit number, registration code, etc. and modify permits/registration as needed.	Use	32(a)	
Offstreet discloses parking data (licence plate and time that plate is permitted to park) via API to Impark's Valid Parker List (VPL) in their system (Pay-By-X) for parking enforcement. Impark accesses VPL used by handheld enforcement devices to confirm validity of a vehicle's parking during parking enforcement. Data is automatically removed from VPL system when parking time expires.	Disclosure Use	33(2)(d) 32(a)	
Parking Admin manages records and removes personal information from the Offstreet system after a minimum of 1 year and when retention/disposal applies (no automatic deletion of records/PI in Offstreet).	Disposal	31	

6. Collection Notice and Consent

6. 1 Collection Notice

If you are collecting personal information <u>directly </u>from an individual the information is about, <u>FIPPA s. 27(2)</u> requires that you provide a collection notice (except in limited circumstances). <u>If your vendor is collecting personal information on behalf of VCC, the vendor must also provide a collection notice</u>. FIPPA requires that you notify the individual of:

- *the legal authority,*
- *purpose(s) and use of their personal information (including any third party disclosures), and*

- *contact information or someone who can answer questions about the collection and use.*

N/A - VCC's use of Offstreet does not collect any personal information directly from the individual; this collection happens through existing Parking registration procedures outside of the system that are not included in the scope of this PIA. Parking Admin should provide the collection notice to individuals at the point of collection.

6. 2 Consent

If you are obtaining consent for the use or disclosure of personal information (indicated by the FIPPA authorities you used in Question 5), add any consent language here.

N/A

PART 3: STORING PERSONAL INFORMATION

If you're storing personal information outside of Canada, identify the sensitivity of the personal

information and where and how it will be stored.

7.   Is any personal information stored outside of Canada?

Yes but limited.

Personal information is primarily but not exclusively stored in Canada. Offstreet uses cloud-based servers s. 15(1)(l)   . These servers are located in Canada. s. 15(1)(l)

Web applications are hosted in s. 15(1)(l)   . Other applications and services with proxies across various s. 15(1)(l)

Offstreet uses Google Maps API(s) for locations of parking lots, and allows parkers to optionally use the function with their location to find directions to parking locations. This use is voluntary and under Google's Terms of Service.

8.   If you answered yes to Question 7: Where are you storing the personal information involved in your initiative?

Be specific about the location where the personal information is stored (e.g. which state(s) or country/countries).

s. 15(1)(l)   or other data centres in US (other applications and services with proxies; see Question 7).

9.   Does your initiative involve <u>sensitive personal information</u> that will be stored outside of Canada?

Sensitive personal information is not defined in FIPPA. Personal information may be considered sensitive depending on the type of information and the context in which it is collected, used, disclosed, or stored. Common sensitive personal information could include: personal health or medical information; financial

information; criminal records; disciplinary or complaint history; unique government issued identifiers (passport number, driver's license, personal health number, SIN); racial or ethnic origins; sexual orientation; religious or philosophical beliefs; etc. Please see the above link for more guidance or consult with VCC's Privacy Office.

No: Licence plate information is stored in Canada. VCC does not use Offstreet for payment.

- If no, skip ahead to Part 5

10. **If you answered "yes" to Question 9: Is the sensitive personal information being stored outside of Canada only because it is being made available to the public under an enactment that authorizes or requires the information to be made public (FIPPA section 33(2)(f))?**

N/A

PART 4: ASSESSMENT FOR DISCLOSURES OUTSIDE OF CANADA

16. **Describe the privacy risks for disclosure outside of Canada.**

Use the table to indicate the privacy risks, potential impacts, likelihood of occurrence, and level of privacy risk. For each privacy risk you identify describe a privacy risk response that is proportionate to the level of risk posed.

This may include reference to the measures to protect the sensitive personal information (contractual, technical, security, administrative and/or policy measures) you outlined. Add new rows if necessary. See Section 3 of the Guidance Document for examples of privacy risks and risk responses and more guidance for how to complete this table, or see the Guidance on Disclosures Outside of Canada.

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

PART 5: SECURITY OF PERSONAL INFORMATION

In Part 5, you will share information about the privacy aspect of securing personal information. People, organizations or governments outside of your initiative should not be able to access the personal information you collect, use, store or disclose. You and/or your vendor need to make sure that the personal information is safely secured in both physical and technical environments.

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

    Yes.

    - If yes: Are these digital tools, databases, or information systems new to VCC?
        - Yes

    17.1 If you answered "yes" to Question 17: Do you or will you have a security assessment to ensure the initiative meets the security requirements of FIPPA s. 30?

    Consult with VCC IT Services to complete a security assessment that will ensure that the initiative has reasonable security arrangements against such risks as unauthorized collection, use, disclosure, or disposal of personal information.

    No: Impark is providing VCC with the instance of Offstreet. VCC does not have a contract directly with Offstreet and will not be administering/managing the system.

    - If no, continue to question 18.

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

Describe <u>*where the records, whether digital or physical, for your initiative are stored*</u> *(e.g., on your organization's LAN, on your computer desktop, in a filing cabinet, etc.) and the technical and/or physical security measures in place to protect those records. (Please consult the policies for any software/cloud services/etc. but please do not just copy and paste).*

- <u>*Technical security*</u> *measures include secure passwords, encryption, firewalls, etc.*
- <u>*Physical security*</u> *measures include restricted access to filing cabinets or server locations, locked doors, security guards, etc.*

s. 15(1)(l)

s. 15(1)(l)

- **Compliance Frameworks**:
  - SOC 2 Type 2 and PCI-DSS SAQ A attestations demonstrate compliance with industry-standard security and privacy frameworks.
- **Data Hosting**:
  - Data is stored in s. 15(1)(l) cloud infrastructure located in Canada, s. 15(1)(l) . Web applications are hosted in s. 15(1)(l)

s. 15(1)(l)

s. 15(1)(l)

19. Controlling and tracking access

Please respond to each strategy that describes how you or your vendor limit or restrict who can access personal information and how you keep track of who has accessed personal information in the past. To effectively protect privacy, access to personal information should be limited to authorized employees who need the information to do their jobs. Insert your own strategies if needed.

Strategy	
We only allow employees in certain roles access to information:	Yes (Vendor and VCC). Administrative access to Offstreet is limited to Coordinator & Manager of Safety & Security and ED SSRP (Parking Admin).
Employees that need standing or recurring access to personal information must be approved by their managerial lead:	Vendor: Yes VCC: Yes (SSRP). Parking Vendors only access information communicated via API to Impark system.
We use audit logs to see who accesses a file and when:	Yes. s. 15(1)(l)
Describe any additional controls:	s. 15(1)(l)

PART 6: ACCURACY, CORRECTION AND RETENTION

In Part 6, you will demonstrate that you will make a reasonable effort to ensure the personal information that you have on file is accurate and complete.

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

FIPPA s. 28 states that a public body must make every reasonable effort to ensure that an individual's personal information is accurate and complete. For example: verifying information with the person it is about prior to recording it.

VCC Parking Admin will collect personal information directly from Employees in the parking pool, or directly from Guests (or receive information from the employees responsible for coordinating Guests, who collected it directly from Guests). Parking Admin will verify any personal information provided to the Offstreet system.

21. Requests for correction

FIPPA s. 29 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.

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

Yes: Parkers can contact Parking Admin, and Parking Admin is able to edit any registration or permit within the Offstreet system. Parkers can also request access to, correction of, or deletion of their personal data directly from Offstreet.

21.2 Sometimes it's not possible to correct the personal information. FIPPA s. 29 requires that you make a note on the record about the request for correction if you are not able to correct the record itself. Will you document the request to correct or annotate the record?

Yes.

21.3 If you receive a request for correction from an individual and you know you disclosed their personal information in the last year, FIPPA s. 29 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 but likely not necessary. Any personal information disclosed from the system to Impark's system is automatically via API and any correction or update within Offstreet should also update automatically. Parking Admin can communicate with Impark (Parking Vendor) in any other scenario.

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

Yes: VCC Parking Admin will only use Offstreet to manage employee parking permits and guest parking, but this information is linked to Impark's system and will affect ticketing decisions made by Impark's parking enforcement.

23. If you answered "yes" to Question 22: Do you have a records retention schedule in place related to personal information used to make a decision?

FIPPA s. 31 requires that public bodies keep personal information for a minimum of one year after it is used to make a decision. Please consult the VCC Records Retention Schedule to assist you in answering this question.

The disclosure of some personal information to the Impark system (VPL) will potentially be used in decision making. PI in Offstreet will be retained for a minimum of one year after they are no longer in use and will be managed by Parking Admin. VCC Parking Records are under the classification and retention of FA-700 (Parking Administration).

The Offstreet system retains any personal information collected from parking Employees or Guests, or Parking Admin indefinitely, but it can be deleted on request from VCC or by Parking Admin within the Offstreet system.

PART 7: PERSONAL INFORMATION BANKS

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

A personal information bank is a collection of personal information that is organized and retrievable by the name of the individual or an identifying number, symbol or other identifier.

Yes (see PIB for Parking Administration records)

PART 8: ADDITIONAL RISKS

Part 8 asks that you reflect on the risks to personal information in your initiative and list any

risks that have not already been addressed by the questions in the template.

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. Add new rows if necessary.

Possible risk	Response / mitigation strategies
Indefinite retention of personal information about parkers (Employees and Guetss) and Parking Admin in the Offstreet system.	• Parking Admin should remove any Admin accounts when they are no longer needed. • VCC Parking Records are under the classification and retention of FA-700 (Parking Administration). • Parking Admin must adapt this retention/disposal for use with a database/online system. • Personal information used for employee parking pool and guest parking permits must be retained for minimum of one year once no longer in use, and no longer than necessary.

Possible risk	Response / mitigation strategies
	• Parking Admin will be responsible for managing information in Offstreet with assistance from Offstreet as needed.
Offstreet experiences a data/privacy breach (Offstreet not managed by VCC IT Services)	**s. 15(1)(l)** • VCC initiates Privacy Breach procedures when notified and works with Impark and Offstreet to respond to breach (including notification of Privacy Office, if Parking Admin is notified)
VCC Parking Admin experiences a privacy breach while using Offstreet platform	• Parking Admin initiates VCC Privacy Breach procedures • Parking Admin notifies Impark and Offstreet if breach requires support from systems or parking enforcement.
VCC Parking Admin decides to use Events features or other features offered by Offstreet that collect, use, or disclose personal information that were not considered in the scope of this PIA.	• Parking Admin will need to update/revise PIA and have it reviewed by Privacy Officer. • Collection notice may need to be given on Offstreet, depending on how platform is used (e.g. parkers are registering vehicles directly with platform for Events, etc.).

PART 9: SIGNATURES

You have completed a PIA. Submit the PIA to the Privacy Office for review and comment, and then have the PIA signed by those responsible for the initiative.

Privacy Office Comments

This PIA is recommended for approval with the condition that VCC Parking Admin follows the mitigation strategies identified in the Risks table above. s. 13(1)

Parking Admin must also ensure that any privacy breaches are reported and managed according to VCC procedures. Offstreet is not managed by VCC IT Services. Impark, as the Parking Vendor, is subject to FIPPA and VCC's Privacy Protection Schedule and Offstreet must be managed under these contractual obligations as well, since the instance is offered through VCC's contract with Impark.

Privacy Office Signatures

This PIA is based on a review of the material provided to the Privacy Office as of the date below.

Role	Name	Electronic signature	Date signed
Privacy Officer	Caralee Maloney	Caralee Maloney — Digitally signed by Caralee Maloney Date: 2025.12.04 08:01:23 -08'00'	December 4, 2025

Program Area Signatures

The PIA must be signed by a role that is able to hold accountability for a PIA, proportionate to the sensitivity of personal information and/or the risks of the initiative. This signature confirms that this PIA accurately documents data elements and information flow at the time of signing. If there are any changes to the overall initiative, including the way personal information is collected, used, stored, or disclosed, the program area will contact Privacy and, if necessary, complete a PIA update.

Program Area Comments:

Role	Name/Position	Electronic signature	Date signed
Role designated accountable for the initiative	Gurp Sandhu	Gurp Sandhu — Digitally signed by Gurp Sandhu Date: 2025.12.10 09:43:21 -08'00'	