



# Privacy Impact Assessment (PIA) for ValiMail

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## PART 1: GENERAL INFORMATION

PIA file number: #2024-016

|                                  |   |
|----------------------------------|---|
| Initiative title:                | Valimail - DMARC Enforcement  |
| VCC Department / Program Area:   | IT Services   |
| Link to VCC initiative website:  | n/a   |
| Link to vendor website:          | <a href="https://www.valimail.com">https://www.valimail.com</a>                               |
| Link to vendor privacy policy:   | <a href="https://www.valimail.com/legal/privacy/">https://www.valimail.com/legal/privacy/</a> |
| Your name and title:             | Jack Siu, Associate Director Network Services   |
| Your work phone and email:       | 604-871-7654 jsiu@vcc.ca  |
| Initiative Lead name and title:  | Jack Siu, Associate Director Network Services   |
| Initiative Lead phone and email: | 604-871-7654 jsiu@vcc.ca  |

### General information about the PIA:

|   |    |
|---|----|
| Is this initiative a data-linking program under FIPPA? See the definition in <a href="#">Schedule 1 of FIPPA</a> . If this PIA addresses a data-linking program, the Privacy Officer must submit this PIA to the <a href="#">Office of the Information and Privacy Commissioner</a> . | No |
| Is this initiative a common or integrated program or activity? See the definition of <a href="#">Schedule 1 of FIPPA</a> . Under section <a href="#">FIPPA 69 (5.4)</a> , 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 <a href="#">Information Sharing Agreement</a> . | No |
| Related PIAs, if any:   |    |

### 1. What is the initiative?

IT is enhancing email security by enforcing DMARC (Domain-based Message Authentication, Reporting and Conformance) to validate emails and prevent spoofing attacks. Valimail is a tool to help manage and report on this. Valimail is an email validation system s. 15(1)(l)

. If the email fails the checks, it will report and block. By doing so, it will prevent external entities to spoof VCC and reduce phishing attempts at VCC.

Valimail has no access to email itself or other personal identifiable information. Valimail may have access to IP addresses, which are provided in the form of DMARC aggregate reports. These IP addresses are not from individual senders but from the sending service, and is only accessed to assist in identifying the service provider utilized for sending the e-mail messages.

### 2. What is the scope of the PIA?

This change is part of a larger IT security project that we are implementing in phases but this particular piece does not touch any personal or confidential information. The only personally identifiable information is the email address and name of staff used for accounts to access the system.

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

Valimail collects data required for administering its email authentication services, including the originating or delivering domain; the originating IP address; and/or the service provider used to send an email message; and organizational domain and subdomain names.

Valimail also collects basic user information (email address and name). Email addresses and names will be of VCC staff administering in this product only. Other VCC institutional information for billing may also be collected.

DMARC reports generated through Valimail do not include the “to” of email addresses or any left of the “@” in a from address and does not collect the content of emails. s. 15(1)(l)

### 3.1 Did you list personal information in question 3?

No: user information is VCC business contact information, and other data collected cannot identify an individual.

- If no, answer question 4.
- If yes, are all of the personal information elements **necessary** for your initiative?
  - N/A

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

- VCC will ensure that only VCC contact information is used to set up administrator access and no personal information is provided to the service.
- VCC will not use any social media through Valimail’s site or provide any personal information in relation to any research or survey solicitations received from Valimail.
- IT Services will review the service once implemented and revise this PIA if there is any indication that the service is collecting personal information.

## PART 9: SIGNATURES

### Privacy Office Comments

### 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 | Surinder Aulakh |  | 2024/11/05  |

**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              | Jack Siu<br>Associate Director,<br>Network Services |  | 11/29/2024  |
| Contact Responsible for Systems Maintenance and/or Security | Norman Chang<br>Director IT                         |  | 11/22/2024  |