



Royal Roads University Privacy Impact Assessment

Climate Action - Kumu

PIA#2025-1

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PART 1: GENERAL INFORMATION

PIA Drafter	Maria Bremner
Business unit:	Climate Action & Sustainability
Your name and title:	Maria Bremner, Manager
Your work phone:	250.391.2600 ext. 4118
Your email:	Maria.bremner@royalroads.ca
Initiative	Climate Network Map
Initiative Lead name and title:	Maria Bremner
Initiative Lead phone:	250-391-2600 x4118
Initiative Lead email:	Maria.bremner@royalroads.ca



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GENERAL INFORMATION ABOUT THE PIA:

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.
This initiative is a data-linking program under FOIPPA 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.
This initiative is a common or integrated program or activity No
Related PIAs, if any: None

1. What is the initiative?

The RRU Climate Network Map is an interactive, visual map and database will profile a broad range of climate expertise, projects and activities being undertaken by RRU faculty and staff. The purpose of the map is to profile RRU climate action expertise and work and to support greater connectedness, collaboration and capacity-building with interested partners, prospective students, community members and others.

The map is being led by the RRU Climate Action & Sustainability Team, with collaboration and development support from the Cascade Institute.

To create the map, RRU faculty and staff will be invited by email to add their profile to the map or include any research or projects that are focused on or intersect closely with climate. Two web-based forms will be available for adding information and those who are interested can choose which to fill out (Form 1 includes information about the person, and Form 2 includes information about the initiative). Forms will be voluntarily submitted and the data/info for the map will be collected in Airtable. The project team will review and then add information to the mapping program called Kumu.



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The map will appear on the Royal Roads website (a child page of the Climate Action and Sustainability section). This initiative has no end date. The first phase of mapping will occur in 2025 with the help of members from Cascade. After the map is live, any updates, additions and ongoing map maintenance will be carried out by the Climate Action and Sustainability team.

2. What is the scope of the PIA?

This PIA will focus on the use of the KUMU software and AirTable process to collect project lead and initiative information.

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

Note: Email addresses are for internal use and will not be publicly displayed. Only the following underlined information is required. The rest is optional.

Form 1: Name (first and last) position, email, country, city, province, research area, general work focus or background, photo, and website/social media links.

Form 2: Initiative name/description, website, lead institution, initiative status, project area, start/end dates, principal lead, names of others involved, partner institution, funder, and outputs.

3.1 Did you list personal information in question 3?

Yes

4. How will you reduce the risk of unintentionally collecting personal information?

We use a data input form that only allows for specific information to be collected.



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PART 2: COLLECTION, USE AND DISCLOSURE

5. Collection, use and disclosure

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	FOIPPA authority	Other legal authority
Step 1: Prospective researcher/employee completes the information in one or both of two forms created in Airtable.	Collection	s.26(c)	
Step 2: Airtable organizes the information according to Kumu's format.	Use	s.32(a)	
Step 3: The dataset will be exported to an Excel file and stored in a private SharePoint folder (only the RRU Climate Action & Sustainability team will have access).	Use	s.32(a)	
Step 4: Once the selected information from the Excel file—intended for display in Kumu—has been approved, it will be manually imported into Kumu.	Disclosure	s.33(2)(c)	

6. Collection Notice

The following collection notice and consent statement have been placed on the Airtables input form:

Collection Notice

Your personal information is collected under the authority of the BC University Act and is subject to the BC Freedom of Information and Protection of Privacy Act. Your personal information will be used to populate RRU's Climate Action Map and will not be disclosed to any other external third parties unless we are directed to do so by you. For more information regarding the collection and use of your personal



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information please contact Royal Road's University's Privacy Officer via regular email at privacyofficer@royalroads.ca

Consent:

I consent to the personal information provided above being used to populate the RRU Climate Action Map.

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?

No.

8. Does your initiative involve sensitive personal information?

No.

9. Where are you storing the personal information involved in your initiative?

The information collected is stored in a secured folder on a SharePoint site managed by the Climate Action & Sustainability Team. The secured folder can only be accessed by members of the Climate Action and Sustainability Team.

The SharePoint site is located in the Royal Roads University tenant in the Microsoft Canadian data centre.

PART 4: SECURITY OF PERSONAL INFORMATION

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

Yes



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

Yes.

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

The data collected through the Airtables form is saved in an Excel spreadsheet located in a secured folder on a dedicated SharePoint site. Data being posted to the Excel spreadsheet is encrypted in transit. Access to the shared folder is limited to members of the Climate Action & Sustainability team. The shared folder is secured by folder permissions, and user accounts that require strong passphrases and multi-factor authentication.

17. Controlling and tracking access

Please check each strategy that describes how you limit or restrict who can access personal information and how you keep track of who has accessed personal information in the past.

Insert your own strategies if needed.

Strategy	
We only allow employees in certain roles access to information.	<input checked="" type="checkbox"/>
Describe any additional controls:	Training in process for staff who do have access to files with personal information.



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PART 5: ACCURACY, CORRECTION AND RETENTION

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

The forms will be filled out by the individuals themselves. Upon receipt of the information, our office will do a review to ensure that mandatory fields are completed and accurate. If there is any error, we will reach out to the individuals who completed the form to correct it.

19. 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.

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

Yes.

19.2 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. Due to the nature of how the data is stored it will always be correctable.

19.3 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?

Not applicable. Data collected in this initiative will not be disclosed to other agencies.



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

No

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

Not applicable. The information collected is not being used to make a decision about an individual.

Royal Roads has a detailed records and retention schedule that may be viewed [HERE](#). A review of the appropriate section in this schedule confirms that personal information used to make a decision directly affecting an individual (is / is not) retained for a minimum of one year.

PART 6: AGREEMENTS AND INFORMATION BANKS

Please provide information about whether your initiative will involve an information sharing agreement, research agreement or personal information bank.

22. Does your initiative involve an information sharing agreement?

No

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

No



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PART 7: ADDITIONAL RISKS

24. Risk response

Possible risk	Response
Risk 1: The RRU SharePoint network is hacked and users access the information.	RRU cybersecurity acts to prevent and provide early identification of such breaches. Additionally, the information has been submitted already with the intended purpose of appearing on the Kumu map. It is therefore, not valuable or sensitive information.
Risk 2: The Kumu application shuts down or is otherwise unavailable for an extended term.	RRU maintains a separate store of the data used to populate Kumu. This can be used to populate a similar page on another service.

PART 8: SIGNATURES

Privacy Office Comments

From a data privacy perspective this is a low-risk initiative that uses a minimal set of personal information. I am satisfied that the appropriate controls are in place and recommend this PIA for approval.

Privacy Office Signatures

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



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Signing below constitutes a recommendation of this PIA to the RRU VP Finance & Operations.		
Privacy Lead	Signature: <u>X</u> Privacy Officer, Royal Roads University	Date: <u>7/23/2025</u>
	Name: Don Devenney	

Program Area Signatures

This PIA accurately documents the data elements and information flow at the time of signing. If there are any changes to the overall initiative, including to the way personal information is collected, used, stored or disclosed, the program area will engage with their Privacy Office and if necessary, complete a PIA update.

Program Area Comments:

Nothing additional to what is listed above.

Role	Name / Signature (Right-click on signature line and select "Sign")	Date signed
Initiative lead	Signature: <u>X</u> Initiative Lead Name: Maria Bremner	Date: <u>12/23/2025</u>



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Role	Name / Signature <small>(Right-click on signature line and select "Sign")</small>	Date signed
Head of public body, or designate	<div style="display: flex; flex-direction: column; align-items: flex-start;"> <div style="background-color: #e0e0e0; padding: 5px; margin-bottom: 5px;">Signature:</div> <div style="text-align: center; margin-bottom: 5px;"> X <hr style="width: 100%;"/> </div> <div style="text-align: center; margin-bottom: 5px;"><small>VP CFO Royal Roads University</small></div> <div style="background-color: #e0e0e0; padding: 5px; margin-bottom: 5px;">Name:</div> <div style="text-align: center; margin-bottom: 5px;">Alex Kortum</div> </div>	Date: <u>7/28/2025</u>