



PRIVACY IMPACT ASSESSMENT

Initiative Update

1. Purpose of the Privacy Impact Assessment Initiative Update

This form is used for a change to an initiative involving the collection, use, disclosure, storage, accuracy, correction, or retention of personal information where a PIA has already been completed. If a change does not involve any one of these elements, then an updated PIA is not needed. If the change involves many of these elements, you may need to prepare a new PIA instead of using this document.

2. Title of original PIA and any number assigned to original PIA

PIA2024-073 – Canvas Cloud LMS

Connected PIAs

PIA2022-001 Instructure Canvas LMS for SFU Beedie School of Business

PIA2013-003 Learning Management System "Canvas@SFU"

3. Unit and Program Area

Identify the department and program area submitting this PIA update

Department:	IT Services
Program:	Canvas Cloud

4. Contact

Name of PIA Drafter:	Keith Fong, Director, Application Services Peter Onota, Project Manager Eryn Holbrook, Business Relationship Manager		
Position Title:	As above		
Phone:		E-Mail:	keith_fong@sfu.ca peter_onota@sfu.ca eryn_holbrook@sfu.ca
Name of Program Manager:	Keith Fong, Director, Application Services		
Position Title:	As above		

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5. Common or Integrated Program and Data-Liking Initiatives

		Yes	No
(a)	Does the original PIA (or the change now being considered) involve a "common or integrated program/activity", as defined in Schedule 1 of the <i>Freedom of Information and Protection of Privacy Act</i> (FOIPP Act)? * *Note: a "common or integrated program/activity" must be confirmed by regulation		X
(b)	Does the original PIA (or the change now being considered) involve a "data-linking initiative", as defined in Schedule 1 of the FOIPP Act?		X

6. Description of the revision

Fill in each relevant box and provide (a) a brief description of the change to the collection, use, disclosure, security, storage, accuracy, correction or retention of personal information, and (b) the authority under the Freedom of Information and Protection of Privacy Act or other rationale by which the change should be permitted. **You may remove the rows which do not apply in the table below.**

Change	Brief Description	FOIPP Authority / Rationale in Brief
	Members of the Canvas Cloud Implementation Project Team need to access training resources in the Instructure Training Services Portal server located in the United States. The Canvas LMS roles of Admin, Teacher, ID, and those users who have been added but not enrolled in a Canvas Course within SFU's Canvas LMS instance will have access to the Training Services Portal.	
Collection	<p><i>SFU data will be passed into the Training Services Portal server in the United States.</i></p> <p>The SFU data passed into the Training Services Portal from users includes the following:</p> <ul style="list-style-type: none"> User Name User Institution User email Date of Access Canvas url 	FIPPA s. 26(c)

7. Purpose/Objectives of the revision

Explain in as much detail as is needed *why* the change is being made and why the initiative will, after the change, continue to comply with the Freedom of Information and Protection of Privacy Act

This change is being made to extend the coverage of the Canvas Cloud PIA to include data centres run by Instructure in the AWS United States Zone. This change allows SFU users involved in the Canvas Cloud Implementation access a Training Services Portal server located in the United States.

8. What are the potential impacts of the proposal?

Include privacy impacts in this description.

Collection: SFU data will be shared with a Training Services Portal server located in the United States.

Access: SFU data will be accessed by a Training Services Portal server located in the United States.

Use: SFU data could be used by the Training provider.

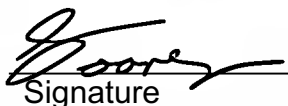
Disclosure: The SFU data passed into the Training Services Portal from users includes the following:

- User Name
- User Institution
- User email
- Date of Access
- Canvas url

Retention: Retention of personal information longer than is necessary, which increases the risk of unauthorized use, access, and disclosure. In order to counteract this lack of an automated process, a request can be made to have the data cleared on our behalf. Reminders will be set on staff calendars for the end of August and again at the end of 2025, aligning roughly with two 90-day cycles.

Storage: SFU Data is stored in an AWS Data Centre in the United States.

9. Signatures

	 Signature	
Ernest Soares	 Signature	
Privacy Legal Counsel		

