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MEMORANDUM

ATTENTION: Bill Krane, Special Advisor to the Vice-President,
Academic and Provost and Chair, Canvas
Directors Team

DATE: February 3, 2014

FROM: Ian Forsyth, Coordinator of Information and
Privacy

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RE: Recommendations for use of the Canvas mobile app

I write further to my meeting with the Canvas Directors Team on January 15, 2014 to discuss and advise on any privacy issues arising from the use of the Canvas mobile app. We agreed that:

- 1) Using the file upload feature in the Canvas mobile app does not violate protection of privacy provisions under BC's *Freedom of Information and Protection of Privacy Act* because students are not required to use either Google Drive or Dropbox, cloud-based storage services located outside Canada, to store their assignments; and
- 2) Informing users through additional notices and publishing all notices in multiple locations will help students and instructors understand their choice to use the Canvas mobile app.

You asked me to send you my recommended solutions. They are based on the background information and analysis tabled and discussed at the meeting (included at the end of this memo). If accepted, this memo will be an Addendum to the Privacy Impact Assessment previously completed and awaiting approval. My recommendations are:

- 1) Revise the existing **Personal Information Disclosure Notice** described in the PIA to read:

Personal Information Disclosure and Storage Notice

The Act establishes protection of privacy rules with which the University and its employees must comply as well as the companies we retain under contract to handle personal information on our behalf.

Personal information is to be stored and accessed only in Canada unless students and instructors know and give prior written permission to disclose and store their personal data outside Canada.

Personal information may be disclosed and stored inside Canada by a supplier of educational technology and services only when: 1) SFU, through Procurement Services, retains the service provider under a contract that includes the University's protection of privacy agreement or 2) students and instructors know and give prior written permission.

Canvas@SFU

Student and instructor personal information is communicated using encrypted network transmission when users connect to the learning management system over the University's information technology network. Personal data is stored on SFU servers located at the Burnaby

campus **except** when using External Learning Tools that collect and store the data on servers controlled by the company supplying the digital tool and services.

External learning tools

Student and instructor personal information, collected and used through an External Learning Tool, is only disclosed to and stored by service providers inside or outside Canada when the tool passes the External Learning Tool Privacy Assessment Checklist. Instructors complete the Checklist **before** using the tool to determine if it complies with protection of privacy requirements. If the tool fails the Checklist, instructors then consult with the Learning Technology Specialists in the Teaching and Learning Centre. TLC staff helps assess and advise instructors on possible solutions when the tool is not privacy compliant.

When instructors use a privacy compliant External Learning Tool and must obtain students' prior written consent before using the tool, a standard consent form prescribed under the Act is available from the Learning Technology Specialists in the Teaching and Learning Centre.

Before giving consent to disclose and store personal data on servers controlled by service providers, whether inside or outside Canada, it is strongly recommended that students enrolled in the course and instructors teaching the course, read carefully the "Terms of Use" and "Privacy" policies of the company supplying the External Learning Tool.

Social media identity

The University is permitted and exercises its right under Part 3 of the Act to disclose the personal data obtained about students and instructors, who voluntarily use a social media identity and choose to use social media to be notified about events in a course.

Canvas mobile app

Students may choose to submit assignments using the file upload feature in the Canvas mobile app.

The Canvas mobile app is configured to use the file sharing feature on iPhone and Android devices. The help pages within the Canvas mobile app uses Google Drive and Dropbox as the examples for file sharing. However, every mobile app that supports sharing files is compatible, including email, web browser, instant messaging, photo and other file viewing apps.

Like Google Drive and Dropbox, many of these apps are Cloud-based storage services located outside Canada. SFU does not require students to use any of these services. Rather, students using them from which to upload their assignments to Canvas@SFU do so voluntarily and at their sole discretion. You understand that you are storing your personal information using a personal account with a service provider according to their "Terms of Use" and "Privacy" policies.

Students may upload their assignments using alternative methods or storage services located inside Canada.

Alternative methods include: 1) using a mobile app that stores the files directly on the device or on a storage service located inside Canada, 2) using a desktop or notebook computer to connect directly to the canvas.sfu.ca website and 3) instructors giving students the option to hand in a physical copy of their assignment.

- 2) Inform users about the importance of securing their cell phone or tablet using a PIN and protecting their PIN and login password. Add the following notice:

Protection of Personal Information Notice

Students and instructors may voluntarily access the learning management system using the Canvas mobile app on a mobile device such as a cell phone or tablet. Student and instructor personal information is encrypted when communicating between your mobile digital device and Canvas@SFU over Internet or cell phone service provider networks.

Before using the Canvas mobile app, users are reminded to: 1) secure their cell phone or tablet using a PIN, 2) protect and not disclose their PIN and login password and 3) if you lose your mobile device, immediately delete the device’s authentication token from your Canvas@SFU webpage account.

- 3) Publish all notices on the:
 - a) Canvas@SFU Central Authentication Service page,
 - b) TLC Canvas website, and
 - c) Academic Calendar > Student Contract > Protection of Privacy > Canvas@SFU: Collection of Personal Information and Protection of Privacy Notices.

Background information and analysis of Canvas mobile app

Key	ISP = Internet Service Provider CPSP = Cell Phone Service Provider ★ = Storage location optional at discretion of user Risk is L, M, H = Low, Medium, High
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Feature	Sub-feature(s)	Location where information is or may be stored			Personal information	
		SFU	ISP/CPSP	Cloud	Yes/No	Risk
Profile	• Biographical info. & image	✓	★	★	Y	M-H
	• Calendar feed	✓	★	★	Y	L
	• Files – personal (can be downloaded)	✓	★	★	Y	L-H
Communication	• Text message	✓	★		Y	L
	• Announcements	✓	✓		N	None
	• Discussions Attach photo from gallery, take photo or video, record audio	✓	✓		Y	L-H
	• Conversations Used to keep in touch about course (readings, assignments, quizzes, etc.)	✓	✓		Y	L-H
	Messages sent, received and replied to Attach photo from gallery, take photo or video, record audio	✓	✓	★	Y	L-H
Courses	• Course list	✓	✓		Y	L
	• People (names of students enrolled in course, their profiles & images)	✓	✓		Y	M-H
Syllabus		✓	✓		N	None
Modules		✓	✓		N	None
Pages		✓	✓		N	None

Feature	Sub-feature(s)	Location where information is or may be stored			Personal information	
		SFU	ISP/CPSP	Cloud	Yes/No	Risk
Assignments	• Details	✓	✓		N	None
	• Rubrics	✓	✓		N	None
	• Submission					
	Comment about submitting assignment	✓	✓		Y	L
	Make comments (statements, questions & feedback recorded as text, audio or video)	✓	✓		Y	M-H
	Submit assignment (instructor chooses assignment type)					
	▪ File upload	✓	✓	★	Y	L-M
▪ Media recording (audio or video)	✓	✓			L-M	
▪ Text entry	✓	✓			L-M	
▪ Online URL	✓	✓			L-M	
Quizzes	• Complete quiz	✓	✓		Y	M
	• View graded results (instructor can restrict)	✓	✓		Y	H
Grades		✓	✓		Y	H

Q&As

- ❖ Is the student voluntarily using a personal Google Drive or Dropbox account from which to upload a file to Canvas@SFU?
 - Yes
- ❖ Does the Canvas mobile app give students the option to upload a file stored in locations other than Google Drive and Dropbox?
 - Yes
- ❖ Will students be given the option of submitting assignments in ways other than by file upload from Google Drive or Dropbox?
 - Yes
- ❖ Can we add content to the legal notices accessible through the mobile app (i.e. Privacy Policy and Terms of Use)?
 - No