

Access Pearson

Department: Chemistry	Date: 2025-08-07
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Part 1 – General Information and Overview

1.1 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.

First year chemistry courses at VIU use a textbook published by Pearson Education Ltd (Chemistry: A Molecular Approach 4th Canadian Edition by Tro et al). This book is an e-textbook and comes with an online homework platform called Mastering Chemistry. Currently, there is no integration between Mastering Chemistry and VIULearn, which means that instructors cannot provide links to the assigned textbook readings and homework assignments in VIULearn. Students are currently required to check both VIULearn and Mastering Chemistry regularly for due dates etc. Access Pearson is a Brightspace Learning Tool Interoperability (LTI 1.3 tool that will allow for direct linking to e-textbook and homework assignments in Mastering Chemistry from VIULearn, which will streamline the student experience using these tools. Automated grade pass back can also be managed through the Access Pearson tool.

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1.2. What is the scope of the PIA?

Your initiative might be part of a larger one or might be rolled out in phases. What part of the initiative is covered by this PIA? What is out of scope of this PIA?

This PIA will cover the Access Pearson LTI 1.3 integration with VIULearn (VIU's Brightspace LMS).

1.3. Are there any related Privacy Impact Assessments?

Please indicate if this an update on an existing PIA or an additional module that was not covered in the original PIA.

This PIA is related to the Brightspace PIA from BCNET. Data sent from Pearson to VIULearn will be handled according to the Brightspace PIA.

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

Data collected during account creation

Required

- Name (first, last and preferred)
- Country and city
- Email address
- Username and password
- Group or grade
- Institution
- Course or class identifier

Optional

- Date of birth
- Gender
- Native language
- Profile picture

Data collected during use

Pearson has declined to provide a more specific privacy policy for Mastering Chemistry so this information is based on their broader privacy policy. All of the following may be collected per Pearson's [Privacy Policy](#). In addition, Pearson may provide just-in-time notifications within their software when additional data is being collected or when data is collected by a third party.

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- Purchase information if students choose to purchase directly from Pearson. Students can opt to purchase their textbook code from the VIU bookstore instead.
 - Name
 - Payment details
 - Address
- User-generated data
 - Content of any assignments/work completed on the platform
 - Documents uploaded
 - Submissions to forums or communities
- Any information submitted to customer service
 - Email address
 - Content of service request
 - Screen shots of errors received
 - Response to surveys or questionnaires
- Device and cookie information
 - IP address
 - Browser type
 - Device type
 - Details of referring source (link in email, website or application that user was at immediately prior to accessing Pearson's service)

In the table below, please list all the elements of information or data that you might collect, use, store, disclose or access as part of your initiative. If your initiative involves large quantities of information or datasets, you can list categories or other groupings of personal information in an appendix.

Information Type	Information Collected
Personal Information	From Students: Name, email, information included in assignments/work, payment details, IP Address; From Third Parties: account information if registration is done by VIU on students' behalf (name, email); From VIU Employees: assessment (feedback may contain personal information) from instructor
Contact details	From Students: Email address, address From Third Parties: email address (if institution is provisioning account) From VIU Employees:
Account information	First name, last name, Pearson username, password for Pearson account, institution, course identifier, VIULearn/Brightspace username, Brightspace UserID, user role, email address
Commercial information	

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Optional information asked for but not required	Gender, primary language, profile picture
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1.4a. Did you list personal information in question 1.4?

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.

Examples of Personal Information	
<ul style="list-style-type: none"> • Name, age, sex, weight, height • Home address, phone number • Race, ethnic origin, sexual orientation • Medical information • Health history • Number or symbol assigned to the individual • Income, purchases and spending habits • Blood type, DNA code, fingerprints 	<ul style="list-style-type: none"> • Marital or family status • Religion • Education • Financial information • Criminal information • Employment information • Personal views or opinions, except if they are about someone else

- If yes, go to [Part 2](#)
- If no, answer question 1.5 and submit questions 1 to 1.5 to privacy.officer@viu.ca. You do not need to complete the rest of the PIA template.

Yes

1.5. How will you 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 an information incident.

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Part 2 – Collection, Use, and Disclosure

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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.

2.1 Four point “Necessity Test” for the collection, use, and disclosure of Personal Information.

To determine if the Personal Information from your initiative meets the necessity threshold, apply the following four-point test to each element of PI from 1.4 above. Note that each element of PI must meet all four points of the test.

Four point “necessity test” for collecting personal information ([OIPC Canada, 2016](#)).

1. The information is rationally connected and demonstrably necessary to an operating program or activity
2. The information is likely to be effective in meeting the objectives of the program or activity
3. There are no other less privacy-invasive ways to effectively achieve the objectives of the program or activity
4. The loss of privacy is proportional to the objectives of the program or activity

Personal Information element	Does it meet all four points of the necessity threshold?	Reasons for keeping or excluding from initiative
Student name	Yes	Required for the instructor to know which student earned which grade
Grades on homework	Yes	Required for the instructor to know what grade the student earned on their assignments
Email address	Yes	Needed for contact and notifications.
Information included in assignments/work	Yes	To serve as a homework platform, Pearson has to collect, store and disclose (to instructors) student work.



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IP Address	Yes	IP address is collected as part of user last login data when students submit an assignment along with a timestamp and time spent in the assignment. This data is used if there are disputes around academic integrity. This data can only be accessed by Pearson support who access only in helping instructors with academic integrity investigations.
Engagement/Behavioral surveillance data		

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2.2 Personal Information Flow Diagram and/or Personal Information Flow Table

In the table below, list the personal information from question 1.4. Think about how each element of information flows through your project. Your Privacy Officer can help you figure out whether each step is a collection, use, or disclosure, and whether you have the legal authority for the way you're working with the information. Alternatively, you can attach a flow diagram to this PIA. Add rows as necessary.

	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 or other legal authority
<i>E.g.</i>	<i>E.g., Student email, password, and IP address collected by software platform for account creation.</i>	<i>Collection</i>	<i>FIPPA 26(c) "info relates to and is necessary for a program or activity"</i>
1.	<p>User Account Creation Student or Instructor clicks on the link in their course. They will be directed to a Pearson page where they will need to either link a previously created Pearson account or create a new account on Pearson's service which will then be linked to their VIULearn user through the LTI integration. To create an account students must provide:</p> <ul style="list-style-type: none"> • First and last name • Preferred name • Email address • Country and city • Institution and course membership • LMS role • DOB? 	Collection (Pearson collects account creation data).	s. 26(c)



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	<p>The Pearson Account is then linked to the LMS user, so that they do not need to log in to Pearson every time they access a link in their course. Information from the LMS that is accessed by the LTI:</p> <ul style="list-style-type: none"> • Username (student number for students) • System email (student system emails are anonymized in 2024-2025, this may change in the future as VIU students now have VIU email addresses) • System role (student or instructor) • Full name (VIULearn first name is based on student preferred name field in their student record) • Course membership 		
<p>2.</p>	<p>Student Subsequent Access After the initial account is created, users will be automatically logged in to their Pearson account through the integration.</p> <ol style="list-style-type: none"> 1. Student clicks on a Pearson link in their course 2. The user is connected to their Pearson account through the LTI 3. Student accesses information and activities on Pearson 4. Activities linked to grade items in D2L will pass score information back to VIULearn (D2L Brightspace) 	<p>Use- Pearson uses student input and generates scores</p> <p>Collection (VIU collects score information)</p>	<p>s. 32(a)</p> <p>s.26(c)</p>
<p>3.</p>	<p>Instructor Assesses Student Work Students may complete assignments and other activities through the Mastering Chemistry platform. Instructors can view and assess these activities on the Pearson platform and then (depending on how they configured their activities) pass a numeric grade back to their course in VIULearn.</p>	<p>Collection (VIU collects grade info)</p>	<p>s. 26(c)</p>

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	<ol style="list-style-type: none"> 1. Instructor accesses Pearson through a link in their VIULearn course. After initial account linkage/creation, they are automatically logged in through the LTI integration. 2. Instructor views and assesses student work on the Pearson platform, including leaving feedback students can view 3. For assignments linked to the VIULearn gradebook, grades can be pushed to the LMS. These grades will be connected to the student based on their linked D2L and Pearson accounts 		
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2.2 Risk Mitigation Table

Thinking through the information flow, identify where there are risks for privacy incidents or data breaches. For each risk, identify a mitigation strategy, as well as the likelihood of an incident, and level of impact or harm if people's information were breached.

Risk Mitigation Table				
	Risk	Mitigation Strategy	Likelihood	Impact/harm
1	Unauthorized individuals could access the personal information in the system and use or disclose it for personal purposes (within VIU)	Password protected access; limited abilities for student accounts, vetting process for instructor accounts. Single sign-on/MFA?	Low	Low
2	Authorized individuals (VIU employees) could access the personal information in the Pearson platform and use or disclose it for personal purposes	Employee Code of Conduct; principle of least access; access logs; Privacy & Access course	Low	Low



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3	Unauthorized individuals could access the personal information in the system and use or disclose it for personal purposes (within Pearson)	Employee Code of conduct and Non-disclosure agreements; Use of Information & Technology Policies; annual Information Security and Data Privacy training courses; password protected access, user access to system based on need to know basis, permission restrictions, controls, and monitoring.	Low	Low
4	Pearson security breach	Regular monitoring and maintenance, SOC 2 Type 2 auditing	Low	Med
5	AWS Cloud Services security breach	Physical security measures; encryption during transit and storage; Amazon shares SOC2 Type 2 annually	Low	Med
6	Data containing personal information is compromised during transmission between Pearson and VIU.	Encryption, LTI 1.3 connection for integrated products checks sender's and receiver's identity	Low	

2.3. Collection or Privacy Notice

If you are collecting personal information directly from an individual the information is about, FIPPA requires that you provide a collection notice, also known as a privacy notification.

A collection notice must contain the following elements:

- The legal authority and section under FIPPA under which you are collecting personal information.
- The purpose for which you are collecting the personal information and how it will be used.
- The contact information of an employee or officer at VIU who can answer questions about the collection of personal information.

Contact the privacy office for a collection/privacy notice template.

Draft Privacy Notification



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Collection and Use of your Personal Information

- As part of taking this course, you will be asked to register for Pearson Education Inc.'s online textbook and homework platform called Mastering Chemistry. As a service provider to VIU, Pearson Education collects your personal information as outlined below in accordance with s. 26(c) of the BC *Freedom of Information and Protection of Privacy Act*. The information is limited to only what is necessary for the purpose of providing their services, which include providing an online text book and homework platform for first year Chemistry students.

Registering for this service transmits the information you submit into the registration page outside of Canada. The personal information collected for registration includes first and last name, preferred name, date of birth, email address, country and city, username and password, institution, course membership number, and marketing preferences. There is also an option to enter your gender, native language, and profile picture, but you do not have to provide this information.

- The Mastering Chemistry platform will be securely integrated with VIU Learn, where you instructors will provide links to readings, homework assignments, quizzes, and other learning materials. When you click on these links, you will again be taken to Pearson's Mastering Chemistry platform, which is housed on AWS servers in the United States. While you are on the platform, Pearson may introduce optional features provided by third party service providers, which may be housed in other countries. Before linking you to these services, Pearson will provide "just in time notices" at the point of data collection, which should be read together with their [privacy policies](#). You do not have to engage with these features.

Deleting your personal information:

- Course results are kept for one year after the end date that the instructor sets for their course section on the Pearson platform. After that year, course results are deleted.
- User accounts with no activity for one year or more may be contacted by Pearson to advise of pending deletion. Accounts will be deleted six months after this notice if there is no further account activity.
- You may also make a request to Pearson Education Inc. to dispose of your personal information from their servers. The VIU Centre for Innovation and Excellence in Learning will provide you support in contacting them if you need it.



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- If you have any questions regarding how your personal information is managed between Pearson Education Inc. 's Mylabs & Mastery service and VIU's D2L service, contact your instructor.

When users first connect to the Pearson app through their course they will need to manually log in to their Pearson account or set up a new Pearson account to link to their LMS account. Pearson's Privacy Policy and Terms of Service are linked on this page.



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Part 3: Storing Personal Information

3.1. Is any personal information being stored outside of Canada?

If you're storing personal information outside of Canada, identify the sensitivity of the personal information and where and how it will be stored.

Yes. Personal information for this initiative will be stored in the USA on AWS East servers.

3.1.1. Where is the personal information stored?

In AWS cloud

3.2. Does your initiative involve sensitive personal information?

Examples of sensitive personal information include personal health information, genetic and biometric data, personal finances, geolocation data, criminal records, counselling records, HR records, payroll records, racial or ethnic origin, sexual orientation, religious, philosophical, or political beliefs, etc.

No. For the purposes of this PIA, the Access Pearson app does not collect any sensitive personal information. However, if the exam proctoring service were to be used, Pearson will collect Gov-issued photo IDs and selfies, which would be subject to facial recognition software. However, that is beyond scope of this PIA as the CHEM department will not be utilizing the proctoring services.

If **yes**, please complete [Part 4: Assessment for Disclosures of Sensitive Personal Information](#).

If **no**, skip to [Part 5: Security of Personal Information](#)

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Part 4: Assessment for Disclosures of Sensitive Personal Information

Complete this section if you are disclosing sensitive personal information. You may need help from your organization's Privacy Officer.

4.1. Is the sensitive personal information stored by a service provider?

N/A

If yes, fill out the table below, then go to question 4.3. If no, continue to [question 5](#).

Information about Service Provider

Name of service provider	Name of cloud infrastructure and/or platform provider(s)	Where is the sensitive personal information stored (including backups)?
Pearson	Amazon Web Services – East	AWS has two eastern locations: North Virginia and Ohio

4.2. Provide details on the disclosure, including where and how the personal information is stored.

Answer this if question 4.1 does not apply. Be specific about where and how the information is being stored.

4.3. Is there a contract that includes privacy-related terms?

If there is a contract with the provider, please describe any privacy-related terms in the contract, or attach the privacy schedule.

<https://loginstatic.pearson.com/html/PearsonEULA.html>

Part 5: Security of Personal Information

Section 30 of FIPPA imposes a duty on the public body to prevent unauthorized access to Personal Information both internally and with any contracted third parties. As such, we need to make sure that



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personal information is safely secured in both physical and technical environments. **For each item in this section, please describe the security measures for both the service provider and for VIU internally.**

5.1. Please describe the physical security measures related to the initiative (if applicable).

For example, physical security measures may include: the security environment of vendor's data centres; storing records containing PI in locked storage rooms, offices, and/or filing cabinets with controls over distributions of keys/access; locked workstations that do not permit others to view your screen (including when working remotely, etc).

Pearson: All locations have Physical Access Controls that restricts access to authorized users; Access granted on "need-to-access" basis; Users must comply with Physical and Environmental Security policy; AWS uses multiple physical security measures at their data centers. For more details, see the [AWS Data Center controls website](#)

VIU: Instructors access LMS via username and password/SSO and are prompted for MFA. VIU computers have lockable screens, though this is up to users to use feature.

5.2. Please describe the technical security measures related to the initiative (if applicable).

E.g. Encryption standard for data in transit and data at rest; firewalls, strong passwords; MFA; encrypted documents, etc.

Pearson: Data is encrypted at rest and in transit. Pearson uses a firewall, and has an Intrusion Detection System implemented on their network. Principles of least access are in place and only Pearson-approved devices and accounts will have access to data based on need to know. Pearson also has policies for employee devices that can access Pearson systems that requires VPN and MFA, with a strong password required.

VIU instructors access system via SSO and MFA.

5.3 Tracking Access / Access Controls. In this section, you will describe how the unit will minimize the risk of unauthorized access to Personal Information.



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5.3.1. FIPPA section 30 requires public bodies to manage access to PI based on the principle of “need to know” – that users may only access information that is necessary to do their job. This is frequently accomplished by assigning role-based access controls (RBAC), and by establishing a security matrix that describes which positions/roles are permitted to access specific types or groups of Personal Information. Access to personal information should only be permitted to those who demonstrate their right of access on the security access chart. **Please describe how access controls work in the department, or with this initiative.**

Pearson: Principles of least access are in place and only Pearson-approved devices and accounts will have access to data based on need to know. Pearson also has policies for employee devices that can access Pearson systems that requires VPN and MFA, with a strong password required. Access to records is logged and tracked.

VIU: only instructor of course can access student’s work (need-to-know) for grading/evaluation purposes

5.3.2 How will you know if sensitive personal information is accessed, including access by service providers? This should include a description of what information is available through logs.

VIU will not have the ability to see logs of who accesses data on the Pearson platform.

Pearson logs access to user data on their internal Support Dashboard tool. They do not provide audit logs externally so VIU will not have access to this data. If special circumstances arise, Pearson *may* work with VIU to accommodate the request.

5.3.3 Please describe any access controls and/or ways in which you will limit or restrict unauthorized changes (such as additions or deletions) to personal information.

Pearson logs access to user data on their internal Support Dashboard tool. Access to make changes to user accounts is restricted and all views and changes are logged.

5.4 What controls does the provider have in place to prevent unauthorized access to sensitive personal information?

Describe technical, administrative, and/or policy measures in place to protect PI. If using a cloud-based service provider, include a description of controls in each layer of the stack: software level, platform level, infrastructure level.

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Pearson staff has access to the data based on business need and assigned access based on least privilege. Pearson has policies for employee devices that can access Pearson systems. Pearson logs access to user data on their internal Support Dashboard tool.

Part 6: Accuracy/Correction/Retention of Personal Information

[FIPPA section 28 states](#) that a public body must make every reasonable effort to ensure that an individual's personal information is accurate and complete. In this section, you will demonstrate how you intend to keep personal information on file accurate and complete.

6.1 How is an individual's information updated or corrected?

[FIPPA section 29](#) states that a person can ask you to correct their personal information in your custody or control. If it is not possible to update or correct (for physical, procedural or other reasons) it must be noted on the record. **Please explain how it will be updated or annotated. If personal information will be disclosed to others, how will VIU notify them of the update, correction, or annotation?**

Users control their name and email address on the platform. If there is a mistake in a user's name or email, they can correct it in their Pearson account.

Students can update their Personal Information by logging into their account in the Student Record System (SRS). If there is a field they cannot change, they can go to the Registrar's Office for help.

6.2. Does your initiative use personal information to make decisions that directly affect an individual(s)?

Potentially, yes. The activities completed by students on the Pearson Platform are intended to be formative and not summative assessments so should not be used to determine grades for the users. However, instructors may choose to use student submissions through Pearson as part of the final grade calculation for their course.



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6.2.1. If you answered “yes” to question 6.2, do you have an information schedule in place related to personal information used to make a decision?

FIPPA requires that public bodies keep personal information for a minimum of one year after it is used to make a decision.

Course results are kept for one year after the end date that the instructor sets for their course section on the Pearson platform. After that year, course results are deleted. Grades passed to VIULearn will be kept for another academic year before being deleted from that platform.

6.3. Do you have a records management schedule in place?

How long will you keep the personal information collected? Is there a plan in place for retention and deletion? Please also use this question to note how long it will be stored by the service provider (if applicable).

Course results are kept for one year after the end date that the instructor sets for their course section on the Pearson platform. After that year, course results are deleted.

User accounts are not deleted on a set schedule. Accounts with no activity for 1 year or more may be contacted by Pearson to advise of pending deletion. Accounts will be deleted 6 months after this notice if there is no further account activity.

Users can request Pearson destroy their data when they are finished with the service. This would delete the data on the Pearson platform but not grade information passed to VIULearn (Brightspace by D2L). That data is kept in accordance to our PIA for VIULearn.

Part 7 – Personal Information Banks

A personal information bank (PIB) is a collection of personal information searchable by name or unique identifier.

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

No



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If yes, please complete the table below:

Describe the type of information in the bank
Name of main organization involved
Any other ministries, agencies, public bodies or organizations involved
Business contact title and phone number for person responsible for managing the Personal Information Bank

Part 8 – Further Information

8.1. Does the initiative involve systematic disclosures of personal information? If yes, please explain.

No

8.2. Will the information collected be used for research or statistical purposes?

No



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Part 9 – Summary and Proponent Responsibility

This section is for Privacy Office recommendations as well as any limitations due to privacy concerns.

Please verify that the collection of Government-issued ID and “selfie” photo are for exam proctoring services only, and that VIU Chem will not be using this unless and until a PIA addendum is completed for this feature.

This PIA accurately documents the data elements and information flow at the time of completion. 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.