



Givergy

Initiative:	Givergy
Department or Service Area Name:	Office of Advancement & Alumni, External Relations

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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.

As part of Giving Tuesday 2024, the Advancement Department will be running an online auction. Donors, alumni, VIU staff and the community will have an opportunity to place bids on items. The items will be sold to the highest bidder and the funds raised will be used to support the Access Fund which supports VIU students through scholarship and bursaries and other programs on campus. Participants will also have an opportunity to make an additional donation to the Access Fund on this platform. Through a series of emails donors and alumni will have the opportunity to participate in the auction which runs from Nov 20th at noon to Dec 3 at 10pm. Information regarding the auction will also be available on the VIU web site and will be distributed to staff through the VIU digest e-newsletter.

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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?

The online auction will be a part of the Giving Tuesday campaign for 2024. Giving Tuesday is a fundraising initiative that is run by the Advancement Department to raise funds to support VIU students. Winners will be announced on Dec 4 and the platform will remain active until all donations have been processed and winners have been notified of their prizes. Funds will be transferred to the Foundation using Blackbaud Merchant Services through the secure integration between Givergy and Raiser's Edge NXT. Donation secured on the Givergy web site will be processed and downloaded to Raiser's Edge NXT so that an official tax receipt can be issued.

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.

Click or tap here to enter text.
N/A

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

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	<p>Personal Information is only collected from those who chose to participate in the auction. They may be staff, students, or the public.</p> <p>The following personal data will be collected:</p> <ul style="list-style-type: none"> ● First Name ● Last Name ● Home Address ● Date of Birth ● Email

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	<ul style="list-style-type: none"> • Telephone Number
Contact details	<p>Contact details are only collected from those who chose to participate in the auction.</p> <ul style="list-style-type: none"> • Home Address • Email • Telephone Number
Account information	<p>Credit Card information will be used to process the winning bids and to process any donation secured through the Givergy platform.</p>
Commercial information	N/A

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?



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Some initiatives that do not require personal information are at risk of collecting personal information inadvertently, which could result in an information incident.

Click or tap here to enter text.

Part 2 – Collection, Use, and Disclosure

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
First Name and Last Name	Yes	The participant’s name is required to track the bidders and is used in the notification process when a participant is outbid on an item. The first and last name is also used to verify that winners of the auction receive the correct items.



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Home Address	Yes	The home address is collected as part of running the online auction and is required in the verification process for the winners of each auction item.
Date of Birth	Yes	Date of birth is required for verification and security purposes to confirm the identity of the user/winners.
Email	Yes	The email address is required to notify participants when they have been out bid so that they can have an opportunity to increase their bid. Winners can be notified by email at the end of the auction.
Telephone Number	Yes	The phone number is required to notify participants when they have been out bid so that they can have an opportunity to increase their bid. Winners can be notified by phone at the end of the auction.

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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>First and Last Name:</p> <p>Collected when an individual signs up for the online auction. The winners are notified when they have been outbid, giving them an opportunity to submit a higher bid for an item in the auction.</p> <p>If a participant donates, their name will be used to issue a tax receipt in accordance with Canada Revenue Agency guidelines (CRA). Tax receipts are issued on the Raiser's Edge NXT database. Blackbaud and Givergy have an Application Programming Interface (API)</p>	Collection, Use, Disclosure	<p>BC FIPPA</p> <p>Collection: c s. 26(c); s.</p> <p>Use: s. 32(a)</p> <p>Disclosure: s. 33(2)(d) (to Raiser's Edge)</p>
2.	<p>Address:</p> <p>Collected when an individual signs up for the online auction. The winner is the person who places the highest bid on an item. Their address is used for verification purposes.</p>	Collection, Use, Disclosure	<p>s. 26(c);</p> <p>s. 32(a);</p> <p>s. 32(a)</p>

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	<p>The postal code is also used to process the online payment through the Address Verification System (AVS) that is used the payment providers. The AVS ensures that the billing address of the participant matches the one on file with their bank. This helps prevent fraudulent transactions.</p> <p>If a participant donates, the address information is used to issue a tax receipt in accordance with Canada Revenue Agency guidelines (CRA). Tax receipts are issued on the Raiser’s Edge NXT database. CRA requires that all tax receipts include the donor’s full name and address. The information on the tax receipt is used to calculate the donation tax deduction on the donor’s income tax return. Without a full address, the receipt may be considered invalid by the CRA and may prevent the donor from claiming the tax credit.</p> <p>Charities are required to keep detailed records of donations and tax receipts for CRA audit purposes.</p>		<p>CRA guidelines</p> <p>Retention: CRA requirement</p>
<p>3.</p>	<p>Date of Birth: Collected when an individual signs up for the online auction. It is required as in some instances a minimum age verification is needed for the participant to engage in bidding or entering into payment agreements.</p>	<p>Collection, Use</p>	<p>s. 26(c) s. 32(a)</p>
<p>4.</p>	<p>Email: Collected when an individual signs up for the online auction. The email is an option for use in account creation and verification. The email provides a unique identifier and allows the online platform to verify their identity to reduce fraud.</p> <p>The email address will also be used for notification on bid status, payment and invoicing.</p>	<p>Collection, Use</p>	<p>s. 26(c) s. 32(a)</p>

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	If a participant donates, the email address will be securely transferred to the Raiser's Edge NXT database and a tax receipt will be issued. The donor will be sent their official tax receipt via email.	Disclosure	s. 33(2)(d)
5.	<p>Phone:</p> <p>Collected when an individual signs up for the online auction. The phone number is an option for use in account creation and verification.</p> <p>Participants may choose to received notification regarding the status of their bid through text message using the phone number.</p> <p>The phone number may also be used for customer support.</p>	Collection, Use	s. 26(c) s. 32(a)

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	Selected services and business functions are provided by third parties.	Review of privacy and security processes Encryption, data security software to prevent malware and external threats, permission controls.	Low	Possibility of unauthorised access, alteration, disclosure or destruction of data.

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		Givergy maintains agreements with third parties to ensure they provide the appropriate level of physical security and access restrictions to their Data Centres. Third parties are following the Privacy notice and data protection laws followed by Givergy.		
2	Data Breach	Review of security protocols. These include encryption, security software and permission controls	Low	Possibility of unauthorized access, alteration, disclosure or destruction of data.
3	Unauthorized access	Givergy has a role-based sign on system for VIU staff using the platform. 3 VIU will have log ins to the web site but do not have the authority to update any information. All staff have received training in their onboarding when they first started working at VIU. Training options are available to all employees.	Low	VIU employees could access personal information and use or disclose it for personal purposes.
4	Inadequate Data Encryption	Review of Google Cloud which hosts the Givergy's platform. Google Cloud has robust security features and encrypted data management.	Low	Compromised server that may result in data theft or data loss .
5	Data Loss	Review of Google Cloud which hosts the Givergy's platform. Google cloud uses contingency servers that ensures that user data is maintained if any server disruptions	Low	Loss or destruction of data.



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		occur. Google Cloud has secure automated backup systems with strict access controls.		
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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.

<https://gov.viu.ca/access-and-privacy-viu> (VIU's privacy will be available with user's sign up on the platform)

In addition, Givergy requires consent at the time of sign up.

Givergy's privacy notice can be found here: [Privacy Notice - Givergy](#)



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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.

No

3.1.1. Where is the personal information stored?

Canada - Montreal

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.

Credit Card Information

No credit card information is disclosed to VIU. All transactions take place using Givergy's secure payment provider.

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

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

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?

Click or tap here to enter text.



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Givergy uses some third-parties to provide services and business functions. Givergy provides assurance that all third-parties acting on their behalf operate in accordance with their instructions and fully comply with their privacy policy.

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)?
Stripe, Stripe Payments Europe	Used for taking secure payments Privacy notice https://stripe.com/gb/privacy	Name, Address, phone, email, credit card information
Mailgun Technologies Inc.	Used for email notifications relating to auction activities and payments.	Name, Address, phone, email, credit card information
Google Cloud	Used to host internet services out of London, N. Virginia, Montréal, Sydney and Hong Kong	Name, Address, phone, email, credit card information
Bluebox Worldwide Ltd.	Bluebox provides Givergy with its voucher system to fulfil our auction items.	Name, Address, phone, email, credit card information
Pardot	Used to send marketing emails and for some marketing automation. Consent is required.	Name, Email
Mailchimp.	Used to send marketing emails with the latest items and experiences; Consent is required. https://mailchimp.com/legal/privacy/	Name, Email, Purchase History

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.

If a participant donates, the donor information is securely transferred through the Givergy integration tool to Raiser's Edge NXT. The integration application is available on the Blackbaud Marketplace and allows for the seamless synchronization between the two platforms. Only information required to issue a CRA tax receipt is transferred during this process. No credit card information is ever disclosed.

The information transferred includes:

- First and Last Name

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- Address
- Email
- Donation Amount

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.

Givergy's privacy notice: <https://www.givergy.com/ca/privacy-notice/>
Link: [Privacy Notice - Givergy](#)

This privacy notice provides detailed information on the information that they collect, how it is used and details on how individual can access their personal information if required. They list their third-party providers and safeguarding measures as well as contact information.

Blackbaud's privacy notice: <https://www.blackbaud.com/company/privacy-policy/north-america>
Link: [North American Privacy Policy - Blackbaud](#)

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 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.

CCTV equipment and access control mechanisms at building entry points, to monitor individual physical access to sites.

Givergy prohibits the processing and/or storage and/or access of customer data outside the region within which the server is hosted.

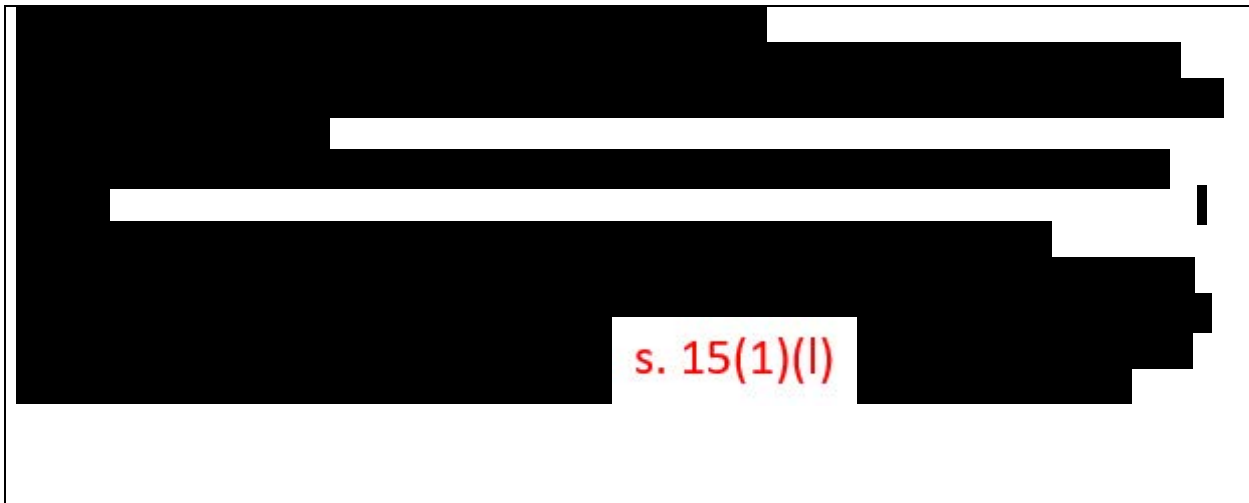
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Personnel are trained to follow all privacy and security policies and are prohibited from copying, moving or storing customer sensitive data on systems outside of the customer defined data environment.

Givergy maintains policies and procedures to ensure appropriate access control for physical assets.

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.



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.

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.](#)

Access will only be granted to employees within the Advancement Department that are involved in the auction as a fundraising activity for Giving Tuesday. This includes staff that are setting up the

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s. 15(1)(l)



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?**

Personal information can only be updated by the user using their secure access through their account.

From Givergy Privacy policy (website): You have the right to access any personal information that we process about you and to request information about: –

What personal data we hold about you and the purposes of the processing

The categories of personal data concerned

The recipients to whom the personal data has/will be disclosed

How long we intend to store your personal data for

If we did not collect the data directly from you, information about the source



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If you believe that we hold any incomplete or inaccurate data about you, you have the right to ask us to correct and/or complete the information and we will strive to correct it as quickly as possible.

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

N/A

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.

Click or tap here to enter text.

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).

VIU is in the process of rolling out a records management program.



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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?

Yes

If yes, please complete the table below:

Describe the type of information in the bank
Donation information will be linked back to the donor to ensure that they are issued a tax receipt for their contribution
Name of main organization involved
VIU – Advancement Services and Raiser’s Edge
Any other ministries, agencies, public bodies or organizations involved
No
Business contact title and phone number for person responsible for managing the Personal Information Bank
Amanda Greenland, Manager Advancement Services, 236.628.1937

Part 8 – Further Information

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

No



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

Yes. The success of the auction or the amount of fund raised will be used to determine if further similar initiatives will occur in the future

Part 9 – Summary and Proponent Responsibility

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

Click or tap here to enter text.

Part 10: 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.

Reviewed by	Privacy Officer
Approved by	Manager, Advancement Services
Date:	30-Oct-2024