



Marsh Tenant Insurance for Student Residence

Initiative:	Marsh Tenant Insurance for Student Residence
Department or Service Area Name:	Student Residence

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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.

Initiative: Student Residence is implementing a mandatory Tenant Insurance for all students who stay long term, 30 days and more.

Partner: Marsh Canada Limited is the insurance company that will be utilized to facilitate this policy. What, how, who and when: Prior to the acceptance of student room offer the student is informed of the mandatory policy through a summary within the portal and within the Student Housing Agreement. The student is then required to pay a mandatory fee associated with this program before they will be provided a room within Student Housing. All students who have accepted their room offers first and last names will be shared with Marsh at the end of September and again January, and May. Students are the named insured/beneficiaries under the Master Policy, and each student will receive their own certificate of insurance. As a result, it is the students' responsibility to report any claims.

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 scope of this PIA is the mandated VIU Student Housing tenant insurance.

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.

Original PIA

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 Hi datasets, you can list categories or other groupings of personal information in an appendix.

Information Type	Information Collected
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Personal Information	<p>From Students: First and Last Name</p> <p>Details of claims: Date of Loss, Student Name, Student Contact Information, Loss Details, Property Damaged, Witness if applicable</p> <p>From Third Parties: no</p> <p>From VIU Employees: Contract manager's first and last name.</p>
Contact details	<p>From Students: Marsh will be informed that the student resides with Student Housing, but not the specific room number.</p> <p>From Third Parties: no</p> <p>From VIU Employees: Contract manager's phone number and email address.</p> <p>From VIU Student: First name, last name, phone number</p>
Account information: what info is required to set up an account?	<p>Students are the named insured/beneficiaries under the VIU Master Policy by providing Marsh with students first and last name, but the student is responsible to initiating a claim. The student would provide all other details when submitting a claim.</p>
Commercial information	

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- see the table below for examples of Personal Information.

Business contact information, in turn, is defined as information to enable an individual at a place of business to be contacted and includes the name, position name or title, as well as business telephone number, address, email or fax number of the individual. BC FIPPA does not protect business contact information.

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



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

Click or tap here to enter text.

1.5. How will you reduce the risk of unintentionally collecting or disclosing personal information?

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

Click or tap here to enter text.



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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 and Last Name	Yes	Keep- this information allows Marsh to create a tenant insurance policy for the student.
Student contact information, date of loss, loss details, property damaged, and witness.	Yes	Keep- students provide this information to Marsh to initiate a claim under their policy. Necessary to process claim.



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2.2 Does your initiative involve the use of Artificial Intelligence (AI)? If so, please fill out Appendix One: GenAI Analysis Questions

2.3 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>



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1.	<p>All students will be informed of the mandatory tenant insurance policy prior to signing the VIU Student Housing Agreement. The names of the students for the current term will be exported into an excel spread sheet and emailed to Marsh. This will be completed within the first month of each term. Marsh will then register the student under the master policy.</p>	<p>VIU discloses to Marsh for the purpose of registering student in Master Policy.</p>	<p>s.33(2)(d)</p>
2.	<p>The student is responsible to initiating a claim. Students can submit a claim to “Marsh” by calling our claims line directly or they can send the details directly to the carrier “Berkley Canada.”</p> <p>When a student submits a claim by phone or email, Marsh will complete a Notice of Loss. This notice of loss includes the following details: Date of Loss, Student Name, Student Contact Information, Loss Details, Property Damaged, Witness if applicable and it is stored, in Canada in our policy management system, EPIC.</p> <p>Claims information provided to Marsh by a student, is stored in our policy management system “EPIC”, indefinitely.</p>	<p>Collection Use</p>	<p>s. 26(c) s. 32(a)</p>
3.			
4.			
5.			
6.			

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2.4 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	Email containing spread sheet of personal information may be sent incorrectly.	<ul style="list-style-type: none"> List will be saved on VIU Sharepoint with limited access: Marsh account manager and VIU Student Housing management. The employee sending the email is to double check the receiver email address before sending. 	Small	Minimal impact.
2	Marsh servers could be breached and students' data compromised	Technical security measures include firewalls, intrusion detection systems (IDS/IPS), encryption for data in transit and at rest, and regular vulnerability assessments. The company employs next-generation threat protection and endpoint detection and response (EDR) solutions. See. Section 5: Security of Personal Information as well as the Marsh Information and Cybersecurity Program document in the project folder.	Low	Medium



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3	Unauthorized access to Marsh servers by Marsh employees	The organization has a Handling Information Appropriately Policy and a Data Loss Prevention (DLP) program to monitor and protect sensitive information. See section 5.3.1 Access Controls for more details, as well as Marsh Information and Cybersecurity Program document in the project folder.	Low	Medium
4				
5				

2.5. 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.



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The following content is within the Student Housing Agreement (yet to be reviewed by contract services):
Insurance. Tenant insurance is to protect yourself and VIU in the event of loss or damage to your personal property while living in Student Housing or if your actions cause the damage of VIU property or other residents' personal property. All residents will be automatically enrolled in a tenant's insurance program through VIU for an annual premium at a rate specified in Schedule "B", Section 4 Additional Fees. Residents will receive the following insurance coverage while they are living in Student Housing:

- \$10,000 Contents Coverage with \$500 deductible
- \$1,000,000 Personal Liability Coverage
- \$2,500 Additional Living Expense

Students are the named insured/beneficiaries under the Master Policy, and each student will receive their own certificate of insurance. As a result, it is the students' responsibility to report any claims. **In accordance with s. 33(2)(d) of the BCFreedom of Information and Protection of Privacy Act (FIPPA) VIU Student Housing will share your first and last name with Marsh Canada Limited for the purpose of creating your certificate of insurance.**

Once the project is approved we will also add the above to the Housing portal to highlight this information before the student signs their agreement.



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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, all data is stored in Canada.

3.1.1. Where is the personal information stored?

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.

Click or tap here to enter text.

No.

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?

No sensitive information for this initiative.

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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)?

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.

Click or tap here to enter text.

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.

NO, Marsh is responsible for both the management and issuance of the policy documents on behalf of the carrier, Berkley Canada. In addition, Marsh also is responsible for record keeping on behalf of Berkley Canada.

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).



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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.

Click or tap here to enter text.

Marsh has physical security controls include electronic and procedural access control, alarm systems, environmental monitoring, and CCTV placement. Specific measures for critical IT facilities include perimeter protection, access control procedures, and security staff presence.

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.

Technical security measures include:

- [Redacted]

Cloud-Based Controls:

- [Redacted]

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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.](#)

Marsh:

Policy Measures:

The organization has a Handling Information Appropriately Policy that outlines the responsibilities and procedures for managing sensitive personal information.
A Data Loss Prevention (DLP) program is in place to monitor and protect sensitive information from unauthorized access and sharing.

Administrative Measures:

Access to sensitive personal information is granted on a least-privilege basis, ensuring that users only have access to the information necessary for their roles.
User access rights are reviewed periodically to ensure compliance with access policies.
Employees receive training on data protection policies and best practices for handling sensitive information.

VIU:

Uses a password protected excel spread sheet for lists of tenants (FirstName LastName, Email) to share with Marsh.
Role-based access to spreadsheet: VIU Housing Manager



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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.

System activity is logged, and the logs are used to investigate any potential incidents reported (see s. 3.10 Info and Cybersecurity document).

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.

Click or tap here to enter text.

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.

See 5.3.1 above.

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.

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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?**

The student is able to update their information within StarRez, which is immediate; however, Marsh will only be updated once per term.

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

No.

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).

The document mentions that data retention is based on business needs and legal requirements, but it does not specify a records management schedule or the exact duration for which personal information will be retained. Claims are stored indefinitely



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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?

Marsh McLennan would be the primary organization involved in managing this information as the data is being processed and/or stored within our systems.

If yes, please complete the table below:

Describe the type of information in the bank
N/A
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



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

Click or tap here to enter text.

no

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, Student Housing
Date:	17-April-2025