



Privacy Impact Assessment for:

Milner Gardens Square POS

Initiative:	Square POS for Milner Gardens
Department or Service Area Name:	Milner Gardens

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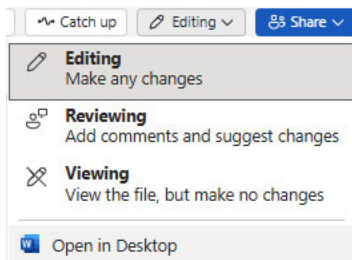
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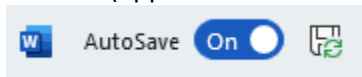
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Tip: Consider using the Microsoft Word Desktop app for a better experience while completing this form.



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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.

To switch our current point of sale system from Moneris Payd to Square. Our POS system is used to make sales in four separate locations of our operations: Our office, Camellia Tea Room, Gift Shop and Welcome Centre.

We have been experiencing challenges with the Moneris Payd software since June 2023 and have been told directly from Moneris customer service representatives that they are no longer investing in the Moneris Payd platform. Instead, they are directing all their clients to switch to an alternate Moneris solution, Moneris Go Retail.

Having an efficient and user-friendly POS system is integral to our operations and revenue generation and must have a simplistic operating design that will work with our senior volunteers. We feel strongly that Moneris Go Retail will not suit our needs, and we have lost faith in them as a company after letting their Moneris Payd software break with no intentions of repairing it for their active customers.

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?

Launching in one phase, we plan to switch out our Moneris Payd software and hardware with Square software and hardware for our entire operation when we re-open to the public on February 13th, 2026.

We are already working with s. 22(1) to determine if Square will be viable from a financial reporting standpoint, discussing proper user access roles to implement, and reviewing our inventory items to be imported into the new system. If this project is to move forward, we plan to have our back end built and hardware purchased by the beginning of January 2026. This will give staff sufficient time to work with the physical system and develop training documents for our volunteers.

This will impact all admission and membership sales at the Welcome Centre, all private event, sponsorship and donation transactions processed through the office, and all purchases made at the Gift Shop and Tea Room.

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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 is a new PIA for a new initiative.

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 (collected from the consumer at the time of transaction)	Name, physical address, billing address, banking information (card number, card type, and bank), device name, model and location (if paying with Apple Pay and location services are turned on)
Contact details (collected from the consumer at the time of transaction)	Telephone number, email address.
Account information: what info is required to set up an account? (collected from us – consumers will not be setting up any accounts or profiles)	Bank account information, tax information, business name, email address, business address, billing address.
Commercial information (collected from us and the information we upload into the backend of our software and how we use our system)	Information about the products and services we sell e.g., inventory, pricing and other data. Information about our payment transactions e.g., when and where the transactions occur, a description of the transactions, the payment or transfer amounts, billing and shipping information, and payment methods used to complete the transactions.

1.4a. Did you list [personal information](#) in question 1.4?

Personal information (PI) 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.



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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	
1. Name, age, sex, weight, height	9. Marital or family status
2. Home address, phone number	10. Religion
3. Race, ethnic origin, sexual orientation	11. Education
4. Medical information	12. Financial information
5. Health history	13. Criminal information
6. Number or symbol assigned to the individual	14. Employment information
7. Income, purchases and spending habits	15. Personal views or opinions, except if they are about someone else
8. Blood type, DNA code, fingerprints	

- 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.

Yes.

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.

N/A



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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
Name	Yes	This information is directly attached to their preferred method of payment, we would not have a choice in keeping or excluding.
Home Address	Yes	This information is directly attached to their preferred method of payment, we would not have a choice in keeping or excluding.



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Phone Number	Yes	This information may be attached to their preferred method of payment and allows us the option to text our visitors a copy of their receipts immediately after a purchase.
Financial information (banking institution, billing address, card type, card number used at time of transaction)	Yes	This information is necessary to perform a transaction and receive funds from the consumer.

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

No.

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 (Privacy Office)
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<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.	Name of consumer attached to their payment card of choice, collected at time of sale.	Collection	<i>FIPPA 26(c) "info relates to and is necessary for a program or activity"</i>
2.	Home address attached to their payment card of choice, collected at time of sale.	Collection	<i>FIPPA 26(c) "info relates to and is necessary for a program or activity"</i>
3.	Phone number and email address attached to their payment card of choice, collected and possibly used at the time of sale to forward the consumer a copy of their receipt.	Collection, possible immediate use.	<i>FIPPA 26(c) "info relates to and is necessary for a program or activity"</i>
4.	Banking institution, card type, card number used at time of transaction. This information is required to process the sale, provide a receipt, and/or to perform a potential future refund.	Collection, possible future use.	<i>FIPPA 26(c) "info relates to and is necessary for a program or activity"</i>
5.			
6.			

2.4 Risk Mitigation Table

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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	Security breach of the software, accessing personal data of our consumers and our own business information.	<p>“To protect Square account holders and their customers, all information submitted by customers is encrypted to Square servers, regardless of whether you're using a public or private WiFi connection or a data service on your phone (such as 4G, 5G or EDGE). Square complies with all required PCI standards and protects its systems with industry-leading technology and security controls, including:</p> <p>Square performs data encryption within the card reader at the moment of swipe.</p> <p>Square's software is developed using industry-standard security best practices.</p> <p>Square's servers are monitored around the clock by dedicated security staff.</p> <p>Square's employees act in accordance with security policies designed to keep your data safe.”</p> <p>Breach Protocol: Square cannot guarantee that unauthorized third parties will never be able to</p>	Low	High



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		<p>defeat our security measures or use your personal information for improper purposes. In the event that any information in our possession or under our control is compromised as a result of a security breach, we will take reasonable steps to investigate the situation and, where appropriate, notify those individuals whose information may have been compromised and take other steps in accordance with applicable laws or regulations.</p> <p>https://squareup.com/ca/en/legal/general/privacy-no-account</p>		
2				
3				
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:

16. The legal authority and section under FIPPA under which you are collecting personal information.



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17. The purpose for which you are collecting the personal information and how it will be used.

18. 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.

Privacy Notice for Consumers: [Privacy Policy for Users Who Do Not Apply or Sign Up for a Square Account](#)

Privacy Notice for Businesses: [Privacy Policy for Users Who Apply or Sign Up for a Square Account](#)



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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.

3.1.1. Where is the personal information stored?

Square has servers all over the world, primarily USA and Japan, but none in Canada. They rely on Amazon Web Services to function.

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

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?

N/A

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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.

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.

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.

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s. 15(1)(l)

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

Square offers two sets of role access rights: Team Member and Owner. The rights of the Owner are inclusive of everything, has a unique entry code, and will only be accessible to four of our staff members. The rights of a Team Member are heavily limited to basic sale functions – processing a sale, refunding a sale, opening the cash drawer. All of which are recorded every time they occur and can be monitored by staff with Owner permissions.

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.

We will not be collecting sensitive personal information as described in section 3.2.

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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.

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.

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?**

All personal information will be stored in Square's servers and is only information that the consumer attaches to their preferred payment method. That information can be updated directly by the consumer through their banking institution.

"You may be entitled to certain rights with respect to your personal information. You can also see, change or fix information you gave us, ask us to deactivate your account, control your location information, or opt out of receiving promotional messages from us. Depending on the jurisdiction in which you reside, you may be entitled under applicable law to request:

Access to your personal information in a portable format, including: (1) the categories of personal information described above that we have collected about you and the categories of sources from which we collected such personal information; (2) the business or commercial purposes for collecting or sharing such personal information; (3) the categories of personal information about you that we have disclosed to third parties for a business purpose; (4) the categories of third parties to whom we have disclosed such personal information; and (5) the specific pieces of personal information we have collected about you.

Deletion of the personal information we have collected from you;

Correction of the personal information we have collected about you;

To opt-out of the sharing of your personal information for purposes of targeted advertising.



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You may submit an access, deletion, or correction request through our dedicated online portal. Although some of the information we collect and process about you may be considered sensitive personal information, we only process such information for purposes authorized by law, such as to provide services you request from us or to verify your information.”

6.2. Does your initiative use personal information to make decisions that directly affect an individual? FIPPA requires that public bodies keep personal information for a minimum of one year after it is used to make a decision.

No.

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).

Customer transaction information:

VIU will not be storing information to be updated or corrected. All personal information will be stored in Square’s servers.

It has been difficult to find specific information about data retention periods for customer transactions. However, the company is PCI DSS compliant, so they should have the following in place:

PCI DSS Requirement 3.1 requires organizations to securely delete data that does not need to be stored for business or legal requirements. Thus, cardholder data cannot be recreated by malicious people.

PCI DSS Requirement 3.1 states that organizations should keep cardholder data storage to a minimum by following data retention and disposal policies, procedures, and processes. The basic approach of PCI Requirement 3.1 is to get rid of the data if you don’t need it.

[PCI DSS Data Storage Requirements](#)

To maintain compliance, Square would (presumably) need to demonstrate to PSI auditors that they meet the requirements in PCI DSS Requirement 3.1.

VIU Account Information:



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“We store your information for as long as is necessary for the purposes identified in this Privacy Notice, including to provide our Services, to comply with legal obligations, to enforce and prevent violations of our Terms, to protect against fraudulent activity, and to defend our legal rights, property and users.

The retention periods for your information are determined on a case-by-case basis that depends on the following factors:

The nature of the information and why it is collected and processed. The length of time we will keep your information will generally be determined by how long we need that information to provide you with our Services, including any optional features you use and to provide customer support. For example:

- As set out in this Privacy Notice, we require Square Account Data to deliver our Services. We need to keep it for the duration your Square account exists so that we can maintain your account.
- Similarly, we will also keep your Usage Data for the lifetime of your account.

Legal reasons. In certain cases, we are obliged to keep your information for legal reasons, which may include after your account has been deactivated. We will keep your information where it necessary for us:

- To respond to a legal request or to comply with applicable law. We must keep your information where we have a legal obligation to do so, for example, if we receive a valid legal request, such as a preservation order or search warrant, related to your account, we preserve your information after you delete your account.
- To deal with and resolve requests, disputes or complaints.
- For litigation or regulatory matters. For example, we preserve your information related to a legal claim or complaint, such as where we are subject to a regulatory investigation or we need to defend ourselves in legal proceedings about a claim related to your information or respond to a regulator in relation to a legal or regulatory complaint made by you or someone else.
- Issues relating to the safety, security and integrity of our Services and to protect rights, property and users. For example, we keep information where it is necessary to investigate misuse of our Services, such as fraud.”

Part 7 – Personal Information Banks

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



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

While Square is collecting personal information listed in the document above, we will not have access to any of it aside from transaction reporting. However, Square has the capability to create a customer directory to track and record sales from frequent supporters. This would result in a PIB recording their name, phone number, email address, home address, company, birthday and any other custom field we wanted to create. It also records all their previous sales, what they bought, how much money the customer has spent with us, and even to keep a credit card on file - **but we do not intend on turning this feature on.**

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.



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

Yes, for financial tracking purposes Having a system like Square that has efficient and dynamic reporting features will help us better track our inventory and measure sales, visitor and event trends. Other than transaction reports, we will not have access to any of the personal information Square collects at the time of transaction.

Part 9 – Summary and Proponent Responsibility

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

I have reviewed the privacy and security risks with this initiative. Data collection is limited to standard financial transaction data, and the vendor complies with Payment Card Industry Data Security Standards (PCI DSS), so risk of a privacy/security incident is low. On this basis, I recommend proceeding with the initiative.

However, if VIU should decide to add the optional “customer directory feature to track and record sales from frequent supporters, (mentioned in s. 7.1) the proponents will be required to submit an addendum to this PIA, as it would substantially change the personally identifiable information collected, access controls, and the information security protections.

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



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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	Milner Gardens Program Manager
Date:	2025-Nov-26