



## StarRez

<b>Initiative:</b>	StarRez
<b>Department or Service Area Name:</b>	VIU 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.

StarRez is a purpose-built property management system designed for Higher Education Student Housing. Key functions this system performs related to VIU Student Housing include admissions management, occupancy management, student profile generation and roommate matching, source of truth for accounting and accounts receivable, standardized email template communication, maintenance and work order submission and management, housekeeping workload management, hotelling and conferencing operations, student conduct case management, facilitation of sponsorship and tuition waiver fee support, user friendly student portals for application and terminations, primary source of reporting and analytics for the department. The above is not exhaustive of functions but



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covers primary items. This system is utilized by all housing employees, all prospective, current, and past housing students for billing and communication. This system also reports directly into Unit4 for financial information.

### 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 for the use of StarRez within VIU.

### 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.

### 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><b>From Students:</b> Legal name, preferred name, DOB, gender, student ID number, medical information that may impact evacuation processes, cleanliness and personal habits, lifestyle patterns, conduct and care incidents/disclosures, parcels received and issued.</p> <p><b>From Third Parties/ Non-Student Guests:</b>            Short Term: group name, contract manger name, guest name.            Long term stays: "" and emergency contact.</p> <p><b>From VIU Employees:</b>            Legal name</p>
Contact details	<p><b>From Students:</b> email, phone number, address. Emergency contact name, phone number, email, and address.</p>

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	<p><b>From Third Parties/Non-Student Guests:</b> phone number, email.  <b>From VIU Employees:</b> VIU email</p>
Account information	Amount owed and paid to Student Residence, payment card type, sponsorship/ government funding
Commercial information	Contractors whom complete maintenance work within Student Residence. Name of contractor and description of work.

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

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

Yes
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### 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.

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
Name	Yes	Keeping- students and guests (party) are required to sign Student Residence Agreements, which is a legally binding agreement between VIU and the other party. Therefore, this information is required for Student Residence to receive to uphold the agreement.
Age	Yes	Student Residence requires age information:



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		<p>-As there is a requirement to be 17 years of age or older to live in Student Residence.</p> <p>- As students under the age of 19 require a legal guardian to complete a Student Residence Agreement waiver.</p> <p>-To identify if students are of legal age to be in possession and/or consumption of legal substances such as cannabis and alcohol.</p>
<p>Student &amp; Guest- Contact Information: phone, email, Student only: mailing address.</p>	<p>Yes</p>	<p>Phone &amp; email: Student Residence requires contact information in the event of an emergency. The department communicates frequently with students and guests to ensure they are well informed of services, and resources. Contact information is also required for conduct and wellbeing concern purposes.</p> <p>Mailing Address: There are rare occasions when Student Residence requires the students mailing address to send refund cheques and/or to mail left behind belongings.</p>
<p>Gender</p>	<p>Yes</p>	<p>Student Residence requires gender identification due to a majority of shared accommodations being</p>



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		<p>gender specific, ie shared bathrooms and bedrooms.</p> <p>Gender is not utilized for room assignment within our Gender Inclusive Housing.</p>
Photo	Yes	<p>Student Residence requires residents to upload photos of their faces for identification purposes.</p>
Medical Information	Yes	<p>Student Residence requests students disclose if they have any health-related concerns that would require assistance during an emergency evacuation. We are currently in the process of working with Accessibility Services to complete personalized evacuation plans for each accommodated student within Student Residence, which will then be stored in StarRez as an attachment.</p>
Emergency Contact: relationship with resident, phone, cell phone, email, address.	Yes	<p>Student Residence has an obligation to contact resident's emergency contacts if residents' health and safety is at risk.</p> <p>Can remove address of Emergency contact as not needed, but we currently have a significant amount of accounts that include this information.</p>

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Sponsorship/ Government funder contact: name, phone, email, address.	Yes	The details gathered are required to complete a sales order through Accounts Receivable.
Personal habits	Yes	Required- these details allow for students to be assigned to rooms with other students who have similar personal habits.
Conduct and Wellbeing Incidents	Yes	Required- Students are held accountable for their behaviour when residing in Student Residence based on the Student Residence Agreement and Community Standards Handbook.
Parcels	Yes	Student Residence receive and process student's packages at the front desk.
Payment Card Type	Yes	The card type is retained for the purposes of daily financial reconciliation and if applicable refunds.

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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.

	<b>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.</b>	<b>(Collection, Use or Disclosure)</b>	<b>FIPPA or other legal authority</b>
<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.	For student data all above details except for parcels are collected through StarRez's Portal X platform during the registration and application phase of admissions and can be updated by the resident via the 'Update My Details' page on the portal.	Collection	BC FIPPA 26 (c) <i>the information relates directly to and is necessary for a program or activity of the public body</i>
2.	<b>For guest data</b> (Short Stay: Name, phone number, and email. Long Term: Name phone number, email, and emergency contact) is either gathered by Expedia or by our front desk. The data is then inputted into StarRez manually by our front desk staff.	Collection	BC FIPPA s. 26(c)
3.	Payment Card Type is gathered any time a resident makes a payment either through the portal or at the front desk. Hotel guests' payment card type is only collected if they pay at our front desk.	Collection	BC FIPPA s. 26(c)



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4.	<p><b>Guest or resident’s name, email, or student ID</b> may be used to look up the guest or residents’ account within StarRez.</p> <p>Residents’ names are disclosed during the roommate selection process, which residents opt into.</p> <p>Residents’ names and email addresses are disclosed to those who they share a space with (bedroom, bathroom and/or apartment) two weeks prior to move in.</p> <p>Residents’ names are disclosed on work orders sent to our general maintenance contractor.</p>	Use/ Disclosure	<p><b>Use:</b> BC FIPPA s.32 (a) <i>“for the purpose for which the information was obtained or compiled, or for a use consistent with that purpose;</i></p> <p><b>Disclosure</b> 33.2 (c) <i>if the individual the information is about has identified the information and has consented, in the prescribed manner, to the disclosure;</i></p>
5.	<p><b>Email:</b> Student Residence utilizes email as the primary communication mechanism between guests and residents. We do so by emailing through StarRez, utilizing email templates. StarRez also has a function that keeps records of all emails sent to residents or guests and if they have opened the email. Conduct related emails, such as a follow up conduct status letter is not sent through StarRez due to the record function being accessible to all front desk staff.</p>	Use	BC FIPPA s. 32 (a)
6.	<p><b>Age:</b> If a resident applies to Student Residence and is below the age of 17 they will receive a notification that they do not meet our age requirement.</p> <p>If a resident is under the age of 18 and they are at risk of harm Student Residence is obligated to contact their emergency contact.</p>	Use	BC FIPPA s. 32 (a)



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	<p>If a resident is under the age of 19 Student Residence requires a guardian or parent to complete an Under 19 form when signing the Student Residence Agreement, stating they have read and understand the SRA and that they acknowledge that the resident is a mature university student and consent to VIU dealing directly with the resident in carrying out the SRA.</p> <p>If the resident is under the age of 19 and is in possession of or consuming alcohol or cannabis Student Residence will hold the resident accountable for underage possession and consumption.</p>		
7.	<p><b>Gender:</b> residents are assigned to rooms based on gender due to Student Residence spaces having shared bathrooms, and bedrooms. This does not apply for our Gender Inclusive Housing, which residents are able to opt in and out of.</p>	Use	BC FIPPA s. 32 (a)
8.	<p><b>Medical Information:</b> Assistance during an emergency evacuation.</p>	Use	BC FIPPA s. 32 (a)
9.	<p><b>Emergency Contact/ Wellbeing Incident:</b> in the event a report is made that a resident or guest’s safety is in jeopardy or has been jeopardized Student Residence manager will call the emergency contact.</p>	Use/Disclosure	<p><b>Use:</b> BC FIPPA s. 32 (a)  <b>Disclosure:</b> 33.2 (d) <i>for the purpose for which the information was obtained or compiled, or for a use consistent with that purpose within the meaning of section 34</i></p>

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10.	<p><b>Personal Habits:</b> residents profiles including personal habits and the percentage of matching habits are shared with future residents who have opted into roommate selection process.</p> <p>For those who are not included in the roommate selection process StarRez utilizes a function to allocate residents based on their room preference and roommate personal habits matching.</p>	Use/Disclosure	<p><b>Disclosure:</b> s. 33.2 (c) <b>Use:</b> BC FIPPA s. 32 (a)</p>
11.	<p><b>Photo:</b> residents' photos are utilized to verify identify upon check in by front desk and admin. staff, and during conduct and wellbeing incidents by Residence Life admin staff.</p>	Use	<p><b>Use:</b> BC FIPPA s. 32 (a)</p>

2.3 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	<p>Personal information, such as conduct/ wellbeing incident reports being viewed by staff who are not on a need-to-know basis, ie. Housekeeping, Front Desk staff.</p>	<p>Security Groups: [REDACTED]</p> <p>[REDACTED]</p> <p>s. 15(1)(l)</p>	<p>Due to the security groups including legacy groups, and the settings being complex we have experienced where Front Desk staff have been unknowingly given access to Incident Reports, which the</p>	<p>Bias in treatment of student by employee(s). Continued breach of privacy if shared further with others (more challenging to contain if unknown).</p>

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			staff has reported same to Admin to rectify.	
2	Employees sharing personal information with a 3 <sup>rd</sup> party, such as parents/guardians, sponsors, future landlords, or other students.	<p><b>Training and awareness:</b> as of 2024 management has mandated all Student Residence employees to complete the VIU Privacy and Information Training.</p> <p><b>Consent to Release Information Form:</b> employees are trained to ensure residents have completed the above form or provide written or verbal consent prior to sharing information with a third party, such as their parents.</p>	Moderate likelihood, especially with parent involvement.	<p>Student's fees may be paid by their parents in a timelier fashion.</p> <p>The student's relationships may be negatively impacted.</p>
3	Personal information printed and stored in an insecure location.	Very limited personal information is printed, such as movement reports (name, room number, and date of move in or out), account statements, and registration lists to events.	All printed reports with personal information are shredded after use. When left unattended is secured behind a locked door and/or in a locked drawer.	Information regarding where individuals reside or their financial standing within Student Residence are at risk of being discovered by non-employees.
4	Payment information is stolen	StarRez is Payment Card Industry Data Security Standard (PCI DSS) Level One service	Low due to level of protection.	Disruption of service Credit card fraud



Privacy Impact Assessment for:

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		<p>provider. This means that have an annual onsite assessment by a Qualified Security Assessor and a Quarterly Network Scan conducted by an Approved Scanning Vendor (ASV). Essentially, they are required by credit card companies to have a high standard of security in their payment systems.</p>		
5				

### 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.

The following notice is the first page of our registration process:

*The personal information collected in support of your student application is being collected under the authority of the University Act and is subject to the Freedom of Information and Protection of Privacy Act (FIPPA). Your personal information will only be used for purposes consistent with facilitating your residence experience while at Vancouver Island University. For more information regarding the collection, use, and disclosure of your personal information please contact [privacy.officer@viu.ca](mailto:privacy.officer@viu.ca).*



Privacy Impact Assessment for:

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The following notice is at the top of the registration page that requests personal information such as contact information:

In the event you are offered a room at VIU Student Residence your email address will be shared with your roommate, bathroom mate, and/ or apartment mate on the Student Residence Portal in advance of you moving in with the purpose of ensuring you are able to communicate with each other regarding living in Student Residence. Communication is essential to ensure you and your shared space mate are set up for success.

Emergency contact notification:

Your emergency contact **will be kept confidential** and only used in an emergency when there is an elevated concern for your health or safety. This could include if you are sick or injured.

Medical Information notification:

All medical information is collected for VIU Student Residences records only. It may be accessed and disclosed to emergency personnel in the event of a medical emergency.

Accommodation Request notification:

For your privacy, please do not send this form or its supporting medical documentation to Residence. (with Accessibility Services contact information above notification).

Roommate Selection notification:



Privacy Impact Assessment for:

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Please note, your profile will only be viewable by others if you have provided consent to do so, by clicking 'I want my profile visible for roommate selection'. Your age will not be shared unless you include it in your bio.

I want my profile visible for roommate selection.

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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?

Storage is in Canada Central Azure data center a dedicated MSSQL database and blob storage, both of which are encrypted at rest.  
Please see <https://learn.microsoft.com/en-us/azure/security/fundamentals/physical-security>

#### 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.

Personal health information that may be required in the case of an evacuation/emergency.  
Incident reports and Student Residence specific conduct files

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.

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

Click or tap here to enter text.

**Yes.**

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)?
StarRez	Azure Data Centre	Canada Central Azure data centre

### 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.

Yes, see attached.

## 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.

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### 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.

StarRez is hosted on Azure, so they have all security controls that come with it  
Physical security measures:

s. 15(1)(l)

### 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.

VIU single sign on for employee access. Students are to utilize their email as their username and the creation of a password to access the portal.

StarRez maintains multiple third—party security certifications, including:

- SOC Type II, a cybersecurity compliance framework that ensures service providers protect customer data from unauthorized access security incidents, and data breaches;
- Cyber Essentials Plus: helps organizations protect data from a range of common cybersecurity attacks.
- PCI DSS Level 1: checks handling of payment processes annually, ensuring they meet the highest standards for secure payment data processing. Additional security features:
- Data in transition and at rest is protected by 256-bit TLS and AES256 encryption.
- platform is regularly tested for vulnerabilities, including manual penetration testing.

### 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.**

As mentioned in 2.3 StarRez

s. 15(1)(l)

**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.

Unknown if this feature exists for StarRez. StarRez has change logs, but not access logs to my knowledge.

**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.

Security groups include limiting access to personal information based on employees roles within VIU.

**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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StarRez Privacy and Security links:

- [Privacy policy](#)
- [Security policy](#)

### 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?**

Students are able to update their personal information on the portal by accessing the Update My Details tab, which is viewable while they are a resident with us. Students can also request updates via email or phone and a front desk staff or admin staff are able to alter their personal information, which they can then view on the portal.

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

Yes, as explained in 2.1.



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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.

We do not have an information schedule. All personal information has been stored indefinitely in StarRez.

### 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).

No. Indefinitely in the event students reapply.

## 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?

Click or tap here to enter text.

Yes

If yes, please complete the table below:

Describe the type of information in the bank
StarRez’s response “We need more details here. We can supply the schema related to the data that can be stored on students. VIU is responsible for granting access to data stored in their StarRez instance and configuring it according to their requirements”.
Name of main organization involved



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[REDACTED]

[REDACTED]

[REDACTED]

s. 13(1)

- [REDACTED]
- [REDACTED]
- [REDACTED]
- Ensure all Student Residence staff members have taken the VIU Access and Privacy Training course.

### 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.*

<b>Reviewed by</b>	Privacy Officer
<b>Approved by</b>	Manger, Student Housing
<b>Date:</b>	2025-01-07