



Studiosity: Full Implementation

Initiative:	Studiosity
Department or Service Area Name:	Library/Writing Centre

Part 1 – General Information and Overview	2
Part 2 – Collection, Use, and Disclosure	7
Part 3: Storing Personal Information.....	18
Part 4: Assessment for Disclosures of Sensitive Personal Information	18
Part 5: Security of Personal Information	19
Part 6: Accuracy/Correction/Retention of Personal Information	22
Part 7 – Personal Information Banks.....	23
Part 8 – Further Information.....	24
Part 9 – Summary and Proponent Responsibility	24
Part 10: Signatures.....	25



Studiosity: Full Implementation

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.

VIU is considering onboarding Studiosity, an online academic support service based in Australia that is available to students 24/7/365.

Studiosity uses AI powered chat bots as well as live human support mediated by online video conferencing and whiteboarding. The support includes writing feedback as well as math and science support for all students. Students will have access to the services outlined below for the duration of the term identified.

Studiosity claims that university partners measure a range of improvements to student retention and experience, with up to 60 per cent of service engagement taking place on evenings, weekends, and holiday periods.

Product Descriptions

Writing Feedback+AI Service

Students upload their own piece of writing for feedback. Constructive, formative feedback is returned in minutes.

- Guidance is provided on how to apply critical thinking based on Blooms Taxonomy.
- Formative feedback on use of sources gives students a chance to improve before submitting assignments.

Students receive a confirmation email once their file has uploaded successfully, and a mobile and/or email notification once the feedback is ready for them to collect after a few minutes. Students can view or print their file with annotated feedback and return to it at any time in their Studiosity dashboard.

The feedback suggests where students might focus their attention and add more thought. CVs and resumes are also accepted, and feedback is provided on grammar, spelling, structure, and readability.

Within the feedback, students also receive referrals for further engagement with the university's other referencing guidelines, resources, and services. This may actively increase participation with VIU's wider student support ecosystem. For example, according to Studiosity, Yorkville University saw a significant increase to their Library's APA Support Centre from Studiosity referrals. VIU can choose what services and supports to promote.

The Writing Feedback+ AI service is a 'closed system' meaning that training of the GenAI-based service only occurs within the Studiosity Quality Assurance team, not student inputs, which are used



Studiosity: Full Implementation

for 'inference' only for the purpose of each interaction. Inference is the process where the AI model uses "learned" knowledge to generate feedback for the students, but it does not use student input for further training. The Studiosity AI ecosystem is underpinned by their [AI-for-Learning Policy](#) and developed using a rigorous approach to providing academic writing feedback. The Writing Feedback+ service provides critical thinking feedback based on the first five levels within Bloom's Taxonomy, to provide students with paragraph-level feedback and actionable suggestions. Using a trusted framework means educators and administrators can see how student's critical thinking skills improve over time. Those with full administrator access in the Partner Portal can view the "Academic Writing Ability" graph located within the Insights tab. This allows VIU to see how a student's writing skills develop over time and how higher order thinking skills are fostered based on the first five levels of Bloom's Taxonomy.

Study Assist Chatbot

Included with Writing Feedback+, Study Assist is the AI-powered academic chat assistant that provides students with access to academic and study support. In the Studiosity dashboard, students type in a question, anytime, and receive a response within seconds.

Study Assist provides academic—not content-specific—guidance and students can ask questions that will help develop the academic skills required for success, in four critical skill areas:

- Assignment research
- Study skills
- Academic writing principles
- Referencing

Studiosity's AI services are uniquely fit for purpose for university partners— that is, evidence-based with a focus on ensuring learning gain, not answers. Study Assist was engineered by Studiosity's in-house machine learning experts and quality assurance team to ensure they are delivering an ethical academic chat assistant that draws on a trusted and recognized collection of [Open Educational Resources](#).

The Open Educational Resources ensure students are always engaging with AI guidance that is relevant, to better avoid the risks associated with public, large language models that are not intended for higher education or defensible student learning associated with degree attainment. This variety and breadth of resources ensures that 'Study Assist' services all students, regardless of field of study.

Connect Live

"I need help right now!" This part of the Studiosity service offers one-to-one, personal study help in real time.

Connect Live provides synchronous, 24/7 on-demand help. A student formulates their own question, then works one-to-one with a Studiosity Subject Specialist in the interactive classroom, with chat, collaborative whiteboard, and file sharing. This timely feedback is intended to boost confidence and

Studiosity: Full Implementation

perseverance. Students can ask for help with core literacy, numeracy, science, and study skills. View the [full subject list](#).

Learn more by watching an example “Connect Live” session:
vimeo.com/studiosity/connect-live.

1.2. What is the scope of the PIA?

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

This PIA covers the full integration of Studiosity across VIU, including Writing Feedback AI+, Study Assist (chatbot), and Connect Live. The services will be accessed [REDACTED] authenticated [REDACTED] with links dispersed throughout various university webpages. Services can also be accessed through [REDACTED] integration with VIU’s Brightspace Learning Management System.

s. 15(1)(l)

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.

August 2022 pilot in project folder.
Jan-June 2025 Pilot in project folder.

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>From Students:</p> <ul style="list-style-type: none"> • First name, Last name • VIU email address • Year level • Any PI the student enters (personal essay, resume, etc.). • Engagement metrics • Meta data (IP address, geo location) • Brightspace (VIULearn) User ID • Brightspace (VIULearn) username <p>From Third Parties:</p>

Studiosity: Full Implementation

	From VIU Employees:
Contact details	From Students: From Third Parties: From VIU Employees:
Account information: what info is required to set up an account?	
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

- 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.



Studiosity: Full Implementation

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



Studiosity: Full Implementation

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, Last name	y	Identity
VIU email address	y	For contact information
Year level	y	Help students with homework, study, assignment research, and exam preparation.
Any PI the student enters (personal essay, resume, etc.).	y	All submissions have their PII scrubbed before passing through the feedback model.
Meta data (IP address, geo location)	y	Website functionality: “to enhance interaction and convenience in using our website and we do not use cookies to record any personal information”



Studiosity: Full Implementation

Engagement metrics	y	Engagement metrics are used to report to VIU how students use and benefit from the service
Social plug-in tracking cookies	n	Studiosity no longer has social cookies and are in the process of removing this outdated language from their privacy policy.
Intervention flags and referrals for academic or wellbeing behaviours.	y	To identify when students are struggling academically, enforce academic integrity policies, and identify risks of harm to self or others.
User Id and username from Brightspace /VIULearn	y	To connect student's VIULearn user account to their studiosity account for easy access to through the LMS

2.2 Does your initiative involve the use of Artificial Intelligence (AI)?

Yes

[Studiosity AI for Learning Policy](#)

Principle 6: Privacy

- 6.1 The Studiosity service will remain data light, this includes preventing unnecessary data capture and storage.
- 6.2 Personally identifiable information (PII) and student feedback are not used in AI model training.
- 6.3 Studiosity is certified for compliance with relevant privacy legal frameworks.
- 6.4 Studiosity is available within the institutional learning management system for secure access and management.

[Q&A with VIU Privacy Office:](#)

Please explain the Closed-loop system referred to in the Writing Feedback + AI service:

In the context of large-language models, training occurs first, followed by inference. The Studiosity model training was completed using their proprietary data set of 23 million metadata points. These data points are the pieces of feedback they have provided over the years from their Subject Specialists applying their feedback on real student tasks.

Inference is the process where the model uses this learned knowledge to generate feedback for the students, but it does not involve any additional learning.

Studiosity: Full Implementation

After this, our human QA teams review daily logs of AI outputs and assess whether the feedback provided was to the standard and satisfaction our partners expect from us. This process is called reinforcement learning from human feedback (RLHF). If there are any unexpected outputs, we adjust our internal metadata. N.B. The quality of our AI-for-learning technology is on par with our human service.

When students submit their work for feedback such as personal essays or resumes, where does the information go and how is it processed? How do they keep it separate from other submissions if it's being processed in an AI system?

*All personal identifiable information (PII) is redacted from students' work before submission to any AI infrastructure which **does not use** students' work for training, only inference. (Students are also asked to remove any personal information before uploading their document). Student work is not retained within the LLMs.*

Studiosity uses a [REDACTED] s. 15(1)(l) [REDACTED] (see Data Security and Protection Policy 1.1.0). Neither student data, nor documents are stored in the artificial intelligence system component of our service, as inference is handled separately from storage (see architecture). Regardless of document type, all personal identifiable information is redacted and encrypted in transit and at rest. Documents are then separately stored for the provision of student retrieval. All interaction information, including document feedback, is deleted after 15 months from the student's last date of service use, unless requested by the student anytime before the conclusion of the 15 month period since last use by emailing privacy@studiosity.com

What if a student submits their own or others' copyrighted material?

All intellectual property rights remain with the end user and/or the appropriate copyright holder, and none with the Studiosity. Students own all their data and intellectual property. Studiosity does not own, nor use any student data. See data deletion policy above.

What is the "Humans in the loop" system?

Studiosity's Humans in the Loop system – includes their Quality Assurance team, Academic Services Team, Student Experience, Senior Leadership, Academic Advisory Board, Higher Education advisers, Global Student Advisory Group – and provides governance, oversight, and due diligence around service delivery and development. Principles in this regard were built on emerging policy from education departments as well as direct consultation with leadership amongst university partners. Studiosity aims to set a best practice for AI in learning technology as a benchmark for others.

Studiosity: Full Implementation

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>
1.	<p>Account creation: Student clicks link to account creation page, where they encounter privacy notification. Student signs off and proceeds to register for account, which includes providing FN, LN, email address, and year level.</p> <p>Alternate workflow: Student clicks on link in LMS and is redirected to Studiosity Student accepts terms and privacy policy Account is created using first and last name, email and user id from LMS</p>	Collection	Student Agreement FIPPA s. 26(c)
2.	Student logs into Studiosity Portal via VIU Single Sign-On (SSO) or by following a link in the LMS.	Use	32(a)

Studiosity: Full Implementation

3.	Student is presented with a dashboard and selects a service which connects them with a subject matter expert or an AI app, depending on service.	Use	32(a)
4.	Students at academic risk or risk of harm to self or others identified by Studiosity and are brought to the attention of VIU for intervention.	Use and Disclosure	32(a); 33(2)(d)
5.	VIU UL or AUL reviews intervention flag and notifies the Manager, VIU Conduct & Care.	Use and Disclosure	32(a); 33(2)(d)(h)
6.	The VIU Conduct & Care Team will reach out to student at their discretion	Use	s. 32(a)
7.	Students upload work, which may include sensitive personal information such as from personal essays, resumes, etc.	Collection	s. 26(c)
8.	Limited, relevant personnel to operate the Studiosity service	Use	s. 32(a)

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	Student PI is compromised or breached in transmission or while stored on Studiosity servers.	Data is encrypted while in transit and at rest, using standard protocols. Please see attached Data Security and Protection Policy	low	low



Studiosity: Full Implementation

		1.1.0.pdf and Data Breach Policy and Procedure 1.1.0		
2	Studiosity Subject Matter Experts (SMEs) leak personal information	Studiosity screening process of SMEs	low	low
3	VIU employees could access personal information of students and disclose it for personal purposes.	Employee contractual terms. Access limited to three roles: University Librarian (UL); Associate UL; one data librarian	low	Low
4	VIU SSO compromised	Multi-factor authentication	low	high
5	Intellectual Property (e.g., student work; faculty assignments) is input into Studiosity AI model and could show up in outputs	<ul style="list-style-type: none"> Studiosity [REDACTED] s. 15(1)(l) [REDACTED] (see Data Security and Protection Policy 1.1.0). Neither student data, nor documents are stored in the artificial intelligence system component of their service, as inference is handled separately from storage (see architecture). Studiosity does not train LLMs on student input. All intellectual property rights remain with the end user and/or the appropriate copyright holder, and none with the Studiosity. 	low	med



Studiosity: Full Implementation

6.	Students are unaware that their inputs and engagement with Studiosity is shared with VIU administrators. (Periodic usage reports; usage patterns; content of student learning sessions; comments left in post-session surveys; transcripts and audio recordings; intervention referrals).	<ul style="list-style-type: none"> Explicitly and clearly stated in VIU-specific privacy notification, which students are presented with before signing on to service. 	high	low
7.	Students are unaware that they are engaging with AI.	<ul style="list-style-type: none"> Explicitly and clearly stated in VIU-specific privacy notification 	low	low
8.	Student unintentionally uploads their Personal Information to the AI tool	<ul style="list-style-type: none"> Students asked to remove PI before uploading their document Studiosity uses automated rule-based and model-based detection to redact PI before submission to AI infrastructure See confidential “Focus on PII” document in project folder for more technical info on PI redaction techniques. 		
9.	VIU employees and students do not have “opt out” option for cookies when on Studiosity website.	<ul style="list-style-type: none"> VIU-specific privacy notification: Recommend VPN as well as options for browser settings to limit cookie metadata collection. 	high	low
10.	Studiosity’s third party service providers breach VIU student’s personal information	<ul style="list-style-type: none"> Studiosity limits PI provided to third parties to only what is required to perform their functions; 	low	med



Studiosity: Full Implementation

		<ul style="list-style-type: none">• Contracts with third parties include provisions for protecting PI at or exceeding Studiosity Privacy Policy.		
--	--	--	--	--

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.

Students click on one of the Studiosity links dispersed throughout various relevant university webpages. They are taken to a landing page where they are presented with the following privacy notification tailored by VIU.

VIU Privacy Notice for use of Studiosity

Studiosity is a **private company** that provides 24/7/365 online academic support for students. To deliver their services, Studiosity uses Generative AI, AI-powered chatbots, and one-to-one, personal help in real time. The AI models do not use your submissions for training the AI tools, and neither student data nor documents are stored within the AI system. All interaction data and document feedback will be removed from Studiosity servers after 15 months of inactivity. You may also ask Studiosity to delete your information at any time by contacting privacy@studiosity.com.



Studiosity: Full Implementation

Collecting your Personal Information

As a service provider to VIU, Studiosity collects your personal information as outlined below in accordance with s. 26(c) of the BC *Freedom of Information and Protection of Privacy Act*. The information is limited to only what is necessary for the purpose of providing their services, which include helping students with homework, essay writing, research, resumes, and exam preparation. This information is stored on secure AWS servers in Australia.

Studiosity **collects the following personal information:**

- Name.
- Email address.
- Year of study.
- Education status, including which VIU campus.
- Any personal information that you include in submitted work (for example in an essay you have asked for feedback on, or a resume and cover letter).
- Engagement data (frequency of using the service and how you are using the service).
- Intervention flags and referrals for academic or wellbeing behaviours. *
- Interaction data, including transcripts and audio recordings of live sessions.
- Cookies: Studiosity uses a variety of cookies on their website, some of which collect information about your computer, such as IP address and geolocation. This type of tracking can be avoided by using a Virtual Private Network (VPN). While Studiosity does not offer an opt-out option for cookies, you can block third party cookies in your browser privacy settings.

Sharing your Personal Information



Privacy Impact Assessment for:

Studiosity: Full Implementation

Studiosity **will share personal information** with VIU. This is to help VIU understand how effective the service is, and what kind of content is being covered in learning sessions. This information may include the content of your learning sessions and any written comments you make in post-session surveys. Studiosity may also share transcripts and audio recordings with VIU for the purpose of quality assurance or for intervention flags and referrals. The University Librarian (UL), the Associate UL, one Librarian and, in the case of intervention flags and referrals, the VIU Student Conduct and Care team have access to this data.

***Intervention flags and referrals:** there are instances where Studiosity will send intervention alerts to VIU where they have identified the following types of concerns:

- **Academic:** if you are showing signs of struggling academically (for example, not grasping core concepts; extensive issues with vocabulary, grammar, or sentence structure; or if you indicate you are feeling overwhelmed, including remarks about failing or quitting the course).
- **Academic integrity:** if you're violating academic integrity policies (for example, by repeatedly asking the AI chat bot to write content for you).
- **Well-being:** mentions of self-harm or suicidal ideation; bullying and harassment; feeling overwhelmed with managing time and workload.

In these instances, VIU's Conduct and Care team will see transcripts for only the sessions that were flagged. Studiosity will not inform you when you have been referred to VIU for interventions.

Studiosity is Optional

If you choose not to use Studiosity, other on-campus help is available to you at VIU through your instructors, the [Writing Centre](#), [VIU Library](#), [Career Studio](#), [Math Learning Centre](#), [Learning Matters](#), [Academic Advising](#), the [Volunteer Tutor Program](#), and more. Ask your department for more information on these and other academic support services.



Privacy Impact Assessment for:

Studiosity: Full Implementation

You can learn more about Studiosity's Privacy Policy by reading their Canadian [Privacy and Cookies Policy](#), and you can reach out directly by contacting privacy@studiosity.com.

You may also contact the VIU Privacy Office with any questions or concerns at privacy.officer@viu.ca.

Students then click 'Go to my account' and are prompted to sign-in using their MyVIU credentials. They are asked to create a 4-digit pin that will function as 2-factor authentication to secure student's accounts should their browser be left open. They are then logged into Studiosity and ready to use the service. Students will need to click the check box that they agree to the complete Studiosity Cookie and Privacy Policy and Terms of Use (text below). Every time students access Studiosity they need to enter their PIN to confirm their identity.

A flowchart demonstrating this use is in the project folder. Please note that the SSO Landing Page is currently inactive if the SSO Link is clicked/QR is scanned from the flow document. It can be activated at any time for testing and use purposes.

Studiosity: Full Implementation

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?

Studiosity stores data in Australia in Amazon Web Services (AWS) Data Centres. Third party service providers Studiosity uses are located in other countries including Australia, United States, United Kingdom and countries of the European Union.

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.

Studiosity does not collect sensitive personal information, however, a student may choose to upload documents with sensitive PI, such as a personal essay.

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?

Yes

Studiosity: Full Implementation

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)?
Studiosity	AWS	Australia

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.

NA

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.

Please see project folder.

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

Studiosity: Full Implementation

controls over distributions of keys/access; locked workstations that do not permit others to view your screen (including when working remotely, etc).

Studiosity:

- **Revocation of Access:** Upon the conclusion of employment, an employee's access to physical premises must be revoked.
- **SOC 2 Type 2 Compliance:** hosted on AWS platform.
- **Screen locking** with pin, passcode, or fingerprint for unlocking

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.

Studiosity:

- Sensitive data is encrypted in transport using TLS
- Sensitive data is encrypted in file storage using disk encryption. Databases storing personal data are encrypted using AES-256. All data stored in the cloud is encrypted using AES-256, and backups are strongly encrypted and stored in an encrypted cloud storage bucket. Additionally, server disk encryption is applied to all EC2 instances using EBS volume encryption.
- Password policy
- MFA
- For more details, see Vendor Assessment Toolkit (HECVAT) in project folder as well as Data Security and Protection Policy 1.1.0 in the project folder.

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.

Studiosity: Full Implementation

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.

Studiosity: Access controls for staff within Studiosity are based on role-based access control (RBAC). Access to personal data will be limited to only those employees that require it, and only for the stated purpose for which it was collected.

VIU: The University Librarian (UL), Associate University Librarian (UAL) and a data librarian, but only the UL and AUL will have access to student's personal data. In the event of an intervention flag or referral, concerns will be passed on to VIU's Conduct & Care Team.

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.

Studiosity's system logs security and authorization changes, along with user and administrator security events like login failures and access denials. Logs are retained for 12 months and are encrypted at rest. They are protected by strict permissions, accessible via authenticated VPN only. Studiosity does not provide an interface for partner access to these logs, but relevant logs can be provided to aid in troubleshooting and debugging if required.

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.

See 5.3.1

Studiosity: Full Implementation

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 can manage different elements of their profile, including first name, last name, email address time zone., via the 'Account Details' link from the right-hand side of their logged in account homepage.

As mentioned above, personal information will be deleted or anonymized after 15 months of inactivity. If a student would like their personal data removed sooner, they can contact the Studiosity privacy officer via email.

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

Yes

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.

All data related to the institution will be returned upon request at the completion of the contract. Data is typically retained for 15 months post-contract for retrieval purposes. Data destruction follows AWS policies for cloud storage.

Studiosity: Full Implementation

--

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).

Studiosity retains personal information as long as necessary for the fulfillment of the identified purposes for its collection or as otherwise necessary to comply with applicable laws or protect their interests. When personal information is no longer necessary or relevant for the identified purposes (in general this is 15 months after the last access of the service by an individual), or is required to be retained by applicable laws, Studiosity will take steps to have it deleted, destroyed, erased, aggregated or made anonymous. Studiosity uses reasonable industry practices to ensure they have adequate controls, schedules and practices for information and records retention and destruction which apply to your personal information.

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
Student FN, LN, email, year of study
Name of main organization involved
Studiosity



Studiosity: Full Implementation

Any other ministries, agencies, public bodies or organizations involved
VIU
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.

N/A

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

No

Part 9 – Summary and Proponent Responsibility

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

Privacy and Security: I have reviewed the privacy and security procedures and am satisfied that they meet or exceed expectations and protections under FIPPA.

AI: the AI component of the service operates in a “closed loop system” and does not train their AI on student’s data. All student data, including interaction data, documents, and document feedback is stored in a partition of their architecture that is separate from their AI system. All interaction information, including submissions and document feedback, is deleted after 15 months from the student’s last date of service use. They can also have it deleted any time before that by emailing their privacy office.



Studiosity: Full Implementation

IP: Studiosity is clear that students own all of their data and retain intellectual property, and further, all intellectual property rights remain with the end user and/or the appropriate copyright holder, and none with the Studiosity.

I recommend that VIU continue to use the updated VIU-specific privacy notification that must be read before students sign on to the service. This is so students can make an informed choice about their privacy and using the service without having to read a long and jargon-heavy privacy policy.

The notification should cover all privacy considerations and clearly lay out other options should they choose not to use the service.

A draft of this notice with suggested changes is in section 2.5 above.

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	University Librarian
Date:	26-Aug-2025