

**PRIVACY IMPACT ASSESSMENT - iCent**
**GENERAL INFORMATION**

|                                                              |                                                                                                                                          |
|--------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Initiative Title:</b>                                     | iCent                                                                                                                                    |
| <b>Department:</b>                                           | Camosun International                                                                                                                    |
| <b>Initiative Lead (PIA Drafter) Name and email Address:</b> | Marius Langeland, Associate Director, International Partnerships & Projects, Camosun International Admin Office<br>langelandm@camosun.ca |
| <b>Dean or Director Name, Title, and Email:</b>              | Christiaan Bernard, Executive Director, Camosun International<br>bernardc@camosun.ca                                                     |
| <b>Privacy Officer:</b>                                      | Ann Behennah, behennaha@camosun.ca                                                                                                       |
| <b>Date:</b>                                                 | April 28, 2025                                                                                                                           |

|                        |                                                                                                              |
|------------------------|--------------------------------------------------------------------------------------------------------------|
| Service Provider Name: | iCent app by Neel-Tech, Inc.<br>a federal corporation hereinafter referred to as ' <b>Service Provider</b> ' |
| Contact & Position:    | Ganesh Neelanjanmath, Founder, Director of Sales and Marketing                                               |
| Business Address:      | 4 Robert Speck Pkwy, Suite #1500, Mississauga ON L4Z 1S1                                                     |
| Business Telephone:    | +1 (905) 266-0419                                                                                            |
| Email:                 | <a href="mailto:ganesh@neel-tech.com">ganesh@neel-tech.com</a>                                               |
| Website:               | <a href="http://www.iCentapp.com">www.iCentapp.com</a>                                                       |

|                     |                                                                                                 |
|---------------------|-------------------------------------------------------------------------------------------------|
| Sponsor Name:       | guard.me International Insurance<br>a corporation hereinafter referred to as ' <b>Sponsor</b> ' |
| Contact & Position: | Clark Hortsing, VP Sales and Marketing                                                          |
| Business Address:   | 80 Allstate Parkway, Markham, Ontario L3R 6H3                                                   |
| Business Telephone: | +1 (905) 731-8140                                                                               |
| Email:              | <a href="mailto:clark@guard.me">clark@guard.me</a>                                              |
| Website:            | <a href="http://www.guard.me">www.guard.me</a>                                                  |

**1. Initiative description:**

Camosun International is hoping to use complementary access to iCent app/mobile services using their existing partnership with guard.me. Access to the iCent platform could be highly beneficial to the Study Abroad program. The iCent app provides remote assistance to international students schedule to begin their studies at Camosun. This offer extends to incoming students only and may potentially benefit CI's inbound short-term programs and exchange students.

One of CI's partners in Nova Scotia is using iCent for their incoming students – linked here to their form:

<https://iadmin.icentapp.com/AdhocForm/PublicForm?FID=b7ad588a84a348a8979bb19712b85210>

Further details include:

- Complimentary Service
- Timeline – as soon as possible
- No integration/IT support is required
- Business need or functional requirement:
  - CI has an opportunity to use this established system.
  - It makes the incoming application process much simpler.
  - CI heard from Nova Scotia college that is is safe and reliable and students like it.
  - It's a big step up from students emailing personal information.
  - More convenient, saves time, more efficient, reduces time spent back and forth via email. Not a subscription service... it is free through the partnership with Guard-me membership.
  - The partnership with Guard-me and iCent allows this to be complimentary.  
The free functionality is specific to incoming. They have a similar service for outbound, but that is for a fee. The standard version is available for free. If we want customized, then that is for a fee.

**2. Is this an administrative/operational, teaching and learning, or a research initiative? Select all that apply.**

☒ Administrative/Operational

**3. What is the total cost of ownership – including subscription commitments over multiple years and implementation costs?**

No fee for the services

**4. Is local installation required or is it Cloud based? How many devices will require installation?**

Hosted on their platform.

**5. What type of support will be requested for the usage of the software?**

None from ITS. iCent will provide all the training. The service (training) extends to anyone else in the college that needs it. It would be used only by the International team so SSO isn't necessary. Server is within Canada.

6. Is this software for one user/department or for installation/usage in labs?

One department, not installed anywhere.

7. Are there any specific device requirements to run the software?

No

8. Does the software/system have a server or network installation component?

No

9. Does the software/system upload or download large amounts of information?

No

10. Will the system integrate with existing Camosun accounts (single sign-on, LDAP, etc...)?

None required.

11. Will the system load data from any other Camosun systems?

No

12. Will the system export data to any other Camosun systems?

No

13. Which internationally recognized standard or framework does your organization adhere to, such as SOC 2, ISO 27001, PCI DSS or SOX? Please provide certification.

See attached – iCent app Non-Disclosure and Service Agreement.

- iCent Cloud security: <https://www.icentapp.com/data-security.html>
- ISO 9001 business practices certification
- ISO 27001 Information Security certification
- GDPR compliant
- Data Centre: **AWS**, Canada Central.

- iCent Information Security Certification, [ISO 27001:2013](#)
- iCent Business Practices Certification, [ISO 9001:2015](#)

14. What is the nature of the data being collected - specifically personal information?
- Student Info: Name, email, phone #, citizenship, DOB, mailing address;
  - Academic Info: enrolled program, campus, student number, admit term, semester;
  - Emergency Contact: Contact's Name, phone number, relationship, email address, home address;
  - Additional Info: flight details/arrival info
15. If personal information is being collected, how is it being used?  
To admit temporary, (not for credit) international students to our programs.
16. How is the personal information stored or accessed?

According to the attached third party PIA, the data is stored in highly secured cloud data centre in **Canada** that is compliant with federal and provincial laws. Data is hosted by Amazon Web Services (primary) and Microsoft Azure (secondary). The cloud infrastructure team is in Canada and India. Canadian team manages the data whereas India team manages the server upgrades and patching at regular intervals.

Please see attached third party PIA for further commentary.

17. IT Security Manager Comments
- Validated that multiple PSIs in BC and across Canada are using this 3rd Party Service. No obvious security vulnerabilities reported.
  - Vendor provided a copy of the PIA that was completed for another PSI in response to question on how data is secured. Please see sections 9-15 of the attached PIA for Non-Ministry Public Bodies completed by the Office of Global Engagement/North Island College Comox Valley Campus for reference.

## PRIVACY OFFICE COMMENTS

This PIA is based on a review of the material provided to the Privacy Office(r) as of April 8, 2025. If, in the future, any substantive changes are made to the scope of this PIA, the College will have to complete a PIA Update and submit it to Privacy Office(r). Based upon the professional opinion and comments of the IT Security Manager, the attached PIA completed by the Office of Global Engagement/North Island College Comox Valley Campus, THE iCent user Terms and Conditions and Privacy Policy as well as the iCent app Non-Disclosure and Service Agreement, Privacy Office has no immediate concerns with the proposed use of the free iCent app through Camosun International. Privacy Office update: A PIA from the University of the Fraser Valley (dated March 10, 2021) was also reviewed and also did not raise any concerns.

## Privacy Office Signature

| Name and Title                | Signature           | Date signed   |
|-------------------------------|---------------------|---------------|
| Ann Behennah, Privacy Officer | <i>Ann Behennah</i> | April 8, 2025 |

## DECLARATIONS AND SIGNATURES

**Declaration of Initiative Lead:** I confirm that I understand the privacy impacts of this College initiative and I am committed to my FIPPA obligations related to the collection and management of Personal Information involved in the initiative. If there are any changes to the initiative, including to the way Personal Information is collected, used, stored, or disclosed, I understand that the department will need to inform the Privacy Office and if necessary, complete a PIA update.

### Signature of Initiative Lead or PIA Drafter

| Name and Title                           | Signature  | Date signed |
|------------------------------------------|------------|-------------|
| Marius Langeland, Associate Director, CI | Section 22 | 2025/04/29  |

**Declaration of Information Security:** I confirm that I am satisfied that the Information Security safeguards employed in this college initiative meet reasonable requirements relative to the amount or sensitivity of the Personal Information or Camosun College business information described in this PIA.

### Signature of IT Security

| Name and Title                                       | Signature  | Date signed |
|------------------------------------------------------|------------|-------------|
| Farzaan Nusserwanji, Associate Director, IT Security | Section 22 |             |
| Ted Pennell, Chief Information Officer               |            |             |

# iCent app Non-Disclosure and Service Agreement

This Non-Disclosure and Service Agreement is drafted between the below mentioned parties for the services of **iCent**, the International Office mobile software suite here in after referred to as '**Software**',

|                            |                                                                                          |
|----------------------------|------------------------------------------------------------------------------------------|
| Institution / Client Name: | Camosun College (Education Institution)<br>hereinafter referred to as ' <b>Client</b> '; |
| Contact & Position:        | Christiaan Bernard   Director International                                              |
| Business Address:          | Victoria, B.C., Canada                                                                   |
| Business Telephone:        | 250-370-3000 (main)                                                                      |
| Email:                     | <a href="mailto:BernardC@camosun.bc.ca">BernardC@camosun.bc.ca</a>                       |
| Website:                   | <a href="https://camosun.ca">https://camosun.ca</a>                                      |

and

|                        |                                                                                                              |
|------------------------|--------------------------------------------------------------------------------------------------------------|
| Service Provider Name: | iCent app by Neel-Tech, Inc.<br>a federal corporation hereinafter referred to as ' <b>Service Provider</b> ' |
| Contact & Position:    | Ganesh Neelanjanmath, Founder, Director of Sales and Marketing                                               |
| Business Address:      | 4 Robert Speck Pkwy, Suite #1500, Mississauga ON L4Z 1S1                                                     |
| Business Telephone:    | +1 (905) 266-0419                                                                                            |
| Email:                 | <a href="mailto:ganesh@neel-tech.com">ganesh@neel-tech.com</a>                                               |
| Website:               | <a href="http://www.iCentapp.com">www.iCentapp.com</a>                                                       |

and

|                     |                                                                                                 |
|---------------------|-------------------------------------------------------------------------------------------------|
| Sponsor Name:       | guard.me International Insurance<br>a corporation hereinafter referred to as ' <b>Sponsor</b> ' |
| Contact & Position: | Clark Hortsing, VP Sales and Marketing                                                          |
| Business Address:   | 80 Allstate Parkway, Markham, Ontario L3R 6H3                                                   |
| Business Telephone: | +1 (905) 731-8140                                                                               |
| Email:              | <a href="mailto:clark@guard.me">clark@guard.me</a>                                              |
| Website:            | <a href="http://www.guard.me">www.guard.me</a>                                                  |

## Description of Service Inclusions

International Office mobile software suite to digitize student handbook, engage students, assist and provide students with better access to information and services available; also, better prepare them as part of pre-departure learning and acclimatization at their country of study. Information feed and content update to the app is achieved via the included web based iAdmin platform. The app supports Android and iPhone devices AND the web based iAdmin works on various browsers.

### Features included – Standard Edition:

- About – important information such as About the **Client**, Accessibility, Security, Emergency Info
- Orientations, Study Abroad students' pre-departure and post arrival checklist items
- Important Links that students will need to use throughout the program term
- Announcements, events calendar details, orientation videos, LOA request form, FAQ, drop query form, international staff access, and feedback form
- Career Centre information, appointment request with a career counsellor, and career tips
- Settings – managing personal and program profiles, change password, language selection
- Instant notifications on the app – push notifications can be sent to all students or an individual student or can even be targeted by campus / program / a group of students (student consent required on the app)
- Grouping – iAdmin can create & manage groups and pool students from various campuses / programs
- Workshops – iAdmin can create workshop sessions and students could RSVP and mark attendance. Images and videos of past and present workshops can be added as well
- Management reports – insights to students' activities via analytics reports. Helping the management staff to build strategies around student engagement; improve service & support
- Settings based auto generated email alerts to iAdmin with download stats, study permit, and emergency contact details submitted on the app, LOA requests, appointment booking requests
- iCent partner dashboard services, information and notifications covering students' academic & social life
- Canadian hosting; generic updates and enhancements to the app and platform
- guard.me branded custom app icon with links to a dashboard and information, push notifications and relevant partner services
- Scholarship forms and SSO integration.

## Data Storage, Security and Privacy

**Client** Data and production servers are located in Canada. Information is made available to authorized users only and access to production databases is restricted via the application server only. **Section 21, Section 15(1)(l)**

Servers and data storage are hosted with [Microsoft Azure](#) and [AWS Cloud](#) in an environment with 24x7 security and video surveillance monitored by security guards and protected by biometric hand scan entry systems and a mantrap-controlled entrance/exit.

- iCent Information Security Certification, [ISO 27001:2013](#)
- iCent Business Practices Certification, [ISO 9001:2015](#)

## iCent<sup>®</sup> User Terms and Privacy

- Terms and Conditions: <https://www.icentapp.com/terms-condition/>
- Privacy Policy: <https://www.icentapp.com/privacy-policy/>

## Project Communication Management

The **Service Provider** would assign a dedicated Account Manager for training and assistance throughout the project life cycle, likewise it is vital that the **Client** identifies and assigns a primary point of contact from the institution end. i.e.: iCent Champion at the institution.

**Service Provider** may not be fully aware of the internal organization hierarchy and reporting structure at the **Client** institution, hence any decisions made by the identified **Client** point of contact with respect to the **Software** updates would be considered as a decision on behalf of the entire **Client** team.

## Support Services Included

A regular support channel connectivity would also be established for immediate questions and assistance via email, phone and web conference calls. Technical support services are available through **Service Provider's** website: [www.iCentapp.com](http://www.iCentapp.com) and support centre: [support@iCent.app](mailto:support@iCent.app)

## Training Services Included

Up-to 3 free training sessions on the iAdmin backend platform and app usage assistance are included. Training appointments can be booked a week in advance with the Account Manager or via sending an email to the support centre at: [support@iCent.app](mailto:support@iCent.app)

## Pricing Details

|                                                                                                                                                                                                              |                                                                                                                                                                                                                                                                                                     |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Software as a Service:</b><br>iCent app Standard Edition<br>a) Up-to 2000 app users annually<br>b) Up-to 1+2 iAdmin web licenses, &<br>c) initial training, set up fees, and annual service fees included | <b>Standard Pricing in CAD:</b><br>Section 21 per user covered by the <b>Sponsor</b> .<br>For any reason, if the <b>Client</b> discontinues relationship with the <b>Sponsor</b> , then the Standard Price is to be covered by the <b>Client</b> and paid directly to the <b>Service Provider</b> . |
| <b>Agreement Scope:</b><br>Inbound International Students                                                                                                                                                    | <b>Payment Schedule:</b><br>One-time annual payment                                                                                                                                                                                                                                                 |
| <b>Usage Term:</b><br>2025, April 1 <sup>st</sup> until terminated                                                                                                                                           | <b>Termination:</b><br>120 days written notice prior to anniversary date.                                                                                                                                                                                                                           |

## Custom Service Exclusions

Any additional exclusive functions or feature enhancements requested by the **Client** (specific to their own institution, ex: SSO, PeopleSoft, Banner, Salesforce integrations) would be considered a custom requirement project and is subject to be billable upon discussion and prior approval at a standard rate of Section 21 CAD per hour as part of professional services. Any travel costs during such projects if incurred are billed at actual cost.

## Grant of License and Proprietary Rights

The **Service Provider** hereby grants **Client** a personalized, non-exclusive, non-transferable, revocable license, without right to sublicense, to use the **Software**. All right, title and interest including, but not limited to, copyright and other intellectual property rights in and to the **Software** (including but not limited to all UI, scripts, html, aspx, dll, graphic/image, and text files) are owned by **Service Provider**. Such rights are protected by Canadian copyright laws, other applicable copyright provisions, and international treaty provisions. **Service Provider** retains all rights not expressly granted herein.

## Confidentiality and Non-Disclosure

**Client** acknowledges that the **Software** and documentation constitute the valuable property and trade secrets of the **Service Provider**, embodying substantial creative efforts and constitutes the Confidential Information.

Any such information or data shall and will be maintained confidential among authorized **Client** staff members and will not be shared in any form or manner with any Canadian or non-Canadian third-party vendors, individuals, consultants, agencies or businesses that the **Client** deals with prior to or post execution of this service agreement.

## Prohibited Usage

**Client** shall not either directly or indirectly (a) reverse engineer, disassemble or decompile any portion of the **Software**, or (b) alter, adapt, copy, or translate the **Software** or documentation, or create derivative works based upon the **Software**; or (c) distribute, lend, sell, display or otherwise rent or lease the **Software** or remove any **Software** identification, copyright or other notice from the **Software** or Documentation, or (d) place revenue generation ads or promotions, or (e) process or permit to be processed the data of any other party, or (f) release the results of any benchmark of the **Software** to any third party without prior written consent from the **Service Provider**, or (g) host irrelevant, inappropriate or in-applicable data on the **Software**, or (f) remove **Sponsor's** guard.me app icon from the app dashboard.

## Limited Liability

License to a web-based Content Management System (CMS) called the **iAdmin** is included as part of this Service Agreement Wherein **Client's** data or content is created, updated and managed by the **Client's** staff member/s. **Client** agrees that only appropriate and relevant content will be hosted on the **Software** and that reasonable steps will be taken always to protect their data. During the setup or operational stage, as and when help/assistance/training involving content/record updates are requested, **Service Provider's** support team will seek prior oral/written consent and make appropriate updates (content provided by the **Client**); methods of support could include in-person, email, remote screen sharing, web conference or telephonic. For no reason, neither the **Service Provider** or **Sponsor** will be held liable for **Client** relevant content hosted on the **Software**.

## Indemnification

**Client** will indemnify, defend and hold harmless **Service Provider** or **Sponsor**, including all its officers, directors, employees, agents and affiliates, from and against any and all claims, demands, actions, damages, losses, assessments, charges, liabilities, costs and expenses including without limitation, interest, penalties and

attorney's fees which at any time may be asserted against or suffered by any or all of them, directly or indirectly, which arise solely as a result of **Client's** negligence.

## Governing Law

The Non-Disclosure and Service Agreement is governed by and under the Canadian federal laws where the **Service Provider, Sponsor** and the **Client** primarily operate.

**Camosun College**

**iCent app by Neel-Tech, Inc.**

\_\_\_\_\_  
Printed Name

\_\_\_\_\_  
Printed Name

\_\_\_\_\_  
Printed Title

\_\_\_\_\_  
Printed Title

Signature: \_\_\_\_\_

Signature: \_\_\_\_\_

**guard.me International Insurance.**

\_\_\_\_\_  
Printed Name

\_\_\_\_\_  
Printed Title

Signature: \_\_\_\_\_



# Privacy Impact Assessment for Non-Ministry Public Bodies

## *iCent app Implementation*

PIA#[assigned by your privacy office(r)]

### Why do I need to do a PIA?

Section 69(5.3) of the *Freedom of Information and Protection of Privacy Act* (FOIPPA) requires the head of a public body to conduct a privacy impact assessment (PIA) in accordance with the directions of the minister responsible for FOIPPA. Public bodies should contact the privacy office(r) for their public body to determine internal policies for review and sign-off of the PIA. Public bodies may submit PIAs to the Office of the Information and Privacy Commissioner for BC (OIPC) for review and comment.

If you have any questions about this PIA template or FOIPPA generally, you may contact the Office of the Chief Information Officer (OCIO) at the Privacy and Access Helpline (250 356-1851). Please see our [PIA Guidelines](#) for question-specific guidance on completing a PIA.

### What if my initiative does not include personal information?

Public bodies still need to complete Part 1 of the PIA and submit it along with the signatures pages to their privacy office(r) even if it is thought that no personal information is involved. This ensures that the initiative has been accurately assessed.

## **Part 1 – General**

|                            |                                                                      |        |  |
|----------------------------|----------------------------------------------------------------------|--------|--|
| Name of Department/Branch: | Office of Global Engagement/North Island College Comox Valley Campus |        |  |
| PIA Drafter:               | Jennifer Barth                                                       |        |  |
| Email:                     |                                                                      | Phone: |  |
| Program Manager:           |                                                                      |        |  |
| Email:                     |                                                                      | Phone: |  |

*In the following questions, delete the descriptive text and replace it with your own.*

### 1. Description of the Initiative

The use of the iCent app to provide 24/7 remote assistance to international students schedule to begin their studies at NIC, including returning students. The app includes content that provides students with local, provincial and federal guidelines, institutional level information, as well as advice from Public Health. The information provided also includes instructions to international students about their legal obligations. The app includes a detailed pre-arrival guide, self-serve tools, links to on-campus support, and post-arrival guide and more.



# Privacy Impact Assessment for Non-Ministry Public Bodies

## *iCent app Implementation*

PIA#[assigned by your privacy office(r)]

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### 2. Scope of this PIA

Through the custom branded app provided by iCent, primarily an international student acclimatization tool used throughout the academic life cycle, International Operations can run virtual 24/7 during emergency times and beyond.

When downloading the app, students are required to input their email address and a PIN number that is emailed to their email address as part of the authentication process.

As part of the International Student Services – Quality Standards Framework initiative, the app also provides a secure, centralized portal for students to input information required by NIC (and local and provincial agencies/ministries).

### 3. Related Privacy Impact Assessments

N/A. New service provider to NIC.

### 4. Elements of Information or Data

The following is summary of the personal information collected using the app:

- Student Info: **Name, email**, phone #, citizenship, DOB, mailing address;
- Academic Info: **enrolled program, campus, student number**, admit term, semester;
- Emergency Contact: Contact's Name, phone number, relationship, email address, home address;
- Additional Info: flight details/arrival info.

If personal information is involved in your initiative, please continue to the next page to complete your PIA.

If no personal information is involved, please submit Parts 1, 6, and 7 to your privacy office(r). They will guide you through the completion of your PIA.



# Privacy Impact Assessment for Non-Ministry Public Bodies

## *iCent app Implementation*

PIA#[assigned by your privacy office(r)]

### **Part 2 – Protection of Personal Information**

*In the following questions, delete the descriptive text and replace it with your own.*

#### **5. Storage or Access outside Canada**

The data is stored in highly secured cloud data centre in **Canada** that is compliant with federal and provincial laws. Data is hosted by Amazon Web Services (primary) and Microsoft Azure (secondary). The cloud infrastructure team is in Canada and India. Canadian team manages the data whereas India team manages the server upgrades and patching at regular intervals.

#### **6. Data-linking Initiative\***

In FOIPPA, "data linking" and "data-linking initiative" are strictly defined. Answer the following questions to determine whether your initiative qualifies as a "data-linking initiative" under the Act. If you answer "yes" to all 3 questions, your initiative may be a data linking initiative and you must comply with specific requirements under the Act related to data-linking initiatives.

|                                                                                                                                                    |                |
|----------------------------------------------------------------------------------------------------------------------------------------------------|----------------|
| 1. Personal information from one database is linked or combined with personal information from another database;                                   | yes/ <b>no</b> |
| 2. The purpose for the linkage is different from those for which the personal information in each database was originally obtained or compiled;    | yes/ <b>no</b> |
| 3. The data linking is occurring between either (1) two or more public bodies or (2) one or more public bodies and one or more agencies.           | yes/ <b>no</b> |
| If you have answered "yes" to all three questions, please contact your privacy office(r) to discuss the requirements of a data-linking initiative. |                |



# Privacy Impact Assessment for Non-Ministry Public Bodies

## *iCent app Implementation*

PIA#[assigned by your privacy office(r)]

### 7. Common or Integrated Program or Activity\*

In FOIPPA, “common or integrated program or activity” is strictly defined. Answer the following questions to determine whether your initiative qualifies as “a common or integrated program or activity” under the Act. If you answer “yes” to all 3 of these questions, you must comply with requirements under the Act for common or integrated programs and activities.

|                                                                                                                                                                                                                                                        |        |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------|
| 1. This initiative involves a program or activity that provides a service (or services);                                                                                                                                                               | yes/no |
| 2. Those services are provided through:<br>(a) a public body and at least one other public body or agency working collaboratively to provide that service; or<br>(b) one public body working on behalf of one or more other public bodies or agencies; | yes/no |
| 3. The common or integrated program/activity is confirmed by written documentation that meets the requirements set out in the FOIPP regulation.                                                                                                        | yes/no |
| Please check this box if this program involves a common or integrated program or activity based on your answers to the three questions above.                                                                                                          |        |

***\* Please note: If your initiative involves a “data-linking initiative” or a “common or integrated program or activity”, advanced notification and consultation on this PIA must take place with the Office of the Information and Privacy Commissioner (OIPC). Contact your public body’s privacy office(r) to determine how to proceed with this notification and consultation.***

***For future reference, public bodies are required to notify the OIPC of a “data-linking initiative” or a “common or integrated program or activity” in the early stages of developing the initiative, program or activity. Contact your public body’s privacy office(r) to determine how to proceed with this notification.***

### 8. Personal Information Flow Diagram and/or Personal Information Flow Table

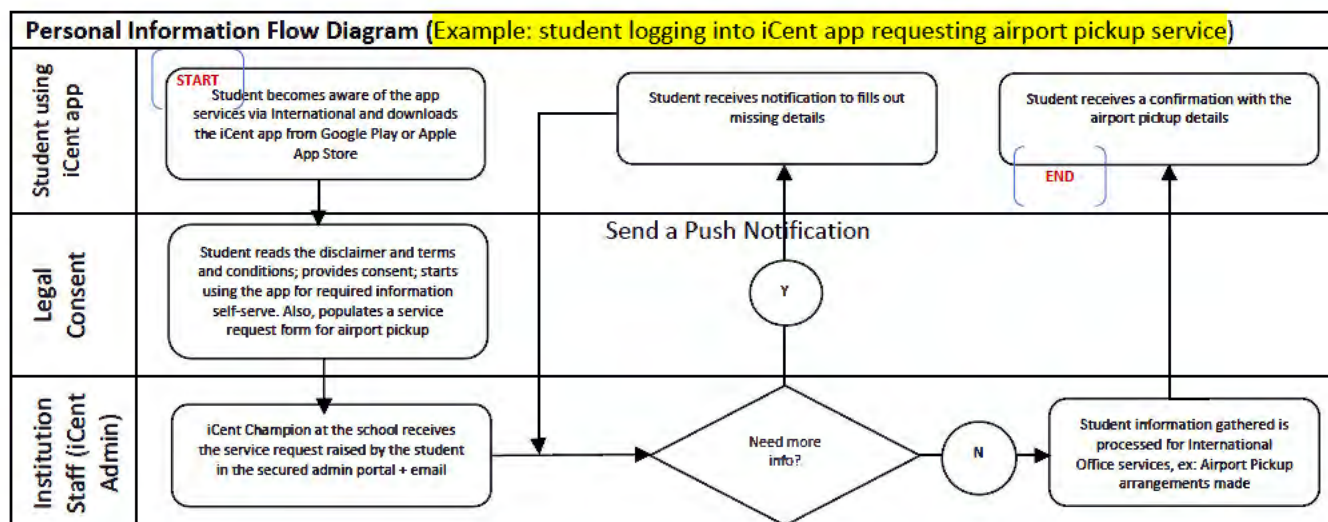
Please read below..



# Privacy Impact Assessment for Non-Ministry Public Bodies

## iCent app Implementation

PIA#[assigned by your privacy office(r)]



| Personal Information Flow Table |                                                                                                                                                                                                                                                                                                                                            |                                |                  |
|---------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------|------------------|
|                                 | Description/Purpose                                                                                                                                                                                                                                                                                                                        | Type                           | FOIPPA Authority |
| 1.                              | Student becomes aware of the app services via International and downloads the iCent app from Google Play or Apple App Store;<br><br>Student reads the disclaimer and terms and conditions; provides consent; starts using the app for required information self-serve. Also, populates a service request form for airport pickup (example) | Self-Consent<br><br>Disclosure | 33.1(7)          |
| 2.                              | iCent Champion at the school receives the service request raised by the student in the secured admin portal + an optional email notification                                                                                                                                                                                               | Information Collection         | 26(c)            |
| 3.                              | Student information gathered is processed for International Office services, ex: Airport Pickup arrangements made                                                                                                                                                                                                                          | Information Use                | 32(a)            |

### 9. Risk Mitigation Table



# Privacy Impact Assessment for Non-Ministry Public Bodies

## *iCent app Implementation*

PIA#[assigned by your privacy office(r)]

| Risk Mitigation Table |                                                             |                                                                                                                                                                                                                                                                                                   |            |        |
|-----------------------|-------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------|--------|
|                       | Risk                                                        | Mitigation Strategy                                                                                                                                                                                                                                                                               | Likelihood | Impact |
| 1.                    | Service provider employees may misuse information collected | Employee background verification is conducted upon hiring.<br>NDA, Trade Secret and employment contract is put in place. Plus, training on client information management and confidently is provided from time to time.<br>Lastly, access to client data itself is limited (purpose & need basis) | Low        | High   |
| 2.                    | Institution employees may misuse information collected      | NIC policies apply;<br>On iCent Admin platform when NIC staff/contractors gain access, they digitally sign an NDA and acknowledge to usage T&C                                                                                                                                                    | Low        | High   |
| 3.                    | Data in transit may get compromised                         | Section 15(1)(l)                                                                                                                                                                                                                                                                                  | Medium     | High   |
| 4.                    | Data at rest may get compromised                            | Section 15(1)(l)<br><br>Data and servers are located in Canada. The network and servers<br>Section 15(1)(l)                                                                                                                                                                                       | Low        | High   |



# Privacy Impact Assessment for Non-Ministry Public Bodies

## *iCent app Implementation*

PIA#[assigned by your privacy office(r)]

|    |                | Section 15(1)(l)                                                                                                                                                                                                                                                                                                                                          |     |        |
|----|----------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----|--------|
| 5. | Authentication | <p>A secured email / PIN authentication method is used + institution SSO can be put in place as well.</p> <p>Users authenticate the use of their email and relevant identification information during the first point of engagement. i.e.: when signing up for the services and/or upon receiving secure login credentials and/or during first login.</p> | Low | Medium |
| 6. | Authorization  | Information is made available to authorized users only                                                                                                                                                                                                                                                                                                    | Low | High   |

### 10. Collection Notice

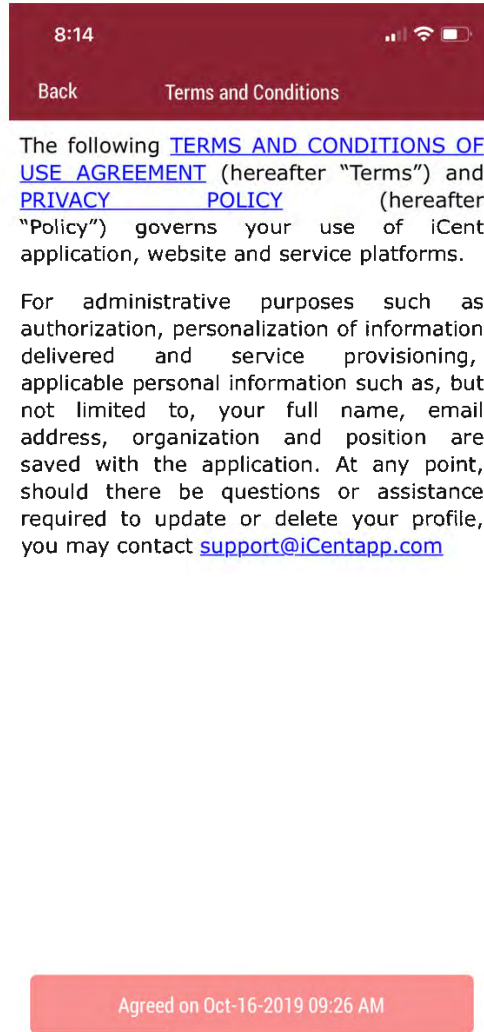
- Terms students agree to before gaining access to the app dashboard:



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- Disclosure used in the login instructions email, even before students download the app:

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*Disclosure: Personal information such as, but not limited to, your full name and program of study may be shared with the application you are logging into for administrative purposes such as authorization and service provisioning. By logging into this application, you accept that some personal information may be shared with the application. For further information please refer to our [Privacy Policy](#) and [Terms & Conditions](#).*

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### **Part 3 – Security of Personal Information**

*If this PIA involves an information system, or if it is otherwise deemed necessary to do so, please consult with your public body's privacy office(r) and/or security personnel when filling out this section. They will also be able to tell you whether you will need to complete a separate security assessment for this initiative.*

**11. Please describe the physical security measures related to the initiative (if applicable).**

iCent data security and compliancy information:

**Section 15(1)(l), Section 21**

**Section 15(1)(l), Section 21**

**12. Please describe the technical security measures related to the initiative (if applicable).**

Data communications are transmitted over secure HTTPS channels. The network and servers are protected by Firewall and antivirus software. Additionally, information is only made available to authorized users. Also, iCent uses the strongest encryption products to protect customer data and communications.

**13. Does your branch/department rely on any security policies?**

- **Section 15(1)(l), Section 21** <https://www.icentapp.com/data-security.html>
- **Section 15(1)(l), Section 21**
- Contact:
  - Name: Ganesh Neelanjanmath
  - Position: Founder, CTO
  - Phone: 905 266 0419
  - Email: [founder@iCent.app](mailto:founder@iCent.app)

**14. 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.**



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Application security:

# Section 15(1)(I)

### 15. Please describe how you track who has access to the personal information.

Employees (ex: support staff) are only auth<sup>Section 15(1)(I)</sup> access to the system by sign-in and sign-out.

Employees accessing the system are recorded into access and activity logs.

Importantly, employees are only given access to specific areas of the product/client information on a use-case basis.

### Part 4 – Accuracy/Correction/Retention of Personal Information

### 16. How is an individual's information updated or corrected? If information is not updated or corrected (for physical, procedural or other reasons) please explain how it will be annotated? If personal information will be disclosed to others, how will the public body notify them of the update, correction or annotation?

Students are in control of their own information, they have access to update/change their information anytime on the app.

Likewise, authorized institution personnel also have access to, either update the student info based on enrolment data and/or notify the student via notifications to update the information.



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17. Does your initiative use personal information to make decisions that directly affect an individual(s)? If yes, please explain.

Yes

18. If you answered “yes” to question 17, please explain the efforts that will be made to ensure that the personal information is accurate and complete.

The information is obtained either directly from the student or from NIC student information system. Additionally, both the student and NIC staff have access to make updates to the student records anytime.

19. If you answered “yes” to question 17, do you have a records retention and/or disposition schedule that will ensure that personal information is kept for at least one year after it is used in making a decision directly affecting an individual?

The data retention policies are covered in the contract. NIC data retention policies apply since iCent is only providing platform as a service, its NIC staff that is actually managing and using the data for student support services.

### **Part 5 – Further Information**

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

NIC policies apply.

On iCent end, if there is a legal requirement from the government bodies to disclose information under the obligation of law then, NIC International is kept in loop.

|                                                                                                                                                                                         |  |
|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--|
| <p><i>Please check this box if the related Information Sharing Agreement (ISA) is attached. If you require assistance completing an ISA, please contact your privacy office(r).</i></p> |  |
|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--|



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21. Does the program involve access to personally identifiable information for research or statistical purposes? If yes, please explain.

N/A

*Please check this box if the related Research Agreement (RA) is attached.  
If you require assistance completing an RA please contact your privacy  
office(r).*

☐

22. Will a personal information bank (PIB) result from this initiative? If yes, please list the legislatively required descriptors listed in section 69 (6) of FOIPPA. Under this same section, this information is required to be published in a public directory.

N/A

Please ensure Parts 6 and 7 are attached to your submitted PIA.



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### **Part 6 – Privacy Office(r) Comments**

*This PIA is based on a review of the material provided to the Privacy Office(r) as of the date below. If, in future any substantive changes are made to the scope of this PIA, the public body will have to complete a PIA Update and submit it to Privacy Office(r).*

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Privacy Officer/Privacy Office  
Representative

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Signature

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Date



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### **Part 7 – Program Area Signatures**

\_\_\_\_\_  
Program/Department Manager

\_\_\_\_\_  
Signature

\_\_\_\_\_  
Date

\_\_\_\_\_  
Contact Responsible for Systems  
Maintenance and/or Security  
(Signature not required unless they  
have been involved in this PIA.)

\_\_\_\_\_  
Signature

\_\_\_\_\_  
Date

\_\_\_\_\_  
Head of Public Body, or designate

\_\_\_\_\_  
Signature

\_\_\_\_\_  
Date

A final copy of this PIA (with all signatures) must be kept on record.

***If you have any questions, please contact your public body's privacy office(r) or call the OCIO's Privacy and Access Helpline at 250 356-1851.***