



Privacy Impact Assessment for Non-Ministry Public Bodies

[Raisers Edge NXT]

PIA#[/]

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.

3

Part 1 – General

Name of Institution:	Northern Lights College		
PIA Drafter:	[REDACTED]		
Email:	[REDACTED]	[REDACTED]	[REDACTED]
Program Manager:	[REDACTED]		
Email:	[REDACTED]	[REDACTED]	[REDACTED]

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

1. Description of the Initiative

The initiative being assessed in this PIA is Raiser's Edge NXT. Raiser's Edge NXT is a cloud-based software developed by Blackbaud and used for fundraising, donor relations and alumni management. Currently the College/Foundation uses Colleague Advancement which has met the end of its operational life; Colleague will no longer be offering support moving forward for this module. This software is critical for financial reporting (tracking incoming donations, issuing tax receipts), sending thank you letters), donor management and reporting, stewardship, and more. Implementation of Raiser's Edge NXT will greatly improve efficiency and processes affecting Donor Relations, Finance, and Financial Aid and Student Awards by providing a single platform for all donor information, historical interactions and



Privacy Impact Assessment for Non-Ministry Public Bodies

[Raisers Edge NXT]

PIA#[/]

contributions, and valuable relationship information. This platform will be critical for success of our upcoming capital campaigns for NLC to ensure we are tracking donor engagement, alumni, receipting and much more.

2. Scope of this PIA

RENXT will be used for the purposes of managing the following:

- Alumni engagement (events, volunteers, academic history, communications) through Raisers Edge NXT;
- Prospective donors (research, ratings, assignment to fundraisers);
- Fundraising activities (identification, cultivation, solicitation, stewardship);
- Gift processing (accepting payment, issuing receipts, posting to general ledger);
- Event registration processing (accepting payment, importing participants);
- Constituent information updates (biographical, contact, relationships, attributes);
- Reports (dashboards, query building, export to excel file);)
- Imports (add or update records from an excel file); and
- System administration (user account provisioning, application configuration, database backup).

Who uses RENXT:

Foundation/ Advancement + Events employees [REDACTED], and perhaps IT for support

FIPPA section 30.1 storage and access must be in Canada:

[REDACTED]
and it is intended only to be accessed by NLC clients from within Canada.

The scope of this PIA also includes BBMS (Blackbaud Merchant Services), which is a merchant account responsible for processing credit card transactions. Currently, the college uses CanadaHelps, a Canadian solution. [REDACTED]

3. Related Privacy Impact Assessments

Not applicable

4. Elements of Information or Data

Raiser's Edge NXT will store:

- Donor personal information including:
 - Name
 - address;
 - Phone number;
 - email address; and



Privacy Impact Assessment for Non-Ministry Public Bodies

[Raisers Edge NXT]

PIA#[/]

- *All financial contributions as they relate to donors and NLC Foundation fund associated with a contribution including:*
 - *Dollar amount contributed.*
 - *How the contribution was paid including the form of payment (EFT, cash, credit card or cheque number);*
 - *Intention of use (gift-in-kind, financial donation for student award, financial donation for program specific, endowment contribution etc.).*
- *All award names associated with donors, and their associated award numbers and fund IDs*
- *If donor is a business: All business contact information:*
 - *primary contact name and phone number*
 - *business address; and*
 - *email address*
- *Historical information*
 - *contact logs*
 - *emails can be sent from Raiser's Edge NXT*
 - *you can also log that a phone call was made or mail was sent.*
- *past and current gift and naming agreements*
- *education partnerships*

BBMS payment processing data includes: cardholder name; credit card number. Expiration, CSC, and billing address

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

[Raisers Edge NXT]

PIA#[/]

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

Raisers Edge NXT hosts all data for its Canadian partners on Canadian soil using Microsoft Azure's Canada-based datacenters. No production, development or test data is stored in non-Canada datacenters.

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;	No
2. The purpose for the linkage is different from those for which the personal information in each database was originally obtained or compiled;	N/A
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.	N/A
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

[Raisers Edge NXT]

PIA#[/]

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);	no
2. Those services are provided through: (a) a public body and at least one other public body or agency working collaboratively to provide that service; or (b) one public body working on behalf of one or more other public bodies or agencies;	n/a
3. The common or integrated program/activity is confirmed by written documentation that meets the requirements set out in the FOIPP regulation.	n/a
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.



Privacy Impact Assessment for Non-Ministry Public Bodies

[Raisers Edge NXT]

PIA#[/]

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

Personal Information Flow Table			
	Description/Purpose	Type	FOIPPA Authority
1.	<i>Prospective Donors fill out the Donor Information Form and email it back to NLC</i>	<i>Collection</i>	<i>26(c)</i>
2.	<i>Development Officer will enter information from the "Donor Information Form" into Raiser's Edge and attach the form as an attachment in Raiser's Edge NXT.</i>	<i>Use</i>	<i>32(a)</i>
3.	<i>Additional information [what types of information] may be added when contact is made with donors.</i>	<i>Collection & Use</i>	<i>26(c) and 32(a)</i>
4.	<i>Information is used to generate communications such as tax receipts, solicitation, thank you letters, invites, Christmas cards</i>	<i>Use</i>	<i>32(a)</i>
5.	<i>The President's Office or Board may review/request the information for necessary reporting purposes</i>	<i>Use & Disclosure</i>	<i>32(a) and 33(2)(c)</i>
6.	<i>Awards guide may be posted on the website including award description and the donor's name.</i>	<i>Use & Disclosure</i>	<i>32(a) and 33(2)(c)</i>
7.	<i>To donate online: Donor enters and submits payment card information on NLC website (BBMS collects information to process payment. Payment information is not collected by NLC). Information includes: first and last name; payment type; credit card number; expiry date and CVC; address; email; phone number; donation amount and detail on what to support.</i>	<i>Collection, Use & Disclosure</i>	<i>26(c), 32(a), 33.1 (1)(i.1)</i>



Privacy Impact Assessment for Non-Ministry Public Bodies

[Raisers Edge NXT]

PIA#[/]

9. Risk Mitigation Table

Risk Mitigation Table				
	Risk	Mitigation Strategy	Likelihood	Impact
1.	Unauthorized collection of personal information by authorized individuals, processes, systems	[REDACTED]	Low	med
2.	Excessive collection of personal information by authorized individuals, processes, systems	[REDACTED]	Low	Low
3.	Inappropriate or unauthorized use of personal information by authorized individuals, processes, systems	[REDACTED]	Low	Low
4.	Unauthorized disclosure by individuals, processes, systems	[REDACTED]	Low	High
5.	Data stored outside of Canada an in the public cloud	[REDACTED]	Low	Med
6.	Use of existing personal information in a new system or business process	[REDACTED]	Med	Med
7.	Unauthorized disclosure of payment card information by BBMS systems	[REDACTED]	Low	High



Privacy Impact Assessment for Non-Ministry Public Bodies

[Raisers Edge NXT]

PIA#[/]

8.	Service provider privacy breach		Low	High

10. Collection Notice

If your initiative is collecting personal information directly from individuals you must ensure that all individuals involved are told the following:

- 1. The purpose for which the information is being collected*
- 2. The legal authority for collecting it, and*
- 3. The title, business address and business telephone number of an officer or employee who can answer questions about the collection.*

This information is collected by Northern Lights College under section 27(2) of the Freedom of Information and Protection of Privacy Act and will be used for donor relations, thank you letters , tax receipts, future solicitation, and reporting for Northern Lights College. Should you have any questions about the collection of this personal information please contact:

CIO

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.



Privacy Impact Assessment for Non-Ministry Public Bodies

[Raisers Edge NXT]

PIA#[/]

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

Blackbaud enforces strict physical datacenter security based on best practices and SSAE18 audit guidelines:

All building entrances, the datacenter floor, and secure areas require card key access. The datacenter floor and secure areas also require two factor biometric authentication {hand/finger prints and iris scan}.

Active patrol guards are onsite to monitor the interior and exterior of our facilities 24 hours a day, 365 days a year. We also have security cameras covering all entrances, alternate workspaces, and the datacenter floor.

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

Blackbaud uses various strong encryption mechanisms across environments and products, including TLS 1.2, AES 256, RSA 1024 and other FIPS140-2 encryption algorithms.

Blackbaud ensures security of applications through constant education and training and routine vulnerability assessments.

As Blackbaud engages with Microsoft Azure, the details of security are covered at the Microsoft Azure Trust Center:

<https://www.microsoft.com/en-us/trustcenter/cloudservices/azure>

<https://docs.microsoft.com/en-us/azure/security/azure-security-infrastructure>

The responsibility and ownership of personal data lies with our business customers, per the Online Services Terms. However, Microsoft contractually commits that Azure and Intune in-scope services have implemented security safeguards to help them protect the privacy of individuals, based on established industry standards such as /ISO/IEC 27001 and the SOC framework. We have assessed our practices in risk, security, and incident management; access control; data integrity protection; and other areas relative to the recommendations from the Office of the Privacy Commissioner of Canada, and have determined that the in-scope services are capable of meeting those recommendations. Azure continually monitors and updates their infrastructure security, more details can be found on their website:

<https://docs.microsoft.com/en-us/azure/security/azure-infrastructuremonitoring>

[REDACTED]

[REDACTED]



Privacy Impact Assessment for Non-Ministry Public Bodies

[Raisers Edge NXT]

PIA#[/]

[REDACTED]

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

Please find out IT Acceptable use Policy [here](#)

Any questions regarding security policies should be directed to [REDACTED] CIO

[REDACTED]

[REDACTED]

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.

[REDACTED]
based on need. Accounts are password protected. Changes and updates to donor profiles are completed by NLC staff..

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

[REDACTED]

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?

Depending on their security permissions, NLC employees can change/update personal information within the donor database to update donor profiles. Other users of the database will be able to access and view changes. Donors may contact the Foundation/Advancement team to update the personal information in their profile, opt-out of communications {including those from Advancement, Alumni Relations, and regulation Communications newsletters}, and/or delete their account.



Privacy Impact Assessment for Non-Ministry Public Bodies

[Raisers Edge NXT]

PIA#[/]

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

Yes. The Foundation/Advancement team will use personal information within the donor/individual profiles to support fundraising activities and strategy. This may affect the type and content of communications they receive from the College. Individuals on the platform may opt out of communications. Individuals on the platform may take action based on the communications if they wish (ie, donate).

- 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 Foundation/Advancement team will try to keep donor {individual} profiles accurate and up to date. Keeping accurate profile information is relevant to their fund raising activities. Users (college staff) will change and update personal information within individual profiles at the individual's request. Only college staff who have appropriate permissions within the system can make changes. Only college staff with access to the platform can view and access information.

- 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?**

Donor/individual profiles within Raiser's Edge database are not automatically deleted on a schedule. A donor can choose to opt out of communications and/or request deletion of their account. Profiles and donation records are not deleted as to keep an ongoing record of donations and to affect later fundraising activities by the college.

Part 5 – Further Information

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

No

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).

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Privacy Impact Assessment for Non-Ministry Public Bodies

[Raisers Edge NXT]

PIA#[/]

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

No

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).

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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.

No

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