

AR-2026-018

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Re: Google Analytics PIA - No Personal Information

**Erika Brimacombe**[Reply all](#) | [...](#)

Thu 5/12/2022 4:33 PM

To: Elise Mallory

Cc: Julita Festejo [^](#)

Sent Items

Hi Elise,

The Directions seem to indicate that one role should be designated. As these Directions are new, there has not been very much additional guidance created yet, so perhaps that may change.

Thanks,

Erika Brimacombe

Privacy Legal Counsel

Office of the General Counsel & University Secretary and

Archives and Records Management Department

Simon Fraser University

Maggie Benston Centre, Rm 0400

T: 778-782-4042

**From:** Elise Mallory**Sent:** Thursday, May 12, 2022 4:03 PM**To:** Erika Brimacombe**Cc:** Julita Festejo**Subject:** Re: Google Analytics PIA - No Personal Information

Hi Erika,

Thank you so much for your time today and for making this process so straightforward. We are so excited to get this set up and running properly!

Regarding the role that is accountable, I was wondering if it needed to be just one individual or if the accountability can be shared across Julita and myself, as this really is a collaboration between C&M and IT Services.

Cheers,
Elise

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To: Elise Mallory <elise_mallory@sfu.ca>
Cc: Julita Festejo <julita_festejo@sfu.ca>
Subject: Google Analytics PIA - No Personal Information

Hello Elise,

Further to our call today, I confirm that we have conducted a privacy impact assessment in accordance with the Minister of Citizens' Services [Direction 2-21](#), with respect to an SFU.ca (university wide application) of Google Analytics.

You have confirmed that your initiative does not collect personal information ("PI"), as you will have the option to switch off the collection any PI (such as IP addresses) and you will switch off that collection. Google Analytics will only collect, on behalf of SFU, anonymized usage data and statistics that cannot be linked to any identifiable individuals. Even if we later discover that Google Analytics does itself collect personal information from users of SFU websites, your understanding is that SFU would not be able to access that information from Google Analytics as long as we have switched off the collection for SFU under our SFU account.

A concern we addressed was that departments and faculties within SFU currently have the power to create their own, separate account or instance of Google Analytics and add it to their SFU sub-sites as site owners, and they may be choosing to switch on the collection of PI. Departments and faculties may see or hear that SFU has reviewed and approved the use of Google Analytics, not knowing that their PI-collecting instance is not covered and may require additional reviews, consents or collection notices.

In order to mitigate against this risk, I suggest that

[REDACTED]

In accordance with the Minister of Citizens' Services Direction 2-21, we must designate a role accountable for the privacy impact assessment and privacy risks of the initiative. Do you agree that your role can be accountable for SFU-wide Google Analytics or do you believe there is another role that would be better suited to hold this responsibility?

Thank you,

Erika Brimacombe
Privacy Legal Counsel
Office of the General Counsel & University Secretary and
Archives and Records Management Department
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