



PIA #: PIA 2024-012

Microsoft 365 Copilot Pilot test group

PRIVACY TRACKING

PIA number: PIA 2024-012
System / project: Microsoft 365 Copilot Pilot test group
Unit responsible: Information Technology Services
Date of meeting: n/a
Present during meeting: n/a
Notes taken by: Ernest Soares & Courtney Pederson

QUESTIONS FOR INITIATIVE LEAD

- 1. Please provide a description of program/ initiative (what is the purpose/objective of initiative?)

The Microsoft 365 Copilot (MS Copilot) AI Pilot Initiative is designed to evaluate the MS Copilot AI's integration, functionality, and impact with a controlled group of SFU personnel before considering any wider organizational deployment.

The test deployment objectives include assessing the AI's performance in existing workflows, identifying key use cases, evaluating user experience, determining training needs, analyzing productivity impacts, identifying potential risks and their mitigation, and making recommendations for broader rollout.

The program will involve a diverse group of personnel across departments, who will use the MS Copilot AI in their tasks and provide feedback. Test Users are provided with an advisory notice (copied below) prohibiting the uploading of any personal or confidential information whilst testing the MS Copilot and are further advised to avoid relying on any responses from MS Copilot to make decisions concerning individuals.

This initiative aims to ensure that Microsoft Copilot AI enhances productivity, efficiency, and innovation while addressing any challenges before it is implemented more widely.

The trial is intended to run from approximately February 12 to March 31, 2024.

2. Has a contract been signed with vendor/third party? (if yes, send to privacy team for review with these answers)

☐ Yes, through BCNET

3. Was SFU's Privacy Protection Schedule (PPS) or Cloud Privacy Protection Schedule (CPPS) appended to the contract? if not, why not?

☐ No

4. What Personal information (PI) elements are being collected (e.g. email addresses, IP addresses, assignment work)?

☐ None, test users are prohibited from inputting any personal information or confidential information when testing MS Copilot as per the advisory notice below.

5. What non-personal information elements are involved in the initiative (i.e. what other information is being collected):

☐ none

~~6. Is the information necessary for the initiative?~~

~~7. Is the information sensitive (i.e. is the information one of the following types of information: medical or financial information, detailed identification information (e.g. driver's license number, SIN number, date of birth))?~~

~~8. What information is newly collected by the initiative and information has already previously been collected by the university but is put to a new use (e.g. Student email addresses are already known, and may be newly used for this software)?~~

~~9. How and from whom is the newly collected PI collected?~~

10. Please complete the Collection Notice below:

[Advisory Notice to be provided to Copilot testers](#)

During this trial, you agree not to upload, submit, or provide access to sensitive documents that contain personal (non-business contact information) or confidential information to this AI companion, for example:

- ☐ Personal Information may include student names, private non-business addresses, non-work related phone numbers, non-work related email addresses, social security numbers, employment or education history, etc. For a more expansive list of personal information data elements please see: https://www.sfu.ca/content/dam/sfu/policies/files/information_policies/l10-11/l10.11%20Schedule%201%20-%20%20May%2029%202021.pdf
- ☐ Confidential or Sensitive Content: Including regulated data, proprietary business information, financial details, legal documents, or any other information that is confidential in nature regarding the university.

During this trial you will also be provided with additional information protection features (sensitivity labels) that will let you classify content as confidential.

You are to avoid relying on any responses from Microsoft 365 Copilot to make decisions concerning individuals and are responsible for verifying the accuracy of statements provided by this AI companion.

Should you have any inquiries or concerns regarding the appropriate use of the MS Copilot platform at SFU, please contact Courtney Pederson (capeders@sfu.ca).

~~11. How will the PI be used?~~

~~12. Is the information used to make decisions that will affect the individual?~~

~~a. If yes, how long will the records containing the information be retained?~~

~~b. Is there a retention schedule for the records being created by this program/initiative?~~

~~c. What is the retention period?~~

~~13. What is the process to correct the PI if requested by the affected individual?~~

~~14. Who will have access to the PI?~~

~~15. Are there any foreseen disclosures of the PI?~~

16. Role designated accountable (Who would be responsible for monitoring the program/initiative and advising the Privacy Team if the program changes how or what personal information it collects, uses, or discloses?)

Mike Stanger
Associate Director of Learning and Community Systems
IT Services

17. Has an SFU IT security professional determined that this software employs reasonable security arrangements (if so, who?)

A security review has been performed by members of the Microsoft 365 IT Services team for the purposes of this controlled testing phase. Another security review for the broader faculty/staff audience is pending and will be performed during the confirmation of the Microsoft 365 Copilot privacy impact assessment.

QUESTIONS FOR PRIVACY TEAM

Legal Authority for collection, use, and disclosure

- ☐ ~~Collection: 26(c)~~
- ☐ ~~Use: 32(a)~~
- ☐ ~~Disclosure: 33(2)(d)~~

Privacy risks and responses/mitigations

Risks

Mitigations

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