

Subject: Re: PIA for provide access to online games at SFU Surrey Library
Date: Thursday, November 3, 2022 at 11:25:49 AM Pacific Daylight Saving Time
From: Ernest Dos Santos Soares
To: Mark Jordan
Attachments: image001.png, image002.png

Hi Mark,

Thanks for the email.

By the sounds of it no PI is collected at all.
I've provided a PIA Notice for you below.

I confirm that we have conducted a privacy impact assessment in accordance with the Minister of Citizens' Services Direction 2-21, with respect to your initiative, Gaming Services at the Surrey Library.

You have confirmed that your initiative does not collect personal information. You will reduce the risk of unintentionally collecting personal information through the initiative by ensuring no changes to collection are taking place.

Should you discover that personal information has been collected through the initiative, please contact me or another member of the Access and Privacy Program right away as this may constitute a privacy breach.

Should you seek to significantly change the initiative or change the initiative in such a way that personal information will be collected, SFU must conduct a new privacy impact assessment.

In accordance with the Minister of Citizens' Services Direction 2-21, Associate Dean of Libraries, Digital Strategy been designated accountable for the privacy impact assessment and privacy risks of the initiative.

Kind regards,

Ernest Soares
Privacy Legal Counsel
Office of the General Counsel
Simon Fraser University
Maggie Benston Centre, Rm 0400
T: 778-782-7565



I respectfully acknowledge that SFU is located on the traditional unceded territories of the Musqueam, Squamish and Tsleil-Waututh Nations.

--

From: Mark Jordan <mjordan@sfu.ca>
Date: Thursday, November 3, 2022 at 10:21 AM

To: Ernest Dos Santos Soares <ernest_dos_santos_soares@sfu.ca>
Subject: Re: PIA for provide access to online games at SFU Surrey Library

Hi Ernest,

Sorry to drop the ball on this thread. No, the library will not be recording who logs into the gaming PC, but they will be asking IT Services for how many users logged in during a given period, to assess usage. This request will not contain any PII, just how many users logged in during a given month (for example).

Mark

From: Ernest Dos Santos Soares
Sent: Tuesday, October 11, 2022 10:30 AM
To: Mark Jordan
Subject: Re: PIA for provide access to online games at SFU Surrey Library

Hi Mark,

Thanks for the query. Hope you had a good thanksgiving weekend.

Having reviewed the pilot program mission statement it seems that the only personal information used is the SFU computing ID.

My understanding is that Users log into the Gaming PC with their SFU computing ID and then into the games with their own game accounts. Any in-game purchases concluded are between the User and the game publisher only and are independent of any agreement with SFU.

Will the Library log the Users of the gaming PC's, and if so for what purpose?

If the Users are not going to be logged by the Library I don't see this as an actual collection of PI by the University and an extremely short form PIA could be conducted for this. I'm currently thinking that maybe just a collection notice and an advisory to any students of how the program works and that any interactions they have with the game publishers are directly between themselves and the game publishers with SFU having no involvement in any agreements or purchases they conclude with the game publishers.

Kind regards

Ernest Soares

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: 778-782-7565



From: Privacy Department <privacy_sfu@sfu.ca>
Date: Wednesday, October 5, 2022 at 9:03 PM
To: Ernest Dos Santos Soares <ernest_dos_santos_soares@sfu.ca>
Subject: FW: PIA for provide access to online games at SFU Surrey Library

From: Mark Jordan
Sent: Wednesday, October 5, 2022 9:03:20 PM (UTC-08:00) Pacific Time (US & Canada)
To: Privacy Department
Cc: Leanna Jantzi
Subject: PIA for provide access to online games at SFU Surrey Library

Hello Ernest,

Leanne Jantzi, Head of the Fraser Library at SFU Surrey, is undertaking a pilot to provide access to online games from a dedicated computer in her library. A proposal for this pilot is available at:



Note that:

- Users (mostly students) will need to create their own accounts with each game publisher/provider; they are not using their SFU computing accounts for accessing the games (although they may be asked to provide an email address when they create their accounts, and may use their SFU email address). Users need to use their SFU credentials to log into this computer, like they do to log into any SFU-managed computer. However, this login

information is not disclosed with the game provider.

- SFU manages the computer that will be used to access the online games, and can show the user a collection notice.
 - Game publishers may change what personal information a user must provide in order to create an account. There is no way for SFU to be informed of this change until after the fact.
 - We plan to add more games and publishers should this go beyond a pilot, so maintaining the collection notice to specify exactly what personal information will be collected will be impractical.

Can you advise on next steps in the PIA process for this pilot and for the likelihood that it will move beyond this initial pilot phase?

Thank you,

Mark

Mark Jordan
Associate Dean of Libraries, Digital Strategy
W.A.C. Bennett Library, Simon Fraser University
Burnaby, British Columbia, V5A 1S6, Canada
Voice: 778.782.5753 / Fax: 778.782.3023
mjordan@sfu.ca

I respectfully acknowledge the xʷməθkʷəṅəm (Musqueam), Skwxwú7mesh (Squamish), Səlilwətał (Tsleil-Waututh), qíćəy̓ (Katzie), and kʷikʷəłəm (Kwikwetlem) Nations and peoples on whose ancestral and unceded lands the three SFU campuses are located. As a settler on these lands, I am grateful and humbled to live, work, and learn on them.