

Privacy Impact Assessment

PIA# 24-0002

INSTRUCTIONS/INFORMATION:

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.

Do I have to answer all the questions?

Sections marked as “required” must have an answer. Specify *N/A (not applicable)* if appropriate. Other sections not marked mandatory should STILL be answered if the information is known. You will be contacted to answer any questions that are deemed relevant to this assessment so it’s best to be complete.

What if my initiative does not include personal information?

You still need to complete some parts of the PIA to ensure compliance with regulation. Under question “4. Elements of Information or Data”, specify “*no personal information collected*”. Sections that are marked as “*required*” still need to be answered.

What if I have questions?

If you have any questions about FOIPPA generally, you may contact the “*Privacy and Access Officer*” (privacy@tru.ca). For questions specific to this PIA, contact the “*Information Security Director*” (jcuzzola@tru.ca).

Initiative Preamble (Required)

Initiative/ Project/ Program Name:	GEOG 2750, 3740,3750 ESRI ArcGIS Pro and ARcGIS online		
Name of TRU Department/Branch:	Environment Culture and Society, Faculty of Arts		
PIA Drafter (you):	Crystal Huscroft		
Your Email:	chuscroft@tru.ca	Phone:	250-371-7065
Service/Vendor:	ESRI Canada		
Vendor Email:	Krista Amolins <kamolins@esri.ca>	Phone:	s.22

Have you consulted IT Department for this Initiative/Project/Program?

Yes Jim Hobbs _____ **No** _____ **N/A** _____

(If no, it is recommended to consult IT Department first to resolve any potential IT-related issues.)

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Part 1 – General

1. Description of the Initiative (required)

Please provide a general description of the initiative and the context in which it functions. This could include the purpose of the initiative, its benefits, the larger process (if any) that it is part of, how it functions, the parties involved, etc. We will be assessing the impacts of this initiative so please include details which help us understand its size/scale and reach.

To have students registered in GEOG 2750, 3750 and 1000, their Graduate/Undergraduate Teaching Assistants, and Professors become GIS Professional Advanced Named Users as part of ESRI Canada Academic Departmental license. As such, these users would use the following software:

ArcGIS Pro, and the following on-line Apps: Arc GIS StoryMaps, Map view, Scene viewer, ArcGIS Survey123

The following extensions would also be used:

ArcGIS 3D Analyst, ArcGIS Geostatistical Analyst, ArcGIS Network Analyst, ArcGIS Spatial Analyst, ArcGIS Image Analyst, ArcGIS Data

2. Scope of this PIA (required)

This section should explain exactly what part or phase of the initiative the PIA covers and, where necessary for clarity, what it does not cover.

>> If unsure leave blank. Scope will be assessed by Privacy & Information Security Departments.

The scope includes the products listed in “1. Description” and extensions.

2-1. Is this initiative recurring in a regular interval, e.g., yearly, or biennially? (required)

By semester as courses are made available (GEOG 2750, 3750 and 1000)

3. Related Privacy Impact Assessments

Please identify any approved PIAs which cover any parts of the initiative or any previously approved PIAs for this initiative.

No previous PIA

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4. Elements of Information or Data (required)

Please list the elements of information or data involved in the initiative. This could include name, date of birth, home address, personal email, phone number, employment history, health information, financial information, photos, personal opinions, comments/open-ended questions on a survey, or information specific to your area, e.g., stumpage totals, visitor centre stats, etc.

Please submit a copy of any relevant details for evaluation, such as questions, forms or templates used for collection purposes; or system information covering what information is collected, used, stored or shared. These will be appended to your PIA for reference.

Please see: [ArcGIS privacy—ArcGIS Trust Center | Documentation](#)

- Only PII elements required are those for SAML authentication.

Part 2 – Protection of Personal Information

5. Storage or Access outside Canada (required)

Can your information be accessed from outside Canada (i.e. on the TRU website), or is your information being stored outside Canada (i.e. in the “cloud”, or on a non-Canadian social media site)?

5-1. Is a service provider(s) involved? If so, where is the provider located (e.g. Canada, U.S., or other country)? (required)

- Online/cloud-based service – No PII past what is needed for SAML authentication

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6. Common or Integrated Program or Activity (required)

If you answer yes, please contact the *Privacy and Access Officer*

If you answer “yes” to <u>all</u> 3 of these questions, your initiative qualifies as “a common or integrated program or activity,” and you must comply with requirements under FOIPPA.	
1. This initiative involves a program or activity that provides a service (or services);	yes/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;	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.	

7. Data-linking Initiative* (required)

If you answer yes, please contact *Privacy and Access Officer*

If you answer “yes” to all 3 questions, your initiative may be a data linking initiative and you must comply with specific requirements under FOIPPA.	
1. Personal information from one database is linked or combined with personal information from another database;	yes/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

8. Provide a diagram, flowchart, and/or table that shows how your initiative will collect, use, and/or disclose personal information (see examples below) (required).

Your diagram and/or table must also include the authorities for the collection, use, and disclosure of personal information, as laid out in FOIPPA. If the authority comes from other legislation,

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please identify the applicable act(s) or regulation(s), including specific section references. Please contact Manager, FOI and Privacy for assistance on this.

N/A – No PII other than SAML authentication

9. Risk Mitigation Table (required)

Please identify any privacy risks associated with the initiative and the mitigation strategies that will be implemented.

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Risk Exposure Matrix

Risk Exposure Matrix		IMPACT				
		Insignificant	Minor	Moderate	Major	Catastrophic
	Almost Certain	Low	Medium	High	Critical	Critical
	Likely	Low	Medium	High	Critical	Critical
	Possible	Insignificant	Low	Medium	High	High
	Unlikely	Insignificant	Low	Low	Medium	Medium
	Rare	Insignificant	Insignificant	Insignificant	Low	Low

10. Collection Notice

If your initiative collects personal information directly from any 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.

N/A – SAML Authentication only

Part 3 – Security of Personal Information

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

For example: locked cabinets, securely stored laptops, or key card access to the building.

N/A – SAML Authentication only

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

For example: use of firewalls, document encryption, or user access profiles assigned on a need-to-know basis.

N/A – SAML Authentication only

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

Please describe any specific policies and procedures and provide contact details for someone who could answer questions on this matter. If you are relying on a third-party's policies, please include links or documentation for our review, if available.

N/A – SAML Authentication only

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. (required)

For example: role-based access.

N/A – SAML Authentication only

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

For example: audit trails or physical sign-in and sign-out of files.

N/A – SAML Authentication only

Part 4 – Accuracy/Correction/Retention of Personal Information

16. How is an individual's personal information updated or corrected? If it is not updated or corrected (for physical, procedural or other reasons) please explain how it will be annotated.

For example: users have access to update their own information or notes will be made on a case file.

- No PII

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

- No

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

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For example: check to see that the information was obtained from a reputable source such as another government agency.

- 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?**

If you do not yet have a schedule, please document how these records will be kept until the schedule is in place. Please contact Manager, Information Services.

Part 5 – Further Information

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

For example: your initiative involves a regular exchange of personal information (both collection and disclosure) with other government(s) and/or other agencies in order to provide services to your clients.

N/A

Please check this box if the related Information Sharing Agreement (ISA) is attached. **If you require assistance completing an ISA, please contact Legal Services.**

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

For example: your initiative involves disclosing information to PhD students so that they can conduct research.

No.

Please check this box if the related Research Agreement (RA) is attached. **If you require assistance completing an RA, please contact Privacy and Access Officer.**

- 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.**

A personal information bank means a collection of personal information that is organized or retrievable by the name of an individual or by an identifying number, symbol, or other particular assigned to an individual.

No.

Part 6 – Canada’s Anti-Spam Legislation (CASL) Compliance

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23. Please confirm if you plan on emailing, texting, or instant messaging as part of your project. (required)

N/A

If you answered yes to question 23, please explain the purpose(s) of the messages you intend to send. Be sure to note any messages involving promotional activities, including links to the TRU public website or other Internet site(s). The purpose(s) you provide will help us identify whether the overall communication is a commercial electronic message (CEM¹)?

N/A

24. If your communication message does fall under CEM rules, you must comply with the unsubscribe mechanism and identification requirements under CASL. Please confirm your method of unsubscribe mechanism that must be processed within 10 business days and how you will meet the identification requirements?

N/A

25. If you do meet the definition of CEM, please confirm that you have a records retention schedule that will ensure that consent communications, both paper and electronic, are stored appropriately and retained for three years after the last communication?

Part 7 – Common Vulnerabilities and Exposures (CVE) Assessment

(This section to be completed by the **Information Security Office**). If your initiative involves the transmission of personal data between TRU and the vendor, or from the vendor to 3rd parties, then TRU may ask for the name of the software used to determine if there are applicable CVEs.

(Info. Sec): Not Applicable. No CVEs found.

¹ If your initiative or program sends commercial electronic messages (CEMs), such as emails promoting a product or service, you must comply with CASL's requirements to: (1) obtain consent, (2) provide identification information, and (3) include an unsubscribe mechanism in each message. Please note that an electronic message that contains a request for express consent is also considered to be a CEM under CASL.

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Part 8a – Information Security Director Comments

This initiative does not involve any PII with the exception of what is required for SAML authentication (single sign on (SSO)). ^{s.13} [REDACTED]

John Cuzzola

^{s.22} [REDACTED]

2024-01-28

Information Security Director

Signature

Date

Part 8b – Privacy Officer Comments

Privacy and Access Officer

Signature

Date

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Part 9 – Program Area Signatures

Program/Department Manager	Signature	Date
John Cuzzola		2024-01-28
Information Security Director	Signature	Date
Senior Manager, Program Area/Division	Signature	Date
General Manager	Signature	Date
General Manager	Signature	Date

A Final Copy of this PIA (with all signatures) shall be kept on record by the program area responsible for this project. The signed original record will be retained by the FOI and Privacy Office. ***If you have any questions about FOIPPA generally, you may contact the “Privacy and Access Officer” (privacy@tru.ca). For questions specific to this PIA, contact the “Information Security Director” (jcuzzola@tru.ca).***