

Privacy Impact Assessment

PIA# 23-0018-IPE

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:	Mentimeter: interactive presentation software for planning and engagement projects		
Name of TRU Department/Branch:	Integrated Planning and Development (IPE)		
PIA Drafter (you):	Dorys Crespín-Mueller		
Your Email:	dcrespin@tru.ca	Phone:	250-828-5493
Service/Vendor:	Mentimeter North America Inc.		
Vendor Email:	hello@mentimeter.com	Phone:	+46705086768

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

Yes _____ No ☒ X _____ N/A _____

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

Part 1 – General

1. Description of the Initiative (required)

This initiative involves the integration of Mentimeter software into IPE’s planning and engagement projects which include meetings, workshops, events, and/or conferences. Mentimeter is an interactive presentation software that enables real-time audience engagement and feedback. It facilitates interactive sessions where participants can answer polls, quizzes, and engage in Q&A sessions using their smartphones or any web-enabled device. The primary goal is to enhance participant engagement, gather insights, and foster a dynamic environment for knowledge exchange.

2. Scope of this PIA (required)

Mentimeter’s service is based on a subscription model for interactive audience engagement. IPE’s use will not require collecting personal information but will focus on leveraging interactive tools to enhance participation and feedback. This approach emphasizes the utility of Mentimeter in facilitating real-time interaction during meetings, workshops, events, and conferences, while minimizing privacy risks by avoiding the collection, use, or disclosure of personal data.

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

We’re currently looking at a one-year pro subscription, with the possibility of renewing or reassessing the subscription based on our license use.

3. Related Privacy Impact Assessments

See previous PIA #23-0018

4. Elements of Information or Data (required)

Participants will not be asked to provide any personal information or personally identifying information in their responses. Our engagement sessions are intended to be an anonymous process.

Questions put to participants using Mentimeter are mainly related to gathering ideas to identify opportunities for fostering interconnectedness and tap into innovative ideas for internationalization opportunities TRU can realize in the next 10 years. For example, we will ask faculty, staff, and admin questions like, “In what ways do you believe the TRU community can make a positive impact on a global scale?” and, “How can faculty members contribute to the university's broader internationalization efforts, both within and outside the classroom?”

Questions will vary, with some being multiple choice, and others in the form of open-text responses as in the previous examples.

Participants will be asked to respond to a specific survey, and will fall under the “Audience” category of Mentimeter’s Privacy Policy:

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Audience

We may process:	with the purpose to:	and the legal basis being:
Device Information	enable for you to vote/add replies to surveys and presentations and prevent abuse	contractual obligations
Contacts (email address)	enable for a User to send you the survey or presentation you have interacted with, which is optional	contractual obligations
Contacts (email address)	conduct direct marketing via email (if you have provided us your email address to receive a survey or presentation which is optional)	your consent
Cookie Information	conduct marketing activities and provide appropriate security measures, as examples, please read our full Cookie Policy for more information	legitimate interest and your consent

Mentimeter's Cookie Policy ([Interactive presentation software - Mentimeter](#)) provides that cookies will only be used with consent:

"When you visit our websites, you have the right to have access to certain information, for example how cookies are used by us and the purpose of the cookies. **You also need to consent to our use of cookies. You consent by allowing cookies or categories of cookies in the cookie banner that appears when you visit the website.** If you do not consent to the use of cookies, it may affect your user experience and you may not get full access to all features and functions on our websites.

In case you have given your consent to the use of cookies, you may easily withdraw your consent and choose to block and/or delete the cookies. For more information on how to block or erase cookies, please see the "*Cookie Preferences*" section below."

Participants are not required to provide any consent to Mentimeter to participate. If they choose to consent to cookies, they are entering into an agreement directly with Mentimeter – TRU will not be collecting this information.

Part 2 – Protection of Personal Information

5. Storage or Access outside Canada (required)

Data is hosted in the EU by default and is stored on AWS.

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

Mentimeter is located in Sweden and offers multi-regional hosting. A full list of the service

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providers that process Mentimeter users' data, along with details of their location, is available [here](#).

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
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;	no
3. The common or integrated program/activity is confirmed by written documentation that meets the requirements set out in the FOIPP regulation.	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.	n/a

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

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).

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N/A – no personal information will be collected, used, and/or disclosed.

Personal Information Flow Table			
	Description/Purpose	Type	FOIPPA Authority
1.	IPE generates a presentation survey designed to gather anonymous responses.	N/A	N/A
2	Survey is displayed to group and a code is assigned to allow participants to access the survey as “audience” members.	N/A	N/A
3	Participants engage with the survey by providing responses to questions. Mentimeter collects device information for the purpose of enabling users to vote/add replies to surveys and presentations and to prevent abuse.	Collection	26(c)
4	Responses are displayed as they appear and are visible to the group. Participants will not be asked to provide personal information in their responses, but there is a chance that a respondent could include personal info in open-ended responses.	Use	32(a), s.32(b)

9. Risk Mitigation Table (required)

Please identify any privacy risks associated with the initiative and the mitigation strategies that will be implemented. Please identify the likelihood (rare, unlikely, possible, likely, almost certain) of this risk happening and the degree of impact it would have on individuals if it occurred (insignificant, minor, moderate, major, catastrophic). You may contact the *Information Security Director* for assistance.

See previous PIA #23-0018

→ Exposure rating of *high* or *critical* is of concern. Please contact Director, Information Security to discuss possible solutions.

s.13

10. Collection Notice

N/A – no personal information will be collected, used, and/or disclosed.

Standard Collection Notice Statement - Example

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Any personal information is collected by the Thompson Rivers University under *Choose an item.* of the *Freedom of Information and Protection of Privacy Act* and will be used to [enter purpose for collection]. Should you have questions about the collection of this information, please contact:

[Name]

[Position name or title]

[Business address]

[Business phone number]

[Business email or business fax number]

Insert Your Collection Notice Statement Here

“Thompson Rivers University (TRU) collects, uses, discloses and retains personal information in compliance with the BC Freedom of Information and Protection of Privacy Act (FIPPA). TRU is using Mentimeter to conduct surveys. Participation is completely optional.

If you choose to participate, Mentimeter will collect basic device information to enable you to participate in the survey and to prevent abuse. Your responses will be displayed to the group once you submit them using Mentimeter – please do not include personal information or information that would identify you, these surveys are intended to be anonymous. This collection is permitted under s.26(c) of FIPPA. Mentimeter may ask for your consent to use cookies, or for your email address – you are under no obligation to accept, and if you choose to accept you are entering into a separate agreement with Mentimeter.

For further information about how your personal information is being collected, please contact: Integrated Planning and Effectiveness. Email: ipe@tru.ca

Part 3 – Security of Personal Information

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

See previous PIA #23-0018

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

See previous PIA #23-0018

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

Yes, Policy No. BRD 16-1: Information Security

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)

N/A – no personal information will be collected, used, and/or disclosed.

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

N/A – no personal information will be collected, used, and/or disclosed.

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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.

N/A – no personal information collected.

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.

N/A – no personal information collected.

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?

N/A – no personal information collected.

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 Legal Services.**

21. Does the program involve access to personal 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 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.

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)

No

24. 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

25. 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

26. 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?

N/A

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

s.13 [Redacted]

John Cuzzola

s.22 [Redacted]

2024-02-16

Information Security Director

Signature

Date

Part 8b – Privacy Officer Comments

s.13, s.14 [Redacted]

Marina Sparks

s.22 [Redacted]

2024-02-22

Privacy and Access Officer

Signature

Date

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Part 9 – Program Area Signatures

Dorys Crespín-Mueller		
Program/Department Manager	Signature	Date
John Cuzzola		2024-02-16
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).*