

Privacy Impact Assessment

24-0021

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:	RNMKR		
Name of TRU Department/Branch:	Open Learning		
PIA Drafter (you):	Ken Monroe		
Your Email:	kmonroe@tru.ca	Phone:	250.571.2438
Service/Vendor:			
Vendor Email:		Phone:	

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

Yes _____ **No** _____ **N/A** _____ **X** _____

(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 software provides an AI generated individual which students engage with to practice selling technique. The company RMKRS is a globally recognized sales training company and offer this product for free to educational institutions. The students engage with the AI simulation is automatically graded and can be posted on a leader board for a gamification experience within the class. The company also links affiliated business partners within the local area with students when conducting job searches.

[See an overview of the tool here.](#) Scroll down to “Beat the Bot”

[See a student training sample here.](#)

[Information for faculty](#)

2. Scope of this PIA (required)

The purpose of this PIA is to: (1) identify any Personal Identifiable Information (PII) that RNMKRS may require and (2) that any PII given to RNMKRS is protected adequately according to the sensitivity of the data provided. Finally, (3) students/faculty are aware that they should not provide any PII or sensitive information to this service.

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

Access to this site is free and upon invitation by the course instructor. Staff at RNMKRS will coordinate with the instructor to set up students who choose to participate in this activity. Participation will not be mandatory. The initiative would be set up for each student when they enter the course, if they choose. Access to the initiative would stop upon completion of the course.

3. Related Privacy Impact Assessments

None

4. Elements of Information or Data (required)

First and Last Name
E-mail Address
Phone Number

[This link connects to the privacy policy of RNMKRS](#)

Part 2 – Protection of Personal Information

5. Storage or Access outside Canada (required)

Yes.

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

United States

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);	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;	N/A
3. The common or integrated program/activity is confirmed by written documentation that meets the requirements set out in the FOIPP regulation.	N/A
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

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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. Linked In
2. The purpose for the linkage is different from those for which the personal information in each database was originally obtained or compiled;	Yes
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).

Your diagram and/or table must also include the authorities for the collection, use, and disclosure of personal information, as laid out in FOIPPA

Personal Information Flow Table			
	Description/Purpose	Type	FOIPPA Authority
1.	Instructor registers on site. And sets up practice environment with RNMKR staff	N/A	N/A
2.	Instructor sends list of students that want to participate in activity to RMNKR for account set-up and invitation.	Collection & Disclosure	26(c) & 33(2)(c)
3.	Student downloads App to mobile device and authenticates with information provided	Use	32(b)
4.	Upon authentication, student interacts with Bots and gets feedback and grading upon completion of activity	Use	32(b)
5.	Graded result is displayed to other students on a leaderboard	Use	32(b)
6.	Upon completion of the course, the instructor deactivates the student account. Data is erased from database.	Deletion	N/A

9. Risk Mitigation Table (required)

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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.

Risk Mitigation Table					
	Risk	Mitigation Strategy	Likelihood	Impact	Exposure
2.	s.13				
3.					

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

s.13

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

Standard Collection Notice Statement - Example

The use of “RNMKR is OPTIONAL. No personal information is collected. However, RNMKR collects Google Analytics data *(which would include meta-data such as your IP-address and browser identification headers)*. Your content and answers will be accessible to RNMKR and submitted to ChatGPT for processing. ChatGPT will not include this data to train its models. Nonetheless, you should not enter any information considered personal, sensitive, or confidential. Should you have questions about the use of RNMKR please contact the individual below and/or refer to the privacy policies of RNMKR and OpenAI.

Ken Monroe
Senior Instructional Designer
Open Learning
805 Tru Way, Kamloops, BC V2C 0C8
250.571.2438
kmonroe@tru.ca

Part 3 – Security of Personal Information

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

Not Available

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

RNMKRS uses encryption to protect personal information against unauthorized access, disclosure, or misuse.

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

Not Available

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)

Model is a closed, purpose-built system, manually trained to do one thing: build, simulate and evaluate sales conversation practice. Model uses a small set of inputs based on a data set we designed that is 100% explainable. Not a black box.

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

Not Available

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.

Not Available

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

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

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.**

N/A

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.**

N/A

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.

N/A

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

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

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.

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.

Part 8a – Information Security Director Comments

s.13 [Redacted]

John Cuzzola

s.22 [Redacted]

2024-10-31

Information Security Director

Signature

Date

Part 8b – Privacy Officer Comments

Privacy and Access Officer

Signature

Date

Part 9 – Program Area Signatures

Program/Department Manager	Signature	Date
John Cuzzola		2024-10-31
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”*