

Preliminary Privacy Impact Assessment (PIA)

Project ID #		Previously Assessed? (use dropdown below)
Project Name:	CRM Implementation	Previously Assessed - No
Project Lead:	Andrea Rhodes	
Information Owner:	Registrar's Office, Alumni, Advancement, Finance	
Expected Go-live Date:	2019	

Purpose & description of Initiative: TRU is seeking an institution wide Customer Relationship Management (CRM) solution that will streamline functions by creating processes that are easy for staff to understand and provide prospect management tools, communication tools, tracking, scheduling, interaction, reporting and analysis.

IMPACT		Click cell for drop down menu	Score
1	How many individual records are stored, accessed or used?	100,001-1,000,000	s.13
2	What is the most sensitive type of Personal Information in these records?	Employee Information	
3	Is any of the information owned by another organization?	No	

PROBABILITY		Score
4	Where will the information be stored?	Off-campus (inside Canada)
5	How many users will have access to the information?	101-1,000
6	Will a third party (e.g. vendor or service provider) have access to the information?	No

Under Impact #2 list types of student/employee information involved:

- Student biographical (Name, phone number, address, birthday), financial (for financial aid, sponsorship & scholarship support), academic information (grades, course history, program information), travel (visas, study abroad information, travel details)
- Employee - financial (payroll, donation history), biographical (name, address, phone, relationships such as kids, spouse, employer)
- Donor - donation history, pledges, biographical
- International agents (financial, student relationships, employer)
- Homestay families (biographical, financial)
- Prospective students (biographical)

PIA Priority Rating Table					
Impact	Probability				
	1	2	3	4	5
1	1	2	3	4	5
2	2	4	6	8	10
3	3	6	9	12	15
4	4	8	12	16	20
5	5	10	15	20	25

Colour Coding Key
LOW
MEDIUM
HIGH
VERY HIGH

Classification for this Project

s.13

How will system access be given? (if applicable) : ASAR based. Access will reflect existing roles and current access to data. It would be uncommon that access to data within the CRM was greater than what the employee had via pre-existing systems.

If yes, explain: what does this mean?

Describe outsourced/contracted services: Project planning and management, data integration support

Technical description (i.e. client agent, SSL, FTP, hostedt, etc): Cloud service bridged from on prem existing database information

NOTES:

1. This tool is designed to assess the level of overall privacy and security risk for your project. It considers the volume/sensitivity and use of information. The overall risk is calculated as follows: RISK = IMPACT x PROBABILITY
2. Employee information does not included business contact information (name, business address/phone/email used for business purposes).
3. For information and instructions on how to use this tool, see: [Privacy Webpage](#)
4. Other confidential information as defined in the [Information Classification Standard](#).
- 5 Return completed form to privacy@tru.ca. Please be sure to include the name of your project in the subject line.

Risk Scores for CRM - Microsoft Dynamics 365
-(Assessment includes Privacy Threats only (Opportunities are to be assessed by the Project Sponsor))
Based on University Risk Ratings Matrix

Impacts/Threats	Student Success	Learning & Growth - Does not fit well for this assessment	Internal Processes	Stakeholder Benefit	Resource Use - Does not fit well for this assessment	Total Impact	Final Risk Rating for Impact	Likelihood	Rationale for ratings
Risk/Issue #1									
Risk/Issue #1									
Risk/Issue #2									
Risk/Issue #3									
Risk/Issue #4									
Risk/Issue #5									
Risk/Issue #6									
Risk/Issue #7									
Risk/Issue #8									
Risk/Issue #9									
Risk/Issue #10									
Risk/Issue #11									
Risk/Issue #12									
Risk/Issue #13									
Risk/Issue #14									
Risk/Issue #15									
Risk/Issue #16									
Risk/Issue #17									
Risk/Issue #18									
Risk/Issue #19									
Risk/Issue #21									
Considerations:									

# (Risk Category)	Risk/Issue	Likelihood	Impact	Mitigation Strategy/Recommendation	Rationale
1 (General)					

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Risk/Issue #7									
Risk/Issue #8									
Risk/Issue #9									
Risk/Issue #10									
Risk/Issue #11									
Risk/Issue #12									
Risk/Issue #13									
Risk/Issue #14									
Risk/Issue #15									

Considerations:
S, 13

removed - not specific to Privacy

# (Risk Category)	Risk/Issue	Likelihood	Impact	Mitigation Strategy/Recommendation	Rationale
1 (General)	S, 13				

New #6