## **PIA Form**

**Purpose:** This Schedule represents the Privacy Impact Assessment form which will be found on a LIS webpage.

## Privacy Impact Self-Assessment – Collection of Personal Information

INSTRUCTIONS: Before collecting personal information, the *Freedom of Information and Protection of Privacy Act* (FIPPA) requires a written assessment of specific privacy considerations and the steps to be taken to prevent, reduce, or mitigate privacy risks. Please complete the Privacy Impact Self-Assessment below and send it to fippa@uwaterloo.ca. If the privacy risks are identified as high risk, you will be required to work with the Privacy team to complete an Enhanced Privacy Review Assessment.

A. Background information

| Lead (name, position, and      |  |  |
|--------------------------------|--|--|
| email)                         |  |  |
| Department                     |  |  |
| Expected date information will |  |  |
| start being collected          |  |  |
| Date self-assessment completed |  |  |
|                                |  |  |
| В. [                           | Details regarding Collection   |  |
| c                              | What is the purpose of collecting the personal nformation?   |  |
| i                              | Why is the personal nformation necessary to achieve the purpose?   |  |
| i:<br>C                        | Under what legal authority s the collection, use, and disclosure of the nformation being done?   | □ Expressly authorized by the University of Waterloo Act □ Expressly authorized by another statute (please provide statute): □ Used for the purposes of law enforcement □ Necessary to the proper administration of a lawfully authorized activity |
| ii<br>p<br>h<br>ii<br>5. V     | For each type of personal information being collected, provide an explanation of now the information is intended to be used.  What is the source of the personal information that is intended to be collected? | Directly from the individuals by the University.  Name software collecting PI (if applicable):   |
|                                |  |  |



|     |  | ☐ Directly from individuals by a third party (from a source other than the individual to whom the personal information relates).*  Name third party collecting the PI:                          |
|-----|--|---|
|     |  | Name software collecting PI (if applicable):  |
|     |  | Name software conecting Pr (ii applicable)  |
|     |  | * This would trigger consideration of s. 39 and clarification of the manner of collection   |
| 6.  | Are there any limitations or restrictions being imposed on the collection, use, or disclosure of the personal information? (please list)   |   |
| 7.  | What safeguards are in place to protect the personal information? (List administrative, technical and physical safeguards and practices)   | Administrative safeguards (e.g., access control policies):  Technical safeguards (e.g., encryption, firewalls, Multi-Factor Authentication):  |
|     |  | Physical safeguards (e.g., secure facilities, environmental controls, device security):   |
| 8.  | What are the risks to the individuals if the personal information is lost, stolen, or accidentally released?                               |   |
| 9.  | What steps have been taken to reduce the risk of loss, theft, or unauthorized use or disclosure of the personal information?               |   |
| 10. | What steps will be taken to mitigate the risks to the individuals in the event of an incident?   |   |
| 11. | The position titles of the officers, employees, consultants or agents of the institution who will have access to the personal information. |   |
| 12. | The period of time that the personal information will be retained.   | ☐ Personal information will be retained for at least one year after use, unless the individual to whom it relates consents to the earlier disposal (excluding credit or debit card information) |



|                                 |  |                 | rmation will be disposed of in accordance with a schedule.        |
|---------------------------------|--|-----------------|---|
|                                 |  |                 |   |
| 13.                             | Additional information & comments, if necessary.   |                 |   |
|                                 | oomments, ii neeessary.  |                 |   |
|                                 | Risk Classification  |                 |   |
|                                 | What type of personal inform   | ation is being  | □ N/A – No Personal Information (0 pts)                           |
| Τ.                              | collected for this project? (please list)  |                 | ☐ Student Name & Email address (no other PI) (1 pt)               |
|                                 |  |                 | ☐ Student Information (more than name/email) (2 pts)              |
|                                 |  |                 | ☐ Donor, Alumni, & Other 3 <sup>rd</sup> Party Information (3pts) |
|                                 |  |                 | ☐ Credit Card Information (5 pts)                                 |
|                                 |  |                 | ☐ Sensitive (e.g. religion, sexual orientation) (8 pts)           |
|                                 |  |                 | ☐ Health Information (10 pts)                                     |
|                                 |  |                 | - Treatminormation (10 pts)                                       |
| 2.                              | How much personal information is being   |                 | □ 1-1,000 (1 pt)  |
|                                 | collected, used, stored, disclo  | ~               | □ 1,001-10,000 (2 pts)  |
|                                 | records)   |                 | □ 10,001-100,000 (3 pts)  |
|                                 |  |                 | □ 100,001-1,000,000 (4 pts)                                       |
|                                 |  |                 | □ 1,000,001 + (5 pts)   |
| 3.                              | 3. Is any of the information owned by another  |                 | □ No <b>(1 pt)</b>  |
|                                 | organization?  |                 | ☐ Mostly owned by Waterloo (2 pts)                                |
|                                 |  |                 | ☐ Mostly owned by Third Party (4 pts)                             |
|                                 |  |                 | ☐ Yes <b>(5 pts)</b>  |
| 4.                              | 4. How many people will have access to the information? (including Waterloo & Third Party) |                 | ☐ 1-9 (0 pts)   |
|                                 |  |                 | □ 10-99 <b>(1 pt)</b>   |
|                                 |  |                 | □ 100-499 <b>(2 pts)</b>  |
|                                 |  |                 | □ 500-999 <b>(4 pts)</b>  |
|                                 |  |                 | □ 1000+ (5 pts)   |
| 5. Who will have access? (Third |  | party, Waterloo | ☐ UW Employee/Volunteer (1 pt)                                    |
|                                 | employees, or Public)  |                 | ☐ Third Pary <b>(2 pts)</b>                                       |
|                                 |  |                 | ☐ Public (website) (3 pts)  |
|                                 |  |                 | List specific position titles/roles here:                         |
| 6.                              | How long would the records b   | •               | ☐ Not kept longer than minimum retention period (see              |
|                                 | refer to the Records Classifica  | tion &          | Records Classification & Retention Schedule): Personal            |

Retention Schedule



|  | information will be kept for at least one year after use, unless the individual to whom it relates concerns to the earlier disposal (excluding credit or debit card information) (1 pt)  ☐ Kept longer than minimum retention requirement, with schedule of destruction (2 pts) |
|--|---|
|  | ☐ Indefinite, or no schedule of destruction (3 pts)   |
| Add up the points from each answer in this | ☐ 1-14 pts = LOW RISK   |
| section                                    | ☐ 15+ = HIGH RISK**   |
|  |   |
|  | ** Please note: If the total score from this section is 15 points or  |
|  | more, the matter is classified as 'HIGH RISK' and will require you  |
|  | to work with the Privacy Office to complete an Enhanced Privacy   |
|  | Review Assessment.  |

Please complete the Privacy Impact Self-Assessment below and send it to fippa@uwaterloo.ca. Your responses will be reviewed by the Privacy Office, if needed. If you have any questions, please contact fippa@uwaterloo.ca.

