

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	

B. Details regarding Collection

1. What is the purpose of collecting the personal information?	
2. Why is the personal information necessary to achieve the purpose?	
3. Under what legal authority is the collection, use, and disclosure of the information being done?	<input type="checkbox"/> Expressly authorized by the University of Waterloo Act <input type="checkbox"/> Expressly authorized by another statute (please provide statute): _____ <input type="checkbox"/> Used for the purposes of law enforcement <input type="checkbox"/> Necessary to the proper administration of a lawfully authorized activity
4. For each type of personal information being collected, provide an explanation of how the information is intended to be used.	
5. What is the source of the personal information that is intended to be collected?	<input type="checkbox"/> Directly from the individuals by the University. Name software collecting PI (if applicable): _____

	<input type="checkbox"/> 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): _____ * 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.	<input type="checkbox"/> 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)

	<input type="checkbox"/> Personal Information will be disposed of in accordance with a schedule. Specify: _____
13. Additional information & comments, if necessary.	

C. Risk Classification	
1. What type of personal information is being collected for this project? (please list)	<input type="checkbox"/> N/A – No Personal Information (0 pts) <input type="checkbox"/> Student Name & Email address (no other PI) (1 pt) <input type="checkbox"/> Student Information (more than name/email) (2 pts) <input type="checkbox"/> Donor, Alumni, & Other 3 rd Party Information (3pts) <input type="checkbox"/> Credit Card Information (5 pts) <input type="checkbox"/> Sensitive (e.g. religion, sexual orientation) (8 pts) <input type="checkbox"/> Health Information (10 pts)
2. How much personal information is being collected, used, stored, disclosed? (# of records)	<input type="checkbox"/> 1-1,000 (1 pt) <input type="checkbox"/> 1,001-10,000 (2 pts) <input type="checkbox"/> 10,001-100,000 (3 pts) <input type="checkbox"/> 100,001-1,000,000 (4 pts) <input type="checkbox"/> 1,000,001 + (5 pts)
3. Is any of the information owned by another organization?	<input type="checkbox"/> No (1 pt) <input type="checkbox"/> Mostly owned by Waterloo (2 pts) <input type="checkbox"/> Mostly owned by Third Party (4 pts) <input type="checkbox"/> Yes (5 pts)
4. How many people will have access to the information? (including Waterloo & Third Party)	<input type="checkbox"/> 1-9 (0 pts) <input type="checkbox"/> 10-99 (1 pt) <input type="checkbox"/> 100-499 (2 pts) <input type="checkbox"/> 500-999 (4 pts) <input type="checkbox"/> 1000+ (5 pts)
5. Who will have access? (Third party, Waterloo employees, or Public)	<input type="checkbox"/> UW Employee/Volunteer (1 pt) <input type="checkbox"/> Third Party (2 pts) <input type="checkbox"/> Public (website) (3 pts) List specific position titles/roles here: _____
6. How long would the records be kept? (Please refer to the Records Classification & Retention Schedule)	<input type="checkbox"/> Not kept longer than minimum retention period (see Records Classification & Retention Schedule); Personal

	<p>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)</p> <p><input type="checkbox"/> Kept longer than minimum retention requirement, with schedule of destruction (2 pts)</p> <p><input type="checkbox"/> Indefinite, or no schedule of destruction (3 pts)</p>
Add up the points from each answer in this section	<p><input type="checkbox"/> 1-14 pts = LOW RISK</p> <p><input type="checkbox"/> 15+ = HIGH RISK**</p> <p>** 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.</p>

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.