



City of Victoria - Privacy Impact Assessment

e-Newsletter

PIA# PIA-2015-007

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.

Part 1 - General

Name of Department/Branch:	Citizen Engagement and Strategic Planning		
PIA Drafter:	Rob Gordon, information Access and Privacy Analyst		
Email:	rgordon@victoria.ca	Phone:	250.261.0347
Program Manager:	Heather Follis		
Email:	hfollis@victoria.ca	Phone:	250.361.0309

1. Description of the Initiative

A bi-weekly subscription based e-newsletter for residents. Recipients will sign up for the newsletter and receive timely and relevant information about City programs and services. This subscription service will be managed by Mailout on the City's behalf.

2. Scope of this PIA

The scope is related to the actual newsletter subscription service, and sign up page on the City's website.

3. Related Privacy Impact Assessments

There is no previous or related PIA.

4. Elements of Information or Data

Individuals need to provide an email address because the e-newsletter will be available electronically only. Providing first and last name is optional.

If personal information is involved in your initiative, please continue to the next page to complete your PIA.

If no personal information is involved, please submit Parts 1, 6, and 7 to your privacy office(r). They will guide you through the completion of your PIA.

Part 2 – Protection of Personal Information

5. Storage or Access outside Canada

Industry Mailout is a Canadian service that complies with PIPEDA (federal privacy law regulating private companies). Its data is hosted completely within Canada at two data centres (one in Ontario and one in BC) that are SSAE16/CSAE3416 compliant (e.g. an industry standard whereby a third party audits and reports out on such things as a company’s information protection protocols).

6. Data-linking Initiative*

If you answer “yes” to all 3 questions, your initiative may be a data linking initiative and you must comply with specific requirements under the Act related to data-linking initiatives.	
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
If you have answered “yes” to all three questions, please contact your privacy office(r) to discuss the requirements of a data-linking initiative.	

7. Common or Integrated Program or Activity*

If you answer “yes” to all 3 of these questions, you must comply with requirements under the Act for common or integrated programs and activities.	
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.	

8. Personal Information Flow Diagram and/or Personal Information Flow Table

Personal Information Flow Table			
	Description/Purpose	Type	FOIPPA Authority
1.	Individual provides email address and possibly name to receive a subscription to the e-newsletter	Collection	26(c), 26(e)
2.	Email addresses and names are used by Mailout to electronically deliver e-newsletters to subscribers	Use	32(b)
3.			

9. Risk Mitigation Table

Risk Mitigation Table				
	Risk	Mitigation Strategy	Likelihood	Impact
1.	Privacy breach at Mailout	Mailout complies with industry standard protection measures	Low	Low
2.	Retention of email addresses long after subscriber wants e-newsletters	Periodic review of stale email addresses. Mailout automatically deletes inactive emails.	Low	Low

10. Collection Notice

Part 3 – Security of Personal Information

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

N/A

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

Mailout has all the necessary security measures

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

Not required.

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.

Subscribers must sign themselves up and respond to a confirmation email. Only staff in Citizen Engagement and Strategic Planning will have access to log on to the newsletter tool via Industry Mailout.

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

What are Mailout's audit features?

Part 4 – Accuracy/Correction/Retention of Personal Information

16. How is an individual's information updated or corrected? If information is not updated or corrected (for physical, procedural or other reasons) please explain how it will be annotated? If personal information will be disclosed to others, how will the public body notify them of the update, correction or annotation?

Email address is the only required field. When a bounce back to an inactive email address occurs, Industry Mailout automatically removes them from the list

For example: users have access to update their own information or, notes will be made on a case file.

17. Does your initiative use personal information to make decisions that directly affect an individual(s)? If yes, please explain.

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 and complete.

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

21. Does the program involve access to personally identifiable information for research or statistical purposes? If yes, please explain.

No

Please ensure Parts 6 and 7 are attached to your submitted PIA.



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Part 6 – Information Access and Privacy Analyst’s Recommendations

1. Advise the Information Access and Privacy Analyst if there are any changes to the e-newsletter service
2. Advise the Information Access and Privacy Analyst if there are any changes to the way Mailout provides its service.



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Part 7 - Program Area Signatures

Rob Gordon

Privacy Officer/Privacy Office Representative

[Signature]

Signature

Nov 12/15

Date

Program/Department Manager

Signature

Date

N/A

Contact Responsible for Systems Maintenance and/or Security
(Signature not required unless they have been involved in this PIA.)

Signature

Date

Head of Public Body, or designate

Signature

Date

A final copy of this PIA (with all signatures) must be kept on record.