



# Privacy Impact Assessment

Development Tracker  
(OurCity for Prospero)

PIA# 2016-010

## Part 1 – General

Name of Department/Branch:	Sustainable Planning and Community Development		
PIA Drafters:	Katherine Wilson		
Email:	<a href="mailto:kwilson@victoria.ca">kwilson@victoria.ca</a>	Phone:	250.361.0392
Program Manager:			
Email:		Phone:	

### 1. Description of the Initiative

The City of Victoria in collaboration with Tempest Development, developed a mobile application (HTML5) that enables the public to view current permitted processes that are managed within the Prospero system of Tempest. This application was created to allow for greater transparency in the City's processes and upcoming developments within the City.

<https://tender.victoria.ca/tempestprod/ourcity/prospero/search.aspx>

The information displayed on the Development Tracker is collected during the application process and the tasks are updated by City staff throughout the process. Currently only Active permits are displayed on the Development Tracker, but Tempest and the City are looking to display historical permits as well. The date for this is unknown at this time.

Currently, the following permit processes are displayed online:

- Development Permit with Variance
- Development Variance Permit
- Heritage Alteration Permit with Variance
- Rezoning Permit
- Temporary Use Permit

### 2. Scope of this PIA

The scope of this PIA is to the displaying of permit applications on the City of Victoria website using the Tempest MyCity mobile application (Development Tracker).



# Privacy Impact Assessment

Development Tracker  
(OurCity for Prospero)

PIA# 2016-010

---

## 3. Related Privacy Impact Assessments

eApply for Prospero PIA

## 4. Elements of Information or Data

### Permit Application Personal Information:

- Application Contact name (generally Contractor, sometimes homeowner)
- Telephone of Contact
- Email of Contact
- Address (location) of permit application
- Purpose of the application

## Part 2 – Protection of Personal Information

## 5. Storage or Access outside Canada

No data is stored outside of Canada. Anyone with a web browser can view the information displayed online on the City's website, Victoria.ca. The information is read-only and can only be edited by approved staff.

### Physical/technical security:

**Governance:** SAS 70 Type II, SAS 70 protocols

*"A service auditor's examination performed in accordance with SAS No. 70 represents that a service organization has been through an in-depth examination of their control objectives and control activities, which often include controls over information technology and related processes. In today's global economy, service organizations or service providers must demonstrate that they have adequate controls and safeguards when they host or process data belonging to their customers."*

**Security features for system maintenance, patch updates, synchronization:** Firewalls, DDoS protection, SAS 70 protocols

**Transmission security:** SSL (secure socket layer) communication, API keys (Application Programming Interface keys are like a unique identifier to confirm who is requesting the personal information), Session keys (encryption method).

**Back-up locations of personal information:** Back-up servers are located in Victoria, BC.



# Privacy Impact Assessment

Development Tracker  
(OurCity for Prospero)

PIA# 2016-010

## 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.**

1. Personal information from one database is linked or combined with personal information from another database;	No
2. The linkage purpose 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

## 7. Common or Integrated Program or Activity\*

**In FOIPPA, “common or integrated program or activity” is strictly defined. 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
<b>Please check this box if this program involves a common or integrated program or activity based on your answers to the three questions above.</b>	

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

Personal Information Flow Table			
	Description/Purpose	Type	FOIPPA Authority
1.	Application is received requesting application for specific permit type.	Collection	26(c)



# Privacy Impact Assessment

## Development Tracker (OurCity for Prospero)

PIA# 2016-010

2.	Once permit is reviewed by staff, permit folder details are displayed online on Development Tracker.	Disclosure	33.1(1)(a)
3.	Once permit is completed (approved, rejected, or cancelled) the information is no longer displayed on Development Tracker. The information remains in Prospero, but is not visible by the public (future enhancement to display historical applications).	Use	32(a)

### 9. Risk Mitigation Table

Risk Mitigation Table				
	Risk	Mitigation Strategy	Likelihood	Impact
1.	Access to email accounts	Email addresses only, and not passwords are collected and stored in Prospero, but only displayed on Dev Tracker. Applicants have the choice to not display their email address online.	low	low

### 10. Collection Notice

The following disclosure statement is currently provided on the paper/PDF application forms:

**The name, phone number and email address identified as the key contact will be displayed on the City of Victoria website as well as the on-site sign should the public require further information about the application.**

**Note that all correspondence from the City (written and verbal) will be provided to the key contact. It is the responsibility of the key contact to inform other project members.**

*The City of Victoria collects your personal information for the purpose of processing your Rezoning application. The legislated authority to collect your personal information is Section 26 (c) of the Freedom of Information and Protection of Privacy Act. If you wish to have further information regarding the collection of your personal information, please contact the Information Access and Privacy Analyst Archives and Records Management, # 1 Centennial Square, Victoria, BC V8W 1P6 250.361.0347 foj@victoria.ca.*

<http://www.victoria.ca/assets/Departments/Planning~Development/Development~Services/Applications/Rezoning%20Application.pdf>

## Part 3 – Security of Personal Information

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



# Privacy Impact Assessment

Development Tracker  
(OurCity for Prospero)

PIA# 2016-010

---

Not applicable.

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

Development Tracker provides Read-Only access to information stored in Prospero.

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

Existing IT Security policies.

**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.**

Only City staff with the appropriate permissions will be able to modify the information stored in Prospero, Tempest. Users viewing the information on Development Tracker cannot change anything, they have read-only access.

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

Requests by staff for access to Prospero (Read/Modify/Edit/Delete) are sent to Information Technology and require Manager or Supervisor approval.

## **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?**

Information is updated or corrected when City Staff are notified by the Applicant.

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

No. The information is a convenience copy to allow the public to access.

**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.**

**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



# Privacy Impact Assessment

Development Tracker  
(OurCity for Prospero)

PIA# 2016-010

---

## **Part 5 – Further Information**

**20. Does the initiative involve systematic disclosures of personal information? If yes, please explain.**

Yes. The applicant for the permit, at times, is the home owner, therefore the name and address and phone number, and personal email address are displayed online

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

No.

**22. Will a personal information bank (PIB) result from this initiative?**

No.

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



# Privacy Impact Assessment

Development Tracker  
(OurCity for Prospero)

PIA# 2016-010

---

## **Part 6 – Privacy Officer Comments**

This PIA is based on a review of the material provided to the Privacy Office(r) as of the date below. If, in future any substantive changes are made to the scope of this PIA, the public body will have to complete a PIA Update and submit it to Privacy Office(r).



# Privacy Impact Assessment

Development Tracker  
(OurCity for Prospero)

PIA# 2016-010

## Part 7 – Program Area Signatures

Rob Gordon  
Privacy Officer/Privacy Office  
Representative

\_\_\_\_\_  
Signature

June 20, 2017  
Date

\_\_\_\_\_  
Program/Department Manager

\_\_\_\_\_  
Signature

\_\_\_\_\_  
Date

MIKE PALMER

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

\_\_\_\_\_  
Signature

June 29/2017  
Date

Rob Gordon  
Head of Public Body, or designate

\_\_\_\_\_  
Signature

June 20, 2017  
Date

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