



City of Victoria - Privacy Impact Assessment

MICROSOFT OFFICE 365

PIA-2017-005

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:	Finance – Information Technology		
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1. Description of the Initiative

The benefits of transitioning from a traditional IT environment to a Cloud-based environment are compelling. Instead of bearing the costs alone to maintain the network, support services, software and hardware upgrades, knowledge and decision making on product purchases and infrastructure architecture, a public body can migrate to a Cloud Service Provider and share these costs and expertise. The City of Victoria has begun migrating to Microsoft’s Cloud Services for Canada and is transitioning all staff to use of Microsoft’s Office 365 for the Cloud.

O365 offers many benefits to City of Victoria staff, namely the increase productivity by providing access to O365 work from anywhere with internet connection including mobile devices. Furthermore, Microsoft products are automatically updated to the latest version without any additional charges. Pricing is more flexible and predictable as user licenses can be quickly and easily purchased as needed for apps required. Additional benefits, include the reduction in cost of Exchange, SharePoint and Skype for Business hardware, licensing, configuration as updates are managed by Microsoft. Reduction in the number and cost of servers for storage as well as maintenance time spent on physical servers hosted at the City of Victoria. The City of Victoria will use a number of Microsoft’s cloud-based Office 365 apps under a subscription based Software as a Service (SAAS) agreement. Under this SaaS agreement the City chooses which the Office 365 apps it will use.

Office 365 is evolution of the Microsoft Office Productivity Suite of applications. The City currently uses the legacy on premise versions of the suite. Migration to Office 365 has been possible because Microsoft has created a cloud environment within Canada. As importantly, Microsoft complies with the International Organization for Standardization’s ISO/IEC 27000 which is the first international code of practice for cloud privacy. This means that the City maintains control of its content, including personal information, which is protected to a level that complies with FOIPPA’s security requirements. More information on Microsoft’s management of client content can be found here: <https://www.microsoft.com/en-us/trustcenter/privacy/you-own-your-data>

2. Scope of this PIA

Not all of the Office 365 apps that the City subscribed to use are meant to collect, use and/or disclose personal information or manage it that requires compliance with FoIPPA's privacy provisions. City staff will not use the ten apps listed below to manage personal information. As importantly, the apps were not developed for the purpose of managing personal information. Therefore, the scope of this PIA is to verify that the ten apps will not be used to manage personal information and nor is it reasonably likely that they could be used to manage personal information. Those Office 365 apps that could be used to manage personal information or are likely to at least collect and store personal information on more than an incidental basis will be reviewed in a separate PIA.

1. Skype for Business
2. Yammer
3. Teams
4. To_Do (formerly Wunderlist)
5. Planner
6. Project Online
7. Sway
8. Tasks
9. Calendar
10. Azure Active Directory (only contains business contact info)

The following criteria were used to identify those apps that are not meant to collect, use or disclose personal information, will not be used for that purpose by the City and have a very low likelihood of collecting incidental personal information.

- The reason(s) for their development
- The reasons why they were bundled in Office 365
- Their most useful business applications
- Their difficulty for use to manage personal information
- Their flexibility to be used for different purposes

3. Related Privacy Impact Assessments

There are no related PIAs. A PIA will be completed for Office 365 apps that will collect personal information, or the likelihood that they will collect personal information is sufficient, requiring them to be used in accordance with FoIPPA's privacy provisions.

4. Elements of Information or Data

None of the Apps have been provided to staff for the purpose of collecting, using and/or disclosing personal information. The data they collect is provided in Part Two.

Part 2 - Review of the Ten Office 365 Apps

The purpose of this review is to demonstrate that the apps meet the five criteria above sufficiently to categorize them as not collecting, using and/or disclosing personal information. Also, incidental collection of personal information is so small that it would be unreasonable that they must be managed in compliance with FoIPPA's privacy provisions.

Below are five aspects chosen for investigation to provide the supporting evidence that the apps have been correctly identified as not collecting, using, disclosing or managing personal information in any other way that requires compliance with the privacy provisions.

- Description
- Purpose
- Additional purpose(s)
- Staff with access (e.g. all staff or just departments or program areas)
- Data collected

1. SKYPE FOR BUSINESS

i. Description

The real-time communications server software provides the infrastructure for enterprise instant messaging, presence, VoIP, ad hoc and structured conferences. This functionality can be extended to other Skype for Business users outside of the organization.

ii. Purpose

Skype for Business is a real time voice, video and conferencing tool and instant messaging client.

iii. Additional purpose(s)

Staff will be able to use Skype for any way they find useful.

iv. Staff with access (e.g. all staff or just departments or program areas)

All city staff with an email account and E3 Microsoft licensing will have access to Skype for Business as well as other Skype for Business users outside the organization.

v. Data collected

Conversations held in Skype chats can be accessed through Outlook under the Conversation History folder of their inbox. These conversation strings can then be emailed to any email address or copied and saved.

2. YAMMER

i. Description

Yammer is an internal social network for organizations that can also invite/include people outside the organization in discussion and document collaboration. Private messages can also be sent to one or many other Yammer users that are not shared publicly or posted to a Yammer group.

ii. Purpose

Its purpose is to bring together staff working from remote locations or on the same floor to work on projects, organize events, post messages, etc. it can share files, videoconference, pictures etc. It also provides the ability to collaborate and communicate with individuals outside of the organization through direct invites to specific groups. Yammer is designed to help reduce email volumes by consolidating conversations and information sharing within one shared location as opposed to various email inboxes.

iii. Additional purpose(s)

Staff will be free to use it in any work way they find useful.

iv. Staff with access (e.g. all staff or just departments or program areas)

All staff with an O365 account will have access to Yammer. Specific sites can be private with their membership and content kept private from the rest of staff.

v. Data collected

Staff have the option to modify their profile details which include a photo, their birthday, expertise, interests, work contact information as well as work and education history.

Staff have the ability to download copies of documents shared on Yammer under the Files tab. Files added here are stored to Yammer and if it is a public group, anyone in the City's network can view or share it, but if in a Private group then only it's members may view or share it. Files attached to Yammer from OneDrive and SharePoint will only provide links to their existing location; they will not be moved elsewhere.

Yammer groups can be accessed via the web through O365 account, email, and mobile apps designed for iOS, Android, Blackberry and Windows phones. Yammer groups can also be embedded into O365 SharePoint sites or any web platform as it has an open API that only allows authenticated users to view or post content.

Members of a Microsoft Group will also have access to its related Yammer group and therefore have the ability to view and add content to that Yammer feed.

Yammer messages, notes and files and their metadata can be exported only by administrators. <https://support.office.com/en-us/article/Yammer-security-FAQ-Yammer-admin-guide-a2c84111-1da6-4c70-8646-bfe585b93c90?ui=en-US&rs=en-US&ad=US>

3. TEAMS

i. Description

A chat-based communications app that integrates Microsoft Exchange, SharePoint and OneDrive by default, but can also add “tabs” to connect most other Microsoft products (Planner, OneNote, PowerPoint, SharePoint, etc.) to the central team page.

ii. Purpose

A collaborative tool for Teams (groups) to engage in conversations, collaborate on documents and files, and quickly initiate meetings from a central location.

iii. Additional purpose(s)

Staff will be free to use it in any work way they find useful within their assigned Team(s).

iv. Staff with access (e.g. all staff or just departments or program areas)

Each Team will have specific membership associated to their department or program/project area. The ability to create new Teams can be limited to specific roles or staff.

v. Data collected

Data can be retrieved from all other O365 apps connected to Teams. Conversations are collected in Teams, while other data is collected through connected apps where permissions exist (SharePoint, Planner, etc.).

Teams collects the email addresses of its membership.

4. To-Do (Formerly WUNDERLIST)

i. Description

A simple list to track tasks for non-complex projects or daily tasks. To-Do can be easily accessed and updated through the To-Do app on O365, iOS app. To-Do also integrates and is accessible with Microsoft Outlook tasks.

ii. Purpose

Track personal tasks not being managed in Project Online or Microsoft Planner.

iii. Additional purpose(s)

Staff will be free to use it in any work way they find useful.

iv. Staff with access (e.g. all staff or just departments or program areas)

All staff will have access to create their own To-Do lists through their O365 account. Only users invited to be part of a To-Do list will have the ability to modify content on that task list.

v. Data collected

Users only input task list and individual task titles into the app using a free text field. At this time only text can be added for a task, no photos or files can be attached to a To-Do task.

Data in To-Do can only be added and accessed through the mobile app, a web browser through O365 portal, or their personal Outlook account in the My Tasks section. Users who have an existing Wunderlist account can import their existing tasks into To-Do.

Link to Microsoft To-Do Privacy Policy Statement: <https://privacy.microsoft.com/en-gb/privacystatement>

5. PLANNER

i. Description

A tool to organize and assign tasks, share documents and conversations across a team for a medium-sized project or assignment. The app sends email notifications on task assignment and completion to the users email associated with their O365 account.

ii. Purpose

It is a visual tool to organize project tasks across a team that are of low to medium complexity and don't require the detailed/complex tracking capability provided through Microsoft Project.

iii. Additional purpose(s)

Staff will be free to use it in any way they find useful, such as personal task management.

iv. Staff with access (e.g. all staff or just departments or program areas)

Staff must have permission to the Planner board in order to modify content, but all staff can create their own boards. Boards or Plans can be either public or private depending on the owners preference.

v. Data collected

Users add Cards or tasks to the Board or plan. Each Card will have a title, due date, assignees and may have attachments, categories (hashtags) and conversations.

Documents that are added to a Planner Card (or task), are saved to a SharePoint online document library. Microsoft Planner plans are saved to O365 and, at this time, cannot be saved or downloaded from the app in a simple way or format.

6. PROJECT ONLINE

i. Description

Online project and portfolio management tool for more complex online task and plan tracking that provides web-based interface for sharing plans across teams.

ii. Purpose

To better manager projects and collaborate and update status on projects online.

iii. Additional purpose(s)

Project Online may be used to collect project proposals and submissions through a third party app, Agora. This tool will allow for staff to submit project proposals, estimate the budget and work/duration required then analyze it against current portfolio resources and availability. The data stored in Project Online can be displayed in visual dashboards using Power BI.

Due to the licensing costs, only approved staff will be free to use it in any work-related way they find useful.

iv. Staff with access (e.g. all staff or just departments or program areas)

Due to licensing costs required to effectively use Project Online, only specified staff will have editing access to Project Online. Project Managers and members will have additional Project licensing applied to allow for editing of the project plan(s). Unless otherwise noted, all project plans will be visible to all staff.

v. Data collected

Project task names, start and end dates, assignees (staff names), duration and work are recorded in Project Online. Project plans can be downloaded from Project online as MS Project documents or Excel documents. Data is added either through the Project

Online app in O365 or the project plan can be opened in MS Project and tasks be added or updated.

Project Online Service Description on TechNet - <https://technet.microsoft.com/en-ca/library/project-online-service-description.aspx>

7. SWAY

i. Description

Similar to Microsoft PowerPoint, Sway is used to create interactive presentations and reports that can also be quickly shared with anyone online. Images, videos and text are combined to create visual presentations that are optimized for touch screen and mobile displays.

ii. Purpose

Sway can be used for presentations across the organization or can be shared externally. Microsoft designed Sway as a replacement for PDF or static web content as a more interactive and easily created. Microsoft states that Sway may be used for the following: Marketing plans/campaigns, blogs, proposals and sales pitches, project plans/updates, brochures/digital fliers, newsletters, weekly/monthly/quarterly/annual reports, training manuals, and so much more. (<https://www.itunity.com/article/sway-office-365-enterprise-2091>)

iii. Additional purpose(s)

Staff will be free to use it in any way they find useful.

iv. Staff with access (e.g. all staff or just departments or program areas)

All staff with O365 account will have access to Sway.

v. Data collected

Photos, videos and text are added to the Sway templates. Documents can also be embedded into a Sway. Currently downloading Sways off the website is not supported by Microsoft.

8. TASKS

i. Description

Tasks is primarily a personal task management component of Outlook hosted through Microsoft Exchange. Tasks are personal to each user and cannot be viewed by others. Users can assign Tasks to others and those tasks will appear in their personal Outlook account. This feature has been included since Outlook 2007.

ii. Purpose

Tasks is used to manage personal tasks.

iii. Additional purpose(s)

Staff are able to use it in any way they find useful.

iv. Staff with access (e.g. all staff or just departments or program areas)

v. Data collected

Data or tasks are added through the O365 Tasks app or in the Tasks tab of Outlook. The subject, start and due date, priority and reminder flags are recorded in Outlook. Attachments (documents) can be added to Tasks.

Tasks can be manually exported off O365 as a PST or CSV file from O365 Outlook - <https://kb.wisc.edu/helpdesk/page.php?id=38685>

9. CALENDAR

i. Description

Calendar displays a user's existing outlook calendars in O365 and provides a visual display into Group calendars, Rooms or resources and other Outlook users who have allowed access.

ii. Purpose

Its purpose is to provide web-based access to a user's exchange calendars through O365. Scheduling assistant suggests meeting times that do not conflict with all attendees who share their calendar. Users who are members of a Group will be able to see events scheduled to its shared calendar.

Calendar allows users to share their calendar to users outside of their organization where they can show when they are busy, titles and locations of calendar events, or all details of events (title, location, attendees, and details). Online Skype meetings can also be created from within Calendar. Calendars published on the web, from the City's Active Directory or from a file can be uploaded to Calendar to help with event scheduling.

iii. Additional purpose(s)

Staff are able to use it in any way they find useful.

iv. Staff with access (e.g. all staff or just departments or program areas)

All staff with O365 Exchange accounts will have access to Calendar.

v. Data collected

Calendar Events, emails and Skype online meetings can be created from Calendar. Calendars can be shared, published, or a snapshot can be shared to anyone with an email address. Events include the event title, start and end date/time, location or room, attendees, notes and any attachments.

Data added to O365 Calendar can be downloaded as an HTML or ICS file from within the app. Users can specify the level of details included in the download: availability only, limited details, or full details.

10. AZURE ACTIVE DIRECTORY

i. Description

Azure Active Directory is a modern identity management solution spanning on premises and cloud, providing the necessary security capabilities for application access control, federation, identity management, user provisioning, information protection, standard protocols support, comprehensive development libraries, and more.

ii. Purpose

Azure Active Directory supports Office 365 by providing an identity and access management service. It combines core directory services, identity governance and application access management.

iii. Additional purpose(s)

Staff cannot use AAD for any other purposes beyond those stated above.

iv. Staff with access

Only IT staff will have access to AAD. This includes the CIO, IT Helpdesk staff, Technology Security Specialist, and the Systems Administrator.

v. Data collected

Employee business contact information (name, email, office, phone and mobile number) for authentication purposes.

Part 6 - Information Access and Privacy Analyst's Recommendations



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Part 7 - Program Area Signatures

Rob Gordon

Information Access and Privacy
Analyst

Signature

June 9
, 2017

Date

Program/Department Manager

Signature

Date

MIKE PALMER

IT Branch Representative

Signature

June 6/2017

Date

Rob Gordon - Designate

Head of Public Body or Designate

Signature

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, 2017

Date

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