Privacy and Security

Protecting Personal Information

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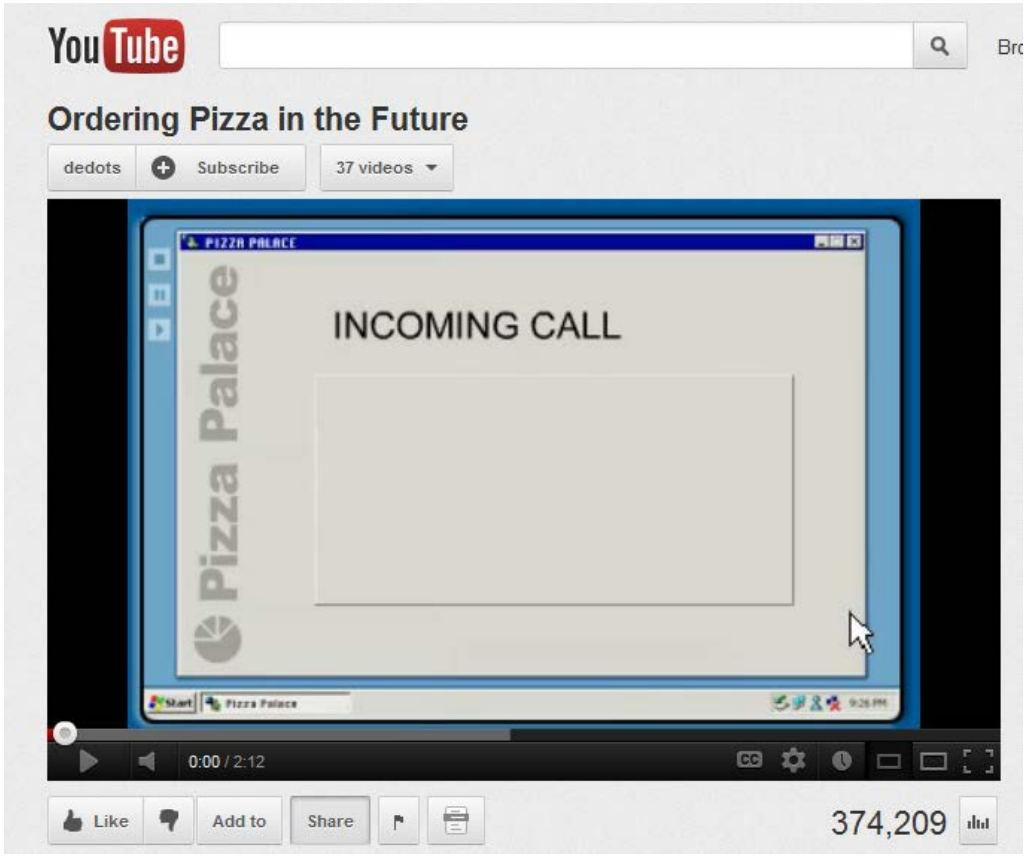
Privacy Video



http://www.youtube.com/watch?feature=player_embedded&v=RNJl9EEcsoE

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What is today about?

- Understand key principles of privacy and security and apply the principles to your work situation;
- Overview of *Freedom of Information and Protection of Privacy Act*, University privacy policy and related privacy and security policies;
- Introduce key privacy and security concepts specific to academic units;
- Integrate the knowledge through practical examples; and
- Provide privacy and security hints.

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Why You?

- Dean/ departmental offices hold records with confidential and highly confidential information;
- Faculty and staff may have privacy/security questions;
- External Review recommended wider education and training at the university

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Why Are You Here?

- Everyone is responsible for privacy and security
- There is no SECRITY without “U”
- There is no PRVACY without “I”
- SEC – **U – R – IT** – Y
- You may be the weakest link

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What is privacy?

- Privacy is the right of an individual to control his or her own personal information.

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Personal information?

- Personal Information is “information about an identifiable individual”


Social Insurance Number
SOCIAL INSURANCE NUMBER
NUMÉRO D'ASSURANCE SOCIALE
000 000 000
LOUISE MARTIN
DRIVER'S LICENCE
BRITISH COLUMBIA, CANADA
CAN
DL: DL
BRITISH COLUMBIA
The Best Place on Earth
NAME
ADDRESS
Issued:
Issued
Date of birth
Date of birth
Expires:
Expires
Class:
Class
Restrictions:
Restrictions
Endorsements:
Endorsements
Sex:
Sex
Eyes:
Eyes
Hair:
Hair
Wt:
Wt
Ht:
Ht
Campus Security/Safe Walk 250-721-7599
University of Victoria
STUDENT
ANDREW STUDENT
V1234567
freedom
CANADA
PASSPORT
PASSEPORT
Ontario
Health • Santé
Title Deeds
0000 0000 0000 0000
VISA
0000 0000 0000 0000
VISA
DEBIT
CareCard

What is security?

- **Confidentiality**
- Only those authorized should have access to information
- **Integrity**
- Information is accurate (correct) and complete
- **Availability**
- Information must be available when, where, and in the manner needed

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What does this really mean?

Do people in the digital age really care about privacy?

Young Canadians have a unique perception of network privacy, according to which personal information is considered private as long as it is limited to their social network

The Next Digital Divide: Online Social Network Privacy (Avner Levin, Ryerson University, Ted Rogers School of Management, Privacy and Cyber Crime Institute, March 2008)

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Why do faculty and staff care?

- Employees treat others personal information with the same care as if it were their own information

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What guides us?

- Legislative responsibilities
- University policies
- Student, staff and faculty expect and trust us to protect their information

What is the legislation?

- FIPPA has applied to the university since 1994;
- Covers public sector institutions;
- Regulates the collection, use, disclosure, retention & security of all personal information by over 2,000 public bodies in BC;

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What is the legislation?

Purposes of legislation are:

- to make public bodies more accountable and
- to protect personal information by right of access and preventing unauthorized collection, use and disclosure

Privacy principles

- Accountability
- Identifying Purposes
- Consent
- Limiting Collection
- Limiting Use, Disclosure and Retention

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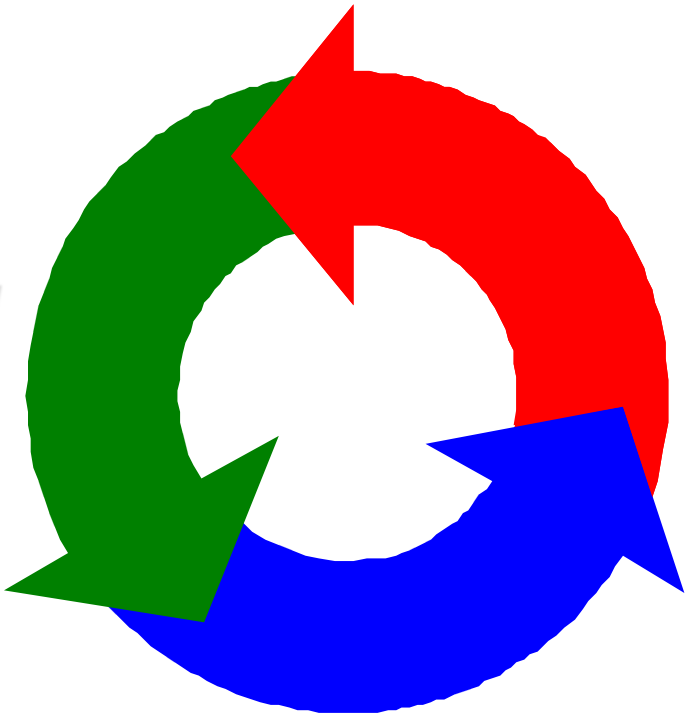
Privacy principles

- Accuracy
- Safeguards
- Openness
- Individual Access
- Challenging Compliance

Security through the life cycle of information

Collect/use

- *in a secure manner*
- *Credit card – PCI*
- *Restrict access to authorized users*



Retention Disposition

- *retention rules*
- *deletion*
- *secure disposition*
- *electronic storage*

Transmission / store

- *transmit using secure means*
- *physical storage – keys/locks*
- *electronic storage - encryption*

Security principles

- Proactive
- Better practices

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University's commitment

Protection of Privacy Policy

The university will manage all Personal Information in accordance with FIPPA and the University Act.

- **University Policy No**.: GV0235
- http://www.uvic.ca/universitysecretary/assets/docs/policies/GV0235.pdf

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Privacy Commitment

Everyone's responsibility

- Know what personal information you are responsible for and where it is stored;
- Protect personal information
- Become familiar and comply with the privacy and security requirements.
- Know the steps to report a privacy incident or breach
- Ask if uncertain or you don't understand

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Dean/Chair responsibility

- Communicate privacy and security requirements to employees in their Units;
- Ensure appropriate procedures are in place to protect personal information;
- Permit and remove access to personal information (physical and electronic).

Dean/Chair responsibility

- Responding to questions from units about privacy and information security

General Principles

- Need to know

- Limit to appropriate access

Need to know

- Need to know v. nice to know
- access is restricted to authorized individuals whose duties require such access.
- Individuals are not entitled to access merely because of status, rank or office.

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Appropriate Access

- Every user, process, or application must be able to access only the information and resources that are necessary to its legitimate purpose or role
- Remove access when person leaves position

Collection Purpose

- University collects personal information that relates directly to, and is necessary for, an operating program or activity of the university (fulfilling its mandate under the *University Act*)

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Collection

- University collects personal information usually **directly** from the student, employee or faculty.

- University is authorized to collect personal information **indirectly** for certain specific purposes:
  - Suitability for award or honour including a scholarship or bursary
  - Collect a debt or make a payment

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Collection

- Collect only the personal information needed to do your job
- Unsolicited personal information not required to assist the student or employee should be returned or destroyed
- Notify students/employees of collection when we collect it

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Use

- University is authorized to use personal information only for:
  - the stated purpose for which it was collected
  - a consistent purpose (would the person expect his or her information to be used in this way?)

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Use

- Consent is usually required where the information may be used for a different purpose – on occasion not possible to obtain consent

Use

- Employees should access and use only personal information necessary for their roles/ responsibilities and the task at hand

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Scenario

- As an employee in student enrollment you have access to student Banner
- Your daughter is a student at UVIC
- You are concerned she has not paid her fees
- Can you check her fee payment?

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Scenario

- Professor requests an A.O. look up the grades of a former UVIC student (over 20 years ago)

- Should the A.O. look up the grades?

Scenario

- Your Chair is at home and requests you send her a spreadsheet of faculty information.
- Spreadsheet includes name, V#, DOB, rank, start date, SIN.
- Chair requests send it via gmail.
- Do you have any concerns?

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Disclosure

- UVic is obligated NOT to disclose information except:
  - For the purpose for which it was collected
  - For a consistent purpose (within Canada)
  - With the consent of the individual

Disclosure

University may disclose:

- an Employee's UVic contact information;
- With an FOI request, information about an individual's position, functions, or remuneration as an employee of the university;

Disclosure

University may disclose:

- names of individuals who have received degrees, the names of degrees and the years degrees were awarded (but not courses or grades); and
- personal information about an individual in an emergency situation.

Scenario

- Neighbour asks you to look up their ex spouse's UVIC salary – she tells you salaries are public information
- Should you look up the salary?

Out of Country disclosure

- Section 30.1 restricts UVic and its service providers from storing, accessing or disclosing personal information outside Canada, unless the individuals the information is about have provided their written consent

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Cloud computing

- The practice of using the Internet to process, manage and store data on remote network services
- This computing trend is fuelling a mass migration of information, once stored on the hard drives of personal computers, to remote servers in a domain controlled by online service providers.

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Cloud computing

With limited exceptions as set out in FIPPA, personal information, including information in computer logs and on backup tapes or drives cannot be stored or accessed outside of Canada. Under FIPPA, it is an offence to store or allow access to personal information outside of Canada unless it is authorized. (OIPC, February, 2012)

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bebo
deviantART
nexopia
YouTube
facebook
flickr
LiVEJOURNAL
Google buzz
Blogger
twitter
tumblr.
LinkedIn
myspace
last.fm
foursquare

Retention

- Retain for minimum **one year** after using information to **make a decision** that **directly affects the individual**
- Also, follow records management guidelines in Directory of Records

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Reasonable Security

- Must implement “reasonable security arrangements”

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Reasonable Security

- need to exercise due diligence in protecting the security of personal information (anti-virus, encryption, password protection, secure transmission)
- security of information requires ongoing vigilance by all of us.
- must respond quickly to any identified privacy and security risks.

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Reasonable Security

- must be proactive and implement ongoing monitoring and testing of the security.
- ensure computer environment is up to date (patching of operation system)
- ensure staff receives regular training.

Reasonable Security for electronic devices

- Limit information on device;
- Secure devices
  - Lock up device;
  - Always password protect and use strong passwords;
  - Store information centrally;
  - If sensitive, store on university server or encrypt;
  - Report lost or stolen items immediately (Campus security)

Privacy Breach Implications

- Potential impact on and disruption of affected individuals
- Expensive changes to systems and procedures
- Public embarrassment
- Fines of up to $500,000

Best Practices

- Learn, stay current and practice good privacy and security habits.
- Incorporate privacy and security practices into your everyday routine.
- Protect privacy in all contexts – conversation in public areas; meetings; emails and social occasions.
- Encourage others to do so as well.
- Build privacy and security in from the beginning.

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In Office HINTS

- Send sensitive personal information using encryption or password protect – e.g. academic accommodation).
- Never give your password to anyone. For any reason. NO MATTER WHAT!
- Be aware of who can view your screen.
- When you leave your office – lock your screen and enable a password protected screensaver.

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In Office HINTS

- Dispose of confidential information using secured means (cross-cut shredding).
- Lock up your laptop.
- Do not leave laptops or other devices or keys unattended
- Lock your office
- ENCRYPT your laptop

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Away from the office HINTS

- When you take work home ensure sensitive information is encrypted and secure
- Use trusted systems such as UVIC supported hardware, computers, systems and email only –
- Use VPN to work from home

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More Questions

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