

# PIA Summary for Public Posting

## Adoption and use of the social media platform and digital marketing services of DragonTrail Interactive for delivering the Canada Specialist Program to the China market

December 2023

### 1. About Destination Canada

The Canadian Tourism Commission, operating as 'Destination Canada' ("**DC**"), is a Crown Corporation wholly owned by the Government of Canada. Established in 2000, DC was created to lead the Canadian tourism industry in marketing Canada as a four-season tourism destination. DC reports to Parliament through the Minister of Tourism.

### 2. About the Project

As Canada's national tourism marketing organization, it is part of DC's mandate to support its travel trade partners and grow tourism revenue for Canada. The Canada Specialist Program ("**CSP**") is a global, on-demand, online training program, designed to provide travel agents with the knowledge and skills to promote Canada as a premier tourism destination. Those agents who complete the CSP become eligible for certain benefits from DC, including participation in contests and familiarization trips to Canada.

In order to provide the CSP to international jurisdictions, DC partners with third-party subcontractors specializing in the development and delivery of such programs in their respective markets. DragonTrail has been selected as the subcontractor to facilitate administration and delivery of the CSP in China. DragonTrail is experienced in digital destination marketing and web and mobile application development in China.

DragonTrail is responsible for providing and managing the social media platform and digital marketing services on which the CSP is provided (the "**Platform**"), and tracking the modules completed by CSP Candidates as they progress through the CSP using a cloud-based database (the "**DT Database**"). DragonTrail implements and delivers the CSP through a WeChat account that it manages on behalf of DC and hosts the DT Database on a secure cloud-based service called Tencent, providing easy and convenient access to the CSP for CSP Candidates in China. WeChat is one of China's largest standalone mobile applications and was developed by Tencent.

In delivering the Service, DragonTrail is responsible for:

- Administration and delivery of the CSP in China;
- Managing the CSP, and related webinar registrations in China;
- Provision of videos, articles, and other resources to CSP Candidates working on the CSP;

- Responding to CSP Candidate inquiries about the program;
- Collection and tracking of the enrollment, progression and success of CSP Candidates;
- Marketing of DC travel trade and related events and promotions to CSP Candidates, with their consent;
- Creation, maintenance, and update of the DT Database; and
- Creation of aggregated reports for internal DC operational use.

### 3. **Scope of the Privacy Impact Assessment**

As a Crown Corporation that reports to Parliament through the Minister of Tourism, DC abides by the *Privacy Act*, RSC 1985, c P-21 ("**PA**") and its supporting policies and directives, as established by the Treasury Board of Canada Secretariat ("**TBS**").

Under the TBS Policy on Privacy Protection, all federal institutions subject to the PA are required to undertake an assessment of the privacy impacts associated with the development or design of new programs or services involving personal information (or when making significant changes to an existing program or service). This PIA report provides evidence of compliance with those requirements. This PIA was completed under the direction of DC's Executive Director, Legal. Consultations with DC's information technology (IT) and CSP China personnel were undertaken where needed.

### 4. **Privacy Analysis**

Based on the results of the present PIA, privacy risks arising from the use of the Platform are expected to be low.

The risk level of low reflects the fact that DC and DragonTrail collect minimal non-sensitive PII about CSP Candidates in China and use the PII only for the purpose for which it was collected or otherwise with express consent. The PII is not disclosed outside of DC and DragonTrail. Further, all collected PII is secured in a manner commensurate with its sensitivity and retained for only so long as it is needed, and in any event, in accordance with DC's retention policy. Potential impacts on the privacy of individuals are being managed by DC through appropriate legal, policy, and technical measures geared at the protection of personal information.

DC has satisfied itself through its due diligence process, and through this PIA process, that the DragonTrail has the appropriate safeguards in place, and that the benefits provided to DC through the adoption of this Platform outweigh the privacy risks. DC has entered into a vendor services agreement detailing these safeguards and will be entering into an updated contract further detailing these safeguards in early 2024.

## 5. Risk Area Identification and Categorization

A. Type of Program or Activity	Level of Risk to Privacy
Program or activity that does NOT involve a decision about an identifiable individual. Personal information is used strictly for statistical / research or evaluations including mailing list where no decisions are made that directly have an impact on an identifiable individual.	1 <input type="checkbox"/>
Personal information is used to make decisions that directly affect the individual (i.e. determining eligibility for programs including authentication for accessing programs/services, administering program payments, overpayments, or support to clients, issuing or denial of permits/licenses, processing appeals, etc...).	2 <input checked="" type="checkbox"/>
Personal information is used for purposes of detecting fraud or investigating possible abuses within programs where the consequences are administrative in nature (i.e., a fine, discontinuation of benefits, audit of personal income tax file or deportation in cases where national security and/or criminal enforcement is not an issue).	3 <input type="checkbox"/>
Personal information is used for investigations and enforcement in a criminal context (i.e. decisions may lead to criminal charges/sanctions or deportation for reasons of national security or criminal enforcement).	4 <input type="checkbox"/>
B. Type of Personal Information Involved and Context	Level of Risk to Privacy
<p>Only personal information provided by the individual – at the time of collection – relating to an authorized program &amp; collected directly from the individual or with the consent of the individual for this disclosure / with no contextual sensitivities.</p> <p>The context in which the personal information is collected is not particularly sensitive. For example: general licensing, or renewal of travel documents or identity documents.</p>	1 <input checked="" type="checkbox"/>
Personal information provided by the individual with consent to also use personal information held by another source / with no contextual sensitivities after the time of collection.	2 <input type="checkbox"/>
Social Insurance Number, medical, financial or other sensitive personal information and/or the context surrounding the personal information is sensitive. Personal information of minors or incompetent individuals or involving a representative acting on behalf of the individual.	3 <input type="checkbox"/>
Sensitive personal information, including detailed profiles, allegations or suspicions, bodily samples and/or the context surrounding the personal information is particularly sensitive.	4 <input type="checkbox"/>

<b>C. Program or Activity Partners and Private Sector Involvement</b>	<b>Level of Risk to Privacy</b>
Within the department (amongst one or more programs within the department).	1 <input type="checkbox"/>
With other federal institutions.	2 <input type="checkbox"/>
With other or a combination of federal/ provincial and/or municipal government(s).	3 <input type="checkbox"/>
Private sector organizations or international organizations or foreign governments.	4 <input checked="" type="checkbox"/>
<b>D. Duration of the Program or Activity</b>	<b>Level of Risk to Privacy</b>
One-time program or activity: Typically involves offering a one-time support measure in the form of a grant payment as a social support mechanism.	1 <input type="checkbox"/>
Short-term program: A program or an activity that supports a short-term goal with an established "sunset" date.	2 <input type="checkbox"/>
Long-term program: Existing program that has been modified or is established with no clear "sunset".	3 <input checked="" type="checkbox"/>
<b>E. Program Population</b>	<b>Level of Risk to Privacy</b>
The program affects certain employees for internal administrative purposes.	1 <input type="checkbox"/>
The program affects all employees for internal administrative purposes.	2 <input type="checkbox"/>
The program affects certain individuals for external administrative purposes.	3 <input checked="" type="checkbox"/>
The program affects all individuals for external administrative purposes.	4 <input type="checkbox"/>
<b>F. Technology and Privacy</b>	<b>Level of Risk to Privacy</b>
Does the new or modified program or activity involve the implementation of a new electronic system, software or application program including collaborative software (or groupware) that is implemented to support the program or activity in terms of the creation, collection or handling of personal information?	1 <input checked="" type="checkbox"/>
Does the new or modified program or activity require substantial modifications to IT legacy systems and / or services?	2 <input type="checkbox"/>

The new or modified program or activity involves the implementation of potentially privacy invasive technologies?	3 <input type="checkbox"/>
<b>G. Personal Information Transmission</b>	<b>Level of Risk to Privacy</b>
The personal information is used within a closed system. No connections to Internet, Intranet or any other system. Circulation of hardcopy documents is controlled.	1 <input type="checkbox"/>
The personal information is used in system that has connections to at least one other system.	2 <input type="checkbox"/>
The personal information may be printed or transferred to a portable device.	3 <input type="checkbox"/>
The personal information is transmitted using wireless technologies.	4 <input checked="" type="checkbox"/>
<b>H. Risk Impact to the Individual or Employee</b>	<b>Level of Risk to Privacy</b>
Inconvenience.	1 <input checked="" type="checkbox"/>
Reputational harm, embarrassment.	2 <input checked="" type="checkbox"/>
Financial harm.	3 <input type="checkbox"/>
Physical harm.	4 <input type="checkbox"/>
<b>I. Risk Impact to the Department</b>	<b>Level of Risk to Privacy</b>
<i>Managerial harm.</i> Processes must be reviewed, tools must be changed, change in provider / partner.	1 <input checked="" type="checkbox"/>
<i>Organizational harm.</i> Changes to the organizational structure, changes to the organizations decision-making structure, changes to the distribution of responsibilities and accountabilities, changes to the program activity architecture, departure of employees, reallocation of HR resources.	2 <input type="checkbox"/>
<i>Financial harm.</i> Lawsuit, additional moneys required reallocation of financial resources	3 <input type="checkbox"/>
<i>Reputation harm, embarrassment, loss of credibility.</i> Decrease confidence by the public, elected officials under the spotlight, departmental strategic outcome compromised, government priority compromised, and impact on the Government of Canada Outcome areas.	4 <input type="checkbox"/>