

# PIA Summary for Public Posting

An assessment of the privacy impacts associated with the migration to and use of Passageways Inc.'s OnBoard online meeting and document storage solution

August 2024

## 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

DC currently has nine board members, six senior executives, and three admins who work and reside in various provinces across the country. For the last decade, those individuals on the DC Board of Directors, DC Senior Management, and other board governance professionals (each, a "**Member**", and collectively, the "**Board**") have relied on a portal software called "Diligent" which allows for the secure storage and/or distribution of confidential information among Members that does not rely on email. Although Diligent was an innovative software at the time of its procurement, following an internal assessment of its systems and its requirements, DC issued a negotiated request for proposal ("**NRFP**") for a new internal board management system. Passageways Inc. ("**Passageways**"), as the supplier of OnBoard, a secure virtual meeting and document management platform (the "**Platform**"), was the successful proponent of this competitive procurement process.

The Platform is a comprehensive and secure board management platform that helps users govern more effectively by facilitating better, more strategic meetings. The Platform includes online storage space for storing, retrieving, and sharing relevant information and documents. More specifically, the new Platform will provide for:

- Integrated uses of Microsoft products and services;
- Integration with Zoom to facilitate virtual meetings;
- Real-time collaboration by Members and executives both during and outside meetings;
- Preparation of and for board meetings from anywhere, on any device;
- Various document management capabilities and tools, including drafting board agendas and meeting minutes; and
- Secure document storage and retention.

Although the Platform provides for additional functionality and integration of both virtual meeting platforms and document storage services, it will not significantly alter the actual scope of collection and processing of personal information as compared to Diligent.

To administer and deliver the Platform, DC must collect personal information about the Members, where relevant, including:

- Name (first and last);
- Basic Contact information (telephone number and email address);
- Employer information (name and nature of business);
- Employment information (business unit, title, city of employment);
- Work contact information (email address and phone number);
- Signature; and
- Financial information (director affiliations and investments for the purposes of determining conflicts of interests),

collectively, the "**PII**". In addition to the above, the Platform has the capability to collect the likeness and voiceprint of Members during recorded meetings and user data and technical information, such as IP address, device information, and browsing history. DC does not currently plan to use the Platform to collect this type of PII, however it is possible that DC may wish to do so in the future, should the circumstances require or benefit.

All of the PII is collected directly from the individual with their explicit consent. DC does not collect information supplemental to that which is required for the Purpose.

### 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 other DC personnel were undertaken where needed.

### 4. **Privacy Analysis**

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

The risk level of low reflects the Purpose of the project, and the relatively low sensitivity of the PII collected. DC has satisfied itself through its competitive procurement and due diligence process, and through this PIA process, that Passageways Inc. has the appropriate safeguards in place,

and that the benefits provided to DC through the adoption of this solution outweigh the privacy risks. DC has entered into an MSA detailing these safeguards.

The Platform adds new functionality, in particular, it offers integrated virtual meeting, document storage, and collaboration functionalities. However, the actual scope of collection and processing of the PII has not significantly changed as a result of the adoption and use of the Platform. All PII collected is secured in a manner commensurate with its sensitivity and retained for only so long as it is needed. The processing of the PII will remain largely in keeping with existing and established corporate practices and procedures. 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.

## 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 checked="" 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 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 checked="" 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 checked="" 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 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 checked="" 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 checked="" type="checkbox"/>