

PIPA & Integrity Advocate

The Personal Information Protection Act of British Columbia, Canada is a provincial law that governs the collection, use and disclosure of personal information by organizations. Personal Information is defined as any information about an identifiable individual and includes employee personal information.

PIPA requires that an organization only use personal information for purposes that a reasonable person would consider appropriate in the circumstances and that fulfill the purposes disclosed.

What is the scope of the PIPA?

The Personal information Protection Act (PIPA) is an Act that describes how all private sector organizations must handle the personal information of its employees and the public and has establishes rules about collecting, using and disclosing that personal information. PIPA stipulates:

1. An individual's right to access, protect, have collected, his or her personal information, and
2. An organization's need to collect, use or disclose personal information for reasonable purposes.

Organizations covered by PIPA

PIPA applies to all organizations and to all personal information held by organizations. Organizations include:

1. Corporations
2. Associations
3. Societies
4. Charities
5. Sports clubs
6. Trade unions
7. Partnerships



Information covered by PIPA

PIPA applies to personal information. PIPA defines personal information as information about an identifiable individual, which means a person can be identified by the information, either directly (e.g., name, image, job title) or in combination with other information. Even data that does include the name of an individual would contain personal information if the individual could be identified through a street address, personal health number, phone number or other information.

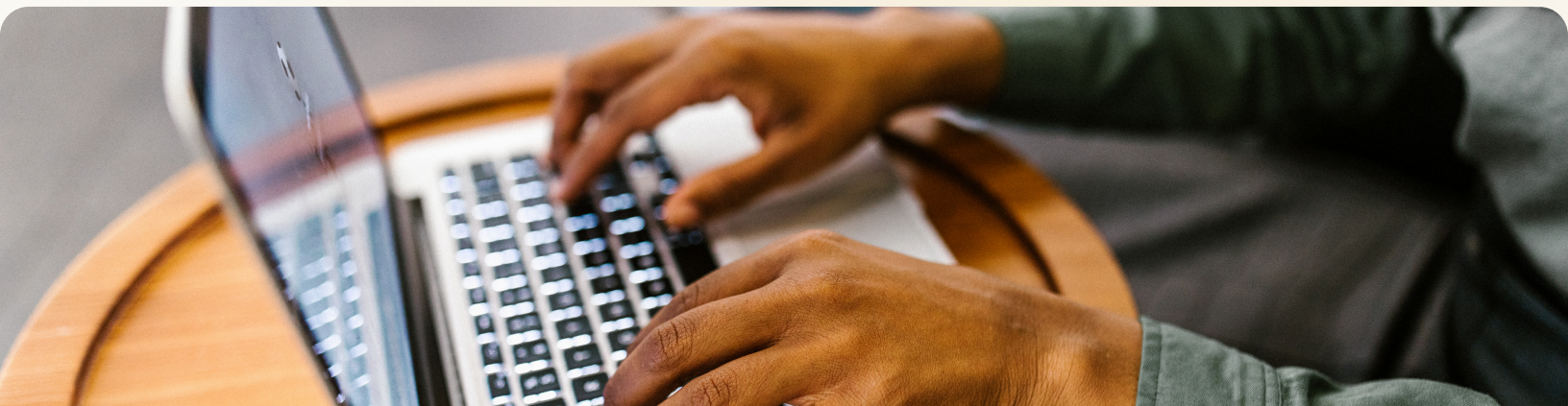


Complying with PIPA using Integrity Advocate

Integrity Advocate services will compliment your organization's efforts to comply with PIPA. The table below illustrates how.

Provision	ACT Requirement	Controls
Required notification for collection of personal information	Part 4, 10 (1) On or before collecting personal information about an individual from the individual, an organization must disclose to the individual verbally or in writing (a) the purposes for the collection of the information".	Prior to every use, Integrity Advocate requires positive consent to a privacy statement that is provided both in summary and full form to ensure accurate understanding of data that will be collected and how the data will be used.
Limitations on collection of personal information	Part 4, 11 Subject to this Act, an organization may collect personal information only for purposes that a reasonable person would consider appropriate in the circumstances and that fulfill the purposes that the organization discloses.	Integrity Advocates limits the personal data it collects, the time it is held, and the individuals/ institutions that can see it. This practice starts with limiting the information we collect and extends to what we retain and share.
Collection of personal information without consent	Part 4, 12 (1) An organization may collect personal information about an individual without consent or from a source other than the individual, if (a) the collection is clearly in the interests of the individual and consent cannot be obtained in a timely way,	Integrity Advocate does not believe that a learner's participation in an online event justifies the collection of more data than is required. Learner programs, browsing history, and desktop are all examples of information that should not be collected, stored and shared simply due to their participation but rather needs to be justified. A learner that can be verified as not leaving the browser window, opening other programs or tabs should not have such additional information collected on them.

Provision	ACT Requirement	Controls
Limitations on disclosure of personal information	Part 6, 17 Subject to this Act, an organization may disclose personal information only for purposes that a reasonable person would consider are appropriate in the circumstances and that (a) fulfill the purposes that the organization discloses under section 10 (1), (b) for information collected before this Act comes into force, fulfill the purposes for which it was collected, or (c) are otherwise permitted under this Act.	Integrity Advocate's human reviewers, in addition to reviewing sessions for violations of an institution's participation standards, also screens out superfluous media that would not be required for "disciplinary action" in order to ensure student privacy is not violated due to the collection, retention and sharing of unnecessary media. As Integrity Advocate claims no ownership of the learner data collected and/or processed and doesn't participate in any social media/networks that commoditize personal data there is no use of learner emails for marketing purposes.
Access to personal information	Part 7, 23 (1) Subject to subsections (2) to (5), on request of an individual, an organization must provide the individual with the following: (a) the individual's personal information under the control of the organization; (b) information about the ways in which the personal information referred to in paragraph (a) has been and is being used by the organization	Proactively, and to provide the highest possible level of transparency, Integrity Advocate enables a post-event email that provides learners with the ability to review all the data retained on them immediately after initial processing, in addition to our findings during processing.
Protection of personal information	Part 7, 34 An organization must protect personal information in its custody or under its control by making reasonable security arrangements to prevent unauthorized access, collection, use, disclosure, copying, modification or disposal or similar risks.	Integrity Advocate utilizes all available industry best practices to secure the data it stores and process. Copies of tests/audits/assessments/policies/standards and response plans are available upon request. In the event of a security or privacy incident involving an organization or its learner data, the organization will be promptly notified (as stipulated within the Integrity Advocate Incident Response Plan).



Provision	ACT Requirement	Controls
Retention of personal information	Part 7, 35 (1) Despite subsection (2), if an organization uses an individual's personal information to make a decision that directly affects the individual, the organization must retain that information for at least one year after using it so that the individual has a reasonable opportunity to obtain access to it. (2) An organization must destroy its documents containing personal information, or remove the means by which the personal information can be associated with particular individuals, as soon as it is reasonable to assume that (a) the purpose for which that personal information was collected is no longer being served by retention of the personal information, and (b) retention is no longer necessary for legal or business purposes.	All student data is subject to deletion at specified time frames and belongs to the student. Deletion time frames are based on need and range from 24 hours to two years depending on the data. Deleting data is the only way to ensure that third parties never gain unauthorized access.

The challenge to providing participation monitoring and proctoring services is to enable the best possible user experience while maintaining robust integrity controls, all while balancing the required (and necessary) privacy protection for learners. Integrity Advocate's demonstrated compliance with PIPA allows for institutions to utilize our services with confidence that the intent of PIPA - **the protection of personally identifiable information** - has been met.

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