

Privacy Impact Assessment for *Typing.com*

PIA# 3

Why should I complete a PIA?

A PIA is a tool to help Schools/Districts ensure compliance with applicable privacy legislation. This document helps mitigate and evaluate many of the unintended risks and consequences that can develop as a result of not anticipating multiple perspectives and circumstances with a new system or project. As part of the process, schools/districts are taking the appropriate steps to ensure that parents, students and educators understand what measures are taken with regards to the safety and security of personal information and the importance of informed consent.

School/District staff need to contact the privacy office(r) or PIA Drafter, at their School/District, to determine internal policies for review and signing-off of a Privacy Impact Assessment. Staff may submit PIAs to their Superintendent of Schools for consideration. If you have any questions about this PIA template or FIPPA in general, you may contact the designated PIA Drafter as noted in this document, or call the provincial **Privacy and Access Helpline at Enquiry BC** as noted below. Completed PIA's must be retained in a secure location at the School/District for the purposes of a Privacy Commissioner's Audit.

Note: This process can help identify and reduce many of the unintended risks and consequences that may potentially jeopardize student and educator privacy and security issues.

What if my initiative does not include personal information?

Best practices indicate that School/Districts' should still complete Part 1 of the PIA and submit it along with the signature pages to their privacy office(r) even if it is thought that no personal information is involved. This process ensures that the initiative has been accurately assessed to meet the requirements of FIPPA.

Note: The definition of personal information is: *Recorded information about an identifiable individual other than contact information.*

The following examples are a non-exhaustive list of personal information:

- Name, address, email address or telephone number;
- Age, sex, religious beliefs, sexual orientation, marital or family status, blood type;
- Information about an individual's health care history, including a physical or mental disability;
- Information about an individual's education, financial, criminal or employment history;
- Social Insurance Number (SIN) and Personal Education Number (PEN); and
- Personal views, opinions, religious or political beliefs or associations.

Enquiry BC – Privacy and Access Helpline. Victoria: 250-356-1851 Vancouver: 604-660-2421 and elsewhere in BC, toll-free: 800-663-7867

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Privacy Impact Assessment for *Typing.com*

PIA# 3

Part 1 - General

Name of District:	Kamloops Christian School Association		
PIA Drafter:	Mr. Sandro Cuzzetto (CEO / Privacy Officer)		
Email:	sandroc@kamcs.org	Phone:	250-376-6900
Program Manager:	NA		
Email:	NA	Phone:	NA

1. Description of the Initiative

This Privacy Impact Assessment (PIA) is to facilitate our School District in the provision of **Typing.com**, an online typing tutoring program that helps students improve their keyboarding skills. Typing.com provides interactive keyboarding lessons, games, assignments, and speed tests. The program includes record keeping abilities for teachers to track student progress through a series of lessons and allows for the creation of certificates and stickers to reward progress.

Typing.com has a number of additional features that support the development of student keyboarding skills, including:

- 300+ lessons (organized in sequence, with students' progress stored on their account)
- animation to show proper finger reach
- keypad lessons
- finger analysis
- narration and reinforcement
- dictation games
- ability for teachers to create their own lesson games
- diagnostic tests
- how-to video tutorials

Vendor

Typing.com's main office is at:
PO Box 9241
Santurce Station,
San Juan, Puerto Rico
00909

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Vancouver, BC V6C 1Z7
Canada
604-484-8053
Email: information@ingenuityworks.com

2. Scope of this PIA

The **Educational Resources Acquisition consortium (ERAC)** is a cooperative member-based BC organization. Our School District has an active membership with ERAC who provides a range of services available to its members including evaluating, licensing and acquiring print, software, and digital learning resources. ERAC works in partnership with its members, BC public school districts, as well as independent schools, to support quality education for public and independent K-12 students.

KCSA has entered into a licensed subscription agreement with Typing.com. The agreement is administered through ERAC and commences on July. 1, 2020 and expires on June 30, 2021.

The intended users are: Classroom subject teachers; authorized students, teachers, education assistant, students, school staff and district operational and administrative staff. Upon completion of this Privacy Impact Assessment, Typing.com will be available for use by teachers and students in our school.

<User accounts will be provisioned based on Typing.com's hierarchy of permissions:

- District Admin users can set up user accounts for School Admin users.
- School Admin users can set up user accounts for Teachers within their school.
- Teachers can set up student user accounts for students in their class(es), either individually, or in a batch by importing a CSV file.>

This PIA covers Typing.com for use within schools. **Use of the program at home is out of the scope of this PIA.**

3. Related Privacy Impact Assessments *It is our understanding that there is no current Typing.com PIA submitted to the Office of the Information & Privacy Commission of British Columbia or BC Ministry of Education.*

4. Elements of Information or Data

The teacher and school administrators have the ability to create student user accounts which enable students to login and access lessons as well as their keyboarding records. Student accounts can be created individually.

When creating accounts, teachers or school administrators can use students' names or ID numbers or create an anonymous generic username e.g. student 1 that **do not include personal student information**.

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Information that *Typing.com* may gather in association with a student's account includes:

- name
- ID
- username
- email
- name of school
- typing speed
- lessons completed
- time spent using the program

Teachers will have access to information for all students in their class. For assessment, teachers can view class reports of all students' progress as well as reports for individual students. Students will only have access to information associated with their account.

All users are solely responsible for maintaining the confidentiality and security of any login credentials associated with their account.

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Part 2 – Protection of Personal Information

- 5. Storage or Access outside Canada** Student information is being stored is not on a local server and is outside Canada using Typing.com’s servers. Parents have the right to review and request that Typing.com delete any personal information that the site has collected and retained about their child. By contacting Typing.com at support@typing.com, or calling directly 1-720-445-9355

<p>In FIPPA, "data linking" and "data-linking initiative" are strictly defined. Answer the following questions to determine whether your initiative qualifies as a "data-linking initiative" under the Act. If you answer "yes" to all 3 questions, your initiative may be a data linking initiative and you must comply with specific requirements under the Act related to data-linking initiatives.</p>	
1. Personal information from one database is linked or combined with personal information from another database;	no
2. The purpose for the linkage is different from those for which the personal information in each database was originally obtained or compiled;	no
3. The data linking is occurring between either (1) two or more public bodies or (2) one or more public bodies and one or more agencies.	no
<p>If you have answered "yes" to all three questions, please contact your privacy office(r) to discuss the requirements of a data-linking initiative.</p>	

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6. Common or Integrated Program or Activity* - Not applicable for this product.

In FIPPA, “common or integrated program or activity” is strictly defined. Answer the following questions to determine whether your initiative qualifies as “a common or integrated program or activity” under the Act. If you answer “yes” to all 3 of these questions, you must comply with requirements under the Act for common or integrated programs and activities.	
1. This initiative involves a program or activity that provides a service (or services);	no
2. Those services are provided through: (a) a school district and at least one other public body or agency working collaboratively to provide that service; or (b) one school district working on behalf of one or more other public bodies or agencies;	no
3. The common or integrated program/activity is confirmed by written documentation that meets the requirements set out in the FOIPP regulation.	no
Please check this box if this program involves a common or integrated program or activity based on your answers to the three questions above.	

**** Please note: If your initiative involves a “data-linking initiative” or a “common or integrated program or activity”, advanced notification and consultation on this PIA must take place with the Office of the Information and Privacy Commissioner (OIPC). Contact your school district’s privacy office(r) to determine how to proceed with this notification and consultation.***

For future reference, public bodies are required to notify the OIPC of a “data-linking initiative” or a “common or integrated program or activity” in the early stages of developing the initiative, program or activity. Contact your school district’s privacy office(r) to determine how to proceed with this notification.

7. Personal Information Flow Diagram and/or Personal Information Flow Table: Users log in to the application via the School User Login page in their web browser: www.typing.com. (the application can be accessed from any internet-connected computer; for the purposes of this PIA, access will take place from school computers). Login credentials are matched with stored user account data on the Typing.com database outside of Canada at the Typing.com datacenters. Users are provided access to their Typing.com Online account and use the application within the web browser on their computer.

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Personal Information Flow Table			
	Description/Purpose	Type	FIPPA Authority
1.	Student Consent and Parental Authorization is sought to start using the program and may collect personal information.	Collection	26(d)
2.	Student uses Program for course work or on own time.	Use	32(a), 32(b)
3.	Service request transferred to service provider contracted by school district.	Disclosure & Use	33.2(c) and 32(a)

8. Risk Mitigation Table

Risk Mitigation Table				
	Risk	Mitigation Strategy	Likelihood	Impact
1.	Vendor's employees could access personal information and use or disclose it for personal purposes.	Oath of Employment; contractual terms, etc.	Low	High
2.	Request may not actually be from client (i.e. their email address may be compromised).	Implementation of identification verification procedures.	Low	High
3.	Users' personal information is compromised when transferred to the service provider.	Transmission is encrypted and over a secure line.	Low	High

9. Collection Notice

Student information collected and stored by *Typing.com Online* through the creation of user accounts and use of the application may include:

- Names
- ID numbers
- Email addresses
- School address
- Typing speed
- Lessons completed
- Time spent using the application

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Typing.com protects the confidentiality of any information transmitted over its network and safeguards the use of information its collections.

To protect users' privacy, Typing.com:

1. Safeguards users' information from unauthorized access.
2. Honors users' requests to remove their names from their telephone, e-mail, or mail solicitation lists.
3. Strives to keep user records current and accurate.
4. Collects, maintains and uses user information that is necessary to provide the most helpful and personalized products and services to meet users' needs.
5. Maintains the confidentiality of user information when undertaking projects with other companies.

Typing.com recognizes and complies with GDPR and those rights, except as limited by applicable law. The rights under GDPR are listed below:

- Access: This includes the user's right to access the personal information we gather about them, and their right to obtain information about the sharing, storage, security and processing of that information.
- Correction: The user has the right to request correction of your personal information.
- Erasure: The user has the right to request, subject to certain limitations under applicable law, that their personal information be erased from our possession (also known as the "Right to be forgotten"). However, if applicable law requires us to comply with the user's request to delete your information, fulfillment of the user's request may prevent them from using Basecamp services and may result in closing your account.
- Complain: The user has the right to make a complaint regarding our handling of their personal information with the appropriate supervisory authority.
- Restrict Processing: The user has the right to request restriction of how and why their personal information is used or processed.
- Object: The user has the right to, in certain situations, to object to how or why their personal information is processed.
- Portability: The user has the right to receive the personal information we have about them and the right to transmit it to another party.
- Automated Decision-Making: The user has the right to object and prevent any decision that could have a legal, or similarly significant, effect on them from being made solely based on automated processes. This right is limited, however, if the decision is necessary for performance of any contract between the user and typing.com, is allowed by applicable European law, or is based on your explicit consent.

Teaching staff and school administrators that have questions, concerns or requests to review user information can be directed to:

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Typing.com
Email: support@typing.com,
Phone: 1-720-445-9355
or write:
PO Box 9241
Santurce Station,
San Juan, Puerto Rico
00909

<**DISTRICT NOTE:** For further help with collection notices please see [Tip Sheet for Consent & Disclosure](#) location on the ERAC website.>

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Part 3 – Security of Personal Information

<If this PIA involves an information system, or if it is otherwise deemed necessary to do so, please consult with your school district's privacy office(r) and/or security personnel when filling out this section. They will also be able to tell you whether you will need to complete a separate security assessment for this initiative.>

10. Please describe the physical security measures related to the initiative (if applicable).

N/A

11. Please describe the technical security measures related to the initiative (if applicable).

- User access profiles assigned on a need-to-know basis.
- Student work will only be stored with name and class information attached;
- School will ensure that there is proper virus/malware scanning of documents on the school's server;
- School will delete all student work 1 year after completion of the class unless a student requires otherwise.

12. Does your district department rely on any security policies?

Only our Technology Department has access to create, delete or edit teacher accounts. Accounts are updated by September 30th of the school year by each school once their staff is finalized.

13. Please describe any access controls and/or ways in which you will limit or restrict unauthorized changes (such as additions or deletions) to personal information.

- Teacher users can add only students and see only classes that they have permissions to.
- Students only have access to their own account and records when logged in to the application.

14. Please describe how you track who has access to the personal information. The program is an online application therefore information is only assessable when logged into the program. Users have access to information based on their roles as described in section 13 above.

Part 4 – Accuracy/Correction/Retention of Personal Information

15. How is an individual's information updated or corrected? If information is not updated or corrected (for physical, procedural or other reasons) please explain how it will be annotated? If personal

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information will be disclosed to others, how will the school/district notify them of the update, correction or annotation? NA

16. Does your initiative use personal information to make decisions that directly affect an individual(s)? If yes, please explain. For assessment purposes, teachers can view class reports of all students' progress in Typing.com as well as reports for individual students.

17. If you answered "yes" to question 16, please explain the efforts that will be made to ensure that the personal information is accurate and complete.

Not applicable

Note: For additional information on the *Privacy Management and Accountability Policy* and the Pro-active Disclosure & Information Management Act, see: <https://pia.bcerac.ca/accountability/>

18. If you answered "yes" to question 16, do you have a records retention and/or disposition schedule that will ensure that personal information is kept for at least one year after it is used in making a decision directly affecting an individual? Not applicable.

Part 5 – Further Information

19. Does the initiative involve systematic disclosures of personal information? If yes, please explain.

Not applicable

Please check this box if the related Information Sharing Agreement (ISA) is attached. If you require assistance completing an ISA, please contact your privacy office(r).

20. Does the program involve access to personally identifiable information for research or statistical purposes? If yes, please explain.

No

Please check this box if the related Research Agreement (RA) is attached. If you require assistance completing an RA please contact your privacy office(r).

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21. Will a personal information bank (PIB) result from this initiative? If yes, please list the legislatively required descriptors listed in section 69 (6) of FIPPA. Under this same section, this information is required to be published in a public directory.

No

< If you have any questions regarding the above section, please contact your school district's privacy office(r) or call the OCIO's Privacy and Access Helpline at 250 356-1851.>

Please ensure **Parts 6 and 7** are attached to your submitted PIA.

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Part 6 – Privacy Office(r) Comments

This PIA is based on a review of the material provided to the Privacy Office(r) as of the date below. The PIA is a “living document” that is periodically reviewed. Should there be substantial changes that may affect the privacy of our users, an update will be initiated. As part of our business practices, this PIA will be reviewed annually. If, in the future, any substantive changes made to the scope of this PIA, the school district will complete a PIA Update and submit it to this Privacy Office(r).

Unless the Agreement otherwise specifies, or the District otherwise directs in writing, the vendor must not disclose any personal information outside of Canada.

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

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Part 7 – Program Area Signatures

Mr. Sandro Cuzzetto

Program/Department Manager
Privacy Officer/Privacy Office
Representative

A handwritten signature in black ink, appearing to read "Sandro Cuzzetto", is written over a horizontal line.

Signature

Dec. 22, 2020

Date

If you have any questions, please contact your school district's privacy office(s) or call the OCIO's Privacy and Access Helpline at 250 356 1851.

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Privacy Impact Assessment

Appendix A

Collection Authorities:

Section 26 of the *Freedom of Information and Protection of Privacy Act* (FOIPPA) details the authorities under which a public body may collect personal information. If a program involves the handling of personal information, the program must have an authority to have collected that information. Please cite in your Privacy Impact Assessment the primary authorization(s) related to your initiative from the collection authority section below.

Section	Authority - A public body may collection personal information only if:
26(a)	The collection of the information is expressly authorized under an Act (Act name, and relevant section numbers must be provided)
26(b)	The information is collected for the purposes of law enforcement*
26(c)	The information relates directly to and is necessary for a program or activity of the public body
26(d)	With respect to personal information collected for a <u>prescribed* purpose</u> (i) the individual the information is about has consented in the prescribed* manner to that collection and (ii) a reasonable person would consider that collection appropriate in the circumstances
26(e)	The information is necessary for the purposes of planning or evaluating a program or activity of a public body
26(f)	The information is necessary for the purpose of reducing the risk that an individual will be a victim of domestic violence, if domestic violence is reasonable to occur
26(g)	The information is collected by observation at a presentation, ceremony, performance, sports meet or similar event (i) at which the individual voluntarily appears, and (ii) that is open to the public
26(h)	The information is personal identity information that is collected by (i) a provincial identity information services provider and the collection of the information is necessary to enable the provincial identity information services providers to provide services under section 69.2 or (ii) a public body from a provincial identity information services provider and the collection of the information is necessary to enable (a) the public body to identify an individual for the purpose of providing a service to the individual or, (b) the provincial identity information services provider to provide services under section 69.2

*Relevant definitions:

Prescribed: means prescribed by FOIPPA regulation.

Law enforcement: means (a) policing, including criminal intelligence operations, (b) investigations that lead or could lead to a penalty or sanction being imposed, or (c) proceedings that lead or could lead to a penalty or sanction being imposed.

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Appendix B

Use Authorities:

Section 32 of the *Freedom of Information and Protection of Privacy Act* (FOIPPA) details the authorities under which a public body may use personal information. If a program uses personal information in any way, the program must have an authority to use that information. Please cite in your Privacy Impact Assessment the primary authorization(s) related to your initiative from the use authority section below.

Section	Authority - A public body may use personal information only:
32(a)	For the purpose for which that information was obtained or compiled, or for a use consistent* with that purpose
32(b)	If the individual the information is about has identified the information and has consented, in the prescribed* manner, to the use
32(c)	For a purpose for which that information may be disclosed to that public body under sections 33 to 36

*Relevant definitions:

Consistent purpose: A use of personal information is consistent with the purpose for which the information was obtained or compiled is the use (a) has a reasonable and direct connection to that purpose, and (b) is necessary for performing the statutory duties of, or for operating a program or activity of, the public body that uses or discloses the information.

Prescribed: means prescribed by FOIPPA regulation.

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Appendix C

Disclosure Authorities:

Sections 33 to 36 of the *Freedom of Information and Protection of Privacy Act* (FOIPPA) detail the authorities under which a public body may disclose personal information. If personal information moves in any way from one person to another the program must have an authority to disclose that information. Disclosures can include, but are not limited to: sharing, releasing, transferring, provision of access, publication, or divulging personal information. Please cite in your Privacy Impact Assessment the primary authorization(s) related to your initiative from the disclosure authority section below.

The list of disclosure provisions under FOIPPA is lengthy. For ease of use we have organized all of the disclosure provisions into common categories based on the purpose of the disclosure. For an ordered listing of disclosure authorities, please see sections 33-36 in FOIPPA [here](#).

Some authorities will appear more than once. Every instance where disclosure can only occur within Canada has been explicitly identified as "A public body may disclose personal information inside Canada only..."

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[Disclosures for archival reasons](#)

[Special disclosure authorities](#)

	Disclosures with an individual's consent or other authorizations
33.1(1)(b)	If the individual the information is about has identified the information and consented, in the prescribed* manner, to its disclosure inside or outside Canada, as applicable
33.2(g)	A public body may disclose personal information inside Canada only to a member of the Legislative Assembly who has been requested by the individual the information is about to assist in resolving a problem



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33.2(h)	<i>A public body may disclose personal information inside Canada only to a representative of the bargaining agent, who has been authorized in writing by the employee whom the information is about, to make an inquiry</i>
33.1(7)	A public body may disclose personal information <u>to the individual</u> the information is about if (a) the individual has initiated contact with the public body about a matter and the public body is responding to that contact, (b) the public body discloses information only in respect of the matter, <u>and</u> (c) the public body use (i) the same communication method used by the individual to initiate contact, or (ii) another communication method authorized by the individual
	Disclosures for a consistent purpose
33.2(a)	<i>A public body may disclose personal information inside Canada only for the purpose for which it was obtained or compiled or for a use consistent with that purpose</i>
	Disclosures resulting from public events and/or dialogues
33.1(1)(q)	If the information was collected by observation at a presentation, ceremony, performance, sports meet or similar event (i) at which the individual voluntarily appeared, <u>and</u> (ii) that was open to the public
33.1(1)(r)	If the information (i) was disclosed <u>on a social media site</u> by the individual the information is about, (ii) is obtained or compiled by the public body for the purpose of enabling the public body to engage individuals in public discussion or promotion respecting proposed or existing initiatives, policies, proposals, programs, or activities of the public body or respecting legislation relating to the public body, <u>and</u> (iii) is disclosed for a use that is consistent with the purpose described in subparagraph (ii)
	Disclosures to government officials
33.1(1)(e)	To an individual who is a <u>minister, an officer of the public body or an employee</u> of the public body other than a service provider, if (i) the information is necessary for the performance of the duties of the minister, officer or employee, <u>and</u> (ii) in relation to disclosure outside Canada, the outside disclosure is necessary

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	because the individual is temporarily travelling outside Canada.
33.1(1)(e.1)	To an individual who is a service provider of the public body, or an employee or associate of such a service provider, if (i) the information is necessary for the performance of the duties of the individual in relation to the public body, and (ii) in relation to disclosure outside Canada (A) the individual normally received such disclosure only inside Canada for the purpose of performing those duties, and (B) the outside disclosure is necessary because the individual is temporarily travelling outside Canada.
33.1(1)(f)	To an officer or employee of the public body or to a minister, if the information is immediately necessary for the protection of the health or safety of the officer, employee or minister
33.1(1)(g)	To the Attorney General or legal counsel for the public body, for the purpose of preparing or obtaining legal advice for the government or public body or for use in civil proceedings involving the government or public body
33.1(1)(h)	To the minister responsible for the <i>Coroners Act</i> or a person referred to in section 31(1) of that Act, for the purposes of that Act
33.2(c)	A public body may disclose personal information inside Canada only to an officer or employee of the public body or to a minister, if the information is necessary for the performance of the duties of the officer, employee, or minister
33.2(d)	A public body may disclose personal information inside Canada only to an officer or employee of (i) a public body, or (ii) an agency, or to a minister, if the information is necessary for the delivery of a common or integrated program* or activity and for the performance of the duties, respecting the common or integrated program or activity, of the officer, employee or minister to whom the information is disclosed
33.2(e)	A public body may disclose personal information inside Canada only to an officer or employee of a public body or to a minister, if the information is necessary for the protection of the health or safety of the officer, employee or minister
33.2(f)	A public body may disclose personal information inside Canada only to the auditor general or any other prescribed* person or body for audit purposes
33.2(g)	A public body may disclose personal information inside Canada only to a member of the Legislative Assembly who has been requested by the individual the information is about to assist in resolving a problem

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33.2(h)	<i>A public body may disclose personal information inside Canada only to a representative of the bargaining agent, who has been authorized in writing by the employee whom the information is about, to make an inquiry</i>
33.2(i)	<i>A public body may disclose personal information inside Canada only to a public body or a law enforcement agency in Canada to assist in a specific investigation (i) undertaken with a view to a law enforcement proceeding, or (ii) from which a law enforcement proceeding is likely to result</i>
33.2(j)	<i>A public body may disclose personal information inside Canada only to the archives of the government of B.C. or the archives of a public body, for archival purposes</i>
33.2(l)	<i>A public body may disclose personal information inside Canada only to an officer or employee of a public body or to a minister, if the information is necessary for the purposes of planning or evaluating a program or activity of a public body</i>
	Disclosures for financial purposes
33.1(1)(a.1)	If the information or disclosure is of a type described in section 22(4)(e), (f), (h), (i), or (j)
	22(4)(f): the disclosure reveals the financial details of a contract to supply goods or services to a public body
	22(4)(h): the information is about expenses incurred by the third party while travelling at the expense of a public body
	22(4)(j): the disclosure, in respect of a discretionary benefit of a financial nature granted to a third party by a public body, not including personal information referred to in subsection (3)(c), reveals any of the following with respect to the benefit: (i) the name of the third party to whom the benefit applies; (ii) what the benefit grants to the third party; (iii) the date the benefit was granted; (iv) the period of time the benefit is valid; (v) the date the benefit ceases.
33.1(1)(i)	If (i) the disclosure is for the purposes of collecting amounts owing to the government of B.C. or a public body by (A) an individual (B) a corporation of which the individual the information is about is or was a director or officer, and (ii) in relation to disclosure outside Canada, there are reasonable grounds for

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	purposes
	Special disclosure authorities
33.1(4)	ICBC may disclose personal information if (a) the information was obtained or compiled by ICBC for the purposes of insurance provided by the public body, and (b) disclosure of the information is necessary to investigate, manage or settle a specific insurance claim
33.1(5)	A provincial identity information services provider (PIISP) may disclose personal identity information (a) to enable the PIISP to provide services under section 69.2, or (b) to a public body if the disclosure is necessary to enable the public body to identify an individual for the purpose of providing service to the individual.
33.1(6)	A public body may disclose personal identity information to a PIISP if the disclosure is necessary to enable (a) the public body to identify an individual for the purpose of providing a service to the individual, or (b) the PIISP to provide services under section 69.2

*Relevant definitions:

Prescribed: means prescribed by FOIPPA regulation.

Consistent purpose: A use of personal information is consistent with the purpose for which the information was obtained or compiled is the use (a) has a reasonable and direct connection to that purpose, and (b) is necessary for performing the statutory duties of, or for operating a program or activity of, the public body that uses or discloses the information.

Common or Integrated Program or Activity: Means a program or activity that (a) provides one or more services through (i) a public body and one or more other public bodies or agencies working collaboratively, or (ii) one public body working on behalf of another public body or agency, and (b) is confirmed by regulation as being a common or integrated program or activity.

Law enforcement: means (a) policing, including criminal intelligence operations, (b) investigations that lead or could lead to a penalty or sanction being imposed, or (c) proceedings that lead or could lead to a penalty or sanction being imposed.

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