

PIA Summary for Public Posting

Follow the Global Customer (FTGC) PIA

January 2015

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's legislated mandate is to: sustain a vibrant and profitable Canadian tourism industry; to market Canada as a desirable tourist destination; to support a cooperative relationship between the private sector and the governments of Canada, the provinces, and the territories with respect to Canadian tourism; and to provide information about Canadian tourism to the private sector and to the governments of Canada, the provinces, and the territories. It fulfills its mandate by working with various levels of government to conduct research and to administer marketing initiatives that increase international visits and tourism revenue. DC also works alongside several international partners to help promote Canadian tourism.

2. About the Project

"Follow the Global Customer" (or FTGC) is an initiative developed by DC, in conjunction with industry and provincial tourism partners, to better engage and interact with individuals online using behavioural and targeted advertising.

The purpose of the FTGC initiative is to capitalize on advanced digital marketing tools to better promote and encourage travel and tourism in Canada. Digital marketing allows DC to build advanced analytical capabilities to better identify individuals who are most likely to travel to Canada. The initiative also allows DC to improve the efficiency of its tourism marketing efforts by focusing promotional efforts on the right individuals, at the right time – and by delivering information that is most relevant to those individuals' needs.

3. Scope of the Privacy Impact Assessment

Although DC is not itself named in the Schedule to the *Privacy Act*¹, it reports to Parliament through the Minister of Innovation, Science and Economic Development of Canada (previously the Minister of Industry). As such, and in keeping with its designation as a Crown Corporation, DC abides by the Act and its supporting policies and directives, as established by TBS.

¹ [Privacy Act](#) (R.S.C., 1985, c. P-21).

Under the TBS [Policy on Privacy Protection](#), all federal institutions subject to the *Privacy Act* 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.

The purpose of the FTGC PIA was to provide evidence of compliance with legislative requirements concerning privacy, and to report any privacy related risks identified in the course of the assessment to management. All federal institutions subject to the *Privacy Act* 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).

The scope of the PIA was limited to a review of potential privacy impacts associated with the collection, use, disclosure and retention of personal information from DC’s behavioural and targeted advertising activities under the FTGC initiative. It included a review of legislative authorities for the collection of personal information, and an examination of privacy practices governing the use and disclosure of that information. It also included a review of DC’s privacy notifications. The PIA did not include a review of how industry and provincial program partners handle personal information . Program partners are expected to undertake their own proper privacy impact assessments in relation to on-line behavioural advertising where appropriate.

4. Privacy Analysis

Based on the results of the PIA, the FTGC initiative is expected to have a low to negligible impact on the privacy of individuals. Information to be collected through behavioural and targeted advertising activities by DC is limited to that which is needed to fulfill the Commission’s core mandate. That information is not considered to be sensitive in nature. All information is to be used for purposes consistent with those for which it was first collected, and safeguarded in a manner that reflects its sensitivity. Personal information collected through the FTGC initiative, if any, will not be used for administrative decisions affecting individuals.

All risks identified in the PIA have been properly addressed and mitigated through the implementation of policy, legal and technical controls.

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.	<input checked="" type="checkbox"/> 1

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...).	<input type="checkbox"/> 2
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).	<input type="checkbox"/> 3
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).	<input type="checkbox"/> 4
B: Type of Personal Information Involved and Context	Level of risk to privacy
Only personal information provided by the individual – at the time of collection – relating to an authorized program & collected directly from the individual or with the consent of the individual for this disclosure / with no contextual sensitivities. 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.	<input type="checkbox"/> 1
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.	<input checked="" type="checkbox"/> 2
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.	<input type="checkbox"/> 3
Sensitive personal information, including detailed profiles, allegations or suspicions, bodily samples and/or the context surrounding the personal information is particularly sensitive.	<input type="checkbox"/> 4
C: Program or Activity Partners and Private Sector Involvement	Level of risk to privacy
Within the department (amongst one or more programs within the department)	<input type="checkbox"/> 1
With other federal institutions	<input type="checkbox"/> 2

With other or a combination of federal/ provincial and/or municipal government(s)	<input checked="" type="checkbox"/> 3
Private sector organizations or international organizations or foreign governments	<input checked="" type="checkbox"/> 4
D: Duration of the Program or Activity	Level of risk to privacy
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.	<input type="checkbox"/> 1
Short-term program: A program or an activity that supports a short-term goal with an established "sunset" date.	<input type="checkbox"/> 2
Long-term program: Existing program that has been modified or is established with no clear "sunset".	<input checked="" type="checkbox"/> 3
E: Program Population	Level of risk to privacy
The program affects certain employees for internal administrative purposes.	<input checked="" type="checkbox"/>
The program affects certain employees for internal administrative purposes.	<input type="checkbox"/> 1
The program affects all employees for internal administrative purposes.	<input type="checkbox"/> 2
The program affects certain individuals for external administrative purposes.	<input type="checkbox"/> 3
The program affects all individuals for external administrative purposes.	<input type="checkbox"/> 4
F: Technology and Privacy	Level of risk to privacy
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?	No
Does the new or modified program or activity require substantial modifications to IT legacy systems and / or services?	No
The new or modified program or activity involves the implementation of potentially privacy invasive technologies?	No

G: Personal Information Transmission	Level of risk to privacy
The personal information is used within a closed system. No connections to Internet, Intranet or any other system. Circulation of hardcopy documents is controlled.	<input type="checkbox"/> 1
The personal information is used in system that has connections to at least one other system.	<input checked="" type="checkbox"/> 2
The personal information may be printed or transferred to a portable device.	<input type="checkbox"/> 3
The personal information is transmitted using wireless technologies.	<input type="checkbox"/> 4
I: Risk Impact to the Individual or Employee	Level of risk to privacy
Inconvenience.	<input checked="" type="checkbox"/> 1
Reputation harm, embarrassment.	<input type="checkbox"/> 2
Financial harm.	<input checked="" type="checkbox"/> 3
Physical harm.	<input type="checkbox"/> 4
H: Risk Impact to the Department	Level of risk to privacy
Managerial harm. Processes must be reviewed, tools must be changed, change in provider / partner.	<input checked="" type="checkbox"/> 1
Organizational harm. 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.	<input type="checkbox"/> 2
Financial harm. Lawsuit, additional moneys required reallocation of financial resources.	<input type="checkbox"/> 3
Reputation harm, embarrassment, loss of credibility.	<input checked="" type="checkbox"/> 4



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.	
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