

# **Privacy Impact Assessment: Licencing, Inspections and Permitting System (LIPS)**

**Date: April 2020**

## Document Control and Reviews

### Document Control

Date	Author	Version	Change Reference
March 2020	Cenera	1.0	Initial Draft
1 Dec 2020	Harjit Mavi	1.0	Post ATIPP review and post YLC consultation draft
2 Dec 2020	Harjit Mavi	1.1	Draft based on Will T's feedback
7 Jan 2021	Harjit Mavi	1.1	Post mitigation draft

### Reviews

Date	File Name / Version #	Reviewed by
April 28, 2020	1.0	Harjit Mavi
May 28, 2020	1.0	Acasea Lane
July 10, 2020	1.0	Acase Lane/Cheryl Otterbein
Dec 1, 2020	1.0	Harjit Mavi
Dec 2, 2020	1.0	Will Tewnton
Dec 2, 2020	1.0	Luzelle Nagel

### 0.1 Policies, Forms and Reports (PIA Manual reference: 5.1 Collecting information and supporting documentation)

Parties Involved	Role
Amanda McCarthy	Business Analyst, ICT
Harjit Mavi	Project Manager, Service Innovation & Support, ICT
Luzelle Nagel	Director Finance & Information Management, YLC
Ken Howard	Acting Director of Regulatory, Licencing & Compliance Officer, YLC

Policy Name	Hyperlink or Appendix number
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Human Resources Policies (GAM 3.16)	Appendix 4
Records Management (GAM 2.14)	Appendix 4
Security of Public Records (GAM 2.15)	Appendix 4
ATIPP Roles and Responsibilities (GAM 2.24)	Appendix 4
Privacy Management Policy (GAM 2.27)	<a href="http://www.atipp.gov.yk.ca/pdf/Privacy-Management-Policy-GAM-FINAL.pdf">http://www.atipp.gov.yk.ca/pdf/Privacy-Management-Policy-GAM-FINAL.pdf</a>
Collection of Personal Information Policy	<a href="http://www.atipp.gov.yk.ca/pdf/Collection of Personal Information Policy.pdf">http://www.atipp.gov.yk.ca/pdf/Collection of Personal Information Policy.pdf</a>
Use of Personal Information Policy	<a href="http://www.atipp.gov.yk.ca/pdf/Use of Personal Information Policy.pdf">http://www.atipp.gov.yk.ca/pdf/Use of Personal Information Policy.pdf</a>
Disclosure of Personal Information Policy	<a href="http://www.atipp.gov.yk.ca/pdf/Disclosure of Personal Information Policy.pdf">http://www.atipp.gov.yk.ca/pdf/Disclosure of Personal Information Policy.pdf</a>
Employee Privacy Training Operational Policy	<a href="http://www.atipp.gov.yk.ca/pdf/Employee Privacy Training Operational policy.pdf">http://www.atipp.gov.yk.ca/pdf/Employee Privacy Training Operational policy.pdf</a>
PIA Operational Policy	<a href="http://www.atipp.gov.yk.ca/pdf/PIA Operational policy.pdf">http://www.atipp.gov.yk.ca/pdf/PIA Operational policy.pdf</a>
Privacy Breach Policy	<a href="http://www.atipp.gov.yk.ca/pdf/Privacy Breach Operational policy.pdf">http://www.atipp.gov.yk.ca/pdf/Privacy Breach Operational policy.pdf</a>
Privacy Breach Reporting Protocol	<a href="http://www.atipp.gov.yk.ca/pdf/Privacy Breach Reporting Protocol.pdf">http://www.atipp.gov.yk.ca/pdf/Privacy Breach Reporting Protocol.pdf</a>

Document Name	Hyperlink or Appendix number
Detailed System Requirements Sheet	Appendix 1
Privacy Management Guidelines	Appendix 4
Guidance for Public Bodies on Accountable Privacy Management	<a href="https://www.ombudsman.yk.ca/uploads/media/55f99c6eed395/Guidance%20Privacy%20Management%20-%20Revised%20Nov%202016.pdf?v1">https://www.ombudsman.yk.ca/uploads/media/55f99c6eed395/Guidance%20Privacy%20Management%20-%20Revised%20Nov%202016.pdf?v1</a>
ATIPP Act Guide for Managers	Appendix 4
Third Party Service Providers and Privacy	Appendix 4
Service Provider Agreement Template	Appendix 5
YLC Licensing and Compliance Services Business Classification Scheme	Appendix 6
Information Technology Security Framework	Appendix 7
Guidance on Safeguarding Information Assets	Appendix 7
YG Computer Use Guidelines	Appendix 7
YNet Password Policy	Appendix 7

Form Name	Hyperlink or Appendix number
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Cannabis Retail License Application Form: Sole Proprietor	<a href="https://yukon.ca/sites/yukon.ca/files/ylc/ylc-cannabis-retail-sole-proprietor-package.pdf">https://yukon.ca/sites/yukon.ca/files/ylc/ylc-cannabis-retail-sole-proprietor-package.pdf</a>
Cannabis Retail License Application Form: Partnership	<a href="http://www.ylc.yk.ca/pdf/CannabisRetail_Partnership_Package.pdf">http://www.ylc.yk.ca/pdf/CannabisRetail_Partnership_Package.pdf</a>
Cannabis Retail License Application Form: Corporation – Private	<a href="http://www.ylc.yk.ca/pdf/CannabisRetail_CorpPrivate_Package.pdf">http://www.ylc.yk.ca/pdf/CannabisRetail_CorpPrivate_Package.pdf</a>
Cannabis Retail License Application Form: Corporation – Public	<a href="http://www.ylc.yk.ca/pdf/CannabisRetail_CorpPublic_Package.pdf">http://www.ylc.yk.ca/pdf/CannabisRetail_CorpPublic_Package.pdf</a>
Liquor License Application Form	<a href="http://www.gov.yk.ca/forms/forms/5500/yg5502_e.pdf">http://www.gov.yk.ca/forms/forms/5500/yg5502_e.pdf</a>
Liquor Reception Permit Application Form	<a href="https://yukon.ca/sites/yukon.ca/files/ylc/ylc-forms/yg781-reception-permit.pdf">https://yukon.ca/sites/yukon.ca/files/ylc/ylc-forms/yg781-reception-permit.pdf</a>
Liquor Special Occasion Permit Application Form	<a href="https://yukon.ca/sites/yukon.ca/files/ylc/ylc-forms/yg780-special-occasion-permit.pdf">https://yukon.ca/sites/yukon.ca/files/ylc/ylc-forms/yg780-special-occasion-permit.pdf</a>
Inspection Report – Cannabis	Appendix 3
Licensed Premises Check – Cannabis	Appendix 3
Privacy Breach Reporting Form	<a href="http://www.atipp.gov.yk.ca/pdf/Privacy_Breach_Reporting_Form.pdf">http://www.atipp.gov.yk.ca/pdf/Privacy_Breach_Reporting_Form.pdf</a>

Report Name	Purpose of Report	Audit Logs on Report (Y/N)
Inspection Aging Report	Dates of Last inspections performed on licences and their age	Y
Licence Premise Check Report	Statistic information of which premises were inspected and when	Y



# 1 GENERAL

<b>Department/Corporation:</b>	Yukon Liquor Corporation
<b>PIA Drafter:</b>	Cenera
<b>Program Manager:</b>	Harjit Mavi, Service Innovation & Support, ICT

## 1.1 Project Overview (PIA manual reference: 5.2 Documenting the project)

### 1.1.1 Description of the Project (PIA manual reference: 5.2.1 Description of the project)

Yukon Liquor Corporation (YLC) is designated as the distributor corporation for cannabis in the Yukon pursuant to the *Cannabis Control and Regulation Act*, and as the distributor corporation for liquor in the Yukon pursuant to the *Liquor Act*. YLC is therefore responsible for the collection of information related to cannabis and liquor license and permit applications, to provide to the Cannabis Licensing Board and Liquor Licensing Board (the “Boards”) for decision-making.

The Regulatory Service branch within YLC prepares analyses of applications for the review of the Boards, administers all aspects of licensing services, and enforces the *Cannabis Control and Regulation Act*, *Liquor Act* and their regulations.

YG is in the process of designing and implementing a new “licensing, inspections and permitting system” (LIPS or the “System”) for YLC. LIPS includes the functionalities of receiving applications, managing files, conducting assessments, conducting consultations, managing correspondence, issuing licenses and permits, collecting fees, and monitoring and enforcement.

The detailed system access requirement sheet for LIPS, as determined by YLC, is attached in Appendix 1. The contract for development of LIPS has been awarded, and the software application is named Amanda, the vendor being Calytera.

The proposed system will replace the current MS Access and paper-based system. The proposed system once implemented in July, 2020 will allow businesses to submit applications for liquor and cannabis licenses and permits online and to receive the required documentation and payments from the businesses. This will allow for increased efficiency, accuracy and information security for the licensing and permitting processes within YLC.

YLC users will manage the application, assessment, correspondence, and authorization information for the businesses that apply.

Migration of data from the existing MS Access and paper-based system to the new system will be completed once LIPS is operational. After migration occurs, the current MS Access and paper-based system will be decommissioned.

### 1.1.2 Scope of PIA (PIA manual reference: 5.2.2 Project scope)

This PIA will review and address the collection, use, disclosure, and security of personal information within LIPS, which will be going live in early 2021.

There has been significant development of the goals and outcomes required by LIPS (see Detailed System Requirements Sheet attached as Appendix 1). As the System is still in development, exact details of how the program will achieve the system goals have not yet been fully explored and there are decisions yet to be made by the project steering committee. Where concrete decisions have been made, that decision is reflected in this PIA. Where no specific decision has been made, the goal or standard sought by the project committee will be discussed

There will be an internal YLC component of LIPS, for use by YLC employees, as well as a public-facing component, for use by applicants, licensees and permit holders. Access to the System will be very limited within YG. Only a handful of users will have access, including 3 Inspectors, 2 Administrators and the YLC Director. The vendor and ICT will also have system support access.

LIPS will be housed entirely within the YG infrastructure at the data centre managed by ICT, HPW. Public users will access the system through a 72(1)(b)(vi)

There will also be a mobile component used for field-gathering activities related to inspection and enforcement. This mobile component is called "inspector app", is provided by the LIPS vendor and integrates seamlessly with LIPS. This mobile component will be used to gather information which will be transmitted to LIPS. An amendment to this PIA will be provided should the mobile component have any privacy or security standards different than LIPS.

### 1.1.3 Parties Involved (PIA manual reference: 5.2.3 Parties involved)

The following table outlines the stakeholders involved in LIPS.

Stakeholder	Function	Applicable Legislation
YLC	<ul style="list-style-type: none"> <li>Receive applications and payments</li> <li>Review applications</li> <li>Create application assessments and summary for Boards</li> <li>Communicate with applicants and licensees</li> <li>Inspection and enforcement of <i>Liquor Act</i> and <i>Cannabis Control and Regulation Act</i> and their Regulations</li> </ul>	<p>Collection: ATIPP s. 29(a)(b)(c)  Bill No. 24 s. 15(a)(b)(c)(i)  <i>Liquor Act</i> ss. 25, 35, 60, 61, 62, 73-119  <i>Cannabis Control and Regulation Act</i> s. 25, 26, 39, 41, 47-51, 65-75  Cannabis License Regulation s. 7, 9, 10</p> <p>Indirect Collection:  ATIPP s. 30(1)(a)  <i>Liquor Act</i> s. 25(2)  <i>Cannabis Control and Regulation Act</i> s. 27(7)</p> <p>Use: ATIPP s. 35(1)(a)  Bill No. 24 s.21(a), (b)(i)(ii)</p> <p>Disclosure: ATIPP s. 36(c), (l)</p>

Yukon Liquor Board, Cannabis Board	<ul style="list-style-type: none"> <li>Review and approve or deny applications</li> <li>Hearing appeals of license suspensions, barrings and permit refusals</li> </ul>	<p>Disclosure: ATIPP s. 36(c)(d)</p> <p>Bill No. 24 s. 25(c)(i)(ii)</p> <p><i>Liquor Act</i> ss. 8, 27</p> <p><i>Cannabis Control and Regulation Act</i> ss. 21, 27</p>
Applicants and Licensees	<ul style="list-style-type: none"> <li>Provide application materials and payments</li> </ul>	<p>Liquor Act</p> <p>Cannabis Control and Regulation Act</p>
Complainants	<ul style="list-style-type: none"> <li>Provide complaint information against a licensee or permit holder</li> </ul>	<p>Liquor Act</p> <p>Cannabis Control and Regulation Act</p>
Calytera subcontractor Meraki IT	<ul style="list-style-type: none"> <li>Support and Maintain systems (Amanda)</li> </ul>	<p>Use: ATIPP s. 35(1)(a)</p> <p>Bill No. 24 s.21(b)(i)(ii)</p>
HPW, ICT	<ul style="list-style-type: none"> <li>Support and maintain systems (YG Infrastructure)</li> </ul>	<p>Use: ATIPP s. 35(1)(a)</p> <p>Bill No. 24 s.21(b)(i)(ii)</p>
Third Parties	<ul style="list-style-type: none"> <li>Assessment of financial responsibility as a part of the assessment process of Cannabis applications</li> </ul>	<p>Disclosure: ATIPP s. 36(c)(d)</p> <p>Bill No. 24 s. 25(c)(i)(ii)</p> <p><i>Cannabis Control and Regulation Act</i> s. 27(7)(b), (8)</p>
Law Enforcement	<ul style="list-style-type: none"> <li>Enforce compliance with license and permit conditions, <i>Liquor Act</i> and <i>Cannabis Control and Regulation Act</i> and their regulations.</li> </ul>	<p>Disclosure: ATIPP s. 36(c), (l)</p> <p>Bill No. 24 s. 25(c)(i)(ii)(xi)</p> <p>Liquor Act</p> <p>Cannabis Control and Regulation Act</p>
Other YG Departments – Environmental Health, YG Fire and Building, City Fire and Building	<ul style="list-style-type: none"> <li>Application summary is shared with the appropriate YG Branch to verify application information: Environmental Health for all applications, YG Fire and Building or City Fire and Building, depending on the location of the application.</li> </ul>	<p>Disclosure: ATIPP s. 36(c)</p> <p>Bill No. 24 s. 25(a)</p>



#### **1.1.4 Objectives and Benefits (PIA manual reference: 5.2.4 Objective and benefits)**

The implementation of a comprehensive electronic licencing and permitting system will allow for better accountability, efficiency and security of information at YLC.

LIPS will replace an existing MS Access and paper-based system, both of which are inefficient, and time consuming to enter data and utilize information. These systems are also vulnerable to data entry errors, creating accuracy problems and information security risks. LIPS will have a comprehensive auditing capability and accompanying data integrity processes and policies, which will increase accuracy and mitigate information security risks.

Allowing applicants, licensees and permit holders to submit applications, supporting documentation and payments directly into LIPS will also lessen the strain on YLC employees.

YLC employees will manage the application, assessment, correspondence and authorization information for the businesses that apply. Information required by the Cannabis and Liquor Boards will also be pulled from LIPS, increasing efficiency and accuracy.

The inspection and enforcement arm of YLC will be able to full integrate their activities into LIPS using a field data gathering application, which will integrate fully with LIPS and allowing for the full range of information regarding an applicant, licensee or permit holder to be collected, used and stored in one location. Inspectors will be able to conduct their activities efficiently and accurately as a result.

#### **1.1.5 Description of Personal Information Collected (PIA manual reference: 5.3.1 Types of data (field level or clusters))**

Personal Information (PI) is collected by the YLC to review applications, communicate with applicants and licensees, receive complaints, issue permits and licenses and conduct inspections and enforcement activities. Licensees and applicants set up an account within the LIPS system and provide application and other information. YLC Inspectors and Administrative Employees will add additional information to LIPS with YLC Inspectors also adding additional information to the mobile app connected to LIPS as a part of their field activities.

The applicable privacy legislation that will be referred to in this PIA is the ATIPP Act. In addition, Bill No. 24 Access to Information and Protection of Privacy Act is also referenced. As Bill No. 24 is not yet in force, it is recognized that the ATIPP Act is the prevailing legislation that applies.

The Yukon *Liquor Act*, *Cannabis Control and Regulation Act* and their regulations outline the proper management and control of liquor and cannabis with the aim of protecting public safety and promoting education. YLC manages the licencing, permitting, inspection and enforcement programs in compliance with these acts and the associated regulations.

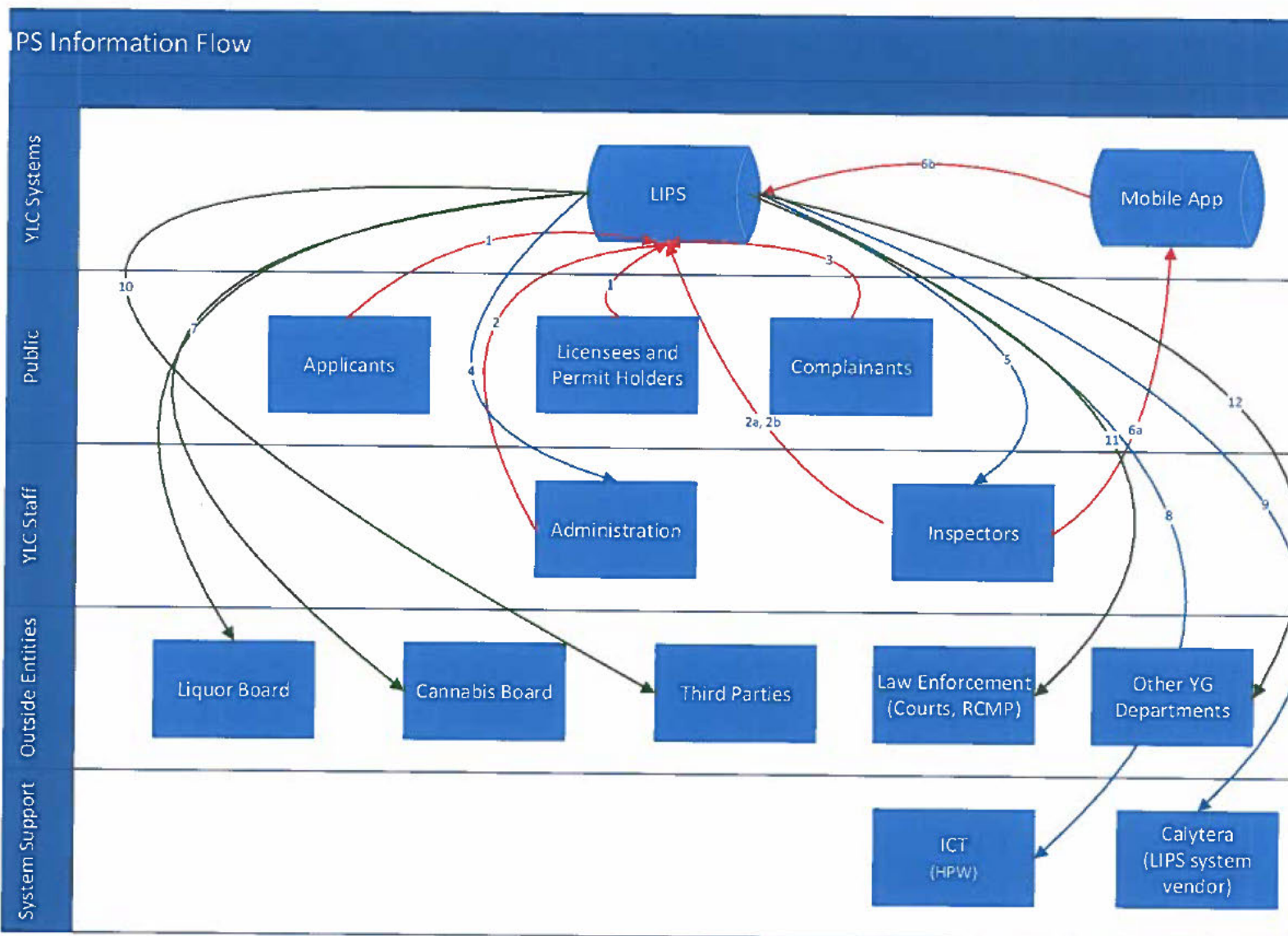
A PI Map has been developed (Appendix 2) to identify the specific fields of personal information collected. The system is still in the development stage, so screen shots are not currently available. As LIPS will be replacing the paper forms currently used by YLC, a set of the current application forms and inspection reports and premises checks are included in Appendix 3.



## 2 DATA FLOW MAPPING AND TABLES

### 2.1 Personal Information Flow Diagram and Table (PIA manual reference: 5.3.3 Data flow mapping)

The following diagram illustrates the information flow of personal information anticipated to be captured by LIPS.



FLOW	DESCRIPTION	INFORMATION CATEGORY	PURPOSE	LEGAL AUTHORITY	CUSTODY OR CONTROL
1	PI is collected directly from applicant/ licensee into LIPS system.  Creates account, applies for licenses and permits, submits accompanying documentation.	Identification and Contact Information Employment Information Financial Information Sensitive Data – Criminal History Application Information Inspection Licensed premises check Complaints	To set up a profile on the LIPS platform to enable the applicant/licensee to acquire licenses and permits as part of the program services of the YLC.  To submit applications for licenses and permits and associated documentation. To have payment submitted via third party payment processor recorded in system.  To submit required updates and documents associated with licenses and permits.	ATIPP s. 29(a)(c)  Bill No. 24 s. 15(a)(c)(i)  <i>Liquor Act</i> ss. 25, 35, 60, 61, 62  <i>Cannabis Control and Regulation Act</i> s. 25, 26, 39, 41  Cannabis License Regulation s. 7, 9, 10	Custody: YLC  Control: YLC
2a	PI is collected directly from applicants and licensees and entered into LIPS by YLC  YLC Employees may communicate with applicants and licensees regarding their licenses and applications.	Identification and Contact Information Employment Information Financial Information Sensitive Data – Criminal History Application Information Inspection Licensed premises check Complaints	To complete applications submitted by the applicant missing information. To submit required updates and documents associated with licenses and permits.  To record payment completion where applicant/licensees attends at YLC in person to complete payment.	ATIPP s. 29(a)(c)  Bill No. 24 s. 15(a)(c)(i)  <i>Liquor Act</i> ss. 25, 35, 60, 61, 62  <i>Cannabis Control and Regulation Act</i> s. 25, 26, 39, 41  Cannabis License Regulation s. 7, 9, 10	Custody: YLC  Control: YLC
2b	PI is collected indirectly from applicants and licensees and entered into LIPS by YLC.	Identification and Contact Information Employment Information Financial Information Sensitive Data – Criminal History Application Information Inspection Licensed premises check Complaints	To conduct investigations into applicants in accordance with the <i>Cannabis Control and Regulation Act</i> and <i>Liquor Act</i> .	Indirect Collection: ATIPP s. 30(1)(a) <i>Liquor Act</i> s. 25(2)  <i>Cannabis Control and Regulation Act</i> s. 27(7)	Custody: YLC  Control: YLC
3	PI is collected from complainants and entered into LIPS by YLC	Identification and Contact Information Complaints	To log a complaint against a licensee or permit holder. To contact complainant in future regarding complaint.	ATIPP s. 29(b)(c)  Bill No. 24 s. 15 (b)(c)(i)	Custody: YLC  Control: YLC
4	PI is used by YLC – Administration	Identification and Contact Information Employment Information Financial Information	To create and distribute correspondence to applicants, licensees and permit holders.	ATIPP s. 35(1)(a)  Bill No. 24 s.21(a), (b)(i)(ii)	Custody: YLC  Control: YLC



FLOW	DESCRIPTION	INFORMATION CATEGORY	PURPOSE	LEGAL AUTHORITY	CUSTODY OR CONTROL
		Sensitive Data – Criminal History Application Information Inspection Licensed premises check Complaints	To record interactions with applicants, licensees and permit holders.  To assess and verify application elements. To create application summary reports for Board reporting.  To record licencing and permitting decisions of the Board.  To record consultations and responses with third parties.		
5	PI is used by YLC Inspectors	Identification and Contact Information Employment Information Financial Information Sensitive Data – Criminal History Application Information Inspection Licensed premises check Complaints	To complete enforcement activities and record warnings, summary convictions, tickets, orders of suspension and seizure.  To complete inspection activities and record infractions, inspection results, incident reports, recommended penalties and approved penalties.	ATIPP s. 35(1)(a)  Bill No. 24 s.21(a), (b)(i)(ii)	Custody: YLC  Control: YLC
6a	PI is collected directly from licensee or permit holder and entered into the mobile app by Inspectors	Identification and Contact Information Inspection Licensed premises check	To complete field enforcement and inspection activities including monitoring and enforcing compliance with license and permit conditions, acts and regulations	ATIPP s. 29(a)(b)(c)  Bill No. 24 s. 15(a)(b)(c)(i)  <i>Liquor Act</i> ss. 73-119  <i>Cannabis Control and Regulation Act</i> ss. 47-51, 65-75	Custody: YLC  Control: YLC
6b	PI is collected from the mobile app to LIPS	Identification and Contact Information Inspection Licensed premises check	To complete record of field enforcement and inspection activities including monitoring and enforcing compliance with license and permit conditions, acts and regulations	ATIPP s. 29(a)(b)(c)  Bill No. 24 s. 15(a)(b)(c)(i)  <i>Liquor Act</i> ss. 73-119  <i>Cannabis Control and Regulation Act</i> ss. 47-51, 65-75	Custody: YLC  Control: YLC
7	PI is disclosed to YLC Board and Cannabis Board	Identification and Contact Information Employment Information Financial Information Sensitive Data – Criminal History Application Information Inspection Licensed premises check	To assess applications, grant licenses and permits, hear appeals, and to enforce compliance with license and permit conditions, <i>Liquor Act</i> and <i>Cannabis Control and Regulation Act</i> and their regulations	ATIPP s. 36(c)(d)  Bill No. 24 s. 25(c)(i)(ii)  <i>Liquor Act</i> ss. 8, 27  <i>Cannabis Control and Regulation Act</i> ss. 21, 27	Custody: YLC  Control: YLC

FLOW	DESCRIPTION	INFORMATION CATEGORY	PURPOSE	LEGAL AUTHORITY	CUSTODY OR CONTROL
		Complaints			
8	PI is used by HPW, ICT	Identification and Contact Information Employment Information Financial Information Sensitive Data – Criminal History Application Information Inspection Licensed premises check Complaints	PI may be accessed by HPW ICT in the course of maintaining or troubleshooting the system within the YG Network infrastructure.	ATIPP s. 35(1)(a) Bill No. 24 s.21(b)(i)(ii)	Custody: YLC Control: YLC
9	PI is used by Calytera	Identification and Contact Information Employment Information Financial Information Sensitive Data – Criminal History Application Information Inspection Licensed premises check Complaints	PI may be accessed by Calytera in the course of maintaining or troubleshooting the LIPS system.	ATIPP s. 35(1)(a) Bill No. 24 s.21(b)(i)(ii)	Custody: YLC Control: YLC
10	PI is disclosed to a third party for assessment of financial responsibility or for the purposes of informing the Board's consideration of an application.	Identification and Contact Information Employment Information Financial Information Application Information	PI may be disclosed to a third party for assessment of financial responsibility as a part of the assessment process of Cannabis applications.	ATIPP s. 36(c)(d) Bill No. 24 s. 25(c)(i)(ii) <i>Cannabis Control and Regulation Act</i> s. 27(7)(b), (8)	Custody: YLC Control: YLC
11	PI is disclosed to law enforcement.	Identification and Contact Information Inspection Licensed premises check Complaints	PI may be disclosed to law enforcement to enforce compliance with license and permit conditions, <i>Liquor Act</i> and <i>Cannabis Control and Regulation Act</i> and their regulations.  For example, license suspension information is provided to RCMP.	ATIPP s. 36(c)(i) Bill No. 24 s. 25(c)(i)(ii)(xi)	Custody: YLC Control: YLC
12	PI is disclosed to other YG departments	Identification and Contact Information	Application summary is shared with the appropriate YG Branch to verify application information: Environmental Health for all applications, YG Fire and Building or City Fire and Building, depending on the location of the application.	ATIPP s. 36(c) Bill No. 24 s. 25(a)	Custody: YLC Control: YLC



## 3 PRIVACY ANALYSIS

The following analysis informs the risk summary and mitigation plan of the PIA. Risks identified in the following sections (3.1-3.10) feed directly into the Risk and Mitigation table in section 4.1.

### 3.1 Accountability (PIA manual reference: 5.5.1 Accountability)

The Privacy Management Policy (GAM 2.27), ATIPP Roles, and Responsibilities (GAM 2.24) outline the authorities and responsibilities in the management and protection of personal information. Departments and their branches manage their privacy actions and expectations within the broader Yukon Government Privacy Management framework.

The Department of Highways and Public Works (HPW), Corporate Information Management (CIM) provides leadership, issues guidelines documents, standards, training materials and supporting policies to assist departments and public bodies deliver and adhere to information privacy policies.

Deputy Ministers are responsible for ensuring privacy protection is a priority within their respective departments, that employees are trained in privacy management, appointing Privacy Officers, and approving PIAs and privacy management plans.

Privacy Officers develop and implement privacy management plans, prepare PIAs and PI Maps, ensure that privacy incidents are reported to HPW, and ensure that reporting and audit requirements are met. They also participate in a Privacy Advisory Committee, which shares information and lessons learned. Policies relating to accountability and privacy compliance are included in Appendix 4.

#### 3.1.1 Identify Information Owner(s)

Name	Position
Will Tewnion	Director Regulatory Services

#### 3.1.2 Identify the Department's Privacy Officer(s)

Name	Position
Luzelle Nagel	Director, Finance & Information Manager (Acting Privacy Officer)

#### 3.1.3 Identify Third Party Service Providers

Service Provider Name	Services Provided	Written Agreement (Y/N)
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Calytera (Amanda)	Technical system support and maintenance	Y: Master License and Service Agreement  Information Manager Service Agreement is being developed
ICT, HPW	Project specific support Ensuring public facing systems meet corporate standards Technical system support and maintenance	Y: Application Support Agreement  Information Manager Service Agreement is being developed

The portions of the Master License and Service Agreement relating to privacy were provided for review. The Agreement in its entirety has not been provided or reviewed for the purposes of this PIA. Upon review of the clauses provided, it has been identified that the Master License and Service Agreement does not thoroughly outline the expectations and standards of Calytera regarding privacy and confidentiality.

A recommended Information Manager Service Agreement template (included in Appendix 5) is under review. This agreement has been developed to specifically address the use of personal information by third party service providers. Once finalized, this Service Agreement will be entered into with the service providers and system vendors to formalize agreement to comply with the same legislated privacy standards as the organization.

It is noted in Bill No. 24 section 33(3) that a public body is required to enter into a written agreement with an information manager that includes a description of each service to be provided as part of the information management service.

#### 3.1.4 Identify Privacy Risks/Security Threats regarding Accountability

<b>Risk</b>	<b>Description of Privacy Risk / Threat</b>
<b>1-1</b>	<p><b>Lack of accountability of a contracted service provider.</b> There are no information manager service agreements in place with third party providers that adequately address information privacy and security. <i>Recommended mitigations:</i></p> <ul style="list-style-type: none"> <li>Enter into an Information Manager Service Agreement with service providers to outline the expectations and standards of service providers regarding privacy, security and confidentiality of information.</li> </ul>
<b>1-2</b>	<p><b>Insufficient accountability and clarity in system support services.</b> Security of information on the YLC systems relies on broader YG system infrastructure security. Lack of clarity in accountability of support services may allow security risks. <i>Recommended mitigations:</i></p>



	<ul style="list-style-type: none"> <li>• Ensure Development and implementation of Application Support Agreement between HPW, ICT and YLC to formalize and clarify the support services provided by ICT, and shared responsibilities.</li> </ul>
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### 3.2 Identifying Purpose (PIA manual reference: 5.5.2 Identifying Purposes)

#### 3.2.1 Describe how your project has notified the individual the purpose for which the personal information is being collected? Include sample collection notice.

The primary point of PI collection is via the LIPS system platform when an applicant, licensee or permit holder creates and updates their account, submits applications and associated materials and updates documentation as required by the conditions of their license or permit. It is recommended that a notification be provided via LIPS upon account creation and system access.

The following notice be used:

*Personal information is collected under the authority of, and in accordance with the Access to Information and Protection of Privacy Act (ATIPP Act), s. 29 (a) and (c) and s. 30 for the purposes of processing, assessing and approving applications for licenses and permits and to enforce the Liquor Act, the Liquor Regulations, the Cannabis Control and Regulation Act and the Cannabis Licensing Regulation. In this process, information will be shared with the Yukon Liquor Board or the Cannabis Board. For cannabis applications, some information may be shared with third parties contracted from time to time by the YLC to assess financial responsibility. For further information, contact the Director, Financial and Information Manager at (867) 667-5245, toll free within Yukon 1-800-661-0408 ext. 5245 or in person at 9031 Quartz Road, Whitehorse YT, Y1A 4P9.*

PI is also collected in person, via email and over the phone from applicants, licensees, permit holders and complainants and then entered into LIPS by YLC Employees. It is a legal requirement under the ATIPP Act that the YLC representative provides the collection notice to the client before collecting personal information. Additionally, a notification poster could be posted in a prominent place at the YLC office front counters where members of the public enter.

Additionally, PI is collected by YLC Inspectors in the field when conducting inspections and enforcement activities. These activities are investigations or proceedings that could lead to a penalty or punishment, and occur for the purpose of requiring or enforcing, the *Liquor Act* or *Cannabis Control and Regulation Act*. As a result, this collection of PI falls under the definition of law enforcement in ATIPP and the requirement to provide notice under s. 30(2) does not apply.

#### 3.2.2 Identify Privacy Risks/Security Threats regarding Identifying Purpose

Risk	Description of Privacy Risk / Threat
2-1	Individuals may be unaware of the authority and purpose for collection of PI, or who to contact to address their questions.

	<p><b>Recommended mitigations:</b></p> <ul style="list-style-type: none"> <li>• Post collection notice on LIPS system where individuals set up their profile and submit their PI.</li> <li>• Provide training to YLC employees that assist individuals with license and permit applications about the importance of emphasising the collection authority and purpose and have them verbally inform clients they are assisting.</li> <li>• Display a notification poster at YLC office front counters where clients can easily view the collection notice</li> <li>• Ensure legal authority is clearly stated in all collection notices printed on forms.</li> </ul>
<b>2-2</b>	<p><b>YLC Inspectors may collect information unrelated to inspections and enforcement activities without providing a collection notice to individuals.</b></p> <p><b>Recommended mitigations:</b></p> <ul style="list-style-type: none"> <li>• Provide training to YLC Inspectors about the importance of determining if information is collected for law enforcement purposes and emphasize that a collection notice must be verbally provided if information collected falls outside the definition of law enforcement.</li> </ul>

### 3.3 Consent (PIA manual reference: 5.5.3 Consent)

#### 3.3.1 Is consent being utilized as an authority to collect, use and/or disclose personal information?

Consent is not being used as an authority to collect, use or disclose PI.

#### 3.3.2 Identify Privacy Risks/Security Threats regarding Consent

<b>Risk</b>	<b>Description of Privacy Risk / Threat</b>
<b>3-1</b>	<b>There are no identified risks or threats regarding Consent.</b>

### 3.4 Collection of Personal Information (PIA manual reference: 5.5.4 Limiting collection)

#### 3.4.1 Describe how personal information is collected directly from individuals.

PI is collected directly in the following ways:

1. Individuals create an account and enter information directly into the LIPS system.
2. Individuals provide information to YLC employees, who enter the information into the LIPS system.



### 3.4.2 Describe how personal information is collected indirectly from individuals.

PI is not routinely collected indirectly from individuals. However, s. 27(7) of the *Cannabis Control and Regulation Act* gives the power to the President of the YLC to, for the purposes of informing the Cannabis Board's consideration of an application, "arrange for an investigation that the president considers necessary for those purposes to be carried out". Section 27(8) further states that section 30 of ATIPP, which requires direct collection, does not apply to personal information collected in such an investigation.

The Liquor Act s. 25(2) also allows for the president or board, when considering an application to "cause to be made an inspection of the premises and any other investigation the president or the board thinks necessary." This potential indirect collection is allowable under ATIPP s. 30(1)(a)(iii) as another method authorized by an Act of Parliament or of the Legislature.

It is possible that an investigation conducted in accordance with the above sections will result in the indirect collection of PI regarding an applicant, which would then be uploaded into LIPS. The type of information collected because of the investigation will be dependant on the individual applicant, it may be financial information, leased property and landlord information, details regarding previous liquor or cannabis businesses or licenses.

### 3.4.3 Has the program conducted a review of the personal information collected to ensure only the minimum necessary is being collected?

LIPS PI collection screens are attached in Appendix 8. However, LIPS will be replacing the paper forms currently used by YLC for applications, assessment, enforcement and inspection. Through the development of this PIA, these forms were reviewed. Through this review process, it was determined that the information collected by YLC is done so in accordance with the relevant legislation, either the *Liquor Act* and Regulations or the *Cannabis Control and Regulation Act* and Regulation, which set out specific requirements for licencing, permitting, applications, enforcement and inspection.

It would be prudent to implement a process whereby PI collection is reviewed on a regular basis, by the Director, Regulatory Services, to assess the necessity of personal information collected. As acts and regulations do not change frequently, the review may only be necessary once every two or three years or as required when legislation changes.

### 3.4.4 Identify Privacy Risks/Security Threats regarding Collection

Risk	Description of Privacy Risk / Threat
4-1	<p><b>PI is collected that is not necessary for carrying out the program services.</b></p> <p><i>Recommended Mitigations:</i></p> <ul style="list-style-type: none"> <li>Conduct a formal review of LIPS as an established process and on a practical schedule to ensure only the minimum PI necessary is collected to carry out the program services. Document this process and schedule and assign accountability.</li> </ul>

### 3.5 **Use, Disclosure and Retention of Personal Information (PIA manual reference: 5.5.5 Limiting use, disclosure, and retention)**

#### 3.5.1 **Does your project use personal information to make decisions that directly affect(s) an individual(s)?**

All PI in LIPS could be used to make a decision directly affecting an individual, including financial, employment, personal history and criminal record information. If an application for a license or permit comes from an individual, the decision to approve or deny the application will affect that individual's ability to hold an event or start a business.

The use of LIPS information for inspection and enforcement activities of YLC Inspectors can also affect an individual, as the suspension of a license, imposition of monetary or other penalties or seizure of goods as a result of an infraction can temporarily or permanently shut down an event or business.

All personal information collected is retained for longer than one year. Retention and disposition scheduling is discussed in section 3.5.5 of this PIA.

#### 3.5.2 **What secondary uses or disclosures are contemplated for the personal information collected?**

PI is not used for secondary uses or disclosures.

#### 3.5.3 **Describe how personal information is used for evaluation or planning purposes.**

PI will not be disclosed for evaluation or planning purposes.

#### 3.5.4 **Does the project disclose personal information for research or statistical purposes? If yes, please explain and attach the research agreement.**

PI will not be disclosed for research or statistical information.

#### 3.5.5 **Has a Records Retention and Disposition Schedule been completed?**

A records retention and disposition schedule has been developed for the records created by YLC regarding liquor purchase, distribution and sale. It is included in Appendix 6. This schedule has not been implemented within YLC.

Due to the recent enactment of the *Cannabis Control and Regulation Act*, YLC has not created a records retention schedule for the records related to cannabis purchase, distribution and sale.

There is currently no process for managing the retention and secure destruction of electronic records. It is recommended that the current records schedule will be applied to electronic records within YLC and LIPS specifically. The YLC Privacy Officer will be responsible for the creation and implementation of the full records schedule. The LIPS vendor has indicated that the system contains the ability to link records schedules to information to support the records retention and destruction process.



### 3.5.6 Identify Privacy Risks/Security Threats regarding Use, Disclosure, Retention

Risk	Description of Privacy Risk / Threat
5-1	<p><b>Lack of records retention schedule for some paper and all electronic records may expose PI to unauthorized use or disclosure.</b></p> <p><i>Recommended mitigations:</i></p> <ul style="list-style-type: none"> <li>• Review current liquor records schedule to ensure it is up to date and comprehensive.</li> <li>• Establish a records schedule for cannabis related records, consider combining with the liquor records schedule.</li> <li>• Implement both the liquor and cannabis records retention schedules.</li> <li>• Establish a clear plan and schedule to deliver training to employees on the records schedules and expectations of employees in managing documents in relation to these schedules.</li> <li>• Document a formal process for executing the records retention schedule and assign responsibilities within YLC to ensure records schedules are being adhered to. This will also facilitate access to information contained in documents when required.</li> </ul>

## 3.6 Accuracy of Personal Information (PIA manual reference: 5.5.6 Accuracy)

### 3.6.1 Describe the steps taken to ensure that the personal information is accurate, complete and up-to-date.

Various steps are taken to ensure information collected by YLC is accurate. The accuracy of PI is important because this information influences what licenses and permits an individual is eligible for under the *Liquor Act* and *Cannabis Control and Regulation Act*. The *Liquor Act* and *Cannabis Control and Regulation Act* both have built-in requirements to confirm accuracy of the PI provided. Accurate information is also important for proper inspections and enforcement under the above acts and their regulations. For example, when completing an application for a Cannabis or Liquor License:

- License applicants are required to swear an Affidavit indicating that the facts and information within the application are true and correct.
- The Personal History Report and Business History Report, which collect the most detailed PI includes a statutory declaration declaring that the contents are true and correct.
- Criminal History is verified by assessing the individual's Criminal Record Check for Cannabis License applications. The provision of the Criminal Record Check is in accordance with the *Cannabis Control and Regulation Act* s. 26(2) *Cannabis Licensing Regulation* ss. 7(a), 10
- Financial information contained in the Cannabis license application must be supported with documentation such as leases, loans and bank account information in accordance with the *Cannabis Control and Regulation Act* s. 26(2), 39.
- The above records will not be retained beyond the minimum retention requirements.

These steps to ensure accurate information will be carried over into LIPS as it is implemented.

Manual entry of information both by applicants, licensees, permit holders and YLC employees carries the risk of data entry errors. To mitigate this risk, it is recommended that a formal and scheduled process for carrying out data validation steps is implemented along with LIPS.

A fulsome audit capability, which has been identified as a priority by YLC and verified with the system vendor, including read/write/edit/view only of fields, including the user ID, date and time for each event.

The current system of MS access and paper forms has not been kept up to date. Correspondence to license and permit holders is often returned due to an incorrect address on file in the system. The onus is placed on the applicants, licensees, and permit holders to keep their information up to date with YLC. This is one of the reasons for which an electronic system is being implemented for collection of information at YLC.

### **3.6.2 Describe how an individual's information will be updated or corrected.**

Individuals will be able to access their personal information via their LIPS account. The individual will be able to review and update their information.

Individuals may also contact YLC directly to update their information in LIPS. It is recommended that upon verification of identity and proof supporting the change (such as documentation to support a change in Directors of a business), YLC will update the information.



### 3.6.3 Identify Privacy Risks/Security Threats regarding Accuracy

Risk	Description of Privacy Risk / Threat
6-1	<p><b>Data accuracy errors in PI impact applicants, licensees and permit holders.</b></p> <p><i>Current mitigations:</i></p> <ul style="list-style-type: none"> <li>• Supporting documentation is required as verification for some of the PI collected.</li> <li>• Applicants, licensees and permit holders will be able to access and update their PI in LIPS.</li> </ul> <p><i>Recommended mitigations:</i></p> <ul style="list-style-type: none"> <li>• Ensure a comprehensive audit capability is built into LIPS, including audit logs of changes to data in records to support data accuracy for manually inputted data.</li> <li>• Develop a formal and scheduled process for carrying out data validation and accuracy checks. Document these quality assurance and control processes.</li> </ul>
6-2	<p><b>Data accuracy errors in PI due to applicants, licensees and permit holders providing false information.</b></p> <p><i>Current mitigations:</i></p> <ul style="list-style-type: none"> <li>• Applicants must swear an affidavit and undertaking verifying the accuracy of the information in their Application and Personal or Business History Report.</li> <li>• Supporting documentation is required to verify criminal record and financial information.</li> </ul>

## 3.7 Safeguarding Personal Information (PIA manual reference: 5.5.7 Safeguards)

### 3.7.1 Has a Security Threat Risk Assessment (STRA) been completed?

A STRA was completed and submitted to corporate security officer, in August 2020 using a third party vendor. The corporate security officer has approved the go live based on the STRA report.

### 3.7.2 Describe how users are authenticated before accessing the information.

LIPS will be contained on the YG servers. YLC employee users will have access via Active Directory groups.

Applicants, licensees and permit holders will access the system through a customer portal in the <sup>72(1)</sup> ~~ALC~~ <sup>ALC</sup>. The exact authentication method to be used has not been finalized. It may be an individual log in and password or may be integrated with the MyYukon ID system, which will be implemented later in 2020.

### 3.7.3 Describe how access to the information is controlled.

Access to the information will be regulated and controlled using role-based assignments within the AD groups. It is anticipated that there will be differing levels of access to information for liquor inspectors (3 users), administrators (2 users) and the YLC Director (1 user).

Employee inclusion in YNet AD groups relies on managers to submit tickets to the ICT service desk when employees transfer or change roles. Due to the very small number of YLC employees and system users, there is a low risk of this step being overlooked when employees change roles, transfer, leave or join YG.

There will also be system support access and applicant/licensee access to the system.

An access control policy will be developed as the project progresses, including role-based access information. A user agreement and acceptable use policy will also be developed.

#### **3.7.4 Describe how you will audit or track who accessed information.**

There will be a full audit capability for the system, including read/write/edit/view only of fields, including the user ID, date and time for each event.

It is important to address the risk of inappropriate use of PI with auditing functionality and a documented process and delegated accountability for reviewing the audit reports to effectively monitor employees use of the system and the PI contained therein.

YLC will work with the project steering committee and vendor to create appropriate audit reports.

YLC will also create policies and procedures regarding review of audit trails and reports. Employees will be provided with the policies and procedures regarding review of audit trails and reports and made aware of consequences for unauthorized use within the user agreement and acceptable use policy.

Effective security and protection of PI is best achieved with a combination of access controls to limit the employees with access to PI to only those that require the access to carry out their role in delivering program services, combined with an auditing process.

#### **3.7.5 Describe where and how information is transmitted.**

LIPS does not transmit data outside of the YNet environment; however, information will be transmitted into the system regarding field enforcement and inspection activities when triggered by the app user, via a sync action.

The transmission process will be defined once the mobile system solution, "Inspector App" is developed. It will be very tightly integrated, and the information will get transferred from mobile server to application server automatically and securely through 72(1)(b)(vi)

YLC will seek appropriate technical advice to identify and address security risks. This will include securing 72(1)(b)(vi)

#### **3.7.6 Describe where and how information is stored.**

The LIPS server will be located within the YG data center which is managed by ICT, HPW. There is no transmission of data or storage outside of the secure YG infrastructure. Security measures in place include:

- 72(1)(b)(vi)

- 72(1)(b)(vi)
- Any computer connected to YNet, whether physical or virtual, can be used to access the internal web-based applications that connect to the system's database. Data is not stored on workstations or laptops.
- Any computer connected to the internet can be used to access the web-based, publicly accessible applications (the Public Site). Data is not stored on these computers.

There will be also be a mobile component of the system to support field data gathering for inspections and enforcement. The project steering committee has determined that the Calytera "Inspector App" will be used.

The mobile "Inspector App" is very tightly integrated, and the information will get transferred from mobile server to application server automatically and securely using SSL.

### **3.7.7 Describe the physical security measures taken to protect the personal information.**

The Records Management (GAM 2.14) and Security of Public Records (GAM 2.15) policies (Appendix 4) provide guidance and standards for all YG Departments in the secure handling of records.

The YLC office is open to the public, with a front counter separating the office work area from the public area. The front counter monitored during business hours to ensure no unauthorized access to the office work areas.

Inspectors are located in one closed-off area of the office. An individual would need to enter the office and then the Inspector's cubicle in order to see any work material or monitors. Members of the public do not meet with Inspectors in their office. A meeting room is used, and visitors are escorted in and out of the private areas. The entire building is locked after hours.

It was identified through this PIA process that the YLC support clerk computers were visible from the bathroom, hallway and boardroom where public meetings are held. As a result, privacy screens have been put in place to obscure the view of these monitors.

Data on LIPS will be contained and backed up via the ICT HPW servers. Security measures in place include:

- 72(1)(b)(vi)
- 
- Any computer connected to YNet, whether physical or virtual, can be used to access the internal web-based applications that connect to the system's database. However, access to web-based application does not translate to database access. Database access is securely accessible only to selected roles with YG. Data is not stored on workstations or laptops.
- Any computer connected to the internet can be used to access the web-based, publicly accessible applications (the Public Site). Data is not stored on these computers.



### 3.7.8 Describe the technical security measures taken to protect the personal information.

YG has a variety of mechanisms to secure the information system infrastructure and networks within which systems such as LIPS are accessed. The following describes these mechanisms:

- 72(1)(b)(vi)

- 
- 
- 
- 

Technical security measures of the LIPS system include the following:

- 72(1)(b)(vi)

- 
- 
- 
- 
- 
- 

### 3.7.9 Describe the administrative security measures taken to protect the personal information.

IT security policies (Appendix 7) provide YG Departments and all YG employees policy and guidelines relating to safeguarding information assets and the information contained within. The expectation is that Departments develop department specific strategies for physical, technical and administrative safeguards in alignment with the enterprise wide policies and train employees on these practices and expectations.

The YG Computer Use Guidelines document (Appendix 7) is included in the onboarding package for employees and outlines appropriate use of computer resources including standards employees are expected to comply with to protect the security, confidentiality and performance of the network infrastructure and information. Employees are required to set a strong password for access to YNet. A YNet Password Policy (Appendix 7) provides guidelines to users on how to effectively create and manage passwords. The standard is a minimum of 72(1)(b)(vi)

## 72(1)(b)(vi)

In the event of an employee termination, YNet access is terminated immediately and keys, access cards and fobs are collected from the employee.

A Privacy Management Framework and GAM policies (Appendix 4) provide YG Departments and all YG employees policy and guidelines relating to privacy management. The expectation is that Departments develop department specific strategies for compliance with the enterprise wide privacy management policies and legislation and train employees on these practices and expectations.

Employees are required to sign an Oath of Confidentiality. This must be signed and verbally read in front of a Notary Public before an employee starts their employment. There is an online privacy course that employees take at the start of employment during onboarding. This course provides a general overview of what is considered personal information, why it is important to maintain privacy, and the proper handling of personal information including responsibility to the public. A quiz at the end tests the user on their knowledge.

Potential employees who will have access to personal information are adequately and appropriately screened, including criminal record checks for Licensing and Compliance officers.

After initial hire, there is limited employee training within YLC to ensure employees maintain their awareness of privacy legislation and how this applies to their day to day handling of PI. The YG Employee Privacy Training Policy

([http://www.atipp.gov.yk.ca/pdf/Employee\\_Privacy\\_Training\\_Operational\\_policy.pdf](http://www.atipp.gov.yk.ca/pdf/Employee_Privacy_Training_Operational_policy.pdf)) outlines Department responsibilities regarding ongoing training.

While the YG Privacy Management Framework provides a comprehensive set of policies and guidelines, the application of these standards must be formally developed within YLC.

Once the new ATIPP Act is active HPW will be launching training modules. The licensing team (as enforcement officers) are well versed in the restrictions around sharing of private information.

### 3.7.10 Identify Privacy Risks/Security Threats regarding Safeguards

Risk	Description of Privacy Risk / Threat
7-1	<p><b>Unauthorized, or inappropriate collection, use or disclosure due to system threats and limitations.</b></p> <p><i>Recommended mitigations:</i></p> <ul style="list-style-type: none"> <li>Ensure a STRA is conducted on LIPS to fully understand the security strengths, threats and risks of the system.</li> </ul>
7-2	<p><b>Unauthorized access to information by authorized users.</b></p> <p>YG employees, service providers or vendors access personal information outside of their functional requirements or in violation of policy.</p> <p><i>Current mitigations:</i></p> <ul style="list-style-type: none"> <li>Vendor agreements outline the vendor responsibilities and expectations relating to the safe handling of YLC documents which include PI.</li> </ul>



	<p><i>Recommended mitigations:</i></p> <ul style="list-style-type: none"> <li>• Develop and document a clear process for maintaining accurate AD Groups through active management of employee changes.</li> <li>• Identify employee roles that require access to PI in order to carry out their work functions and document this for reference by IT employee that manage access. Develop a clear process when access is requested for a role that does not require access to PI, such as escalating the request to the Privacy Officer for review and sign off.</li> <li>• Enter into Information Manager Service Agreements with contracted service providers and ICT that outline the services to be provided and the expectations relating to privacy standards and compliance (including training and compliance enforcement of company representatives performing the work)</li> <li>• Ensure LIPS has complete audit logging and reporting capabilities. Implement a documented process for reviewing audit reports to monitor employee access of PI and notify employees.</li> <li>• Put in place a user agreement and acceptable use policy to ensure employees are aware of their responsibilities, consequences of unauthorized use and audit log review policies.</li> </ul>
7-3	<p><b>Unauthorized use or accidental disclosure of data due to lack of training.</b></p> <p><i>Current mitigations:</i></p> <ul style="list-style-type: none"> <li>• Policies forming the YG Privacy Management Framework (Appendix 4) provide direction and a central standard for departments in applying their information privacy and security practices</li> </ul> <p><i>Recommended mitigations:</i></p> <ul style="list-style-type: none"> <li>• Create a YLC specific privacy program to expand current employee training development.</li> <li>• Partner with HPW, ICT to include training on securing information within systems through best practices. Align guidelines with the YG Information Security policies.</li> <li>• Develop a schedule for rolling out training to all employee groups. Establish a process to require employee training on a regular basis (recommend annually) to support ongoing awareness.</li> <li>• Put in place a user agreement and acceptable use policy to ensure employees are aware of their responsibilities, consequences of unauthorized use and audit log review policies.</li> </ul>

### 3.8 Openness (PIA manual reference: 5.5.8 Openness)

#### 3.8.1 Describe how policies and procedures related to the management of personal information are made available to the public.

The Yukon government ATIPP office posts information relating to the privacy program on the website at the following link: <http://www.atipp.gov.yk.ca/privacy-concern.html>

This includes information about how the Yukon government manages privacy, with links to policies and tools that form part of the Privacy Management Policy. In addition, the site outlines how to submit a complaint, and lists the Privacy Officers and their contact information for each the department. There is

also a link to the Information and Privacy Commissioner website and the contact information for the Commissioner's office.

The ATIPP office publicly posts summaries of closed access to information requests on the website, in an effort to increase public awareness of current issues. Details of requests for personal information remain confidential.

Collection notices provide the contact information of the Privacy Officer for questions.

### 3.8.2 **Identify Privacy Risks/Security Threats regarding Openness**

<b>Risk</b>	<b>Description of Privacy Risk / Threat</b>
<b>8-1</b>	<b>There are no identified risks or threats regarding Openness.</b>

## 3.9 **Individual Access to Personal Information (PIA manual reference: 5.5.9 Individual access)**

### 3.9.1 **Describe how access to the personal information will be facilitated.**

Access to personal information is handled by each department that manages programs resulting in the collection of personal information.

Each designated public body has a ATIPP Coordinator who is responsible for responding to requests. The ATIPP Coordinator works with the applicant to:

- Clarify the request and prepare an estimate of costs, if necessary
- Conduct a search for the relevant records within the public body
- Review the records to see if any exceptions are applicable
- Ensure a response is provided within the time limits outlined in the Act.

For formal access requests for personal information collected by the YLC, individuals may contact the the ATIPP Office. Individuals may also contact YLC directly for informal information requests. Notices providing the contact information for questions related to personal information are outlined in section 3.2.1 of this PIA. If an individual is unsure, they can contact any YLC employee and they will be directed to the Privacy Officer.

The Privacy Officer will advise the individual of the process and will facilitate access according to the established procedures outlined above

Individuals may access their personal information via LIPS once it is operational. Here the individual can review their profile and update their information.

### 3.9.2 **Has a Personal Information Map been completed for this project?**

Yes, a PI map has been completed and is included in Appendix 2. This PI Map outlines the PI collected into LIPS.



### 3.9.3 Identify Privacy Risks/Security Threats regarding Access/Correction

<b>Risk</b>	<b>Description of Privacy Risk / Threat</b>
<b>9-1</b>	<b>There are no identified risks or threats regarding Access/Correction.</b>

### 3.10 Challenging Compliance (PIA manual reference: 5.5.10 Challenging compliance)

#### 3.10.1 Are policies and procedures related to the management of personal information available to the public?

Yes. The Yukon government ATIPP office posts information and policies relating to the privacy program on the website at the following link: <https://yukon.ca/en/privacy-protection>. This website is accessible to the public. These policies and procedures apply to all YG Departments.

Individuals can also contact any YLC employee and will be directed to the ATIPP Coordinator who can advise the individual on where to access policies and answer questions the individual may have regarding how their personal information is managed.

#### 3.10.2 Are staff aware and procedures in place to respond to a privacy complaint?

Yes. The process for employees and citizens to challenge compliance is outlined on the Yukon government ATIPP website: <https://yukon.ca/en/privacy-protection>. This website is accessible to the public.

The YLC ATIPP Coordinator and Privacy Officer are available to respond to complaints and expected to follow the process set out by the ATIPP Office. If an individual is not satisfied with the response, they can contact the Information and Privacy Commissioner to make a formal complaint. Contact information is available on the Yukon Government ATIPP website.

In addition, there is a clear process for dealing with a privacy breach, outlined in the Privacy Breach Policy and Privacy Breach Reporting Protocol:

<https://yukon.ca/en/privacy-breach-operational-policy>

<https://yukon.ca/en/atipp-coordinators>

These policies and procedures apply to all YG Departments.

#### 3.10.3 Identify Privacy Risks/Security Threats regarding Challenging Compliance

<b>Risk</b>	<b>Description of Privacy Risk / Threat</b>
<b>10-1</b>	<b>There are no identified risks or threats regarding challenging compliance.</b>

## 4 OVERALL RISK AND MITIGATION

### 4.1 Risk Mitigation Table (PIA manual reference: 6.0 Assessing risk and mitigation strategies)

A Risk Mitigation table follows providing a summary of the threats. The risk level is identified based on the likelihood of the threat occurring and the impact of that threat (potential harm) if it did occur. This risk level is determined using the Risk Reference Table below and takes into consideration the current mitigation steps in place. The mitigation would be applied within six months of implementation on best effort basis.

Impact	Risk Reference Table		
	Medium	High	Very High
	Low	Medium	High
	Very Low	Low	Medium
Likelihood	Low	Medium	High



#	Privacy Risk / Threat	Like- lihood	Impact	Risk Level	Mitigation Strategy	Accountability	Risk Level After Additional Recommended Mitigations
1-1	<b>Lack of accountability of a contracted service provider.</b>  There are no information manager service agreements in place with third party providers that adequately address information privacy and security.	M	M	M	<i>Recommended mitigations:</i> <ul style="list-style-type: none"> <li>Enter into an Information Manager Service Agreement with service providers to outline the expectations and standards of service providers regarding privacy, security and confidentiality of information. Recommended template included in Appendix 5.</li> </ul>	YLC	L
1-2	<b>Insufficient accountability and clarity in system support services.</b>  Security of information on the YLC systems relies on broader YG system infrastructure security. Lack of clarity in accountability of support services may allow security risks.	L	M	L	<i>Recommended mitigations:</i> <ul style="list-style-type: none"> <li>Ensure Development and implementation of Application Support Agreement between HPW, ICT and YLC to formalize and clarify the support services provided by ICT, and shared responsibilities.</li> </ul>	YLC	VL
2-1	<b>Individuals may be unaware of the authority and purpose for collection of PI, or who to contact to address their questions.</b>	M	L	L	<i>Recommended mitigations:</i> <ul style="list-style-type: none"> <li>Post collection notice on LIPS system where individuals set up their profile and submit their PI.</li> <li>Provide training to YLC employees that assist individuals with license and permit applications about the importance of emphasising the collection authority and purpose and have them verbally inform clients they are assisting.</li> <li>Display a notification poster at YLC office front counters where clients can easily view the collection notice</li> <li>Ensure legal authority is clearly stated in all collection notices printed on forms.</li> </ul>	YLC	VL

#	Privacy Risk / Threat	Like- lihood	Impact	Risk Level	Mitigation Strategy	Accountability	Risk Level After Additional Recommended Mitigations
2-2	YLC Inspectors may collect information unrelated to inspections and enforcement activities without providing a collection notice to individuals.	M	L	L	<i>Recommended mitigations:</i> <ul style="list-style-type: none"> <li>Provide training to YLC Inspectors about the importance of determining if information is collected for law enforcement purposes and emphasize that a collection notice must be verbally provided if information collected falls outside the definition of law enforcement.</li> </ul>	YLC	VL
4-1	PI is collected that is not necessary for carrying out the program services.	L	M	L	<i>Recommended mitigation:</i> <ul style="list-style-type: none"> <li>Conduct a formal review of LIPS as an established process and on a practical schedule to ensure only the minimum PI necessary is collected to carry out the program services. Document this process and schedule and assign accountability.</li> </ul>	YLC	VL
5-1	Lack of records retention schedule may expose PI to unauthorized use or disclosure.	H	H	H	<i>Current mitigations:</i> <ul style="list-style-type: none"> <li>There is no current electronic retention schedule, will need to determine how inactive records can be archived</li> </ul> <i>Recommended mitigations:</i> <ul style="list-style-type: none"> <li>Review current liquor records schedule to ensure it is up to date and comprehensive.</li> <li>Establish a records schedule for cannabis related records.</li> <li>Implement both the liquor and cannabis records retention schedules.</li> <li>Establish a clear plan and schedule to deliver training to employees on the records schedules and expectations of employees in managing documents in relation to these schedules.</li> <li>Document a formal process for executing the records retention schedule and assign responsibilities within YLC to ensure records</li> </ul>	YLC	L



#	Privacy Risk / Threat	Like- lihood	Impact	Risk Level	Mitigation Strategy	Accountability	Risk Level After Additional Recommended Mitigations
					schedules are being adhered to. This will also facilitate access to information contained in documents when required.		
6-1	Data accuracy errors in PI impact applicants, licensees and permit holders.	L	H	M	<p><i>Current mitigations:</i></p> <ul style="list-style-type: none"> <li>Supporting documentation is required as verification for some of the PI collected.</li> <li>Applicants, licensees and permit holders will be able to access and update their PI in LIPS.</li> </ul> <p><i>Recommended mitigations:</i></p> <ul style="list-style-type: none"> <li>Ensure a comprehensive audit capability is built into LIPS, including audit logs of changes to data in records to support data accuracy for manually inputted data.</li> <li>Develop a formal and scheduled process for carrying out data validation and accuracy checks. Document these quality assurance and control processes.</li> </ul>	YLC	L
6-2	Data accuracy errors in PI due to applicants, licensees and permit holders providing false information.	L	M	H	<p><i>Current mitigations:</i></p> <ul style="list-style-type: none"> <li>Applicants must swear an affidavit and undertaking verifying the accuracy of the information in their Application and Personal or Business History Report.</li> <li>Supporting documentation is required to verify criminal record and financial information.</li> </ul>	YLC	L
7-1	Unauthorized, or inappropriate collection, use or disclosure due to system threats and limitations.	H	H	H	<p><i>Recommended mitigations:</i></p> <ul style="list-style-type: none"> <li>Ensure a STRA is conducted on LIPS to fully understand the security strengths, threats and risks of the system.</li> </ul>	YLC	L

#	Privacy Risk / Threat	Like- lihood	Impact	Risk Level	Mitigation Strategy	Accountability	Risk Level After Additional Recommended Mitigations
7-2	<p>Unauthorized access to information by authorized users.</p> <p>YG employees, service providers or vendors access personal information outside of their functional requirements or in violation of policy.</p>	L	H	M	<p><i>Current mitigations:</i></p> <ul style="list-style-type: none"> <li>Vendor agreements outline the vendor responsibilities and expectations relating to the safe handling of YLC documents which include PI.</li> </ul> <p><i>Recommended mitigations:</i></p> <ul style="list-style-type: none"> <li>Develop and document a clear process for maintaining accurate AD Groups through active management of employee changes</li> <li>Identify employee roles that require access to PI in order to carry out their work functions and document this for reference by IT employee that manage access. Develop a clear process when access is requested for a role that does not require access to PI, such as escalating the request to the Privacy Officer for review and sign off.</li> <li>Enter into Information Manager Service Agreements with contracted service providers that outline the services to be provided and the expectations relating to privacy standards and compliance (including training and compliance enforcement of company representatives performing the work)</li> <li>Ensure LIPS has complete audit logging and reporting capabilities. Implement a documented process for reviewing audit reports to monitor employee access of PI.</li> </ul>	YLC	L
7-3	<p>Unauthorized use or accidental disclosure of data due to lack of training.</p>	M	M	M	<p><i>Current mitigations:</i></p> <ul style="list-style-type: none"> <li>Policies forming the YG Privacy Management Framework (Appendix 4) provide direction and a central standard for departments in applying their information privacy and security practices</li> </ul> <p><i>Recommended mitigations:</i></p>	YLC	L

#	Privacy Risk / Threat	Like- lihood	Impact	Risk Level	Mitigation Strategy	Accountability	Risk Level After Additional Recommended Mitigations
					<ul style="list-style-type: none"> <li>• Create a YLC specific privacy program to expand current employee training development. Align training with YG Privacy Management Framework and leverage training materials developed by the ATIPP office (HPW) for consistency.</li> <li>• Partner with HPW, ICT to include training on securing information within systems through best practices. Align guidelines with the YG Information Security policies.</li> <li>• Develop a schedule for rolling out training to all employee groups. Establish a process to require employee training on a regular basis (recommend annually) to support ongoing awareness.</li> </ul>		



## 5 COMMENTS FROM REVIEWER:

First draft comments provided by the ATIPP Office May 28, 2020

Second draft comments provided by the ATIPP Office, July 10, 2020.



## 6 SIGNATORIES AND APPROVAL

This third draft was done by PM on Dec 1<sup>st</sup> 2020 after consulting YLC and evaluating various key risks identified by ATIPP.

The following recommended mitigation have already been applied to mitigate the risks further

Risk ID	Risk Mitigation	Remarks
1-2	Application Support Agreement between ICT and YLC	Agreement available
2-1	Collection notice available and staff training planned	Notice drafted
7-1	A STRA has been completed successfully	Completed

Management understands some risks cannot be fully eliminated but accept that implementation of recommendations will mitigate the risk, and will endeavor to implement in a timely manner.

DM or Delegate		<u>2021-02-03</u>
	Name, Position	Date
Information Owner		<u>FEB 02 2021</u>
	Name, Position	Date
ATIPP Office Reviewer	_____	_____
	Name, Position	Date

To complete the process, a final copy of this PIA (with all applicable signatures and attachments) must be provided to ATIPP office for its records.

## Appendix List

### Appendix 1: Detailed System Requirements Sheet

*Includes:*

- Detailed\_system\_requirements\_sheet

### Appendix 2: Personal Information Map

*Includes:*

- HPW-PIA-2020-02 Appendix A Personal Information Map - R120200825

### Appendix 3: Sample of Liquor and Cannabis Applications and Forms

*Includes:*

- Inspection Report – Cannabis
- Licensed Premises Check - Cannabis

*Links:*

- Cannabis Retail License Application Form: Sole Proprietor:  
<https://yukon.ca/sites/yukon.ca/files/ylc/ylc-cannabis-retail-sole-proprietor-package.pdf>
- Cannabis Retail License Application Form: Partnership:  
[http://www.ylc.yk.ca/pdf/CannabisRetail\\_Partnership\\_Package.pdf](http://www.ylc.yk.ca/pdf/CannabisRetail_Partnership_Package.pdf)
- Cannabis Retail License Application Form: Corporation – Private:  
[http://www.ylc.yk.ca/pdf/CannabisRetail\\_CorpPrivate\\_Package.pdf](http://www.ylc.yk.ca/pdf/CannabisRetail_CorpPrivate_Package.pdf)
- Cannabis Retail License Application Form: Corporation – Public:  
[http://www.ylc.yk.ca/pdf/CannabisRetail\\_CorpPublic\\_Package.pdf](http://www.ylc.yk.ca/pdf/CannabisRetail_CorpPublic_Package.pdf)
- Liquor License Application Form: [http://www.gov.yk.ca/forms/forms/5500/yg5502\\_e.pdf](http://www.gov.yk.ca/forms/forms/5500/yg5502_e.pdf)
- Liquor Reception Permit Application Form: <https://yukon.ca/sites/yukon.ca/files/ylc/ylc-forms/yg781-reception-permit.pdf>
- Liquor Special Occasion Permit Application Form: <https://yukon.ca/sites/yukon.ca/files/ylc/ylc-forms/yg780-special-occasion-permit.pdf>

### Appendix 4: Privacy Management Framework & GAM Policies

*Includes:*

- Human Resources Policies (GAM 3.16)
- Records Management (GAM 2.14)
- Security of Public Records (GAM 2.15)
- GAM Policy 2.24 ATIPP Roles and Responsibilities
- Privacy Management Guidelines
- ATIPP Act Guide for Managers
- Third Party Service Providers and Privacy
- LIPS Collection Notice

*Links:*

- Privacy Management Policy (GAM 2.27): <http://www.atipp.gov.yk.ca/pdf/Privacy-Management-Policy-GAM-FINAL.pdf>
- Collection of Personal Information Policy: [http://www.atipp.gov.yk.ca/pdf/Collection\\_of\\_Personal\\_Information\\_Policy.pdf](http://www.atipp.gov.yk.ca/pdf/Collection_of_Personal_Information_Policy.pdf)
- Use of Personal Information Policy: [http://www.atipp.gov.yk.ca/pdf/Use\\_of\\_Personal\\_Information\\_Policy.pdf](http://www.atipp.gov.yk.ca/pdf/Use_of_Personal_Information_Policy.pdf)
- Disclosure of Personal Information Policy: [http://www.atipp.gov.yk.ca/pdf/Disclosure\\_of\\_Personal\\_Information\\_Policy.pdf](http://www.atipp.gov.yk.ca/pdf/Disclosure_of_Personal_Information_Policy.pdf)
- Employee Privacy Training Operational Policy: [http://www.atipp.gov.yk.ca/pdf/Employee\\_Privacy\\_Training\\_Operational\\_policy.pdf](http://www.atipp.gov.yk.ca/pdf/Employee_Privacy_Training_Operational_policy.pdf)
- PIA Operational Policy: [http://www.atipp.gov.yk.ca/pdf/PIA\\_Operational\\_policy.pdf](http://www.atipp.gov.yk.ca/pdf/PIA_Operational_policy.pdf)
- Privacy Breach Policy: [http://www.atipp.gov.yk.ca/pdf/Privacy\\_Breach\\_Operational\\_policy.pdf](http://www.atipp.gov.yk.ca/pdf/Privacy_Breach_Operational_policy.pdf)
- Privacy Breach Reporting Protocol: [http://www.atipp.gov.yk.ca/pdf/Privacy\\_Breach\\_Reporting\\_Protocol.pdf](http://www.atipp.gov.yk.ca/pdf/Privacy_Breach_Reporting_Protocol.pdf)
- Privacy Breach Reporting Form: [http://www.atipp.gov.yk.ca/pdf/Privacy\\_Breach\\_Reporting\\_Form.pdf](http://www.atipp.gov.yk.ca/pdf/Privacy_Breach_Reporting_Form.pdf)
- Guidance for Public Bodies on Accountable Privacy Management: <https://www.ombudsman.yk.ca/uploads/media/55f99c6eed395/Guidance%20Privacy%20Management%20-%20Revised%20Nov%202016.pdf?v1>

**Appendix 5: Information Manager Service Agreement template***Includes:*

- 2020 IT tech support agreement

**Appendix 6: Records Schedule**

- Licensing\_ComplianceSvcs\_BCS\_Final

**Appendix 7: IT Security Policies***Includes:*

- Information Technology Security Framework
- Guidance on Safeguarding Information Assets
- YG Computer Use Guidelines

**Appendix 8: LIPS PI collection screen***Includes:*

- LIPS PI Collection Screen - Profile
- LIPS PI Collection Screen - Stakeholders





# Privacy Impact Assessment (PIA) Cannabis eCommerce (Yukon Liquor Corp)

## Document Control and Reviews

### Document Control

Date	Author	Version	Change Reference
04-Sep-2018	S. Korobanik	0.1	Initial draft
10-Oct-2018	S.Korobanik	0.2	Revised for release of draft to IPC – removed comments
15-Oct-2018	L.Stewart	0.3	Edits; clarified return to YLC from Canada Post no pick up

### Reviews

Date	File Name / Version #	Reviewed by

#### 0.1 Policies, Forms and Reports (PIA Manual reference: 5.1 Collecting information and supporting documentation)

Parties Involved	Role

Policy Name	Hyperlink or Appendix number

Document Name	Hyperlink or Appendix number

Form Name	Hyperlink or Appendix number

Report Name	Purpose of Report	Audit Logs on Report (Y/N)

## 1 GENERAL

<b>Name of Public Body:</b>	<b>Yukon Liquor Corporation (YLC)</b>
<b>PIA Drafter:</b>	Shelly Korobanik, PrivacyWorks Consulting Inc.
<b>Email/Contact:</b>	<a href="mailto:shelly@privacyworks.ca">shelly@privacyworks.ca</a>
<b>Program Manager:</b>	Steve Cummings, Director of Operations
<b>Email/Contact:</b>	<a href="mailto:Steve.Cummings@gov.yk.ca">Steve.Cummings@gov.yk.ca</a>
<b>Date (YYYY-MM-DD)</b>	2018-10-03

### 1.1 Project Overview (PIA manual reference: 5.2 Documenting the project)

#### 1.1.1 Description of the Project (PIA manual reference: 5.2.1 Description of the project)

Effective October 17, 2018, the production, distribution, sale and possession of cannabis across Canada will be regulated in accordance with the new federal *Cannabis Act*. Federal, provincial and territorial governments share responsibility for the oversight of the new system, with provinces and territories held responsible for developing, implementing, maintaining and enforcing systems to oversee the distribution and sale of cannabis. Subsequently the Yukon Government (YG) has developed the *Cannabis Control and Regulation Act*<sup>1</sup> (CCRA) which designates the Yukon Liquor Corporation (YLC) as the distributor corporation<sup>2</sup>. Under Section 9(1)(a) of the CCRA, YLC is responsible for establishing warehouses and stores for the distribution of cannabis. As a result of this new legislation, in addition to its brick and mortar cannabis store to be operated in Whitehorse, YLC will also be implementing an e-commerce store (<https://cannabisyukonstore.ca>) to offer cannabis sales to Yukon customers over the age of 19. Information is publicly available on the YLC website at <http://www.ylc.yk.ca/cannabis.html>.

Drupal Commerce 2 (version 8), an Acro Media ecommerce solution was chosen by Highway and Public Works (HPW), Information, Communications and Technology (ICT) because ICT eServices has extensive experience building online services using Drupal, with vendors providing development, maintenance and support. Drupal uses MariaDB, which is an open source DB compatible with MySQL. ICT-eServices is responsible for the management of the Virtual Machines (VMs), their operating systems (OS), libraries, application and the Drupal system. This work is often conducted by a vendor, and for this initiative Acro Media will provide 90 days of support, after which Yellow Pencil has been contracted to provide their services. ICT-Technology Infrastructure and Operations (TIO) is responsible for the 72(1)(b)(vi)

**Commented [sk1]:** Susan – I cannot find anything in the CCRA that makes it mandatory for YLC to ensure cannabis is available across Yukon.....can you point me to where it is stated that YLC MUST do this.  
Shelley: it is not mandatory.

<sup>1</sup> Cannabis Control and Regulation Act – <http://www.gov.yk.ca/legislation/acts/ccore.pdf>

<sup>2</sup> Order-in-Counsel 2018/107 [http://www.gov.yk.ca/legislation/regs/oic2018\\_107.pdf](http://www.gov.yk.ca/legislation/regs/oic2018_107.pdf)



Drupal provides functionality for role-based access which will be implemented as follows:

Role	Access	Number of YLC Users	Number of ICT Users
Content Administrator	Edit/admin pages and related content only, e.g. menus - no access to personal information(PI)	2	1
Product Administrator	Edit/admin product catalogue only – no access to PI	4	1
Order Manager	Read orders – access to PI	0	1
Order Administrator	Read and modify orders - access to PI	2	0
User Administrator	Create and modify users – no access to PI	1	0
Administrator	Unlimited permissions – access to PI	0	1

There are two main source of logs for the eCommerce site as follows:

- the webserver, which logs only traffic (Figure 1), and 72(1)(b)(vi)

Figure 1 – Web server log example

- Drupal, which logs some business-level activity (Figure 2), but currently does not audit access to order information. Auditing for Drupal order information is being developed, but is not yet available for use for the version of Drupal (8) being used for this initiative.

**Commented [sk2]:** IPC comment 1 – require details

- Page 4: 'Auditing for access to order information' process must be explained further, analyzed, personal information (PI).

**Commented [sk3R2]:** No work has been done on this- Maintenance contract includes elective work. When site was built there was a audit component for a previous version of the software and hope was there would be an updated version – no loop back; no custom development; someone at Yukon has to ask??

Susan → as the YLC privacy officer can you follow up regarding getting auditing for Drupal in place and if YLC is not going to pursue this it will have to be noted with reasons in the PIA as a response to the IPC concern

;

SaaS model?

Details	
Home » Administration » Reports » Recent log messages	
Type	content
Date	Tuesday, October 2, 2018 - 22:37
User	<a href="#">jhodgins</a>
Location	<a href="https://web-canni-uat01.ynet.gov.yk.ca/node/7/edit">https://web-canni-uat01.ynet.gov.yk.ca/node/7/edit</a>
Referrer	<a href="https://web-canni-uat01.ynet.gov.yk.ca/node/7/edit">https://web-canni-uat01.ynet.gov.yk.ca/node/7/edit</a>
Message	page: updated <i>Cannabis and your health</i> .
Severity	Notice
Hostname	10.135.2.140
Operations	<a href="#">View</a>

Figure 2 – Sample of Drupal log

Canada Post services that will be used for this initiative are:

- Rating (shipment cost estimate uses customer's address) using the Canada Post public web API, and
- Enterprise Shipping Tool (EST) (uses customer's name, address, and email) to generate a shipping label for printing. Canada Post's EST machine will be installed on premises in YLC warehouse and networked on YNET. Integration is done by transmitting a csv file containing the Order ID, customer's name, address and shipping method (in this case mail) to a restricted folder on a YG shared network drive from Drupal where EST can then access the information. The frequency of the csv file export from Drupal has not yet been decided, but is anticipated to be 72(1)(b)(vi) and will be configured based on operational needs. 72(1)(b)(vi) and When access to the file is restricted to a single service account 72(1)(b)(vi) an Order ID is entered, EST will read the file for that Order ID and generate the shipping label. Once the shipping label is successful the file with the order and customer details will be deleted.

Payment processing of orders placed will be completed using Bambora's Custom Checkout, which is used for other Yukon government payment processes including vehicle registration and business name renewal, paying a government invoice, online property tax payment and purchasing fishing, hunting and camping licences/permits, and is integrated into this eCommerce solution using an inline iframe.

The eCommerce site will require individuals to enter their date of birth to validate that they are over 19 years of age and only then will the selection of available products be available for their viewing. The date of birth is only used for age validation and is not collected or retained by YLC after the verification has been completed. The individual's date of birth is retained in their browser's cache until such time as they close the browser session. If an individual does not pass the age verification, a message is displayed to inform them they have failed the age check and they can then return to the YLC Cannabis home page (<https://yukon.ca/cannabis>). Cookies on

Commented [sk4]: LEE – how often is this done and is the csv file that is transmitted overwritten by each new order? If not, what happens to those csv files?

2. Page 5: Accessing PI from a security' Section (S) 33 of the to the information, unauthor happens to the CSV files cont or will be stored for other pu confirm this is about the sam

Commented [sk5]:

Commented [sk6R5]: Generic service account – automated access; move data from one system/another; in order for a user to access the data they need to log in;

the individual's computer expire when the browser is closed, but until then the user's ability to access the products for viewing is restricted. Recognizing that there is no way to prevent individuals from entering a false date of birth, this age verification is a best effort by YLC to be compliant with legislative requirements to not market cannabis to those under the age of 19. A second confirmation of age is incorporated in the checkout process as well as a best effort by YLC to be compliant with legislative requirements to not sell cannabis to those under the age of 19.

If an individual passes the age verification, they are then able to view the products available for purchase. If they wish to purchase a product, they select it and add it to their cart. When they have completed their selection of product(s) they then proceed to the checkout. During the checkout process they will be required to provide personal information to enable shipping calculation, payment processing and delivery of their purchase. There is no ability for a customer to set up an account in Drupal, so they must enter their personal information each time they wish to place an order. Fields in the checkout process are limited to only information required to process the order, and field validation is utilized to help ensure a correct email format is used and the customer's postal code is within Yukon. Customers may have a billing address outside of the Yukon however all shipping addresses (which includes post office mailbox) are validated for a postal code within Yukon. The customer must also re-confirm via a checkbox that they are 19 years of age or older during the checkout process. During the checkout process, if the option of "mail" delivery has been chosen, the selected product's weight and the customer's shipping address is used by Canada Post to provide an estimate of shipping costs. If the customer is agreeable to the cost, they can then enter details for payment processing. If the customer decides not to proceed at any point after placing items in the cart, the information entered is retained in Drupal as well as in the customer's browser cache. By default, Drupal retains abandoned carts automatically after 22 days. If "in-store pickup" has been selected as the delivery method, no information is disclosed to Canada Post and the customer can continue to payment processing. Bambora, the payment processor, provides an inline page on the YLC ecommerce checkout page that collects the necessary payment details and processes that information independent from YLC. An Order ID is generated by Drupal and passed to Bambora along with the amount owing but no product details. Bambora generates and returns a Transaction ID (an identifier of a payment transaction) and result code (success, failure and failure reason) for that Order ID. If successful payment, a message is displayed to the customer and they are re-directed to a YLC Feedback page to complete an anonymous feedback survey related to their ordering experience. If payment processing fails, a message is displayed to the customer and they may repeat the payment processing or not. If the payment processing remains as a failure, Drupal retains the order and transaction details however no further processing is done. If a subsequent payment process is successful, a new transaction ID is provided and overwrites the previous one transmitted to Drupal. Upon successful payment processing, Drupal sends an automated email order confirmation to the customer. No product description is included in the email. Other than the order placement, nothing else is tracked in Drupal.

For orders with successful payment processing, an email is automatically sent to the customer, and Drupal produces an export of the order details for integration with YLC's existing Store Management Suite (SMS). See Appendix A for screen dumps of the online ordering system. SMS has not undergone a PIA, however given that there is no personally identifiable data involved, no linkage to Drupal, and only one ICT user will have access to both systems for

#### Observations

1. Page 5: The claimed retention period for a month in the

Commented [sk7]:

Commented [sk8R7]: LEE 74(1)(a)

#### Questions

1. Page 6: Please provide a prevent over collection c

Commented [sk9]:

Commented [sk10R9]: Susan – can you please forward me a copy of the feedback survey



support purposes, the risk of re-identification is low. This export will be a flat file and contain the Order IDs, products purchased and the costs. Initially, this export will be done manually, with the intent to automate this functionality in future. Upon success importing into SMS an authorized member of the YLC Fulfilment Team prints the packing slip then prepares and packages the order. The Order ID is then scanned into the Canada Post EST which queries the Order ID in the .csv file in the shared drive and pulls the associated personal information to generate a shipping label for printing. Initially deletion of the .csv file will be done manually by the user by clicking on a button, but in future is planned to be automated. The label is affixed to the package, and if mail delivery was selected, is then secured in a Canada Post shipping bin within the Cannabis vault pending Canada Post pickup. Canada Post will initially be making two pickups at the YLC Warehouse. This may change over time depending on volume of orders being processed. When Canada Post arrives to pick up the packages, only authorized Warehouse Management, Shipper/Receiver or Cannabis Operations staff can move or load the shipping bin from the Cannabis Vault. Canada Post may take possession of the bin outside of the Vault, or on the YLC loading dock. Canada Post employee scans each item into the Canada Post system which generates an email to the customer to enable them to track their order. ~~There is no option for in-store pickup for online orders. For in-store pickup orders, the label which includes only the customer's name, is secured in the Cannabis vault and delivered to the YLC Cannabis store as per existing processes to deliver other cannabis products from the warehouse to the store.~~

Canada Post is responsible for the personal information in their custody and control and use it to enable delivery of the package, as well as to authenticate the recipient of the package is over the age of 19 to ensure compliance with the cannabis legislation when making delivery. The outcome of the delivery of the package is tracked by Canada Post, who will in future provide YLC with a delivery log file which will be loaded into a Sales Tracking System which is currently under development and will require a PIA Addendum to be submitted. Data from Drupal & the Sales Tracking System will be anonymized after a ~~30 day~~ 30-day retention period of order and delivery respectively. Until the Sales Tracking System is developed, there will be no tracking of order delivery by YLC. Order details in Drupal will be retained for 30 days, after which anonymization will be done manually (until such time as automated processes are developed), with deletion of all personally identifiable data fields including, name, address including postal code, email, Order ID, Transaction ID, and IP.

In the event of an undeliverable package for whatever reason (underage, intoxicated, or no one home), Canada Post leaves their standard notice with pick up instructions at a Canada Post Depot or outlet. Purchaser has 15 days to pick up purchase at Canada Post Depot or outlet. If no one picks up the package in the allotted time, the package is returned to YLC's mailbox by Canada Post. YLC has a process in place to contact the customer and arrange for pickup of their order at the Whitehorse cannabis store. Packages will be transported from the warehouse to the cannabis store securely with other cannabis products. If contacting the customer is unsuccessful, or no pickup occurs, after 30 days the product will be moved to a secure location for subsequent destruction, as per the Terms of Sale. The label containing personal information will be securely disposed of, and data in the Sales Tracking System anonymized after 30 days of the product destruction.

Commented [sk111]:

## Observations

2. Page 7: Finding someone's package will require an employee to see all names. Alternatively, it could be collected with an (randomized) order ID accompanied and age verification. This would reduce the usage of PI as recommended in CS.

Commented [sk12R11]: No option to pick up in store

### 1.1.2 Scope of PIA (PIA manual reference: 5.2.2 Project scope)

The scope of this PIA is for the implementation of the Drupal eCommerce solution for processing cannabis sales within the Yukon Territory.

Out of scope of this PIA are the:

- Payment processing by Bambora
- Canada Post processes
- Sales Tracking System – is yet to be developed, and mentioned in the PIA to describe process to be used when it is available. PIA Addendum will be required to be submitted.
- Feedback Survey

### 1.1.3 Parties Involved (PIA manual reference: 5.2.3 Parties involved)

All parties that may collect, use, or disclose information involved in the initiative being assessed must be identified, along with the justification (purpose) and legal authority for doing so. Parties may include a vendor that may access and/or use personal information to provide support, patients that provide their information, and staff of the department/organization that collect and use the information. Business areas involved in the project should be noted in the PIA by identifying job functions and the legal authority under which they participate.

Stakeholder	Function	List Applicable Legislation
YLC – Steve Cummings	Executive Sponsor of the initiative Director, Operations, Yukon Liquor Corporation	ATIPP, Cannabis Control and Regulations Act & regulations
YLC – Patch Groenewegen,	Manager of Social Responsibility, Policy & Planning, Yukon Liquor Corporation	ATIPP, Cannabis Control and Regulations Act & regulations
YLC – Susan Russell	A/Director of Finance responsible for access management and auditing of cannabis ecommerce solution	ATIPP, Cannabis Control and Regulations Act & regulations
YLC – Susan Russell	Privacy Officer responsible for ensuring compliance of YLC with Yukon Privacy legislation	ATIPP, Cannabis Control and Regulations Act & regulations
ICT	Yukon Government network and system support; support of all components of the Cannabis eCommerce solution	ATIPP
Customers	Provide personal information when purchasing from the site	Cannabis Control and Regulation Act & regulations
YLC Warehouse & Cannabis Store staff	Processing of orders and maintenance of the csv files	ATIPP, Cannabis Control and Regulation Act & regulations
Acro Media Inc	Drupal Support	ATIPP s29(c), 36(f)
Yellow Penci	Drupal Support	ATIPP s29(c), 36(f)
Bambora	Payment Processing	
Canada Post	Shipping charges, delivery and authentication of recipient's age	

As part of its standard procedures, YG ICT requires all third-party vendors to sign a Network Access Agreement (Appendix B) and each individual vendor user must sign an Account Information Agreement (Appendix C).

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3. Page. 8: The third parties p access personal informatio unauthorized disclosure of and control between the p the PIA and it is not comple

Commented [sk13]:

Commented [sk14R13]: Lee advises that from ITC perspective – vendors must sign network access agreement; individual users must sign an information access agreement; Append the 2 forms; - forms rec'd and appended.

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1.1.4 **Objectives and Benefits (PIA manual reference: 5.2.4 Objective and benefits)**

As there will initially only be one brick and mortar store available (Whitehorse) in Yukon to purchase cannabis, the objective of this initiative is to provide accessibility across the territory for individuals over the age of 19 to purchase cannabis. This eCommerce solution will benefit individuals across the territory who wish to purchase cannabis legally without the time and cost incurred to travel to the Whitehorse store.

1.1.5 **Description of Personal Information Collected (PIA manual reference: 5.3.1 Types of data (field level or clusters))**

*In the excel file below, complete Tab 2: Categories of PI.*



Personal  
Information Map.xls

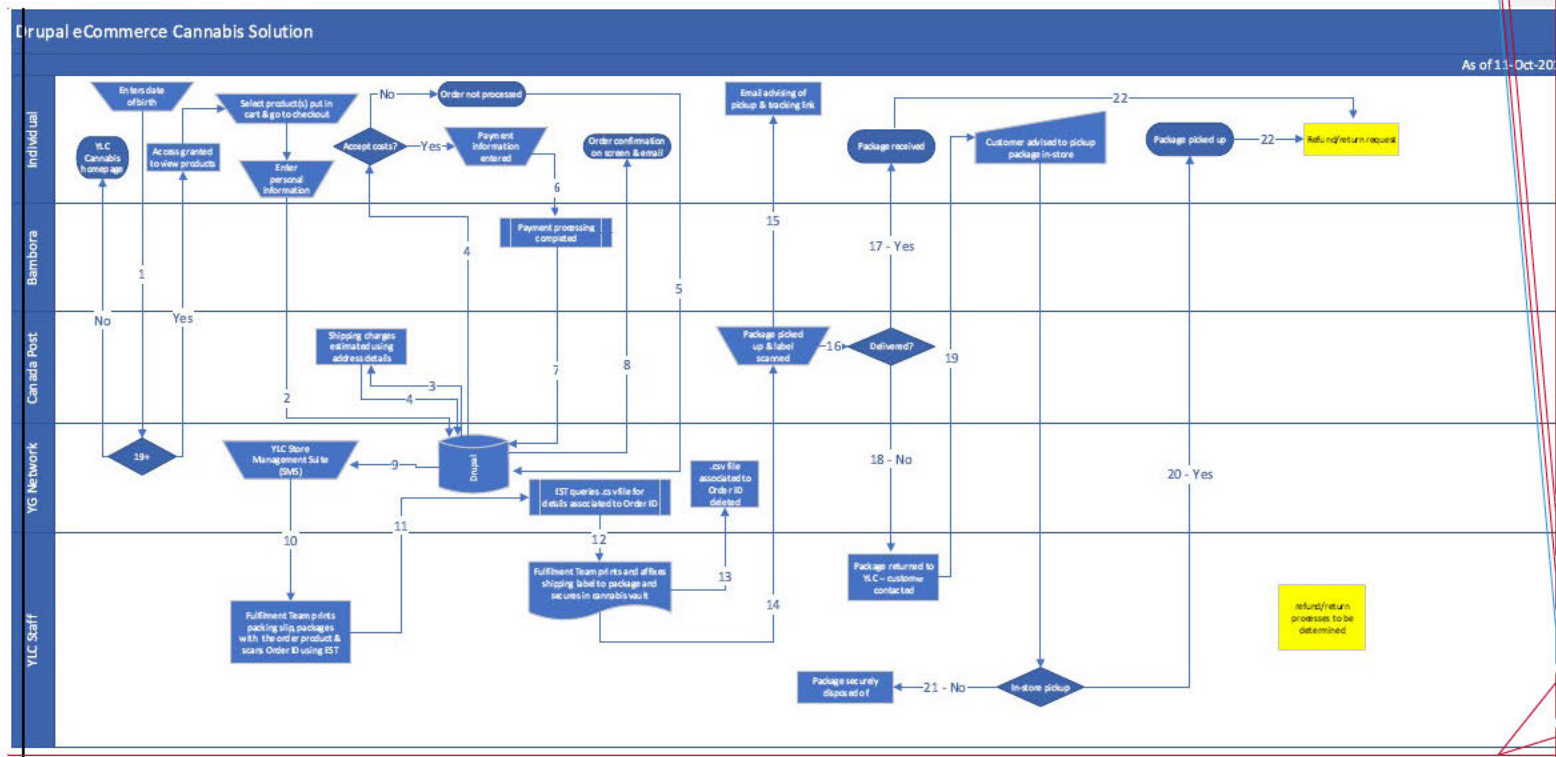
Commented [SK15]: Awaiting details on how customers will be contacted for undeliverable packages – if email will need to assess risk based on details; if phone – should be authentication process to ensure customer is being spoken to and a documented script; refunds/returns - file will need to be updated once details are known; u/k how refunds are processed and whether it has to be done via Drupal.

Commented [sk16R15]: Steve – can you advise what the process is



## 2 DATA FLOW MAPPING AND TABLES

## 2.1 Personal Information Flow Diagram and Table (PIA manual reference: 5.3.3 Data flow mapping)



4. Regarding the information:
  - a. S29(c), S30(c) require that these authorities be notified of the program or activity.
  - b. A requirement for the provision of information currently exists, but it is unclear if this can be used to justify the request.
  - c. Flow 5: The information does not seem to be necessary.

Commented [sk17]:

<sup>3</sup> The use of cookies/persistent browser session cookies is not restricted to the US border.

## Observations

**Commented [sk18]:**

**Commented [sk19]:** Observation 3 – likely email address but need to check with Susan

**Commented [SK20]:** Yellow indicates unknown refund/return processes

**Commented [sk21R20]:** Lee doesn't know the process?  
Susan

**Commented [sk22]:** How do I put IP collection into this and where?  
Privacy statement does article what is captured by web analytics  
→ recent....from MATOMO

|

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INFORMATION FLOW	DESCRIPTION (Who is it from, who is it going to, who will use it, etc.)	INFORMATION CATEGORY	PURPOSE	LEGAL AUTHORITY (cite specific sections of appropriate legislations)	CUSTODY OR CONTROL (Who is accountable for the information?)
1	PI is used by YLC	Identification and Contact Information	Date of birth is used to determine if individual is eligible to enter the online store. <u>This is necessary to comply with CCRA -S. 1(3)(b) which requires "at the time the purchaser orders the cannabis they confirm that they are not intoxicated and are not a young person."</u>	<u>CCRA S. 1(3)(b)</u> <u>S. 35(1)</u>	<u>Customer – Custody and control</u>
2	PI is collected by YLC	Identification and Contact Information, Sensitive Information (Products selected) IP Address	If 19 or older, access is granted and customer selects item(s), goes to checkout and enters personal information. If not 19 or older, no access given, and user re-directed to home page.	S. 29(c) S. 30(2)	YLC – Custody and control
3	PI is disclosed by YLC to Canada Post	Identification and Contact Information (Address)	If customer has selected mail delivery, address information is disclosed to calculate shipping cost.	S. 36(c)	YLC – Custody Canada Post – Control
4	PI is collected by YLC from Canada Post	Financial Information (Cost of shipping)	Shipping cost of order is displayed to customer. <u>If the customer continues with the order the shipping cost and order ID is collected by YLC from Canada Post to ensure collection of the delivery costs.</u>	S. 30(1)(c)(iii)	HPW - Custody YLC – Control
5	PI is retained by YLC	Identification and Contact Information, Sensitive Information (Products selected) IP Address	<u>If individual decides not to proceed with the order, the cart information is retained in Drupal and user's cache to enable continuation of ordering if desired.</u>	S. 29(c) S. 30(2) <b>S34</b>	HPW - Custody YLC – Control
6	PI is disclosed to Bambora by customer and YLC	Identification and Contact Information, Financial Information, Order ID and amount (YLC)	If individual proceeds with <u>the</u> purchase, details <u>are</u> entered to enable payment processing. YLC discloses Order ID and amount of purchase.	S. 36(c)	Bambora – Cu and control
7	PI is collected by YLC from Bambora	Financial Information	Payment success or failure information is collected <u>with the Order ID - in order to enable YLC to</u> determine whether to proceed with order processing or not.	S. 30(1)(c)(iii)	HPW – Custody YLC – Control
8	YLC <del>uses-discloses</del> PI to confirm <u>the</u> order	Identification and Contact Information, Order ID and amount	To confirm successful order placement YLC displays a message on screen and sends an automated email to the customer.	<del>S. 25(1)(a)</del> <u>S. 36(c)</u>	HPW – Custody YLC – Control Customer – Custody and control of email

**Commented [sk23]:** Lee to get some information; can limit the retention period of the cookies; how long do sessions last – cookies and other settings that make data persist; does it need to be persistent...no; general identifier cookie longest use case need to support; other aspects;  
There is no "need" for this retention of PI - Do not persist beyond the browser session – quote to change cookie setting – then would have to be approved;  
**LEE – has the quote been obtained and any decision to proceed with changing the cookie seeking to not persist**



9	YLC uses PI	Identification and Contact Information, Sensitive Information (product ordered)	Order ID and product details imported into SMS to enable preparation of order for delivery or pick up	S. 35(1)(a)	YLC – Custody and control
10	YLC Fulfilment Teams uses PI from SMS	Identification and Contact Information, Sensitive Information (product ordered)	Packing slip printed, used to prepare ordered product for shipping and Order ID scanned into EST	S. 35(1)(a)	YLC – Custody and control
11	YLC Fulfilment Teams uses PI	Identification and Contact Information	EST queries .csv file on shared network drive and generates shipping label for package	S. 35(1)(a)	YLC – Custody and control
12	YLC use PI	Identification and Contact Information	Shipping label printed, affixed to package and package secured in cannabis vault by Fulfilment Team	S. 35(1)(a)	YLC – Custody and control
13	YLC disposes of PI	Identification and Contact Information	.csv file deleted by Fulfilment Team after printing of label. <u>Printing of label is not a decision impacting the individual so 1-year retention not required of the .csv file.</u>	<u>S. 34</u>	<u>Not applicable</u>
14	YLC discloses PI to Canada Post	Identification and Contact Information	Canada Post picks up package for delivery	S. 36(c)	Canada Post – Custody and control
15	Canada Post uses PI	Identification and Contact Information	To send email to customer with tracking details		
16	Canada Post uses PI	Identification and Contact Information	To attend customer's residence to deliver package		
17	Canada Post uses PI	Identification and Contact Information	To confirm recipient of package is over 19 years of age		
18	PI is collected by YLC from Canada Post	Identification and Contact Information	For undeliverable packages, Canada Post <u>leaves a 15-day notice for pickup at Canada Post depot or outlet. If no pick-up after 15 days, then Canada Post returns package to YLC. (See Appendix E – Terms of Use) returns the packages to YLC.</u>	S. 29(c) S. 30(1)(a)(i)	HPW – Custody YLC – Control
19	YLC uses PI	Identification and Contact Information	To contact customer and arrange in-store pickup within 30 days	S. 35(1)(a)	HPW – Custody YLC – Control
20	YLC uses PI	Identification and Contact Information	To verify customer's age when picking up package in-store	<del>S. 35(1)(a)</del> <u>Not applicable</u>	<del>HPW – Custody</del> <del>YLC – Control</del> <u>Not applicable</u>

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21	YLC disposes of PI	Identification and Contact Information	If package not picked up within 30 days, package with label affixed is securely disposed of. <u>Disposal of unclaimed package is not a decision impacting the individual so 1-year retention not required of the csv file.</u>	<u>S. 34</u>	<u>Not applicable</u>
22	Refunds and returns - TBD				
	YLC disposes of PI	Identification and Contact Information	<u>Identifiable data from Drupal processed orders (both successful, incomplete and failed payment processing) and the sales tracking system is replaced with null value (name date of birth address excluding postal code*) or fake data (IP and email).</u>  <u>*YLC decided to not anonymize the postal code of a customer's address and currently is retaining the first 3 digits of the postal code for Whitehorse addresses and the full postal code for all other Yukon addresses</u>  <u>Identifiable data is deleted (name, date of birth, address, email, phone, IP) from Drupal processed orders (both successful and failed payment processing) and sales tracking system. Identifiable data is deleted from Drupal for orders that did not complete payment processing.</u>	HPW – Custod YLC – Control	
	Anonymized data used by YLC	Anonymized_data	<u>Anonymized data* is used by YLC for reporting purposes (i.e. statistics, trending, etc.). Anonymized data from Drupal (see row above) as well as anonymized web analytics are used by YLC for reporting purposes (i.e. how many website visitors turned into sales, unique visitors, trending, etc.) YG has on premise install of MATOMO which is managed by ITC and is used for all Yukon government websites. IP addresses are masked to level of 2 bytes.</u>  <u>**YLC decided to not anonymize the postal code of a customer's address and currently is retaining the first 3 digits of the postal code for Whitehorse addresses and the full postal code for all other Yukon addresses. At this time there has been no reporting conducted.</u>	N/A	HPW – Custod YLC – Control

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**Commented [sk24]:** From ToU – need more details to track the PI. It appears that a person has to attend the Whitehorse store in person to do a refund since they have to show their gov't ID. What happens to the package when they bring it back... who handles it from point of return to destruction of the package (including product and label).

Also for any refund requests, information has to be retained for at least 1 year to satisfy ATIPP S. 34 as a decision is made by YLC to issue or not issue a refund. This is not optional so please provide details on how retention of 1 year is being met for any refund requests. I would expect the same would apply for any complaints as well since YLC would be making a decision as to whether to respond or not?

**REFUNDS**

The Cannabis Yukon online store will ONLY accept returns or issue refunds if:

- YLC is notified of product issues within 30 days of purchase.
- Return is accompanied by the original receipt.
- Your order does not arrive.
- Your order arrives damaged or the packaging has been tampered with.
- You received a product you did not order or the order is incomplete.

The purchase price will be refunded in the applicable tender and means used for the purchase. Purchases returned as cash, credit card purchases returned to original credit card, all mobile or near field purchases will be returned to credit card of origin.) Please note that delivery charges are non-refundable.

All product returns require the purchaser's name, address and telephone number and the purchaser's signature to acknowledge receipt of the refund. Customers returning product must also show valid, government-issued photo ID to verify their identity. If a customer does not provide this information, the return will not be processed (see "Privacy Policy and Security Statement" section below). Refunds will not be provided for returns without a receipt.

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**Commented [sk25]:** Susan this WILL be an issue with the IPC. What safeguards are in place to prevent re-identification using postal codes? How is retention justified when there has not been any reporting conducted (based on what Lee told me)?

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		Anonymized data is used by YLC for reporting purposes (e.g. statistics, t.e.d.g. etc)		
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### 3 PRIVACY ANALYSIS

The following analysis informs the risk summary and mitigation plan of the PIA. Risks identified in the following sections (3.1-3.10) feed directly into the Risk and Mitigation table in section 4.1.

#### 3.1 Accountability (PIA manual reference: 5.5.1 Accountability)

*Objective: To ensure a program and public body or custodian designates an individual(s) who is responsible to ensure compliance with privacy legislation. For more detailed information, see section 5.5.1 in the PIA Manual. Relevant sections of legislation and policy: HIPMA General Regulations s. 16; GAM 2.27 paragraph 3(2)(e) and 3(2)(f).*

##### 3.1.1 Identify Information Owner(s)

Name	Position
Steve Cummings	YLC Director of Operations

##### 3.1.2 Identify the Department's Privacy Officer(s)

Name	Position
Susan Russell	YLC Privacy Officer

##### 3.1.3 Identify Third Party Service Providers

Service Provider Name	Services Provided	Written Agreement (Y/N)
HPW – ICT	Hosting Drupal, SMS, Sales Tracking Systems; Supports and maintains the YG network	Y
Acro Media Inc.	Vendor support for Drupal for 90 days post live	Y
Yellow Pencil	Support for Drupal after vendor support expires	Y

##### 3.1.4 Identify Privacy Risks/Security Threats regarding Accountability



Risk	Description
<b>1-1</b>	Describe Privacy Risk / Threat here
	There are no risks identified regarding Accountability.

### 3.2 Identifying Purpose (PIA manual reference: 5.5.2 Identifying Purposes)

*Objective: To ensure the purposes for which personal information is collected is identified by the public body or custodian at or before the time the information is collected. For more detailed information, see section 5.5.2 in the PIA Manual. Relevant sections of legislation and policy: HIPMA Subsection 39(a): the purpose of the collection, use or disclosure of the personal health Information; and subsection 30(2) of the ATIPP Act.*

- 3.2.1 **Describe how your project has notified the individual the purpose for which the personal information is being collected? Include sample collection notice.**  
 The new YLC Cannabis ecommerce site ~~will have a~~ has link to the Privacy Policy (Appendix AD) and Terms of Use of the website (Appendix E) which provides notice regarding the collection of personal information, the purposes and authority for the collection, and the YLC privacy contact should anyone have questions.

#### 3.2.2 Identify Privacy Risks/Security Threats regarding Identifying Purpose

Risk	Description
<b>2-1</b>	Describe Privacy Risk / Threat here
	Customers may not read the Privacy Policy

### Observations

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4. Page. 15 Regarding 3.2.1.: The link to the policy. Although this ensures notification of the existence of information about them is being collected, the notification method that is often used, it would be up to itself.

Commented [sk27R26]:

### 3.3 Consent (PIA manual reference: 5.5.3 Consent)

*Objective: To ensure consent is collected in compliance with relevant privacy legislation. For more information, see section 5.5.3 of the PIA Manual. Relevant sections of legislation and policy: HIPMA Section 39: Knowledgeable consent; HIPMA Section 41: Notice and Knowledgeable Consent; ATIPP Subsection 35(1)(b): Use of Personal Information; ATIPP Subsection 36(b): Disclosure of Personal Information.*

*Note: Consent is not an authority to collect personal information under ATIPP – it can only be used if your program is governed by HIPMA.*

- 3.3.1 **Is consent being utilized as an authority to collect, use and/or disclose personal information?**

No. YLC collects only the information necessary to achieve its purposes, provides notice to users of the ecommerce site of how personal information is used and disclosed to achieve those purposes in its posted [Terms of Use \(Appendix E\)](#) ~~Privacy Policy~~.

Commented [sk28]:

5. Page 15: 3.3.1 and 3.3.2 could result in a risk under 3.3.2.

### 3.3.2 Identify Privacy Risks/Security Threats regarding Consent

Risk	Description
<b>3-1</b>	Describe Privacy Risk / Threat here
	<del>Customers may not read the Privacy Policy.</del>
	Risk of personal information being used and/or disclosed for unauthorized purposes.

### 3.4 Collection of Personal Information (PIA manual reference: 5.5.4 Limiting collection)

*Objective: To ensure the collection of personal information is in compliance with relevant privacy legislation and is limited that which is necessary for the purposes of the program or activity. For more information, see section 5.5.4 of the PIA Manual. Relevant sections of legislation and policy: HIPMA Section 53: Where collection is permitted; HIPMA Section 54: Where Indirect Collection is permitted; HIPMA: Collection of Personal Health Information Policy; ATIPP Section 29: Purpose for which Personal Information may be collected; ATIPP Section 30: How Personal Information is to be Collected; ATIPP: Collection of Personal Information Policy.*

#### 3.4.1 Describe how personal information is collected directly from individuals.

Personal information will be collected directly from an individual electronically after they have selected products to purchase and proceed through the checkout process. A customer's IP address is collected from the individual's device by Drupal automatically, associated with their order, if one is made, and deleted during the anonymization process. In ICT's web analytics software, IP addresses are truncated by two bits, keeping only the first two parts (e.g. 199.243.xxx.xxx).

#### 3.4.2 Describe how personal information is collected indirectly from individuals.

When an individual proceeds through the checkout, there is an indirect collection of personal information related to the payment of their order. Bambora collects credit card information directly from the customer, processes the individual's payment and then discloses personal information in the form of a Transaction ID and confirmation of either a successful or failed payment to YLC.

#### 3.4.3 Has the program conducted a review of the personal information collected to ensure only the minimum necessary is being collected?

At minimum, address the following in your response:

- The individual who conducted the review as well as the date of the review occurred.

#### 3.4.4 Identify Privacy Risks/Security Threats regarding Collection

6. Page 15: 3.4.1 explains the  
Please describe and cite re

Commented [sk29]:

7. Page 16: 3.4.3

Commented [sk30]:

Commented [sk31R30]: Susan has a review been conducted and if so, by whom and when?  
No review has been conducted.

Risk	Description
4-1	Describe Privacy Risk / Threat here
	Risk of unauthorized or over collection of personal information

### 3.5 Use, Disclosure and Retention of Personal Information (PIA manual reference: 5.5.5 Limiting use, disclosure, and retention)

#### Objectives:

(1) To ensure personal information is used and disclosed for purposes it was collected, except with the consent of the individual or if authorized by law.

(2) To ensure personal information is retained only as long as necessary for the fulfillment of the stated purposes and is destroyed as authorized by law. For more information, see section 5.5.5 of the PIA Manual.

Relevant sections of legislation and policy: HIPMA Section 55: Use with Consent; HIPMA Section 56: Use not Requiring Consent; HIPMA Section 57: Disclosure with Consent; HIPMA Section 58: Disclosure not Requiring Consent; HIPMA Policies: Use and Disclosure of Personal Health Information; ATIPP Section 35: Use of Personal Information; ATIPP Sections 36 – 39: Disclosure of Personal Information; ATIPP Policies: Use and Disclosure of Personal Information; Archives Act Records Management Regulations Section 5.

#### 3.5.1 Does your project use personal information to make decisions that directly affect(s) an individual(s)?

An individual's date of birth is used by YLC to determine ~~whether or not~~ whether they are permitted access to the ecommerce site, however the date of birth is not collected by YLC. YLC also uses the individual's shipping address during the ordering process to verify that the postal code is within Yukon. It is possible for customers to enter a billing address outside of the Yukon, however shipping addresses must be verified as being within the Yukon for the order to be submitted by the customer.

Canada Post uses an individual's personal information to provide an estimate of shipping charges which may impact the individual's decision whether to proceed with their order or not. Canada Post would retain information in accordance with their organization's requirements.

-If they choose to proceed then Bambora uses the individual's financial information to determine if payment is successful or not and would retain the information in accordance with their organization's requirements. YLC will use the personal information collected from Bambora (success, failure, failure reason) to determine ~~whether or not~~ whether the individual's order gets processed for delivery or not.

In the event that an individual has been banned from the YLC Cannabis store, they may still place an online order as long as they meet the age and address requirements noted above, and payment is processed successfully.

8. Page 17 YLC identifies in t individuals. As such, this i irrelevant ones. It is not re the PB's decisions. What i decide not to fulfill orders 'banned persons list' orde a Yukoner place an order

Commented [sk32]:

Commented [sk33R32]: Shipping address in Yukon but billing address can be anywhere; would need an address in the Yukon; could have mailbox in the Yukon.

Commented [sk34]: Susan, is this accurate or does YLC have the authority to NOT sell to a banned individual from the store via online orders? If they do, then who is checking the online orders to ensure a banned individual is not ordering and if they did place an order what is the process? Will need all the details to put into flow diagram as well.  
Shelly: No YLC cannot ban from e-commerce.



### 3.5.2 What secondary uses or disclosures are contemplated for the personal information collected?

The table below summarizes the disclosures of personal information for this initiative.

Anonymized data will be used by YLC for analysis and reporting on sales of the eCommerce store and a portion of the IP address will be used for web analytics to be conducted.

Disclosed to	Personal Information	Purpose/Use	Agreements
Canada Post	Demographic data; Order ID	Shipping <del>estimate and</del> delivery	Contract
Bambora	Demographic data; Order ID	Payment processing	Contract
Acro Media	PI in Drupal	Service support	Contract
Yellow Pencil	PI in Drupal	Service support	Contract

Note that vendors are not contacted to provide service support until after initial troubleshooting has been conducted in the test system. Only in the event that an issue cannot be resolved would a vendor be contacted and requested to provide assistance. If the issue can not be duplicated in the vendor's system then access to the production data may be required.

Anonymized data will be used by YLC for analysis and reporting on sales of the eCommerce store and a portion of the IP address will be used for web analytics to be conducted.

### 3.5.3 Describe how personal information is used for evaluation or planning purposes.

Personal information will not be used for evaluation and planning purposes, only anonymized data will be used for these purposes. Identifiable data from Drupal processed orders (both successful incomplete and failed payment processing) and the sales tracking system is replaced with null value (name date of birth address excluding postal code) or fake data (IP and email).

The data from Drupal as well as anonymized web analytics data is used by YLC for reporting purposes (i.e. how many website visitors turned into sales unique visitors trending etc.). YG has on premise install of MATOMO which is managed by ITC and is used for all Yukon government websites. IP addresses are masked to level of 2 bytes to provide anonymity.

YLC decided to not anonymize the postal code of a customer's address and currently is retaining the first 3 digits of the postal code for Whitehorse addresses and the full postal code for all other Yukon addresses. At this point in time there has not been any reporting conducted.

### 3.5.4 Does the project disclose personal information for research or statistical purposes? If yes, please explain and attach the research agreement.

Personal information will not be disclosed for research or statistical purposes.

### 3.5.5 Has a Records Retention and Disposition Schedule been completed?

*Note: Refer to your Information/Records Officer if you do not have access to a Records retention and Disposition schedule. Refer to Archives Act Records Management Regulations Section 5 for more information.*

Data from abandoned carts is currently set to be automatically deleted from Drupal every 22 days. Information from completed orders in Drupal & the Sales Tracking System will be anonymized

9. Page 18: 3.5.2: please desc 'anonymized data' describe included or how it is anony (e.g. why can the troublesh

Commented [sk35]:

Commented [sk36R35]: Web analytics for reporting; at one point Steve was interested in aggregating data from drupal to ...

Commented [sk37R35]: Service support – initial trouble shoot in test system; UAT; only go to production if unable to reproduce ...

21. The website discloses IP add the Google Fonts API. YLC m not, the disclosure of this inl occurred and the 'possibility

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20. The PIA describes that there must be included in the info

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9. Page 18: 3.5.2: please desc 'anonymized data' describe included or how it is anony (e.g. why can the troublesh

Commented [sk41]:

Commented [sk42R41]: Web analytics for reporting; at one point Steve was interested in aggregating data from drupal to ...

Commented [sk43R41]: Service support – initial trouble shoot in test system; UAT; only go to production if unable to reproduce ...

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21. The website discloses IP add the Google Fonts API. YLC m not, the disclosure of this inl occurred and the 'possibility

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10. Page 18: 3.5.5 must take S3 does not apply because it st

Commented [sk46]:

Commented [sk47R46]:

(except postal code as noted earlier) after a 30-day retention period of order and delivery respectively. As per the Terms of Use (Appendix E) customers have 30 days from the order date to contact YLC if they have any issues after which YLC would have no need to retain the personal information. As noted earlier the .csv files will be manually deleted after labelling of a package has been completed.

### 3.5.6 Identify Privacy Risks/Security Threats regarding Use, Disclosure, Retention Disclosure

Risk	Description
5-1	Describe Privacy Risk / Threat here
	Re-identification of customers may occur if users have access to both SMS and Drupal

### 3.6 Accuracy of Personal Information (PIA manual reference: 5.5.6 Accuracy)

*Objective: To ensure personal information is accurate, complete and up to date for the required purpose. For more information, see section 5.5.6 of the PIA Manual. Relevant sections of legislation and policy: HIPMA Section 52: Accuracy of Information Collected; HIPMA Section 28: Correction of Personal Information; ATIPP Section 31: Accuracy of Personal Information; ATIPP Section 32: Right to Request Correction of Personal Information.*

#### 3.6.1 Describe the steps taken to ensure that the personal information is accurate, complete and up to date.

*For example: records indicate the date the information was last updated; the information systems logs corrections or modifications to information*

Information is collected and entered into the ecommerce site by the individual directly and is deemed accurate, complete and up to date. Field validation is used (see Figure 1 below) where appropriate and no comment fields are used to mitigate the risk of any unnecessary personal information being collected.

Figure 1 – Examples of field validation used in the checkout process

### Observations

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7. Page 17: if the information under 3.6.1 is 'deem' under 3.6.2? Also, verifying if an email address is it.

Commented [sk49R48]: I forgot I need to it mailed to different residence – email receipt to user and then realize they need it sent to summer home so they contact YLC.

11. Page 19: It is the p  
online. Therefore,

Commented [sk50]:

Commented [sk51R50]: Not using Canada post address to confirm the information is accurate; cost involved;



### 3.6.2 Describe how an individual's information will be updated or corrected.

Individuals may correct their information ~~as at any time during entering it during~~ the checkout process ~~prior to submitting their order~~. Field validation is used to help accuracy of data entered and review of the information is provided prior to the individual submitting their order. Once an order has been submitted the individual cannot update or correct the information ~~via the website~~ and would have to use the Contact Us feature on the ecommerce site to pursue any corrections to their order.

12. Page 19: 3.6.2: It is likely th  
which among other inform  
update and correction of or

Commented [sk52]:

Commented [sk53R52]: Order manager at YLC can change – add to the data flow diagram

Example: I forgot I need to it mailed to different residence – email receipt to user and then realize they need it sent to summer home so they contact YLC.

Commented [sk54R52]: LEE – will need more details on this process...How do they "contact" YLC – use the Contact Us link as I indicate in 3.6.2? if so,, what happens to that information so that it gets actioned? IPC requests a data flow and in the example you provided we would need one as YLC would be collecting new personal information (i.e. new address) .

You indicate below that the Order manager can change orders so are they the only ones that can access any requests received from customers? How does this impact the rest of the processing flow such as address label printing if the package is already prepared for pick up by Canada Post?

### 3.6.3 Identify Privacy Risks/Security Threats regarding Accuracy

Risk	Description
6-1	Describe Privacy Risk / Threat here
	Individuals may enter incorrect personal information during checkout process.

### 3.7 Safeguarding Personal Information (PIA manual reference: 5.5.7 Safeguards)

Objective: To ensure personal information is protected against unauthorized access, collection, use, disclosure, retention and disposal. For more detailed information on safeguarding personal information, see section 5.5.7 in the PIA Manual and Schedule 3: Detailed Technical and Security Questionnaire in the PIA Manual. Relevant sections of legislation and policy: HIPMA Section 19: Custodian's Information Practices Generally and HIPMA General Regulation Section 14: Custodian's Information Practices; ATIPP Section 33: Protection of Personal Information

#### 3.7.1 Has a Security Threat Risk Assessment (STRA) been completed?

If a STRA has been completed, and it has addressed the questions below, reference the section or page of the STRA where the analysis occurred.

A STRA has been completed on Drupal and is currently being reviewed and was accepted by Sean McLeish (CIO, ADM Highways and public works).

Commented [S55]: STRA provided to IPC

13. Page 20: The STRA has no as there are concerns regi  
concerns E-commerce wel  
and the sharing of IP infor  
concerns' must be address:

Commented [sk56]:

Commented [sk57R56]: STRA approved yet? ITC Nazar Fahal  
-Susan can request approval info and copy of recommendation  
-Typically ensure the service owner Steve receives and accepts the STRA; Steve or Matt King  
-Lee will check with Nazar

Commented [sk58R56]: Susan can you get a copy of the STRA as per the IPC's request. I also need the recommendations from the accepted STRA as I only have the ones from the draft STRA in the PIA.

#### 3.7.2 Describe how users are authenticated before accessing the information.

Objective: To corroborate that a person is the one claimed.

YLC staff access to Drupal and SMS are restricted by Active Directory security groups. Users must have a YG account

- What method is used:
  - Something the individual knows; a password or PIN, for example.
    - Are passwords known only to the authorized user of the account? Yes

14. Page 20 3.7.2: Currently, use  
implement this as absence c  
data extraction from the sys

Commented [sk59]:

Commented [sk60R59]: Related to auditing; business specific record of logged in users; order managers; viewing information; right now it exists indirectly but cannot be used for auditing; if had to they could piece meal;

Commented [sk61R59]: LEE can you provide some details re: piece meal information if needed so I can put something in the PIA to try and satisfy the IPC



- Where authentication is based on username and password, are effective password policies in place and do they adhere to YG's corporate password policy? **Yes**
- Are users assigned a unique name and/or number for identifying and tracking user identity? **Yes**
- What is the current format used for unique identification? **firstname.surname**
- Can the unique user identifier be used to track user activity within the information system? **Not currently**
- Does the information system have automatic logoff capability whereby users must re-authenticate to access the information system?

Commented [sk62]: Related to IPC concern noted above

Commented [sk63]: LEE I just noticed this was not answered...do you know the answer?

### 3.7.3 Describe how access to the information is controlled.

*Objective: Only individuals with a need to know have access to data; based upon job duties, restrict user functions to view, read, write, delete, and/or execute roles.*

Access to Drupal is role-based, as shown on the table below, and is restricted to very few individuals. Access will be reviewed every 6 months.

Role	Access	Number of YLC Users	Number of ICT Users
Content Administrator	Edit/admin pages and related content only, e.g. menus - no access to personal information(PI)	2	1
Product Administrator	Edit/admin product catalogue only – no access to PI	4	1
Order Manager	Read orders – access to PI	0	1
Order Administrator	Read and modify orders - access to PI	2	0
User Administrator	Create and modify users – no access to PI	1	0
Administrator	Unlimited permissions – access to PI	0	1

### 3.7.4 Describe how you will audit or track who accessed information.

*Objective: To have a record showing who has had access to the information system and what operations were performed during a period of time.*

As noted in 1.1.1, Drupal logs some business-level activity, but currently does not audit access to order information. Auditing for Drupal order information is being developed, but is not yet available for use for the version of Drupal (8) being used for this initiative. A PIA Addendum will be submitted when auditing becomes available and is implemented to answer the required questions noted below.

### 3.7.5 Describe where and how information is transmitted.

*Objective: To safeguard against unauthorized access and modification during transmission (both physical and electronic information).*

Information is electronically transmitted as follows:

- To enter store, customer's date of birth is entered into the secure website to enable calculation of their age.
- During checkout
  - Personal Information (address) is transmitted via Canada Post's secure API to calculate shipping charges.
- During payment processing
  - Personal Information of customer and Order ID is entered directly into Bambora secure inline page to process payment.
  - Transaction ID is transmitted securely back to Drupal.
- Upon completion of successful payment processing
  - Order confirmation is emailed to customer.
  - Order ID and product details are manually exported as a flat file periodically throughout the day from Drupal and manually imported to the SMS for order processing.
  - Order ID and personal information is manually exported as a .csv file to a secure folder on YG network shared drive.
  - Personal information is transmitted from the .csv file when queried by EST to generate shipping label which is affixed to the package for delivery/pickup.
- Upon pickup of package:
  - For mail deliveries, Canada Post scans Order ID which generates an email to the customer through the Canada Post system.
  - For in-store pickup, YLC staff manually transport packaged orders daily to the YLC cannabis store.

- *How does your program transmit information?* **Electronic transmission of data**
  - *How often does your program transmit information?* **When orders are placed, data is transmitted via https ecommerce site to YLC Drupal system on the YG network.**
  - *Is there a procedure in place to ensure that any removal of personal information from the premises has been properly authorized?* **Yes – Canada Post pickup process and delivery to YLC; then YLC delivers to Cannabis store for in-store pickup process**

- *Is data encrypted to prevent access by individuals without access rights?* **Yes - https**

- Encryption is ~~recommended~~ used as for the following follows:
  - *Back-up media that must leave the facility* **N/A**
  - *Emails containing sensitive information* **N/A**
  - *Laptops or mobile devices containing sensitive information* **N/A**
  - *Internet sessions involving sensitive information* **Yes - https**
  - *Any remote access sessions involving sensitive information* **N/A**
- What method of encryption will be used? **https used for eCommerce site**

Encryption is used for all communications with the customer using current industry standards and certificates are tracked for expiry. An online test using SSL Labs was conducted September 4 and 26 2019 with score of A+ achieved.

## Observations

Commented [sk64]:

5. Page. 22 states that HTTPS encryption is *recon* active and if encryption algorithms meet indu standards.

Commented [sk65R64]: Used for all communications between customer/store; customer/bambora; Encryption SSL Labs – online testing tool 4sept A+ Current industry standards; track certificate expiry and internal best practices for server algorithm for encryption

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### 3.7.6 Describe where and how information is stored.

*Objective: To safeguard against unauthorized access and modification at rest (both physical and electronic information).*

Information for all aspects of the YLC electronic processing of orders are stored on the YG network, ICT data centre. No encryption is used for stored data. Labels and packing slips are printed at the time of completing orders for delivery, and affixed to packages that are stored in the YLC warehouse cannabis vault. For in-store pickup of orders, packages are securely delivered to the YLC cannabis store and retained in the secure cannabis storage area until the respective customer attends to retrieve their order.

### 3.7.7 Describe the physical security measures taken to protect the personal information.

*Objective: To protect the actual computer hardware, software, data and information from physical damage or loss due to natural, human, or environmental threats.*

All eCommerce product and physical paperwork (i.e. labels and packing slip) will be confined to the cannabis warehouse vault.

- Do physical security measures include
  - Locked cabinets? **Yes**
  - Locked office doors? **Yes**
  - Pass cards? **72(1)(b)(vi)**
  - Motion detectors and other intrusion alarm systems? **72(1)(b)(vi)**
  - Procedures for visitors? **Yes – sign-in / Visitor Badge**
- Do physical security measures for workstations include:
  - Publicly accessible service counters kept clear of personal information? **Yes**
  - Situating workstations so visitors cannot read screens? **Yes**
  - Enable password protected screen savers? **Yes**
- Is there a nightly closing protocol requiring employees to:
  - Clear all personal information from desks and place files containing personal information in locked filing cabinets? **Yes**
  - Lock all office doors and cabinets? **Vault and critical Offices – President, Directors, HR are all locked**
  - Log out of all computers? **Yes**
  - Remove all documents containing personal information from fax machines and printers? **Yes**
  - Set intrusion alarms (where installed)? **Yes**
- Are users aware of how to securely dispose of information or equipment?
  - Is a policy or procedure in place regarding the secure disposal of personal information or sensitive business information? Does the policy or procedure include:
    - A requirement to identify which types media will require secure disposal; and **Yes (Label & Packing Slip)**
    - The disposal of the information has been logged in order to establish an audit trail **Yes (SMS & Sales Tracking System)**



3.7.8 **Describe the technical security measures taken to protect the personal information.**

*Objective: To secure the information system and the networks on which the data and information reside.*

- 72(1)(b)(vi)

3.7.9 **Describe the administrative security measures taken to protect the personal information.**

*Objective: To control human behaviour through clearly written policies and procedures.*

- Are employees aware of or affirmed in writing they have read and understood corporate privacy policies for HIPMA or ATIPP? **Yes – all YLC employees must complete training at time of hire**
- Are agreements in place for information exchanged between your department and another party, and that these agreements fulfill the requirements of the governing privacy legislation? **Yes – there are agreements in place between YLC and YG and HPW ICT**
- Do all contracts that involve personal information contain a privacy protection schedule? **Yes**
  - Are contractors required to comply with the organization's privacy and security policies or equivalent policies to ensure that contractors are bound by the same legislated privacy standards as the organization? **Contractors are required to comply with YG Guidelines for using computers and a Network access agreement.**
  - Are contractors and other third parties required to return personal information to the contracting organization upon completion of the contract? **Yes**
  - If not required to return the information, are contractors and other third parties required to securely destroy, using an approved method, the information at the completion of the contract? **Yes**
  - Are there regular inspections and/or audits (scheduled and unscheduled) of contractors and third parties to ensure compliance with security and privacy standards? **There are scheduled audits of access logs as well as security reviews. There are unscheduled checks on compliance with privacy standards.**
  - Are there contractual provisions in place to control outsourcing of any role involving personal information to sub-contractors? **Per contract, subcontractors are only permitted with written consent from YG.**
  - Are contractors required to complete privacy training? **No.**
- Has training been implemented for all employees, data custodians and management to ensure they are aware of and understand permitted access, use and disclosure of personal information? **Yes – all YG employees must complete training at time of hire**
- Has training been implemented for all employees, data custodians and management to ensure they are aware of and understand requirements for password maintenance and proper password security? **Yes – all YG employees must complete training at time of hire**
- Are employees required to sign confidentiality agreements? **Yes**
- Are potential employees who will have access to personal information adequately and appropriately screened? **N/A to this initiative as no "potential employees" are involved.**
- Is there a process to ensure immediate recovery of keys and pass cards, and the revocation of access privileges and appropriate notification of security personnel when a termination

(voluntary or involuntary) occurs? **Access to the Drupal system is limited to users with valid YG YNET accounts, in the correct authorization group. ICT has a turn-down process for YNET accounts.**

- Is there a contingency plan (including Data Backup Plan, Disaster Recovery Plan, and Emergency Mode Operation Plan)? **The infrastructure that is on VMs (Drupal servers, DB servers, Search) are included in nightly snapshots and on a regular backup schedule. A Disaster Recovery Plan has not been developed. In case of disaster it is possible to restore from one of those nightly snapshots.**
- Are standards in place on the use of various communications media (both physical and electronic media)? **Yes**
- Is there a policy governing the use of mobile devices and removable media if being used to store personal information? **N/A as no mobile devices or removable media being used in this initiative to store personal information.**

### 3.7.10 Identify Privacy Risks/Security Threats regarding Safeguards

*Note: Include Risks identified in STRA*

Risk	Description
<b>7-1</b>	<i>Describe Privacy Risk / Threat here</i>
	<i>Auditing for Drupal order information is being developed, but is not yet available for use for the version of Drupal (8) being used for this initiative.</i>
	<i>Security patches for Drupal are not maintained regularly exposing data to unauthorized access, use and/or disclosure.</i>
	<i>Lack of documented procedures for staff involved in processing online orders.</i>
	<b>FROM STRA</b>

### Observations

Commented [sk66]:

6. Page 29: The first recommendation from the SI for the e-commerce platform will conduct the product implementation. No one should be the here.



## Overall Risk Determination

Risk Likelihood definitions				
Risk Likelihood	Risk Impact			
	LOW (1)	MODERATE (3)	HIGH (5)	
HIGH (5)	LOW 5	MODERATE 15	HIGH 25	
MODERATE (3)	LOW 3	MODERATE 9	MODERATE 15	
LOW (1)	LOW 1	LOW 3	LOW 5	
Risk Impact Analysis				
Risk	Risk Summary	Risk Likelihood	Risk Impact	Overall Rating
01	Service becomes unavailable or vulnerable due to lack of clarity in operational procedure	Low	MODERATE	LOW (3)
02	Hacker takes control of service due to unpatched security flaw	Moderate	HIGH	MODERATE (15)
03	Hacker takes control of service due to flaw introduced by poor software testing	High	HIGH	HIGH (25)
04	Insider threat to customer data	High	HIGH	HIGH (25)
05	Theft or Lost of citizen data from the site	Moderate	HIGH	MODERATE (15)
06	High cost following any data breach because basic security standards are not met	Moderate	MODERATE	MODERATE (15)
07	Theft of citizen data from the site	High	HIGH	HIGH (25)
08	Theft of citizen data from site Hacker takes control of service due to flaw introduced by not the use of unprotected interfaces and APIs	Low	MODERATE	LOW (3)
09	Hacker takes control of the system due to lack of Intrusion Detection System IDS, network monitoring,	High	HIGH	HIGH (25)

### 3.8 Openness (PIA manual reference: 5.5.8 Openness)

*Objective: To make readily available a program's and a public body's or custodian's policies and practices relating to the management of personal information. For more information, see section 5.5.8 in the PIA Manual. Relevant sections of legislation and policy: HIPMA Section 21: Statement of information practices to be made public; GAM 2.27subsection 2(2)(g).*

#### 3.8.1 Describe how policies and procedures related to the management of personal information are made available to the public.

The YLC eCommerce site will have a link to its Privacy Policy, as well as Website Terms and Conditions of Use.

#### 3.8.2 Identify Privacy Risks/Security Threats regarding Openness

Risk	Description
<b>8-1</b>	Describe Privacy Risk / Threat here

### 3.9 Individual Access to Personal Information (PIA manual reference: 5.5.9 Individual access)

*Objective: To ensure compliance with privacy legislation by giving individual timely access personal information held by public bodies or custodians.*

*Relevant sections of legislation and policy: HIPMA Section 24: Right to Access, Section 25: Application for Access, Section 26: Custodian's Response to access request; ATIPP sections 1(1)(b), 5 and 6.*

#### 3.9.1 Describe how access to the personal information will be facilitated.

#### 3.9.2 Has a Personal Information Map been completed for this project?

*Note: Complete Tab 3: PI Map (Inventory) from the excel file you completed when answering question 1.1.6. See 1.1.6 Tab 3*

#### 3.9.3 Identify Privacy Risks/Security Threats regarding Access/Correction

Risk	Description
9-1	Describe Privacy Risk / Threat here

### 3.10 Challenging Compliance (PIA manual reference: 5.5.10 Challenging compliance)

*Objective: To ensure a process is in place for individuals to challenge a public body's or custodian's compliance with privacy legislation. Relevant sections of legislation and policy: HIPMA Paragraph 19(3)(g); establish a procedure for receiving and responding to complaints regarding its information practices; GAM 2.27: Privacy Complaints Policy*

#### 3.10.1 Are policies and procedures related to the management of personal information available to the public?

Privacy policy (Appendix D) and ~~Website Terms and Conditions~~ of Use (Appendix E) for online ordering system regarding management of information related to this initiative ~~will be~~ available to customers through links on each page of the online store.

#### 3.10.2 Are staff aware and procedures in place to respond to a privacy complaint?

In the event of a privacy ~~breach/complaint~~ YLC staff ~~must adhere to the Yukon Government's Privacy Breach Reporting Protocol (Appendix B) which requires the completion and submission of a Privacy Breach Reporting Form (Appendix C) to the staff's manager who would forward it onto the YLC Privacy Officer.~~

15. Page 27. 3.9.1, 3.9.2, 3.9.3, 3.9.4, 3.9.5, 3.9.6, 3.9.7, 3.9.8, 3.9.9, 3.9.10, 3.9.11, 3.9.12, 3.9.13, 3.9.14, 3.9.15, 3.9.16, 3.9.17, 3.9.18, 3.9.19, 3.9.20, 3.9.21, 3.9.22, 3.9.23, 3.9.24, 3.9.25, 3.9.26, 3.9.27, 3.9.28, 3.9.29, 3.9.30, 3.9.31, 3.9.32, 3.9.33, 3.9.34, 3.9.35, 3.9.36, 3.9.37, 3.9.38, 3.9.39, 3.9.40, 3.9.41, 3.9.42, 3.9.43, 3.9.44, 3.9.45, 3.9.46, 3.9.47, 3.9.48, 3.9.49, 3.9.50, 3.9.51, 3.9.52, 3.9.53, 3.9.54, 3.9.55, 3.9.56, 3.9.57, 3.9.58, 3.9.59, 3.9.60, 3.9.61, 3.9.62, 3.9.63, 3.9.64, 3.9.65, 3.9.66, 3.9.67, 3.9.68, 3.9.69, 3.9.70, 3.9.71, 3.9.72, 3.9.73, 3.9.74, 3.9.75, 3.9.76, 3.9.77, 3.9.78, 3.9.79, 3.9.80, 3.9.81, 3.9.82, 3.9.83, 3.9.84, 3.9.85, 3.9.86, 3.9.87, 3.9.88, 3.9.89, 3.9.90, 3.9.91, 3.9.92, 3.9.93, 3.9.94, 3.9.95, 3.9.96, 3.9.97, 3.9.98, 3.9.99, 3.9.100, 3.9.101, 3.9.102, 3.9.103, 3.9.104, 3.9.105, 3.9.106, 3.9.107, 3.9.108, 3.9.109, 3.9.110, 3.9.111, 3.9.112, 3.9.113, 3.9.114, 3.9.115, 3.9.116, 3.9.117, 3.9.118, 3.9.119, 3.9.120, 3.9.121, 3.9.122, 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3.9.567, 3.9.568, 3.9.569, 3.9.570, 3.9.571, 3.9.572, 3.9.573, 3.9.574, 3.9.575, 3.9.576, 3.9.577, 3.9.578, 3.9.579, 3.9.580, 3.9.581, 3.9.582, 3.9.583, 3.9.584, 3.9.585, 3.9.586, 3.9.587, 3.9.588, 3.9.589, 3.9.590, 3.9.591, 3.9.592, 3.9.593, 3.9.594, 3.9.595, 3.9.596, 3.9.597, 3.9.598, 3.9.599, 3.9.600, 3.9.601, 3.9.602, 3.9.603, 3.9.604, 3.9.605, 3.9.606, 3.9.607, 3.9.608, 3.9.609, 3.9.610, 3.9.611, 3.9.612, 3.9.613, 3.9.614, 3.9.615, 3.9.616, 3.9.617, 3.9.618, 3.9.619, 3.9.620, 3.9.621, 3.9.622, 3.9.623, 3.9.624, 3.9.625, 3.9.626, 3.9.627, 3.9.628, 3.9.629, 3.9.630, 3.9.631, 3.9.632, 3.9.633, 3.9.634, 3.9.635, 3.9.636, 3.9.637, 3.9.638, 3.9.639, 3.9.640, 3.9.641, 3.9.642, 3.9.643, 3.9.644, 3.9.645, 3.9.646, 3.9.647, 3.9.648, 3.9.649, 3.9.650, 3.9.651, 3.9.652, 3.9.653, 3.9.654, 3.9.655, 3.9.656, 3.9.657, 3.9.658, 3.9.659, 3.9.660, 3.9.661, 3.9.662, 3.9.663, 3.9.664, 3.9.665, 3.9.666, 3.9.667, 3.9.668, 3.9.669, 3.9.670, 3.9.671, 3.9.672, 3.9.673, 3.9.674, 3.9.675, 3.9.676, 3.9.677, 3.9.678, 3.9.679, 3.9.680, 3.9.681, 3.9.682, 3.9.683, 3.9.684, 3.9.685, 3.9.686, 3.9.687, 3.9.688, 3.9.689, 3.9.690, 3.9.691, 3.9.692, 3.9.693, 3.9.694, 3.9.695, 3.9.696, 3.9.697, 3.9.698, 3.9.699, 3.9.700, 3.9.701, 3.9.702, 3.9.703, 3.9.704, 3.9.705, 3.9.706, 3.9.707, 3.9.708, 3.9.709, 3.9.710, 3.9.711, 3.9.712, 3.9.713, 3.9.714, 3.9.715, 3.9.716, 3.9.717, 3.9.718, 3.9.719, 3.9.720, 3.9.721, 3.9.722, 3.9.723, 3.9.724, 3.9.725, 3.9.726, 3.9.727, 3.9.728, 3.9.729, 3.9.730, 3.9.731, 3.9.732, 3.9.733, 3.9.734, 3.9.735, 3.9.736, 3.9.737, 3.9.738, 3.9.739, 3.9.740, 3.9.741, 3.9.742, 3.9.743, 3.9.744, 3.9.745, 3.9.746, 3.9.747, 3.9.748, 3.9.749, 3.9.750, 3.9.751, 3.9.752, 3.9.753, 3.9.754, 3.9.755, 3.9.756, 3.9.757, 3.9.758, 3.9.759, 3.9.760, 3.9.761, 3.9.762, 3.9.763, 3.9.764, 3.9.765, 3.9.766, 3.9.767, 3.9.768, 3.9.769, 3.9.770, 3.9.771, 3.9.772, 3.9.773, 3.9.774, 3.9.775, 3.9.776, 3.9.777, 3.9.778, 3.9.779, 3.9.780, 3.9.781, 3.9.782, 3.9.783, 3.9.784, 3.9.785, 3.9.786, 3.9.787, 3.9.788, 3.9.789, 3.9.790, 3.9.791, 3.9.792, 3.9.793, 3.9.794, 3.9.795, 3.9.796, 3.9.797, 3.9.798, 3.9.799, 3.9.800, 3.9.801, 3.9.802, 3.9.803, 3.9.804, 3.9.805, 3.9.806, 3.9.807, 3.9.808, 3.9.809, 3.9.810, 3.9.811, 3.9.812, 3.9.813, 3.9.814, 3.9.815, 3.9.816, 3.9.817, 3.9.818, 3.9.819, 3.9.820, 3.9.821, 3.9.822, 3.9.823, 3.9.824, 3.9.825, 3.9.826, 3.9.827, 3.9.828, 3.9.829, 3.9.830, 3.9.831, 3.9.832, 3.9.833, 3.9.834, 3.9.835, 3.9.836, 3.9.837, 3.9.838, 3.9.839, 3.9.840, 3.9.841, 3.9.842, 3.9.843, 3.9.844, 3.9.845, 3.9.846, 3.9.847, 3.9.848, 3.9.849, 3.9.850, 3.9.851, 3.9.852, 3.9.853, 3.9.854, 3.9.855, 3.9.856, 3.9.857, 3.9.858, 3.9.859, 3.9.860, 3.9.861, 3.9.862, 3.9.863, 3.9.864, 3.9.865, 3.9.866, 3.9.867, 3.9.868, 3.9.869, 3.9.870, 3.9.871, 3.9.872, 3.9.873, 3.9.874, 3.9.875, 3.9.876, 3.9.877, 3.9.878, 3.9.879, 3.9.880, 3.9.881, 3.9.882, 3.9.883, 3.9.884, 3.9.885, 3.9.886, 3.9.887, 3.9.888, 3.9.889, 3.9.890, 3.9.891, 3.9.892, 3.9.893, 3.9.894, 3.9.895, 3.9.896, 3.9.897, 3.9.898, 3.9.899, 3.9.900, 3.9.901, 3.9.902, 3.9.903, 3.9.904, 3.9.905, 3.9.906, 3.9.907, 3.9.908, 3.9.909, 3.9.910, 3.9.911, 3.9.912, 3.9.913, 3.9.914, 3.9.915, 3.9.916, 3.9.917, 3.9.918, 3.9.919, 3.9.920, 3.9.921, 3.9.922, 3.9.923, 3.9.924, 3.9.925, 3.9.926, 3.9.927, 3.9.928, 3.9.929, 3.9.930, 3.9.931, 3.9.932, 3.9.933, 3.9.934, 3.9.935, 3.9.936, 3.9.937, 3.9.938, 3.9.939, 3.9.940, 3.9.941, 3.9.942, 3.9.943, 3.9.944, 3.9.945, 3.9.946, 3.9.947, 3.9.948, 3.9.949, 3.9.950, 3.9.951, 3.9.952, 3.9.953, 3.9.954, 3.9.955, 3.9.956, 3.9.957, 3.9.958, 3.9.959, 3.9.960, 3.9.961, 3.9.962, 3.9.963, 3.9.964, 3.9.965, 3.9.966, 3.9.967, 3.9.968, 3.9.969, 3.9.970, 3.9.971, 3.9.972, 3.9.973, 3.9.974, 3.9.975, 3.9.976, 3.9.977, 3.9.978, 3.9.979, 3.9.980, 3.9.981, 3.9.982, 3.9.983, 3.9.984, 3.9.985, 3.9.986, 3.9.987, 3.9.988, 3.9.989, 3.9.990, 3.9.991, 3.9.992, 3.9.993, 3.9.994, 3.9.995, 3.9.996, 3.9.997, 3.9.998, 3.9.999, 4.0.000, 4.0.001, 4.0.002, 4.0.003, 4.0.004, 4.0.005, 4.0.006, 4.0.007, 4.0.008, 4.0.009, 4.0.010, 4.0.011, 4.0.012, 4.0.013, 4.0.014, 4.0.015, 4.0.016, 4.0.017, 4.0.018, 4.0.019, 4.0.020, 4.0.021, 4.0.022, 4.0.023, 4.0.024, 4.0.025, 4.0.026, 4.0.027, 4.0.028, 4.0.029, 4.0.030, 4.0.031, 4.0.032, 4.0.033, 4.0.034, 4.0.035, 4.0.036, 4.0.037, 4.0.038, 4.0.039, 4.0.040, 4.0.041, 4.0.042, 4.0.043, 4.0.044, 4.0.045, 4.0.046, 4.0.047, 4.0.048, 4.0.049, 4.0.050, 4.0.051, 4.0.052, 4.0.053, 4.0.054, 4.0.055, 4.0.056, 4.0.057, 4.0.058, 4.0.059, 4.0.060, 4.0.061, 4.0.062, 4.0.063, 4.0.064, 4.0.065, 4.0.066, 4.0.067, 4.0.068, 4.0.069, 4.0.070, 4.0.071, 4.0.072, 4.0.073, 4.0.074, 4.0.075, 4.0.076, 4.0.077, 4.0.078, 4.0.079, 4.0.080, 4.0.081, 4.0.082, 4.0.083, 4.0.084, 4.0.085, 4.0.086, 4.0.087, 4.0.088, 4.0.089, 4.0.090, 4.0.091, 4.0.092, 4.0.093, 4.0.094, 4.0.095, 4.0.096, 4.0.097, 4.0.098, 4.0.099, 4.0.100, 4.0.101, 4.0.102, 4.0.103, 4.0.104, 4.0.105, 4.0.106, 4.0.107, 4.0.108, 4.0.109, 4.0.110, 4.0.111, 4.0.112, 4.0.113, 4.0.114, 4.0.115, 4.0.116, 4.0.117, 4.0.118, 4.0.119, 4.0.120, 4.0.121, 4.0.122, 4.0.123, 4.0.124, 4.0.125, 4.0.126, 4.0.127, 4.0.128, 4.0.129, 4.0.130, 4.0.131, 4.0.132, 4.0.133, 4.0.134, 4.0.135, 4.0.136, 4.0.137, 4.0.138, 4.0.139, 4.0.140, 4.0.141, 4.0.142, 4.0.143, 4.0.144, 4.0.145, 4.0.146, 4.0.147, 4.0.148, 4.0.149, 4.0.150, 4.0.151, 4.0.152, 4.0.153, 4.0.154, 4.0.155, 4.0.156, 4.0.157, 4.0.158, 4.0.159, 4.0.160, 4.0.161, 4.0.162, 4.0.163, 4.0.164, 4.0.165, 4.0.166, 4.0.167, 4.0.168, 4.0.169, 4.0.170, 4.0.171, 4.0.172, 4.0.173, 4.0.174, 4.0.175, 4.0.176, 4.0.177, 4.0.178, 4.0.179, 4.0.180, 4.0.181, 4.0.182, 4.0.183, 4.0.184, 4.0.185, 4.0.186, 4.0.187, 4.0.188, 4.0.189, 4.0.190, 4.0.191, 4.0.192, 4.0.193, 4.0.194, 4.0.195, 4.0.196, 4.0.197, 4.0.198, 4.0.199, 4.0.200, 4.0.201, 4.0.202, 4.0.203, 4.0.204, 4.0.205, 4.0.206, 4.0.207, 4.0.208, 4.0.209, 4.0.210, 4.0.211, 4.0.212, 4.0.213, 4.0.214, 4.0.215, 4.0.216, 4.0.217, 4.0.218, 4.0.219, 4.0.220, 4.0.221, 4.0.222, 4.0.223, 4.0.224, 4.0.225, 4.0.226, 4.0.227, 4.0.228, 4.0.229, 4.0.230, 4.0.231, 4.0.232, 4.0.233, 4.0.234, 4.0.235, 4.0.236, 4.0.237, 4.0.238, 4.0.239, 4.0.240, 4.0.241, 4.0.242, 4.0.243, 4.0.244, 4.0.245, 4.0.246, 4.0.247, 4.0.248, 4.0.249, 4.0.250, 4.0.251, 4.0.252, 4.0.253, 4.0.254, 4.0.255, 4.0.256, 4.0.257, 4.0.258, 4.0.259, 4.0.260, 4.0.261, 4.0.262, 4

### 3.10.3 Identify Privacy Risks/Security Threats regarding Challenging Compliance

Risk	Description
1	Describe Privacy Risk / Threat here

Commented [sk73]: To do once answers above are obtained

## 4 OVERALL RISK AND MITIGATION

### 4.1 Risk Mitigation Table (PIA manual reference: 6.0 Assessing risk and mitigation strategies)

Please complete the table below. Input all of the risks identified in sections 3.1 to 3.10, identifying any privacy risks associated with the collection, use or disclosure of the personal information involved in this project and stating the mitigation strategies that will be implemented.

For more information, see section 3 in the PIA Manual.

Impact	Risk Reference Table		
High	Medium	High	Very High
Medium	Low	Medium	High
Low	Very Low	Low	Medium
Likelihood	Low	Medium	High

#	Privacy Risk / Threat	Likelihood	Impact	Risk Level	Mitigation Strategy	Accountability	Risk Level After Mitigation
1	Customers may not read the Privacy Policy	H	L	M	Links are available to the Privacy Policy on all pages of the Cannabis eCommerce site		VL
1	Risk of personal information being used and/or disclosed for unauthorized purposes.	VL	H	M	Restricted access to personal information Users must complete privacy training		L

Commented [sk74]: 17. Page 28/29: Mitigation



23	Risk of unauthorized or over collection of personal information	VL	L	VL	Minimal personal information is collected from customers in the checkout process. No free text fields are included in the online ordering process to mitigate unintentional overcollection of personal information.			18. Page 28/29: The risk of over recognize and appropriately Commented [sk75]: Commented [sk76R75]: Susan this is referencing the Contact Us form – who gets those emails and how have they been trained to manage the PI that they receive? Commented [sk77]: 17. Page 28/29: Mitigation
24	Retention period of 22 days for abandoned carts is unnecessarily long given that a customer cannot “log in” to retrieve cart and it is only available to them until browser is closed.	L	H	M	Retention should be configured to 1 day to avoid unauthorized retention and potential unauthorized use/access/disclosure		VL	19. Page 29: Last time I checked session stays active for 23 d continuation of the shopping as given under recommend: Commented [sk78]: Commented [sk79R78]: Age verification cookie is separate cookie and should all be aligned; Lee to check with vendor; Commented [sk80R78]: 20 & 21 add web analytics; Google fonts API – IP disclosed to them; if the use of the service of a font for a design is accepted then the sharing of information is required for delivery of that service; if Font is required to work with Drupal – we shouldn't use hosted fonts Branding guidelines developed outside of the website included specs for a specific font – use online service Google Font API. Automated process; Lee to send me some information; Could YLC achieve same without a font provided service? Trade offs - turn it off and layout will not conform with the guidelines; pay to develop without using API – cost outlines; Look at privacy statement re: processing and third party lists Commented [sk81R78]: Susan -privacy policy for the cannabis site does not include information about disclosure of PI to Google Font API LEE – I need the data flow for this disclosure Commented [sk82]: Observation6 – need updated STRA recommendations

FROM STRA

## Recommendations

### 1.1 Conduct a Penetration Test

Priority:

High

Recommendation	Findings and Risk Implications	Management Response & Deadline
YG should consider conducting a penetration test for the system before the production	<p>It's critical to ensure that the system goes through a full web application and network penetration test as the system carries highly sensitive data and product. Moreover, this system represents the first full e-commerce system in YG with a new development partner.</p> <p>This should mitigate the following risks:</p> <p><u>Q2 Hacker takes control of service due to unpatched security flaw</u></p> <p><u>Q3 Hacker takes control of service due to flaw introduced by poor software testing</u></p>	<p><b>Management Response:</b></p> <p>A penetration test would be conducted by a third party vendor for the eCommerce portal.</p> <p><b>Owner:</b></p> <p>Kanwardeep Singh</p> <p>Project Manager, ICT</p> <p><b>Implementation Deadline:</b></p> <p>16-Oct-2018</p>

## 1.2 Deploy a Web Application Firewall (WAF) and NSX configuration

Priority:

High

Recommendation	Findings and Risk Implications	Management Response & Deadline
<p>YG is currently using NGINX as a load balancer only which helps with availability and efficiency. However, it is important to configure it as a Web Application Firewall (WAF) as well; such as ModSecurity module, will provide a continuous and real-time protection to the system.</p> <p>Wrapping the system with strict rules in NSX will further mitigate the intrusion risks</p>	<p>WAF will provide a real-time application security monitoring by inspecting the HTTP traffic stream, in real-time and providing a full HTTP traffic logging which in turn will harden the Web application.</p> <p>NSX rules configuration for Virtual Network will help in restricting access to the server and consequently securing it. These should mitigate the following risk:</p> <p><u>09 Hacker takes control of the system due to lack of Intrusion Detection System IDS, network monitoring, and Application layer firewalls</u></p>	<p><b>Management Response:</b></p> <p>ICT is working to install NSX by next week.</p> <p>Lee to further explore on WAF with TIO team.</p> <p><b>Owner:</b></p> <p>Lee O'Mara</p> <p>eServices Web Architect</p> <p><b>Implementation Deadline:</b></p> <p>05-Oct-2018 for NSX</p> <p>12-Oct-2018 for WAF</p>

**1.3 Establish an access control management policy/process**
**Priority:**
**Moderate**

Recommendation	Findings and Risk Implications	Management Response & Deadline
YLC need to have a documented and efficient access control management process	<p>A formal documented access control is vital to reduce the risk of data leak and keep data the integrity.</p> <p>The access control policy should clearly determine the allowed activities of legitimate users, mediate every attempt by a user to access a resource or data in the system.</p> <p>This should mitigate the following risks:  <u>02 Hacker takes control of service due to unpatched security flaw</u>  <u>04 Insider threat to customer data</u></p>	<p><b>Management Response:</b></p> <p>YLC to provide a list of permissions and develop a role and responsibility matrix system by the project go-live date.</p> <p><b>Owner:</b>            Steve Cummings            Director, Operations, YLC</p> <p><b>Implementation Deadline:</b>            16-Oct-2018</p>

**1.4 Building support and operational Model**
**Priority:**
**Moderate**

Recommendation	Findings and Risk Implications	Management Response & Deadline
Management should establish a clear operational model to support the system. First line, second line and third level support with all roles and responsibilities and access level to systems and data should be defined.	<p>This will ensure smooth operations and patching of the system and protect it from accidental and deliberate misconfiguration.</p> <p>This should mitigate the following risks:  <u>01 Service becomes unavailable or vulnerable due to lack of clarity in operational procedure</u></p>	<p><b>Management Response:</b></p> <p>First and second level support to be established by YLC before the go-live of the system. Vendor (Acro Media) will provide the support for initial 3 months after go-live as per the contract.</p> <p><b>Owner:</b>            Steve Cummings            Director, Operations, YLC</p> <p><b>Implementation Deadline:</b>            16-Oct-2018</p>



**1.5 Log monitoring and Intrusion detection****Priority:****High**

Recommendation	Findings and Risk Implications	Management Response & Deadline
YG to provide a tool and process to collect, parse and analyze the system and network logs to ensure early detection of security incidents	<p>Log monitoring is an important factor to maintain the system stability.</p> <p>Logs analytics can help to detect hacking attempts, virus or worm infections and propagation, configuration problems, exploits, hardware problems and many others.</p> <p>This should mitigate the following risk:</p> <p><u>09 Hacker takes control of the system due to lack of Intrusion Detection System IDS, network monitoring, and Application layer firewalls</u></p>	<p><b>Management Response:</b></p> <p>YLC accept the finding and would consider implementing a YG approved solution. Lee to check with Nazar for the potential systems and associated costs.</p> <p><b>Owner:</b></p> <p>Lee O'Mara eServices Web Architect</p> <p><b>Implementation Deadline:</b></p> <p>17-Jan-2019</p>

**1.6 Encryption and Tokenization****Priority:****Moderate**

Recommendation	Findings and Risk Implications	Management Response & Deadline
YG should consider encrypting the transient records in Drupal	<p>It's important to use encryption technologies to protect the confidentiality of customers data within the system from unwanted observation and intrusion</p> <p>This should mitigate the following risks:</p> <p><u>07 Theft of citizen's data from the site.</u> <u>04 Insider threat to customer data</u></p>	<p><b>Management Response:</b></p> <p>All the communication with the server are encrypted, all transactions with the server are encrypted. The data within the application is not encrypted.</p> <p>YLC accept this risk as there is encryption on data in transit. Risk would be reduced by putting a retention policy and limiting the amount of data being retained.</p> <p><b>Owner:</b></p> <p>Steve Cummings Director, Operations, YLC</p> <p><b>Implementation Deadline:</b></p> <p>16-Oct-2018</p>

1.7 Develop a data retention policy		Priority:	Moderate
Recommendation	Findings and Risk Implications	Management Response & Deadline	
YG should clearly define the retention period of all records in the system	<p>It essential to establish periodical reviews of data retained.</p> <p>This should mitigate the following risks:</p> <p><u>10 Risk of data leak from the site due to the lack of a retention policy.</u></p>	<p><b>Management Response:</b></p> <p>Data retention policy in place to retain the personal data for 30days from the date of order and then to anonymize it. Periodic review of the number of days the data needs to be retained for to support the</p>	
		<p>operational processes.</p> <p><b>Owner:</b></p> <p>Steve Cummings Director, Operations, YLC</p> <p><b>Implementation Deadline:</b></p> <p>16-Oct-2018</p>	

## 5 COMMENTS FROM REVIEWER:

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## 6 SIGNATORIES AND APPROVAL

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DM or Delegate

\_\_\_\_\_  
Name, Position

\_\_\_\_\_  
Date

Information Owner

\_\_\_\_\_  
Name, Position

\_\_\_\_\_  
Date

ATIPP Office  
Reviewer

\_\_\_\_\_  
Name, Position

\_\_\_\_\_  
Date

To complete the process, a final copy of this PIA (with all applicable signatures and attachments) must be provided to ATIPP office for its records.



**APPENDIX A – Screen Dumps of the Ordering Process** (~~as of Oct 3, 2018~~ **as of Sep 26, 2019**)**Age Validation**

cannabisyukon.org/homepage



You must be at least 19 years of age to enter this site.

It is illegal for a person younger than 19 years of age to purchase or attempt to purchase, or possess non-medical cannabis in Yukon.

Products will only be shipped to a Yukon address and must be received by a person 19 years and older (valid ID required) who is not intoxicated.

Review our [Terms and Conditions of Sale](#) for purchases.

Enter your date of birth:

MM	DD	YYYY
----	----	------

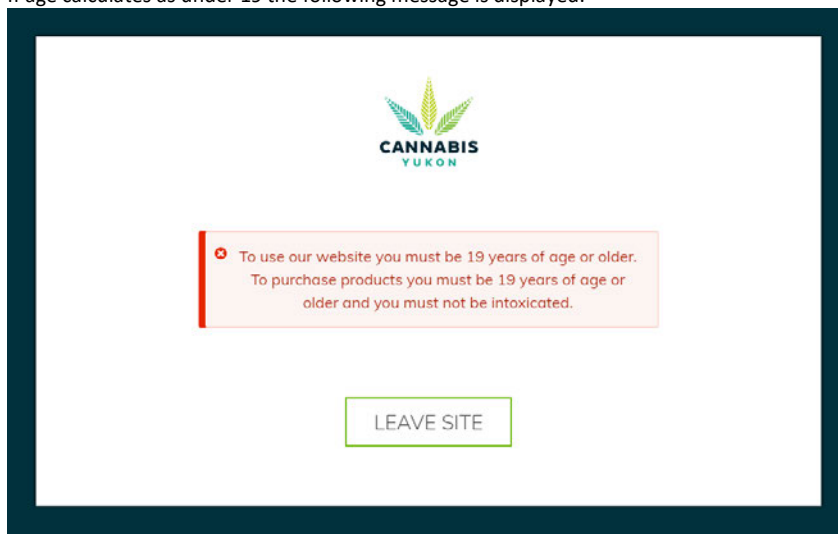
☐ I am not intoxicated. I have read, understand and agree to our [Privacy Policy](#) and [Terms of Service](#), understand that it is illegal to purchase or attempt to purchase cannabis if under 19 years of age.

ENTER SITE

LEAVE SITE

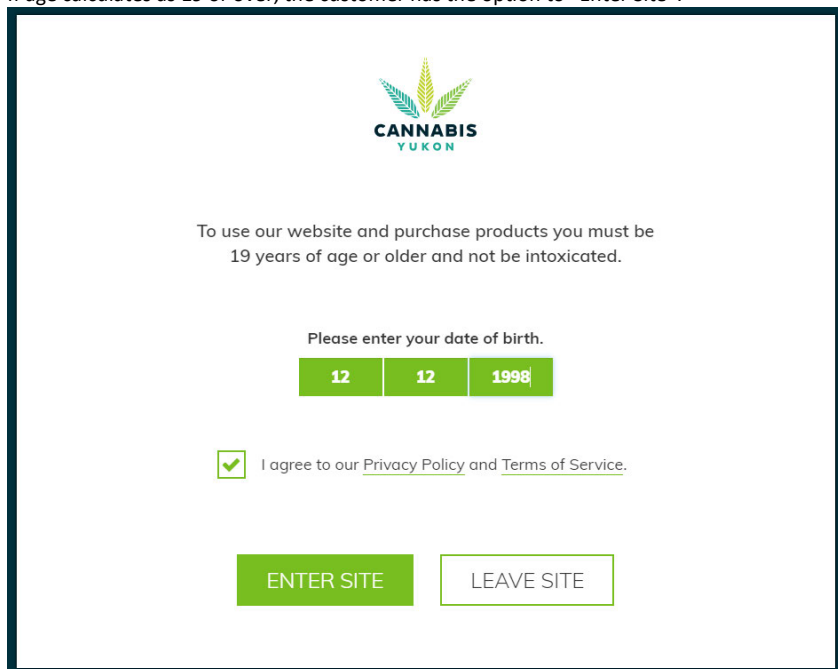
Commented [sk83]: Need to add to the pop up to cover CUD notice  
-Need to get an updated version;

If age calculates as under 19 the following message is displayed:



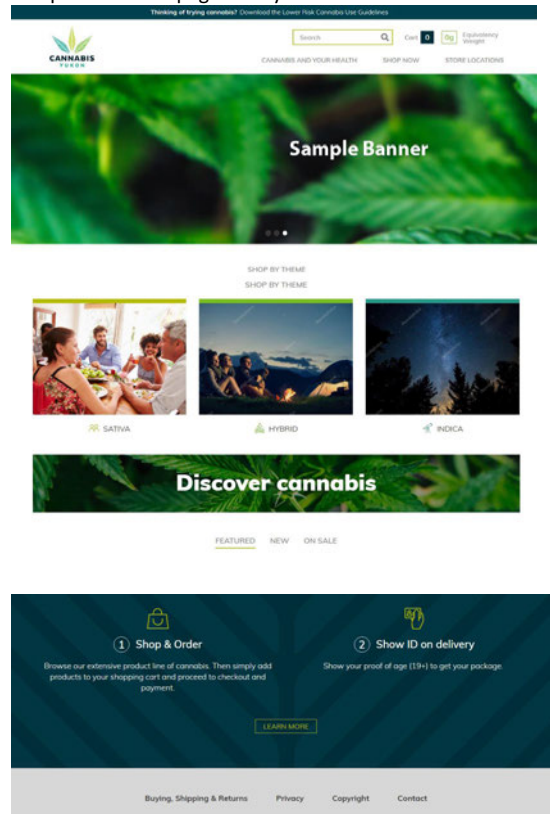
The screenshot shows the Cannabis Yukon logo at the top. Below it is a red-bordered box with a red circle and a white 'x' icon. The text inside the box reads: "To use our website you must be 19 years of age or older. To purchase products you must be 19 years of age or older and you must not be intoxicated." Below this box is a green button labeled "LEAVE SITE".

If age calculates as 19 or over, the customer has the option to "Enter Site":



The screenshot shows the Cannabis Yukon logo at the top. Below it is the text: "To use our website and purchase products you must be 19 years of age or older and not be intoxicated." Below this text is the prompt "Please enter your date of birth." followed by three green input fields containing the values "12", "12", and "1998". Below the input fields is a green checkbox with a white checkmark, followed by the text "I agree to our [Privacy Policy](#) and [Terms of Service](#)." Below this text are two green buttons: "ENTER SITE" and "LEAVE SITE".

Sample of banner page if they enter the site:







Sample of information pages available to the customer:


Mixing cannabis and alcohol	+
Avoid smoking cannabis	+
Synthetic cannabis products	+
Responsible sales	+
Protecting minors	+
The difference between non-medical cannabis and medical cannabis	+

## How to buy cannabis online

Thinking of trying cannabis? Download the Lower Risk Cannabis Use Guidelines





Cart **0**  Equivalency Weight

[CANNABIS AND YOUR HEALTH](#) [SHOP NOW](#) [STORE LOCATIONS](#)

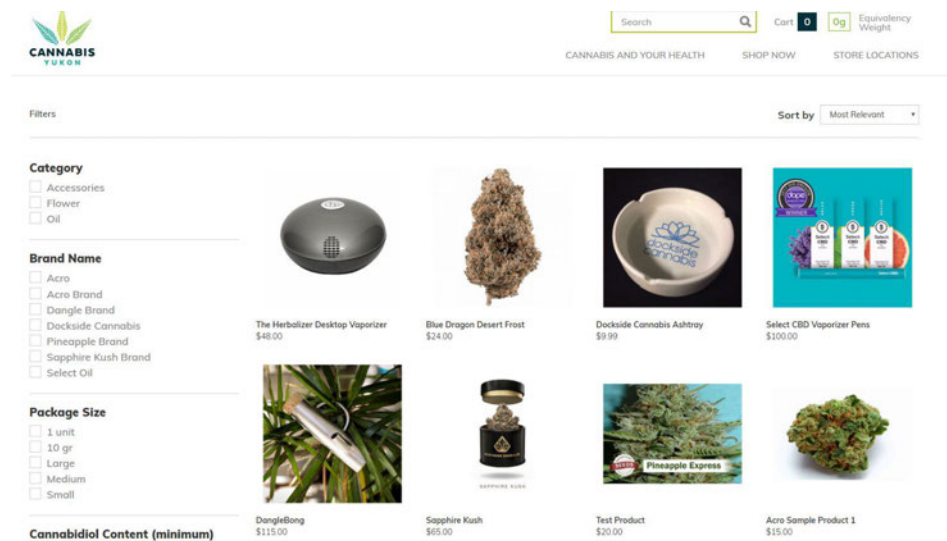
The health risks of using cannabis.

### Cannabis and your health

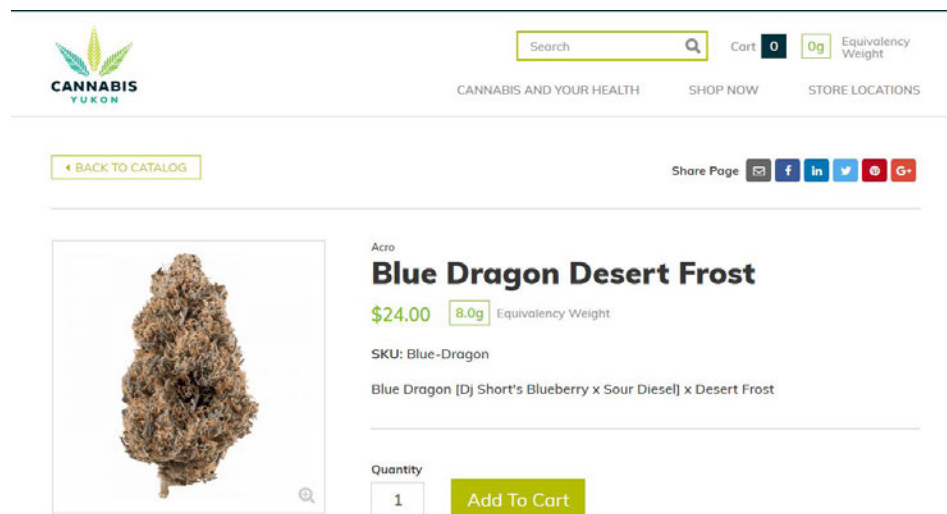
At Yukon Liquor Corporation and Cannabis Yukon, we encourage and promote the responsible use of our products. We will ensure cannabis distribution and sales will prioritize restricting access to minors, eliminating the criminal element, ensuring health and safety standards, and providing public education. We highly recommend reading and following the [Lower Risk Cannabis Use Guidelines](#).

Health effects of cannabis use while pregnant or breastfeeding	+
Short-term effects of cannabis use	+
Cannabis addiction	+
Choose lower-risk cannabis products	+

Sample of the Shop Now page that provides catalog of available products:



When customer clicks on a product more details are provided:



When the customer adds the product to the cart the “Equivalency weight” is updated accordingly:

Thinking of trying cannabis? Download the Lower Risk Cannabis Use Guidelines

CANNABIS YUKON

Search

Cart 2 16.0g Equivalency Weight

Equivalency Weight

Short tool tip about equivalency weight, with a link to learn et ipsum ded ue leo mutatta...  
learn more >

✓ Default added to your cart.

BACK TO CATALOG

Share Page

Acro

### Blue Dragon Desert Frost

\$24.00 8.0g Equivalency Weight

SKU: Blue-Dragon

Blue Dragon [D] Short's Blueberry x Sour Diesel x Desert Frost

Quantity

When Customer views their cart:

CANNABIS YUKON

Search

Cart 2 16.0g Equivalency Weight

CANNABIS AND YOUR HEALTH SHOP NOW STORE LOCATIONS

## Shopping cart

Product	Price	Quantity	Total Equivalency Weight	Total
<p>Default SKU: Blue-Dragon Equivalency Weight: 8.0g</p>	\$24.00	2 remove	16.0g	\$48.00
Subtotal				\$48.00
Total				\$48.00
Total Order Equivalency Weight				16.0g

UPDATE CART CHECKOUT



When Customer clicks on “Checkout” button:

Order Information > Review > Complete

Order Information

Contact Information

Email \*

We'll email your order confirmation to this address.

Shipping Information

First name \*

Last name \*

Company - Optional

Street address \*

City \*

Territory \*

Yukon

Postal code \*

We only accept orders within the territory of Yukon

RECALCULATE SHIPPING

Payment Information

Card number \*

Expiration date \*

CVC \*

First name \*

Last name \*

Company - Optional

Street address \*

City \*

Province \*

- Select -

Postal code \*

CONTINUE TO REVIEW

Go back

You won't be charged until you review your order.

2 x

Default

\$24.00

SKU: Blue-Dragon

Equivalency

Weight:

8.0g

\$48.00

Subtotal

\$48.00

Total

\$48.00

Total Order

Equivalency Weight

16.0g

How to buy cannabis online

After customer fills in the shipping and payment information:

Order Information > **Review** > Complete

## Review

Contact Information [\(Edit\)](#)  
x@y.com

Shipping Information [\(Edit\)](#)  
X Y  
9041 Quartz Road  
Whitehorse YT Y1A1B2  
Canada

Shipping method  
Expedited Parcel


Payment Information [\(Edit\)](#)  
Credit Card

Verify Age  
☐ I am 19 years of age or older and I am currently not intoxicated \*

[PAY AND COMPLETE PURCHASE](#) [Return to Order Information](#)

2 x	Default	\$48.00
	\$24.00	
	SKU: Blue-Dragon	
	Equivalency Weight: 8.0g	
Subtotal		\$48.00
Shipping		\$20.56
GST		\$3.43
Total		\$71.99
Total Order Equivalency Weight:		16.0g

If the card is declined, user is back to the payment information page to re-enter/correct the card details:

 We encountered an error processing your payment method. We use a secure, single-use authorization that is temporary and it might have already expired. Please try adding your payment details again using the "New credit card" option.

Order Information > Review > Complete

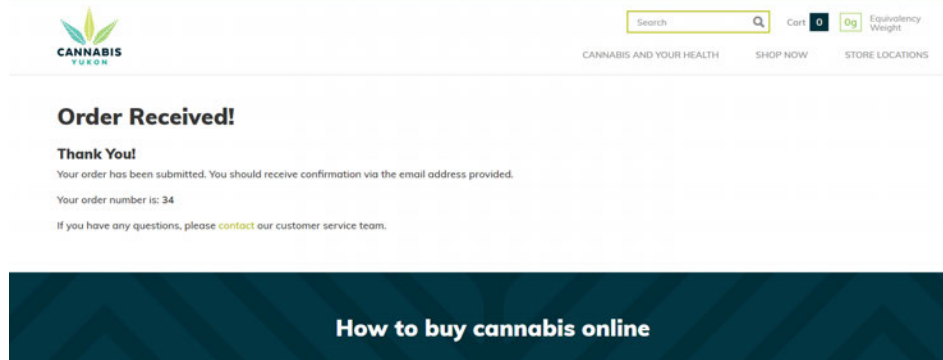
## Order Information

Contact Information  
Email \*  
  
We'll email your order confirmation to this address.

Shipping Information  
First name \*  
  
Last name \*  
  
Company Optional  
  
Street address \*

2 x	Default	\$48.00
	\$24.00	
	SKU: Blue-Dragon	
	Equivalency Weight: 8.0g	
Subtotal		\$48.00
Shipping		\$20.56
GST		\$3.43
Total		\$71.99
Total Order Equivalency Weight:		16.0g

When the payment is successful, confirmation of order and Order ID is generated and email sent:





 Reply
  Reply All
  Forward




Tue 2018-10-02 8:26 PM

info@gov.yk.ca on behalf of webadmin@acromedia.com

Order #31 confirmed

To: Steve.Cummings

 If there are problems with how this message is displayed, click here to view it in a web browser.

Click here to download pictures. To help protect your privacy, Outlook prevented automatic download of some pictures in this message.

[Store](#)

## Order Confirmation

### Order #31 details:

3 x Default \$72.00

#### Shipping Information

Steve Cummings  
 Yukon Liquor Corporation Yukon Liquor Corporation  
 9031 Quartz Road 9031 Quartz Road  
 Whitehorse YT Y1A 4P9 Whitehorse YT Y1A 4P9  
 Canada Canada

#### Billing Information

Steve Cummings  
 Yukon Liquor Corporation  
 9031 Quartz Road  
 Whitehorse YT Y1A 4P9  
 Canada

Shipping method

Expedited Parcel

**Commented [SK84]:** This is not the email that will used to send messages – have not been supplied with it but have been told it is a donotreply address that will not identify the email as being related to a cannabis sale

**Commented [sk85R84]:** LEE Can I get a sample for the actual email account that is being used

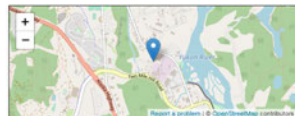
Other available information once in the store site include:

## Store locations

Yukon's plan is to enable private retail stores to operate under a licensing regime after legalization.

Regulations and policies are being developed to allow for private retail sales in 2019.

### Cannabis Yukon



[View Larger Map](#)

120B Industrial Rd  
Whitehorse, Yukon  
Y1A 2T9

Phone:

Email:

HOURS

Monday to Thursday: 11:00 a.m. to 6:00 p.m.

Friday: 11:00 a.m. to 7:00 p.m.

Saturday: 11:00 a.m. to 6:00 p.m.

Sunday: closed

### Footer links:

## Buying, shipping and returns

### Buying

To view or purchase products from our website you must be 19 years of age or older.

Our checkout process limits you to 30 grams or the equivalent per purchase. This limit is to prevent anyone from exceeding the legal personal public possession limit. For more information on possession limits and legal cannabis products visit (Yukon regulations).

Our online store supports Visa and MasterCard credit cards only.

If you have an American credit card, you may not be able to check out due to the restrictions in place by your credit card company.

To learn more about how to choose a product that is right for you visit [Cannabis 101](#). After you place and pay for an order you will receive an email confirmation with your order number. Please keep this email as your order number will help us if you have any issues.

You will receive a second email once your order has shipped. It will include a tracking number. Keep this tracking number in case you have any issues with delivery or need to pick-up from the post office.

### Shipping

### Returns and refunds

## Buying, shipping and returns

### Buying

To view or purchase products from our website you must be 19 years of age or older.

Our checkout process limits you to 30 grams or the equivalent per purchase. This limit is to prevent anyone from exceeding the legal personal public possession limit. For more information on possession limits and legal cannabis products visit (Yukon regulations).

Our online store supports Visa and MasterCard credit cards only.

If you have an American credit card, you may not be able to check out due to the restrictions in place by your credit card company.

To learn more about how to choose a product that is right for you visit [Cannabis 101](#). After you place and pay for an order you will receive an email confirmation with your order number. Please keep this email as your order number will help us if you have any issues.

You will receive a second email from Canada Post once your order has shipped. It will include a tracking number. Keep this tracking number in case you have any issues with delivery or need to pick-up from the post office.

# Buying, shipping and returns

Buying +

Shipping -

We can only ship to a Yukon address, the person receiving the delivery must be at least 19 and not intoxicated.

All deliveries are by Canada Post who will ensure Proof of Age on delivery. Proof of Age ensures that when the receiver appears to be less than 25 years of age, Canada Post will request a photo identification proving the person's age and will record the signature and name of the receiver. Canada Post will only release the package to a person with an acceptable identification (ID) proving the required age of 19 as part of the Proof of Age option and who is not intoxicated.

If no adult is home, or if you appear intoxicated, Canada Post will leave a delivery notice card instructing the recipient to collect the package at a post office. Only the addressee (of legal age) can pick up the package at the post office. The addressee must present one valid piece of government-issued photo identification that matches the address on the item.

If you have a post office box as your delivery address a delivery notice card will be left in the post office box indicating which post office you need to pick-up the package at.

IMPORTANT: If you are not at the delivery address to receive your product, Canada Post will return it to Yukon Liquor Corporation if it is not picked up after fifteen (15) days. Yukon Liquor Corporation will not issue a refund if Canada Post is unable to deliver the product and it is not picked up within the fifteen (15) days.

# Buying, shipping and returns

Buying +

Shipping +

Returns and refunds -

Cannabis retail store staff will process a return for either a refund or a replacement product if the product is returned within 15 days of purchase with the original receipt if:

- The product is recalled.
- A customer received a product they did not order or the order is incomplete.
- The order arrives damaged or the packaging appears to have been tampered with in transit.
- The customer returns the product within 15 days of purchase.
- The package was shipped and not received.

If this happens please [contact us](#) as soon as you notice an issue listed above.



Buying, shipping and returns

Buying

Shipping

We can only ship to a Yukon address.

All deliveries are by Canada Post who will ensure Proof of Age on delivery. Proof of Age ensures that when the receiver appears to be less than 25 years of age, Canada Post will request a photo identification proving the person's age and will record the signature and name of the receiver. Canada Post will only release the package to a person with an acceptable identification (ID) proving the required age of 19 as part of the Proof of Age option.

If no adult is home, Canada Post will leave a delivery notice card instructing the recipient to collect the package at a post office. Only the addressee (of legal age) can pick up the package at the post office. The addressee must present one valid piece of government-issued photo identification that matches the address on the item.

If you have a post office box as your delivery address a delivery notice card will be left in the post office box indicating which post office you need to pick up the package at.

IMPORTANT: If you are not at the delivery address to receive your product, Canada Post will return it to YLC if it is not picked up after fifteen (15) days. YLC will not issue a refund if Canada Post is unable to deliver the product and it is not picked up within the fifteen (15) days.

Returns and refunds

Buying, shipping and returns

Buying

Shipping

Returns and refunds

The Yukon Cannabis online store will ONLY accept returns or issue refunds if:

- 1. Your order does not arrive.
- 2. Your order arrives damaged.
- 3. Your order is wrong or incomplete.

If this happens please contact XXXXXX as soon as you notice an issue listed above.

Privacy Policy: [See Appendix D](#)

Privacy Policy

The Yukon Liquor Corporation is committed to protecting your privacy. The collection, use, disclosure, retention, and disposal of information collected via Yukon Liquor Corporation online properties, such as our websites is done in compliance with the Access to Information and Protection of Privacy Act and the Archives Act. The purpose of this privacy statement is to inform you of the personal information that may be collected from you when you interact with the Yukon Liquor Corporation online.

Collection of personal information

Personal information from Yukon Liquor Corporation websites is collected pursuant to section 29(c) of the Access to information and Protection of Privacy Act for the purposes stated below.

Communicating with the Yukon Liquor Corporation

If you choose to send an email or complete a feedback form online, your personal information may be used in order to respond to your inquiry. Emails and other electronic methods used to communicate with the Yukon Liquor Corporation are not secure unless it is specifically stated on a web page. Therefore, it is recommended that you do not send sensitive personal information using these methods.

Improving your experience on the Yukon Liquor Corporation websites

Web analytics

Website analytics is the collection, analysis, measurement, and reporting of data about website traffic and visits for purposes of understanding and improving the Yukon Liquor Corporation website usage. The Yukon Liquor Corporation uses analytics software to collect website visitor data. This information is not used to identify individuals. When your computer contacts a Yukon Liquor Corporation web page, the following types of information are collected and used for website analytics:

- the originating IP address
- the date and time of the request
- the type of browser used
- the type of device used
- the computer operating system used
- the screen size being used
- the page(s) visited
- the URL of the page that was viewed prior to the current page
- files that were clicked and downloaded
- links to an outside domain that were clicked
- the time it takes for webpages to be generated by the webserver and then downloaded by the user
- the main language of the browser being used

### Cookies

Some Yukon Liquor Corporation websites may download a "cookie" to a visitor's computer. This is a data file that the web server uses to remember the behaviours and preferences of the visitor, thereby allowing the site to better respond to the visitor's habits on subsequent visits. Any visitor with concerns over the collection of this type of information should set their browser to not accept cookies or to display a warning that a cookie will be downloaded if the site is accessed. Setting these browser options will not exclude the visitor from any Yukon Liquor Corporation website, but may prevent you from purchases.

### Registration

Some Yukon Liquor Corporation websites request visitors to register via an online form. This is done so that the Government can deliver a service and respond more effectively to a specific identified individual. The data from the form and its response will be stored to fulfill the service request. These communications become part of the record of the transaction and must be managed according to Yukon Liquor Corporation records management procedures. The personal information contained within the communications is managed according to the requirements of the Access to Information and Protection of Privacy Act.

### Third-party social media

The Yukon Liquor Corporation's use of social media serves as an extension of its presence on the internet. Social media account(s) are public and are not hosted on Yukon Liquor Corporation servers. Users who choose to interact with the Yukon Liquor Corporation via social media should read the terms of service and privacy policies of these third-party service providers and those of any applications used to access them. The Yukon Liquor Corporation is in no way responsible for the privacy practices of these sites. Read their privacy statements to find out how they track and use your information:

- [Facebook](#)
- [Twitter](#)
- [YouTube](#)

### Third party services we use

When you visit our websites, or purchase products, we use the following third party services which may collect personal data:

#### Bambora

Purpose of processing: To process payment for orders in our shop

Data location and security: Canada

Personal data collected: Payment information, billing name, billing address

[Privacy policy](#)

#### Privacy policy

### Canada Post

Purpose of processing: To calculate shipping costs and to deliver products ordered in our shop

Data location and security: Canada

Personal data collected: Name, physical address

[Privacy policy](#)

For questions about online privacy in the Yukon Liquor Corporation email [Susan.Russell@gov.yk.ca](mailto:Susan.Russell@gov.yk.ca) or phone 867-667-3704.

[Buying, Shipping & Returns](#)
[Privacy](#)
[Copyright](#)
[Contact](#)



## APPENDIX B — Network & Information Access Agreement



Information and Communications Technology

### NETWORK and INFORMATION ACCESS AGREEMENT

with respect to services provided to

**Government of Yukon**

("YG")

by

**[[contractor name]]**

(the "Contractor")

1. This agreement governs access by the Contractor's employees, agents, and subcontractors (the Contractor's "Staff") to YG's private networks, computers, and information.
2. This agreement is subject to the terms of YG **contract** **or** **standing offer agreement** number **[[number]]**. Failure to follow the terms of this agreement may result in the termination of the **contract** **or** **standing offer agreement**.
3. The Contractor recognizes that each member of its Staff requiring access to YG networks must have an Account Application Form completed and authorized by the sponsoring department and signed by the individual Staff member before exercising access to those networks. Contractor Staff are authorized network access only to the information identified in their fully signed Account Application Forms.
4. The Contractor shall be accountable for all actions committed and all omissions made by its Staff in accessing YG networks and information.
5. The Contractor shall notify YG's Highways and Public Works Information and Communication Technology Division ("ICT") in writing of all requests for account modifications and changes to authorized YG network access accounts. The Contractor shall immediately inform ICT if a member of the Contractor's Staff ceases to be employed on a contract between YG and the Contractor, or no longer requires access to YG networks for work related to the execution of such a contract.
6. The Contractor shall immediately inform YG in writing if the Contractor becomes aware of any occurrence or incident resulting in suspected or confirmed contravention of any part of this agreement. Furthermore, the Contractor shall inform ICT as soon as possible after becoming aware of any circumstances, incidents, or events that may impact the availability or security of any YG computer program, data, or network component.
7. The Contractor acknowledges that all software, files, data, and documentation created by the Contractor Staff during the execution of a YG contract may constitute YG records and may be subject to YG's legislation and policy regarding the use and disposal of records.

VS.201311121

Initials

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1/3





Highways and Public Works

Information and Communications Technology

8. Contractor Staff shall not use any other person's account name, password, or other form of access credential. They shall not divulge, share, or otherwise compromise any passwords for YG accounts, servers, applications, or network devices with which they may be provided during the course of work on contracts for YG.
9. Contractor Staff shall not use YG computer systems, applications, networks, accounts, or data for activities not directly related to the execution of YG contracts.
10. Contractor Staff shall treat personal information in accordance with Yukon's *Access to Information and Protection of Privacy Act* and shall not disclose it to any third party without the consent of YG.
11. Contractor Staff shall treat as confidential all information supplied to, or obtained by, the Contractor, or that comes to the knowledge of Contractor Staff during work for YG. Furthermore, Contractor Staff shall not publish or disclose this information to any third party, or permit it to be published or disclosed to any third party at any time before or after termination of the contract unless specifically authorized by YG.
12. Contractor Staff shall store and transmit personal and YG information in a manner that ensures it is controlled as required by Sections 10 and 11 of this document. More specifically, Contractor Staff shall not transmit the personal information of Yukon residents via email nor store YG information using data storage services owned by a third party. [[Insert specific examples where possible of other things that are prohibited or OK; example... Contractor Staff may transmit to YG, or to a third party specifically authorized by YG, geomatics-related data, information, images, scripts, software, reports, and correspondence by email or other means via YG networks or the public Internet.]]
13. Contractor Staff shall not make unauthorized copies of YG software, data, or documentation.
14. Contractor Staff shall introduce files or software to YG computer systems only in accordance with a contract between the Contractor and YG. Before doing so, Contractor Staff shall scan files and software for viruses, malware, and other potentially harmful content.
15. Contractor Staff shall not reveal to unauthorized persons the details of any hardware or software security mechanisms or procedures used by YG. Furthermore, Contractor Staff shall not test, examine, or attempt to circumvent such security mechanisms or procedures unless required to do so by a contract between the Contractor and YG.
16. Contractor Staff shall not access or modify YG software, files, or data without express permission from YG to do so. Contractor Staff shall not take any action that might reasonably be construed as likely to impact other YG network users by obstructing, interrupting, or interfering with the use of YG computer programs, data, or network components. Furthermore, Contractor Staff shall not take any action that might be construed as likely to alter or destroy computer programs, data, or network components, or that would render them meaningless, useless, or defective.

V9.20131121

Initials

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2/3



Highways and Public Works  
Information and Communications Technology

These members of the Contractor's Staff who have been granted access to YG networks hereby declare that they have read, understood, and agree to be bound by the provisions of this agreement.

Name	Title	Signature	Date

As an authorized representative of the Contractor, I hereby declare that I have read, understood, and agree to bind the Contractor to the provisions of this agreement.

Name	Title	Signature	Date

1

Formatted: Font: (Default) +Body (Calibri)

# APPENDIX C – Account Application Form



Highways and Public Works  
Information & Communications Technology

Print Form

## ACCOUNT APPLICATION FORM Incident # \_\_\_\_\_

ACCOUNT INFORMATION			
<input type="checkbox"/> NEW	<input type="checkbox"/> DELETE	<input type="checkbox"/> CHANGE	
Last Name: _____	First Name: _____	Middle Initial: _____	
Title: _____	Phone: _____	Mail Code: _____	
Department: _____	Branch: _____	Employee #: _____	
- If you have an EXISTING YNet Account, please use that Account ID. - For new account use: First Name Initial, Middle Initial and Last Name – Up to 8 characters is the standard. - Example: John Paul Smith = JPSMITH - All Account IDs are to be made the same, i.e., YNet and AS400			
ID	_____	Based on Account	_____
<input type="checkbox"/> YNET	<input type="checkbox"/> DIAL-IN YNET	<input type="checkbox"/> VPN	
<input type="checkbox"/> E-Mail	Suggested E-Mail Address _____ @ gov.yk.ca <i>First and Last Name is recommended (example: John.Smith). Please Print Clearly</i>		
<input type="checkbox"/> AS400			
<input type="checkbox"/> CMS			
<input type="checkbox"/> FIRM Required	Access Level _____	Entry Level Access _____	Budget Access Level _____
Data _____	Department _____	Signature of Firm Data Owner _____	

RESPONSIBILITIES
<b>The authorized user (of the account) is responsible for:</b> <ul style="list-style-type: none"> <li>reading, signing, and agreeing to the terms of this form;</li> <li>reading and understanding the government's <i>Guidelines for Using Computers</i> and other guidelines or corporate policies for the use of computer resources and conforming to them;</li> <li>when in doubt, seeking supervisor or departmental HR unit advice to clarify whether a contemplated use is unlawful or unacceptable.</li> </ul>
<b>The supervisor of the authorized user is responsible for:</b> <ul style="list-style-type: none"> <li>ensuring the authorized user reads and signs this form and approving the application by affixing their signature as the user's supervisor;</li> <li>ensuring the authorized user has read and is continually aware of the government's <i>Guidelines for Using Computers</i>, and conforms to appropriate computer use;</li> <li>formally advising ICT of requests for YNet account modifications or to permanently revoke or temporarily suspend a user's access to electronic networks, systems and services;</li> <li>initiating investigations of suspected security breaches, inappropriate or illegal use of the government's computer resources and advising ICT of any suspected activities by the authorized user.</li> </ul>
<b>Information &amp; Communications Technology (ICT) is responsible for:</b> <ul style="list-style-type: none"> <li>managing electronic network user accounts, including identification, authentication and authorization access for YNet users;</li> <li>monitoring the performance, security and integrity of electronic networks and systems; detecting and resolving problems;</li> <li>advising departmental officials and appropriate authorities of suspected unacceptable or illegal activities on a government computer or electronic networks.</li> </ul>

ACCOUNT USER(S) ACKNOWLEDGMENT												
I _____, as authorized user of this account, acknowledge that this account and any information stored in the account is not my personal property, but is the property of Government of Yukon. I agree to fulfill my responsibilities as outlined on this form and in the <i>Guidelines for Using Computers</i> .												
<b>DEPARTMENTAL CONTACT</b>												
<table border="0"> <tr> <td>Authorized User Signature _____</td> <td>Date _____</td> <td>System Administrator's Signature _____</td> <td>Date _____</td> </tr> <tr> <td>Supervisor's Signature _____</td> <td>Date _____</td> <td>Name of System Administrator (Please Print Clearly) _____</td> <td></td> </tr> <tr> <td>Name of Supervisor (Please Print Clearly) _____</td> <td></td> <td></td> <td></td> </tr> </table>	Authorized User Signature _____	Date _____	System Administrator's Signature _____	Date _____	Supervisor's Signature _____	Date _____	Name of System Administrator (Please Print Clearly) _____		Name of Supervisor (Please Print Clearly) _____			
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Revised: 2005-Dec-16

## **APPENDIX D – PRIVACY POLICY (<https://cannabisyukon.org/privacy-policy>)**

The Yukon Liquor Corporation is committed to protecting your privacy. The collection, use, disclosure, retention, and disposal of information collected via Yukon Liquor Corporation online properties, such as our websites is done in compliance with the *Access to Information and Protection of Privacy Act* and the *Archives Act*. The purpose of this privacy statement is to inform you of the personal information that may be collected from you when you interact with the Yukon Liquor Corporation online.

### Collection of personal information

Yukon Liquor Corporation websites collect personal information pursuant to section 29(c) of the *Access to Information and Protection of Privacy Act* for the purposes stated below.

### Communicating with the Yukon Liquor Corporation

If you choose to send an email or complete a feedback form online, your personal information may be used in order to respond to your inquiry. Emails and other electronic methods used to communicate with the Yukon Liquor Corporation are not secure unless it is specifically stated on a web page. Therefore it is recommended that you do not send sensitive personal information using these methods.

### Improving your experience on the Yukon Liquor Corporation websites

#### • Web analytics

Website analytics is the collection analysis measurement and reporting of data about website traffic and visits for purposes of understanding and improving the Yukon Liquor Corporation website usage. The Yukon Liquor Corporation uses analytics software to collect website visitor data. This information is not used to identify individuals. When your computer contacts a Yukon Liquor Corporation web page the following types of information are collected and used for website analytics:

- the originating IP address
- the date and time of the request the type of browser used
- the type of device used
- the computer operating system used
- the screen size being used
- the page(s) visited the URL of
- the page that was viewed prior to the current page
- files that were clicked and downloaded
- links to an outside domain that were clicked
- the time it takes for web pages to be generated by the web server and then downloaded by the user
- the main language of the browser being used

#### • Cookies

Some Yukon Liquor Corporation websites may download a "cookie" to a visitor's computer. This is a data file that the web server uses to remember the behaviours and preferences of the visitor; thereby allowing the site remember shopping cart contents and to better respond to the visitor's habits on subsequent visits. Any visitor with concerns over the collection of this type of information should set their browser to not accept cookies or to display a warning that a cookie will be downloaded if the site is accessed. Setting these browser options will not exclude the visitor from any Yukon Liquor Corporation website but may prevent you from making purchases.



- Registration

Some Yukon Liquor Corporation websites request visitors to register via an online form. This is done so that the Government can deliver a service and respond more effectively to a specific identified individual. The data from the form and its response will be stored to fulfill the service request. These communications become part of the record of the transaction and must be managed according to Yukon Liquor Corporation records management procedures. The personal information contained within the communications is managed according to the requirements of the Access to Information and Protection of Privacy Act.

- Processing Online Orders

If you choose to make purchased on a Yukon Liquor Corporation ecommerce website you will be required to provide personal information to enable processing of your order. Order information will be stored to fulfill the purchase request and managed according to Yukon Liquor Corporation records management procedures in compliance with the Access to Information and Protection of Privacy Act.

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- Third party services we use

When you visit Yukon Liquor Corporation websites, or purchase products online, we use the following third-party services which may collect personal data:

<u>3rd party</u>	<u>Purpose of collection</u>	<u>Data storage location</u>	<u>Personal data collected</u>	<u>Privacy policy link</u>
<u>Bambora</u>	<u>Process payment for orders in our shop</u>	<u>Canada</u>	<ul style="list-style-type: none"> <li>• <u>payment method information</u></li> <li>• <u>billing name</u></li> <li>• <u>billing address</u></li> </ul>	<u>Privacy policy</u>
<u>Canada Post</u>	<u>Calculate shipping costs and deliver products ordered in our shop</u>	<u>Canada</u>	<ul style="list-style-type: none"> <li>• <u>name</u></li> <li>• <u>physical address</u></li> <li>• <u>email address</u></li> </ul>	<u>Privacy policy</u>

For questions about privacy on the Yukon Liquor Corporation websites contact the Director of Finance and Information Services:

Susan Russell  
Susan.Russell@gov.yk.ca  
867-667-3704  
9031 Quartz Rd Whitehorse YT Y1A 4P9

**APPENDIX E – TERMS & CONDITIONS**

(<https://cannabisyukon.org/terms-service>.)

**Terms and Conditions of Sale for Purchases from CANNABISYUKON.ORG**

**THE TERMS AND CONDITIONS IN THIS SECTION APPLY TO ORDERS PLACED THROUGH CANNABISYUKON.ORG**

**PLEASE READ THE FOLLOWING TERMS AND CONDITIONS OF SALE ("TERMS AND CONDITIONS") CAREFULLY BEFORE PLACING AN ONLINE ORDER.**

These Terms and Conditions govern the sale by Yukon Liquor Corporation ("YLC") to you of products ("Products") through the YLC's website located at [www.CannabisYukon.org](http://www.CannabisYukon.org) (the "YLC Website"). YLC reserves the right to change these Terms and Conditions of Sale at any time without prior notice by posting changed Terms and Conditions of Sale on the [www.CannabisYukon.org](http://www.CannabisYukon.org) Website, and you are advised to review the CannabisYukon.org Website regularly for any changes. These Terms and Conditions of Sale were last updated on October 12, 2018. By placing an order through the CannabisYukon.org Website, you agree to be bound by the Terms and Conditions in effect at the time of such order.

**AGE**

As part of YLC's commitment to safe and responsible consumption and in line with federal advertising restrictions, you must be at least 19 years of age to enter this site. It is illegal for a person younger than 19 years of age to purchase or attempt to purchase or possess non-medical cannabis in Yukon. Products will only be shipped to a Yukon address and can only be received by a person 19 years and older with presentation of valid ID on delivery. All sales are final and conditional on the purchaser and recipient being 19 years and older.

**THIRD PARTIES ACTING ON YLC'S BEHALF**

Your personal information is provided by YLC to third parties in order to facilitate payment and delivery. YLC only transfers your personal information to third parties who have agreed to comply with privacy and security standards.

**PAYMENT BY CREDIT CARD**

Payment can be made by VISA or MasterCard. Please complete the credit card section at the checkout page in full. YLC uses a payment gateway provider's server to act as the link between YLC and YLC's bank. YLC does not store any credit card information on its systems.

By submitting your order, you represent that you are authorized to use the designated credit card and you authorize YLC to charge your order to that credit card. When entering your billing information during the checkout process, you must enter the billing address associated with your credit card. YLC reserves the right to obtain authorization from the issuer of that credit card and reserves the right to decline to accept any proposed credit card transaction.

**AVAILABILITY**

Every effort has been made to stock adequate quantities of the goods offered on the CannabisYukon.org Website. Some of the goods, however, are available in relatively small quantities. Some items referred to on the CannabisYukon.org Website may be or become out of stock. If the YLC is unable to fill an

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order for a Product ordered through the CannabisYukon.org Website you will be notified by email and we will only charge on your credit card for the Products that were fulfilled.

#### ORDER QUANTITIES

YLC reserves the right to limit order quantities. Minimum and maximum order quantities as well as order values will be set and changed from time to time. YLC may reject an order if it appears you are attempting to circumvent an order limit.

#### PRICING

Prices quoted on the CannabisYukon.org Website are in Canadian dollars. Prices are subject to change without notice.

#### DELIVERY

Orders to a physical address will be delivered to any individual at that address who is over 19 years of age – see “AGE” above - and who is not intoxicated at the time of delivery (a “designated individual”). The purchaser irrevocably agrees to permit any such designated individual to accept delivery on their behalf.

Orders addressed to a PO box may be delivered to any individual (over 19 years of age – see “AGE” above - who is not intoxicated at the time of delivery) who is registered with Canada Post as associated with that PO box. The purchaser irrevocably agrees to permit any such individual (a “designated individual”) to accept delivery on their behalf.

Delivery times may be affected by weather or order volumes. Orders must be paid in full before they are delivered to their destination.

You will be contacted by email once your order has shipped.

When you pick up Product you must present a copy of your shipping confirmation (which will be emailed to you), and valid government issued photo ID, with proof of age. Products will only be released to a person 19 years of age or older, who is not intoxicated.

Canada Post will not leave Products unattended.

Title to Product passes from YLC to you when you pick up the Product from YLC or when the Product is received by you or a designated individual at the delivery address you indicated in your order, or when retrieved from the Canada Post Depot or outlets by you or a designated individual.

#### IMPORTANT:

If you or the designated individual are not at the delivery address to receive your shipment Canada Post will keep Products at a postal outlet for fifteen (15) days before they are returned to YLC. Once Products are returned to YLC, we may cancel your order. A refund will not be issued.

#### DELIVERY CHARGES

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There is a fee delivery charge for each order for Products shipped to the delivery address you indicate in your order. Products will only be shipped as a complete order. In the event YLC is unable to fulfill your complete order you will be refunded for your order. Delivery charges are not refundable.

#### ERRORS

YLC attempts to ensure that the information on the CannabisYukon.org Website is accurate. However no warranty of accuracy or completeness is expressed or implied. YLC expressly reserves the right to correct errors and to change or update information on the CannabisYukon.org Website at any time without notice. If a Product offered on the CannabisYukon.org Website is not as described, your only remedy is to return it for a refund. In the event of an error in an order confirmation in processing an order in delivering a Product or otherwise YLC reserves the right to correct the error and revise your order accordingly or to cancel the order and to refund any amount charged to you. All refunds are subject to the terms of "REFUNDS" set out directly below.

#### REFUNDS

The Cannabis Yukon online store will ONLY accept returns or issue refunds if:

- YLC is notified of product issues within 30 days of purchase,
- Return is accompanied by the original receipt,
- Your order does not arrive,
- Your order arrives damaged or the packaging has been tampered with,
- You received a product you did not order or the order is incomplete,

The purchase price will be refunded in the applicable tender and means used for the purchase purchases returned as cash, credit card purchases returned to original credit card, all mobile or near field purchases will be returned to credit card of origin.) Please note that delivery charges are non-refundable.

All product returns require the purchaser's name, address and telephone number and the purchaser's signature to acknowledge receipt of the refund. Customers returning product must also show valid, government-issued photo ID to verify their identity. If a customer does not provide this information, the return will not be processed (see "Privacy Policy and Security Statement" section below). Refunds will not be provided for returns without a receipt,

#### GOVERNING LAW

These Terms and Conditions and each purchase of Products through the CannabisYukon.org Website are governed by and shall be construed in accordance with the laws of Yukon and Canada.

#### FORCE MAJEURE

YLC shall not be liable for any damages caused by any delay or failure to perform its obligations where such delay or failure is caused directly or indirectly by an event beyond its reasonable control including, without limitation, (i) acts of God, (ii) natural disasters, (iii) acts of war, insurrection and terrorism, (iv) strikes lockouts and labour disputes (v) government orders or regulations or (vi) shortages of goods labour or transportation.

#### DISCLAIMER AND LIMITATION OF LIABILITY

Except as expressly set out in these Terms and Conditions, there are no warranties, representations or other agreements regarding the Products ordered through the CannabisYukon.org Website. All

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deliveries and pick-up by a designated individual are deemed to have been received by the Purchaser. To the extent permitted by law, YLC shall not be liable to you for indirect, special, consequential, incidental or punitive damages (including, without limitation, damages for or in relation to lateness in delivery, loss of revenue or profits, or the cost of substitute goods), arising directly or indirectly from any breach of contract (fundamental or otherwise) or from any warranties contained herein or from any acts or omissions that may give rise to legal liability (whether in tort, including for negligence, strict liability or under any other theory of legal liability) regardless of whether or not such damages were foreseeable. In no event shall the liability of YLC arising out of or related to any order exceed the total amount paid by you for the Product.

#### DISCONTINUANCE

YLC may discontinue or suspend temporarily or permanently any presently available Products at any time without prior notice.

#### PRIVACY POLICY & SECURITY STATEMENT

YLC is committed to protecting the privacy and confidentiality of its customers' personal information. Please review the YLC Customer Privacy Policy.

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