

Promotion Program

Privacy Impact Assessment

Summary

This document summarizes the project and the Privacy Impact Assessment (PIA)'s recommendations as they pertain to the implementation, starting in December 2015, of a new portal used in connection with the Promotion Program. This new portal is deployed via Appian Cloud and hosted in the United States. Among other things, the portal allows Telefilm Canada's clients to submit funding applications and manage the application process via a user account. Personal information which could potentially be used for administrative purposes is found in employee user accounts (e.g., assignment of tasks and/or files, as well as access history and access permissions to the system relative to these accounts).

A Threat and Risk Assessment (TRA) based on the Treasury Board of Canada Secretariat's security bulletin ITSB-105 (*Security Considerations for the Contracting of Public Cloud Computing Services*) and on our operational standards allowed us to assess the residual risk tied to the technical, physical, operational and legal safeguards of the Appian Cloud platform. The TRA performed as part of the PIA determined 14 potential risks, 11 of which being « low » and 3 being « average » at most. In addition to certain recommendations pertaining to, among other things, administrator and user accounts, incident management, management of the continuity plan as well as data encryption, this PIA allowed Telefilm Canada to determine that the planned measures in relation to the implementation of this portal seeking to ensure the confidentiality, integrity and availability of the information transiting through this platform are in accordance with the *Privacy Act*.