

March 30, 2026

Raynesh Ram

Sent Via Email: rayneshr@gmail.com

Dear Raynesh:

**Re: Access to Information
File Number – 2025-G-030**

MacEwan University has completed your Access to Information Request opened October 28, 2025.

Please find enclosed 59 pages of records in response to your request. Some of the records you requested contain information that is withheld from disclosure under the *Access to Information Act* (ATIA). We have severed the excepted information so that we could disclose to you the remaining information in the records.

The severed information is withheld from disclosure under the following sections of the ATIA.

**Disclosure harmful to business interests of a third party
Section 19 (1)**

“The head of a public body must refuse to disclose to an applicant information that would reveal commercial, financial, labour relations, scientific or technical information that is supplied in confidence and the disclosure of which could reasonably be expected to harm significantly the competitive position or interfere significantly with the negotiating position of the third party.”

The above section was applied to third party information which disclosure would be harmful to business interests of third parties.

**Disclosure harmful to personal privacy
Section 20(1)**

“The head of a public body must refuse to disclose personal information to an applicant if the disclosure would be an unreasonable invasion of a third party’s personal privacy.”

The above section was applied to names and other personally identifiable information of individuals for whom their name and information could constitute an unreasonable invasion of their privacy.

**Advice from officials
Sections 29(1) (a) &(b)**

“The head of a public body may refuse to disclose information to an applicant if the disclosure could reasonably be expected to reveal advice, proposals, recommendations, analyses or policy options developed by or for a public body or a member of the Executive Council and consultations or deliberations involving employees of a public body.”

The above sections were applied to information containing analysis, advice, recommendations, and deliberation related to discussions between MacEwan University staff and faculty.

**Disclosure harmful to economic and other interests of a public body
Section 30(1)(c)**

“The head of a public body may refuse to disclose information to an applicant if the disclosure could reasonably be expected to harm the economic interest of a public body, including information the disclosure of which could reasonably be expected to result in financial loss to, prejudice the competitive position of, or interfere with contractual or other negotiations so a public body.

The above section was applied to information that could harm the economic interests of MacEwan University.

Some information was not responsive to the request and was severed as Non-responsive.

Some records have been excluded from the package (194 pages), which were withheld in their entirety under sections 19(1), 29(1)(a)&(b) and 30(1)(c).

The final fee for your request has been reassessed based the number of pages released, which has resulted in a refund of \$35.65. A refund will be issued as soon as possible.

FEE ESTIMATE			
Description	Units	Rate per Unit	Total
Search/Locate	120 minutes	@ \$6.75 per 15 minute intervals	\$54.00
Converting/reformatting	27 pages	@\$0.25 per page	\$6.75
Prepare/Handle	530 minutes – 59 records	@ \$6.75 per 15 minute intervals	\$53.10
Total			\$113.85
Deposit			-\$149.50
Total Refund			\$35.65

Under section 58 of the ATIA, you may ask the Information and Privacy Commissioner to review this response. You have 60 business days from the date of this notice to ask for a review in writing to the Information and Privacy Commissioner at 410, 9925-109 Street, Edmonton, Alberta, T5K 2J8 by providing the following: the file number quoted at the top of this letter, a copy of this letter and a copy of the original request for information that you sent to MacEwan University. You may also access an electronic version at www.oipc.ab.ca.

Your request for access to information is now closed.

Should you have any questions or concerns, please feel free to contact me quoting the file number above at privacy@macewan.ca. our phone (780) 497-5423.

Sincerely,



Gayle Faires
Analyst, Information and Privacy Office
Office of General Counsel
MacEwan University

Encl.

Alex Syvitski

From: Alex Syvitski <SyvitskiA@macewan.ca>
Sent: Monday, December 2, 2024 10:27 AM
To: Gayle Faires
Subject: RE: Transact PSA

Sounds good.

Non-responsive

From: Gayle Faires <FairesG@macewan.ca>
Sent: Monday, December 2, 2024 9:55 AM
To: Alex Syvitski <SyvitskiA@macewan.ca>
Subject: Transact PSA

Hi. I touched base with Angel on phase 2 of the Payment implementation and she advised it may never go forward, the scope of Phase is yet to be determined. I am going to put the PSA up for sign off with the original information No payment system by Vendor and the possible Phase 2. Recommendation will state that if Phase 2 goes forward a Subsequent PSA will be required before implementation.

Gayle

Alex Syvitski

From: Alex Syvitski <SyvitskiA@macewan.ca>
Sent: Monday, November 18, 2024 2:40 PM
To: s. 20(1)
Cc: s. 20(1)
Subject: RE: Transact Campus Security and Trust Center Information ISEC-637

Hi s. 20(1)

Thank you very much.

Take care,
Alex

From: s. 20(1) @Transactcampus.com>
Sent: Monday, November 18, 2024 1:46 PM
To: Alex Syvitski <SyvitskiA@macewan.ca>
Cc: s. 20(1) @Transactcampus.com>
Subject: RE: Transact Campus Security and Trust Center Information ISEC-637

You don't often get email from s. 20(1) @transactcampus.com. [Learn why this is important](#)

EXTERNAL: Use caution.

Hi Alex,

Kindly find attached the requested redacted SOC 2 report.

Thank you,

s.
20(1)

From: s. 20(1)
Sent: Thursday, November 14, 2024 1:10 PM
To: 'Alex Syvitski' <SyvitskiA@macewan.ca>
Cc: s. 20(1) @Transactcampus.com>
Subject: RE: Transact Campus Security and Trust Center Information ISEC-637

Hi Alex,

I will review and send the document in a few days from now.

Thank you,

s.
20(1)

From: Alex Syvitski <SyvitskiA@macewan.ca>
Sent: Thursday, November 14, 2024 1:06 PM
To: s. 20(1) @Transactcampus.com>
Cc: s. 20(1) @Transactcampus.com>
Subject: RE: Transact Campus Security and Trust Center Information ISEC-637

CAUTION: External Email

Hi s. 20(1)

Yes we are using Campus ID. We are in process of updating the Privacy Security Assessment and we want to get ahead of collecting reports incase we start using more service offerings. I requested the SOC that doesn't require a NDA, but if easy enough to have me sign, that would be preferred.

Today, I don't think we are using any of the purchasing services (exclusively using Campus ID), but I think there will be a discussion in the future between our two groups (from what I read in contract).

Let me know if you need any specific details.

Thanks,
Alex

From: s. 20(1) @Transactcampus.com>
Sent: Thursday, November 14, 2024 10:56 AM
To: Alex Syvitski <SyvitskiA@macewan.ca>
Cc: s. 20(1) @Transactcampus.com>
Subject: Transact Campus Security and Trust Center Information ISEC-637

You don't often get email from s. 20(1) @transactcampus.com. [Learn why this is important](#)

EXTERNAL: Use caution.

Hi Alex,

You requested 1) SOC2 redacted, 2) Attestation of Compliance Payments, 3) Attestation of Compliance Campus ID through our website. Is your organization under contract with one of our solutions today? Before I share the documents, I just wanted to understand our relationship model.

Thank you,

s. 18(1)



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Alex Syvitski

From: Alex Syvitski <SyvitskiA@macewan.ca>
Sent: Friday, November 22, 2024 8:54 AM
To: Privacy
Subject: PSA - Transact

Happy Friday Privacy,

I have completed the security portion of the PSA for Transact.

Thanks,

Alex Syvitski
Senior Security Analyst, Information Technology Services
MacEwan University



Alex Syvitski

From: MacEwan University <consignocloud@notarius.com>
Sent: Monday, December 2, 2024 1:58 PM
To: syvitskia@macewan.ca
Subject: New signature project received [Transact - Campus One Card Solution]



Dear Alex Syvitski,

Your signature is required on a document of the project "**Transact - Campus One Card Solution**" prepared by Gayle Faires with the following:

- The PSA for Transact is ready for signatures.

If you approve it, please sign it by **January 2, 2025**.*

To view and sign the document, please follow the instructions at the following link:

<https://macewan.consigno.com/client/login?t=375ccfb23cb878bff88d3f544e253bc0123dfcd7996129677b3052c88e25d735&lang=en>

For any inquiries, please contact:

Gayle Faires
faresg@macewan.ca

* 23:59 UTC-07:00

We respect your privacy and will not divulge your personal information to any third parties.
Do not reply to this message. This return email address is not valid and you will not receive a response.

[Confidentiality policy](#) | [Contact Notarius](#) | consignocloud.com

Alex Syvitski

From: IT Infrastructure & Operations <jira@macewan.atlassian.net>
Sent: Thursday, November 7, 2024 8:46 AM
To: syvitskia@macewan.ca
Subject: IOSD-13330 Privacy and Security Assessment for Transact

Reply above this line.

This is confirmation that your request has been submitted and received.

Details of your request:
InfoSec Generic Internal Request Form
Privacy and Security Assessment for Transact

[View request](#) · [Turn off this request's notifications](#)

This is shared with Alex Syvitski.

Powered by Jira Service Management

[IOSD-13330] Privacy and Security Assessment for Transact Created: 2024-11-07 Updated: 2024-12-21 Resolved: 2024-11-22

Status:	Closed
Project:	IT Infrastructure & Operations
Components:	None
Affects versions:	None
Fix versions:	None

Type:	Task	Priority:	Medium
Reporter:	Alex Syvitski	Assignee:	Alex Syvitski
Resolution:	Done	Votes:	0
Labels:	None		
Remaining Estimate:	Not Specified		
Time Spent:	Not Specified		
Original estimate:	Not Specified		

Request participants:	None
Resolution Notes:	PSA has been completed
IOSD Department Queues:	Information Security
IOSD Ops Printer Service Requests:	Select what kind of work is needed here.

Description

Privacy and Security Assessment for Transact

Comments

- Comment by [Alex Syvitski](#) [2024-11-07]

BitSight report requested.

Followed up with Privacy about missing reports

Gero has alot of this drafted already.

[Transact Campus One Card](#)
- Comment by [Alex Syvitski](#) [2024-11-14]

Get more details from Privacy, discuss financial additions potential incoming

Find a report request area and communicate with TransAct Campus security about getting SOC2, and PCI-DSS reports. Security reports should be supplied in a few business days.
- Comment by [Alex Syvitski](#) [2024-11-22]

Reports were received by Transact. Complete the PSA and notify Privacy office.

Generated at Wed Nov 12 17:24:54 UTC 2025 by Alex Syvitski using Jira 1001.0.0-SNAPSHOT#100290-rev:7766963b8a267c34a9252a34d1e2daf315c721fa.

[3:19 PM] Angel McVittie

Hi Gayle. I'm the PM on the campus one card project. I was just chatting with Gero about getting the draft contract reviewed by various areas and he said he i should reach out to you for a privacy resource

[3:24 PM] Gayle Faires

Hi. Our Privacy Office would be interested in reviewing the contract. Was a Privacy and Security Assessment completed on the project?

[3:32 PM] Angel McVittie

I would have to do some digging to confirm. I just took over the project after it completed the RFP process and vendor selection. Procurement rec'd the draft contract today. Is that a usual process when a project starts? Is it required on all projects or is there criteria for when to engage privacy? What is the prices to engage privacy? Thx

[3:33 PM] Angel McVittie

Process

[3:40 PM] Gayle Faires

Generally when an RFP is going out for any new application/system Privacy and IT Security get a heads up and we have the program area complete a draft Privacy and Security Assessment Intake Questionnaire for background on the project and received a copy of the RFP. Once the vendor is selected or a short-list of two or three we do an assessment on their proposals that generally have the IT security documents and privacy policies included. If this one has one Vendor chosen we need to have access to the RFP and proposal to complete an assessment for any risks and provide recommendations. Is this the one card project for the "Student Card NRFP 23-24-1347"?

From: [Angel McVittie](#)
To: [Gayle Faires](#)
Subject: RE: PSA for Transact Campus One Card Solution
Date: Tuesday, November 5, 2024 11:24:33 AM
Attachments: [image002.png](#)
[image003.png](#)

Hi Gayle,

See below

From: Gayle Faires <FairesG@macewan.ca>
Sent: Friday, August 23, 2024 3:41 PM
To: Wael Kassab <kassabw@macewan.ca>
Subject: PSA for Transact Campus One Card Solution

Good Afternoon. From the Privacy Review I have a few questions on the information still request for the PSA for privacy which was not available in the Spring.

It was to be determined responses to the following. **Do you have information yet?**

By MacEwan Dept: - TBD – Has this been defined yet?
 Are information logs for this project regularly monitored or audited? Yes **No** N/A
 If yes, by who?
 How frequently is it done (if applicable)? Monthly Weekly Never
 Is there a procedure? If yes, please attach or describe

Role Based Access Controls – Do we have the Roles yet defined (Administrators, Number, description of what the role is...etc) There will be an admin role. We can have up to 5 users in that role. They will access the server hosted by the vendor and then remote into the software to access permissions.

Job Title	User Role	# People in this role	Type of access (Read, Write, Edit)	Description of information this user can access
MacEwan Dept.				
Campus Service Team	TBD	TBD	(Read, Write, Edit)	Description?

What is the Vendor Retention? – The Vendor responded to ITS question: **s. 19(1)**

[Redacted]

[Redacted]

[Redacted]

Thank you for your continued assistance.

Gayle Faires (she/her)

Analyst, Information and Privacy Office
Office of General Counsel
MacEwan University

E: FairesG@macewan.ca



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From: Wael Kassab <kassabw@macewan.ca>
Sent: Tuesday, July 2, 2024 11:17 AM
To: Gayle Faires <FairesG@macewan.ca>
Subject: RE: PSA for Transact Campus One Card Solution

Hi Gayle,

s. 19(1), s. 29(1)(a)&(b)

Best Regards,

Wael Kassab
Procurement Lead - Major Projects

Tel: (780) 633-3696
[Kassabw@macewan.ca](mailto:kassabw@macewan.ca)



From: Gayle Faires <FairesG@macewan.ca>
Sent: Tuesday, July 2, 2024 10:45 AM
To: Wael Kassab <kassabw@macewan.ca>
Subject: RE: PSA for Transact Campus One Card Solution

Good Morning. I had been working with Gero Schaefer before he left on the completion of the Privacy and Security Assessment for the Transact Campus One Care – Library Services.

Gero, in the completion of IT Security review portion, s. 19(1), s. 29(1)(a)&(b)

s. 19(1), s. 29(1)(a)&(b) so I can move forward with the PSA and have the IT Security Review.

Thank you for your assistance.

Gayle Faires (*she/her*)

Analyst, Information and Privacy Office
Office of General Counsel
MacEwan University

E: FairesG@macewan.ca



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Privacy and Security Assessment

Project Name: Transact – Campus One Card Solution	Date of Submission: January 5, 2024. Updated November 5, 2024
Department: Library	Est. Date of Implementation: TBD as of July 2024
Project Manager/Owner: Angel McVittie, IT Project Manager	Email: mcvittiea@macewan.ca

A Privacy and Security Assessment (PSA) assesses and advises on risk for new or substantially modified projects, programs, systems, platforms, and activities (hereinafter referred to as “projects”).

When do I need a PSA?

- Developing a new project that collects personal information;
- Introducing a new IT system that accesses or stores personal information;
- Participating in a new data-sharing initiative with other organizations;
- Changing a program or system access so that new collections or uses of information happen, or those who have access change;
- Outsourcing the management or security of personal information or data to a third-party.

How To Complete a PSA

- We will need information from you, your project team, and any third-party participants. Complete **Section A: Project Summary** and **Section B: Personal Information** of the PSA Intake Questionnaire as thoroughly as possible, and submit your request to BOTH privacy@macewan.ca and informationsecurity@macewan.ca.
 - Only if a Vendor has been chosen, complete **Section C: Privacy Protection**, and submit your request to BOTH privacy@macewan.ca and informationsecurity@macewan.ca.
- Please include a copy of an RFP proposal and/or a Contract, Information Sharing Agreement, and/or Service Agreement.
- In the context of IT Security, we request that you reach out to the vendor to obtain, if applicable, a copy of the following documents:
 - HECVAT Report (Higher Education Community Vendor Assessment Toolkit): You can access the report template at the following link: <https://library.educause.edu/resources/2020/4/higher-education-community-vendor-assessment-toolkit>. This report is to be provided by the vendor as a part of their documentation.
 - Alternatively, if a current HECVAT report is unavailable, we also accept the submission of a Statement on Standards Attestation Engagements (“SSAE”) 16 for Service Organization Controls (“SOC”) 1 and SOC 2 reports from the vendor.

Please submit these documents directly to informationsecurity@macewan.ca.

Timelines

Once a vendor has been selected, please allow up to 2 weeks for initial review of the PSA. Review could take up to 4 weeks during busy periods, such as at the start of an academic term and at yearend. Exceptions may be made for time-sensitive assessments.

If the IPO determines that a Privacy Impact Assessment, which entails a more in-depth analysis, is warranted the IPO will initiate a consultation with the Project Manager/Owner.

Section A: Project Summary – Overview for PSA Assessment

Project Description/Background

What is the business solution that you are seeking and how it will be used?

Campus one Card for all students and Staff. Will allow MacEwan University to provide students and staff with a solution to upload an online photo, print a plastic card, provision a mobile credential, mobile credential use at the Library, gaining entry into the Sports and Wellness Centre as well as using the mobile credential for access to student printing.

How will this product/service achieve that business solution?

The product is expected to cover the entire scope as described in the contract. The assessment will identify all reader devices and campus systems that will be in scope as part of Mobile Credential (12 MRD5 Devices for use at the Library, Athletics Access Control, and Printing services.

Project Snapshot (Note: left double click the grey box to check off)

Project State	<input type="checkbox"/> Substantial change <input checked="" type="checkbox"/> Under Development <input type="checkbox"/> In Production <input type="checkbox"/> Other
System Management	<input type="checkbox"/> Vendor Managed <input type="checkbox"/> Centrally Managed <input type="checkbox"/> Individually Managed <input checked="" type="checkbox"/> Departmentally Managed
Project Audience	<input type="checkbox"/> Small group of users <input checked="" type="checkbox"/> Campus <input type="checkbox"/> Public <input checked="" type="checkbox"/> Department/Business Unit/Functional Unit
Number of Users	<input type="checkbox"/> 1-10 <input type="checkbox"/> 11-100 <input type="checkbox"/> 101-1,000 <input checked="" type="checkbox"/> 1,001-10,000 <input type="checkbox"/> 10,001+
Does this project require data migration? Student demographic information will come from the SIS system data integration.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Unknown <input type="checkbox"/> N/A
Does any part of this project involve cloud services?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Unknown <input type="checkbox"/> N/A
If yes, what type? s. 19(1)	<input type="checkbox"/> Software as a Service (SaaS) <input type="checkbox"/> Platform as a Service (PaaS) <input type="checkbox"/> Infrastructure as a Service (IaaS) <input checked="" type="checkbox"/> Hosted
Does this project involve a third-party vendor? Vendor Information (if applicable)	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Unknown <input type="checkbox"/> N/A Has a Vendor been selected? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No To be filled out once Vendor is known. Company Name Transact Campus Product Name Transaction System Module Name Release/Version # Vendor Contact Person s. 20(1) Vendor Phone & Email s. 20(1) s. 20(1) @transactcampus.com

Section A: Project Summary

<p>Will this project require that payments be processed for individuals by the Vendor? If yes, are those payments being processed in a manner compliant with the Payment Card Industry Data Security Standard (PCI DSS)?</p> <p>Phase Two of the project may include expansion of use case of the Transaction System to include adding Monetary Transactions/Payment features (such as at the Bookstore, Laundry, Vending) as well as expanding the scope of Mobile Credential use for Parking and Access Control.</p> <p>The Transact Project Manager will contact MacEwan to initiate the project if going forward, at which time the completion of a Subsequent PSA would be required.</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> Unknown <input type="checkbox"/> N/A</p> <p><input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Unknown</p>
<p>Will this project include the use of Generative Artificial Intelligence (AI) components? If, yes please provide a description:</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> Unknown <input type="checkbox"/> N/A</p>

Section B: Personal Information**Section B: Personal Information for Collection, Use and/or Disclosure**

Will this project involve Personal Information¹ Yes No

Is this a new use of personal information that was already collected for another purpose?

Yes No N/A

Identify All Data Elements

<input checked="" type="checkbox"/> name	Personal Health Information
<input type="checkbox"/> home address	<input type="checkbox"/> Medical information including health card number,
<input type="checkbox"/> phone number	<input type="checkbox"/> medical history, <input type="checkbox"/> psychiatric history, <input type="checkbox"/> medication
<input checked="" type="checkbox"/> email address (personal or MacEwan)	history, <input type="checkbox"/> laboratory test results, <input type="checkbox"/> diagnostic images,
<input type="checkbox"/> marital status	<input type="checkbox"/> immunization records, any other health information
<input type="checkbox"/> ethnicity	related to identifiable individuals
<input type="checkbox"/> employment history	Personal Identifying Numbers
<input type="checkbox"/> payroll information	<input checked="" type="checkbox"/> Employee/Student number, <input type="checkbox"/> client or license
<input type="checkbox"/> educational history	number, <input type="checkbox"/> Health Card number, <input type="checkbox"/> SIN, <input type="checkbox"/> bank card
<input type="checkbox"/> gender	information (credit or debit), <input type="checkbox"/> bank account number
<input type="checkbox"/> DOB	<input type="checkbox"/> Other types of information , either alone or in
<input type="checkbox"/> financial transactions involving the individual	combination, would identify an individual or their location
<input checked="" type="checkbox"/> photograph of an individual (identifiable)	(e.g., geospatial data, Internet Protocol (IP) address,
<input type="checkbox"/> passport information or photocopy	transaction logs, web analytics tracking).
<input type="checkbox"/> criminal record check	Please provide details:
Other (please list):	

Information Classification Standard

What is the information classification² of the data in this project? Classify all data that the system stores, processes, transmits, or any other critical information assets in your system. If there are multiple levels, use the rating of the highest classified data element.

Restricted Confidential Internal Public

Note: The personal information collected is considered 'Confidential' in accordance with the University Information Classification Standard.

¹ Personal Information is identifiable information about an individual. This is defined in section 1(n) of Alberta's *Freedom of Information and Protection of Privacy Act* (FOIP Act)

² Refer to the University Information Classification Standard for more information or contact IPO.

Section C: Privacy Protection – Complete when Vendor known

Will a Contract, Information Sharing Agreement, or a Service Agreement be required for this project?
 Yes No N/A Describe: *(type, requires legal review, etc.)* Contract November 5, 2024.

Please attach a copy or draft copy if available.

External Stakeholders

Are there any other external stakeholders who are participating in this project such as other Universities, Public Bodies, etc.? Yes No If yes, who?:

Role Based Access Controls

Complete the table or attach a separate access controls document *(if applicable)*. Include MacEwan Departments and third parties who have access to project information.

Job Title	User Role	# People in this role	Type of access (Read, Write, Edit)	Description of information this user can access
MacEwan Dept.				
Campus Service Team	Administrators	5	(Read, Write, Edit)	Read, Write, Edit
Job Title	User Role	# People in this role	Type of access (Read, Write, Edit)	Description of information this user can access
Vendor				

s. 19(1)

Section C: Privacy Protection

Job Title	User Role	# People in this role	Type of access (Read, Write, Edit)	Description of information this user can access
MacEwan Dept.				

s. 19(1)

Monitoring**By MacEwan Dept: -**

Are information logs for this project regularly monitored or audited? Yes No N/A

If yes, by who?

How frequently is it done (if applicable)? Monthly Weekly Never

Is there a procedure? If yes, please attach or describe

The personal information collected for the Library card is considered minimal and low risk. In addition, there are limited staff (5 Administrative Users) with access to the system. Reasonable that regular monitoring of access logs would not be required by MacEwan.

By Vendor:

s. 19(1)

Notification

If you are collecting Personal Information, will MacEwan or the Vendor be providing a Notification of Collection of Personal Information?³ Yes No Unknown N/A

If yes, please describe: Communication on the new card process will be sent out prior to implementation.

The current MacEwan Cardholder Agreement - The MacEwan ID/Library card is issued to registered MacEwan students and to faculty and staff and is the official MacEwan identification card and library card. The Library is responsible for the production, distribution and management of the MacEwan ID/Library card. Use of this card is subject to the terms and conditions listed in the agreement, which the cardholder acknowledges upon receipt of the card.

³ Requirement of Alberta's *Freedom of Information and Protection of Privacy Act* (FOIP)

Retention

What is MacEwan Records Retention Schedule period for which this information must be retained by the project before destruction or archive occurs? Link to: [Records Retention Schedule](#)

Please describe: **MacEwan (current retention) - AA10**

Library Services

- a) Patrons' information that is maintained on the *Symphony* integrated library system
- b) Staff, students and fitness centre users' photographs on *Guard Card*, an identity management system.

Library Services

1Y – D

3Y – D

A patron's personal information will be purged from *Symphony* if the patron is inactive for 3 years.

Personal information on *Guard Card* will be deleted if an account has not be edited in 3 years.

What is the Vendor Retention? (retention information may be included in vendor privacy policy, contract or terms of use etc.)

Please describe: **s. 19(1)**

[Redacted content]

Section D: Privacy and Security Assessment

To be completed by the Information and Privacy Office and IT Compliance and Information Security

Privacy and Security Assessment

PRIVACY	
Review date:	January 5, 2024. Finalized with additional information November 5, 2024
Current contract reviewed:	Yes – 1 st draft reviewed, and the final contract provided November 5, 2024, was reviewed.
Contract expiry date:	August 2029
Vendor's privacy policy reviewed:	YES
Information classification:	Confidential
Privacy Evaluation Comments:	<p>RISK ASSESSMENT ON THE FOLLOWING:</p> <p>1. Data</p> <ul style="list-style-type: none"> • Collection, use, disclosure, and disposition of personal information Privacy Policy covers collection, use, disclose and disposition. Limited personal information required to administer the One Card. Collection authorized under the FOIP Act. • Privacy Policy Public facing https://www.transactcampus.com/legal/privacy-policy Meets Privacy Policy requirements for users of their site for collection, use and disclosure. Access and corrections for this project would be through MacEwan. • Retention Policy MacEwan retention schedule in place for Library Services. Vendor - s. 19(1) [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] • Location of platform Vendor states the platform is intended for use in the United States and is subject to the laws of the United States, which may not provide the same level of protections as those in your own country. • Generative Artificial Intelligence (AI) N/A

Internal Processing
Section D: Privacy and Security Assessment

	<p>2. Access Controls</p> <ul style="list-style-type: none"> Controls allowing only authorized access to personal information MacEwan: Campus Service Team - Five Administrators Vendor: s. 19(1) [REDACTED] <p>3. Breach Reporting</p> <ul style="list-style-type: none"> s. 19(1) [REDACTED] Audit capabilities Vendor: s. 19(1) [REDACTED]. <p>Overall Risk Rating: Meets privacy and information standards. IPO Recommendations:</p> <ol style="list-style-type: none"> A process should be in place to ensure that MacEwan users who are no longer authorized to access the system are removed as soon as possible. MacEwan should request the Vendor’s notification on breach reporting be within a timeframe (e.g. 24 or 48 hours). Phase Two of the project may include expansion of use case of the Transaction System to include adding Monetary Transactions /Payment features (such as at the Bookstore, Laundry, Vending) as well as expanding the scope of Mobile Credential use for Parking and Access Control. <p>The Transact Project Manager will contact MacEwan to initiate the project if going forward, at which time the completion of a Subsequent PSA would be required before implementation.</p>
<p>Information and Privacy Office Analyst</p>	<p>Name: Gayle Faires</p>

Internal Processing
Section D: Privacy and Security Assessment

IT SECURITY	
Reports reviewed:	11/22/2024
Bitsight	YES
HECVAT	NO
SOC 2	YES
SSAE 16	NO
Other	Explanation:
Info Security Evaluation: Comments:	<p>Overall Risk Rating: PROCEED - With Technical Requirements</p> <p>TransAct has a mature infrastructure s. 19(1). Overall, Transact has an A rating across the board. SSO is being used for account access.</p> <p>Explanation:</p> <p><u>RISK ASSESSMENT:</u></p> <ol style="list-style-type: none"> 1. Security Infrastructure Limited information about their security was shared privately or publicly. s. 19(1) it is reasonable to assume they have a robust security infrastructure. s. 19(1) 2. Data Rights & Privacy Protection Data Rights are a concern; according to privacy, they adhere to the right to delete in areas where it is enforced only (i.e., California – CCPA). There is no clear guidance outside of areas where the law does not enforce it. 3. Endpoint & Host Security Transact host data in the cloud in both Azure and AWS. The controls in place were considered acceptable s. 19(1) 4. Data & Access Management Transact supports integration for SSO, various 3rd party student information systems (SIS), information(file) systems, and transaction systems to adhere to compliance within the organization. 5. Regulatory Compliance s. 19(1) no concerns with the infrastructure or controls.

Internal Processing

Section D: Privacy and Security Assessment

	<p>Transact maintains PCI-DSS compliance, validated on the VISA PCI compliance website. Transact maintains TX-Risk and Authorization Management Program (TX-RAMP) certification as well.</p> <p>6. Security & Vulnerability Testing</p> <p>Transact aligns to the methodologies of OWASP and NIST. They state the product team includes security training tools and processes which follow those frameworks. s. 19(1) [REDACTED]</p> <p>7. Incident Reporting & Response</p> <p>There is no formal incident reporting & response publicly shared. There is a public status page which contains a historical record of incidents. https://status.transactcampus.com/</p>
<p>Information Security and Compliance Analyst</p>	<p>Name: Alex Syvitski</p>

Acknowledgements

This page will be prepared for electronic signatures upon completion of the PSA review.

Signing below constitutes your recommendation of this project and cognizance of the risk(s), risk rating(s), and action plan(s) (if applicable) which have been identified during the assessment process.

Signature:	<hr/>
Name:	Project Owner/Manager Eva Revitt, Dean, Library

Signature:	<hr/>
Name:	Lead, Information and Privacy Office Jennifer Stanton

Signature:	<hr/>
Name:	Director, Cybersecurity and Chief Information and Security Officer IT Compliance and Information Security Thomas Wong Matthews

Alex Syvitski

From: s. 20(1) [redacted]@torontomu.ca>
Sent: Tuesday, November 12, 2024 6:00 AM
To: Alex Syvitski; MacEwan IT Information Security Office
Subject: 2024 Ad-hoc vendor monitoring request - [redacted] Transact Holdings Inc
Attachments: [redacted] bitsight-technologies-company-overview-transact-holdings-inc-2024-11-12.pdf

EXTERNAL: [Use caution.](#)

Hi,

Please find the vendor report(s) for [redacted] Transact Holdings Inc attached below.
Let me know if there are any questions or concerns.

Thanks,
s. 20(1) [redacted]

From: [Gayle Faires](#)
To: [Gayle Faires](#)
Subject: FW: Transact PSA
Date: Monday, January 6, 2025 11:32:28 AM

From: Alex Syvitski <SyvitskiA@macewan.ca>
Sent: Monday, December 2, 2024 10:27 AM
To: Gayle Faires <FairesG@macewan.ca>
Subject: RE: Transact PSA

Sounds good.

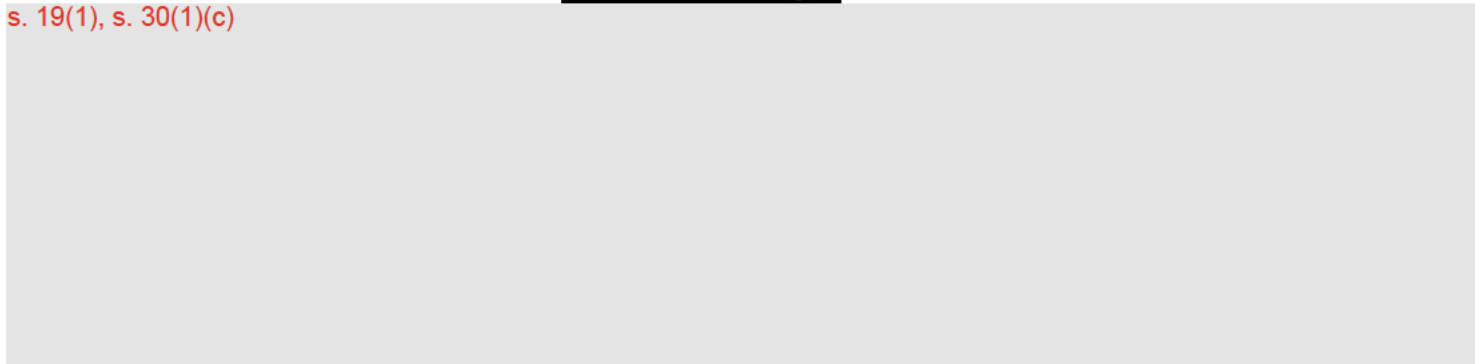
From: Gayle Faires <FairesG@macewan.ca>
Sent: Monday, December 2, 2024 9:55 AM
To: Alex Syvitski <SyvitskiA@macewan.ca>
Subject: Transact PSA

Hi. I touched base with Angel on phase 2 of the Payment implementation and she advised it may never go forward, the scope of Phase is yet to be determined. I am going to put the PSA up for sign off with the original information No payment system by Vendor and the possible Phase 2. Recommendation will state that if Phase 2 goes forward a Subsequent PSA will be required before implementation.

Gayle



s. 19(1), s. 30(1)(c)

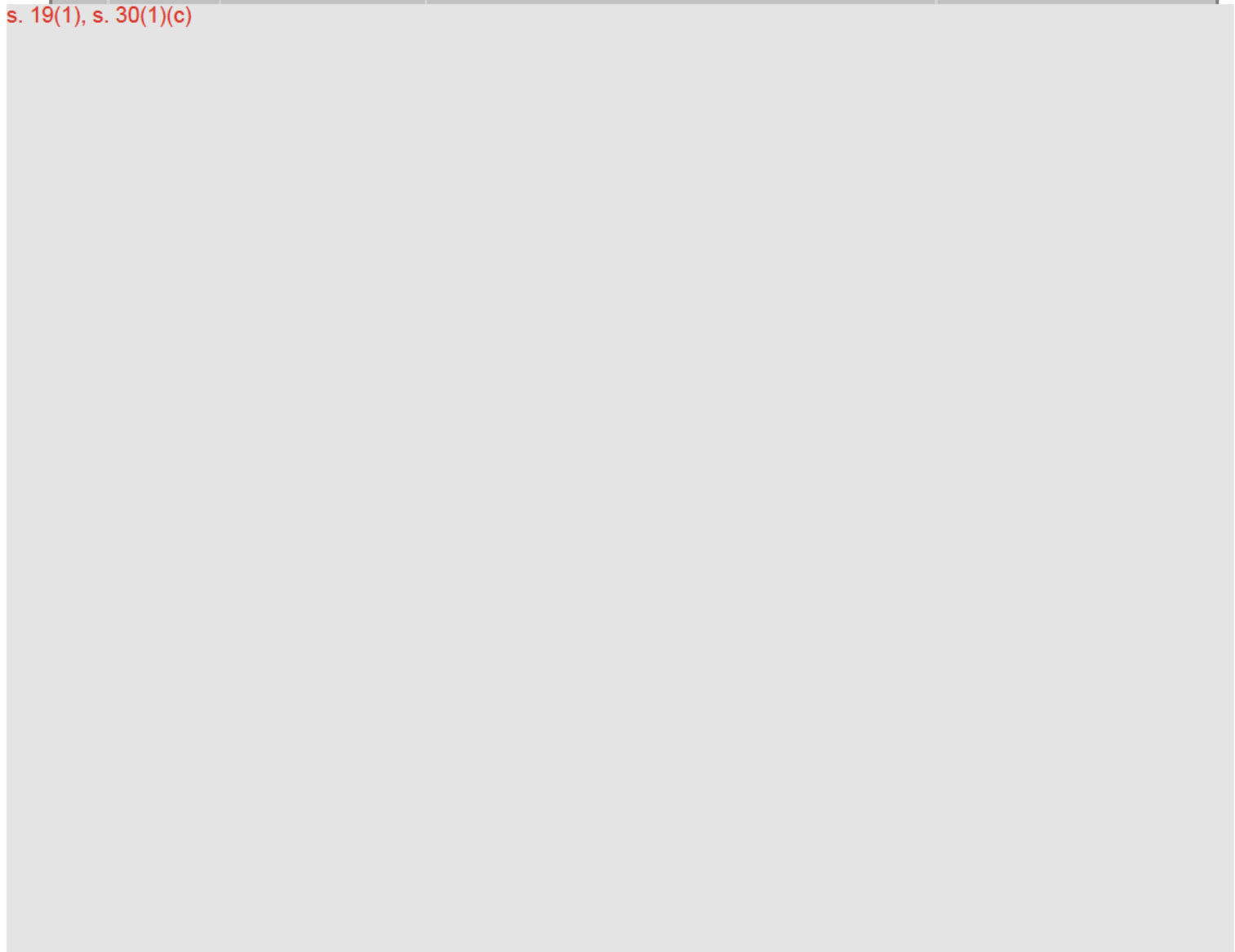


A. Product and Pricing Summary

Order Summary for Current Renewal or Purchase

QTY	UOM	Product Code	Product or Service Description	Term Fees (CAD)
-----	-----	--------------	--------------------------------	-----------------

s. 19(1), s. 30(1)(c)



Sales Approved: s. 20(1)

Initial:

Customer: The Board of Governors of Grant MacEwan University

Transact Campus Inc.

Signature:

20(1)

Name (Printed): Maureen Lomas

Name: s. 20(1)

Title (Printed): Vice President, Finance and Administration and CFO.

Title: CEO

Date: Aug 26, 2024

Date: 8/26/24

Is a Purchase Order (PO) required for the purchase or payment of the products on this Order Form?

No
Yes – Please complete below

PO Number: To Be provided separately

PO Amount: To Be provided separately

Attach PO: To Be provided separately

Attach Tax Exemption:

From: [Gayle Faires](#)
To: [Helena Araujo](#)
Subject: RE: Competitive Bids - Heads UP
Date: Tuesday, June 6, 2023 1:57:00 PM
Attachments: [Privacy and Security Assessment Intake Questionnaire 2023 02 22.docx](#)

Hi Helena. Thank you for the heads up. In preparation for completing a PSA once the proposals are in, would you be able to provide the Project Managers the attached PSA Intake Questionnaire to complete on their projects and provide to our office.

Thank you.

Gayle Faires (she/her)
Analyst, Information and Privacy Office
Office of General Counsel
MacEwan University

E: FairesG@macewan.ca
MacEwan.ca

From: Helena Araujo <AraujoH@macewan.ca>
Sent: Tuesday, May 30, 2023 8:56 AM
To: Jason Fung <Jason.Fung@macewan.ca>; Gayle Faires <FairesG@macewan.ca>; Ian Hanson <hansonI@macewan.ca>
Cc: Soraya Granados Abad <granadosabads@macewan.ca>
Subject: Competitive Bids - Heads UP

Good Morning

Just wanted to give Legal and Info and Privacy a heads up with regards to some competitive bids that are currently in process which will most likely require your input at some point.

Non-responsive

- Student Card NRFP 23-24-1347

I am currently drafting/revising the Negotiated Request For Proposal (NRFP) that will be used for these three and will send to Jason for a quick review.

Let me know if you have any questions

Thank you

Helena Araujo, SCMP, PSPP
Senior Advisor, Procurement and Contracts

Expense Procurement and Contract Services (EPACS)

E: araujoh@macewan.ca

T: 780-497-5544



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From: [Gayle Faires](#)
To: [Erwin Veugelers](#)
Cc: [Justin Gourgouvelis](#)
Subject: FW: Gero Schaefer replied to a comment in "Privacy and Security Assessment - Transact Campus One Card - Library Services"
Date: Wednesday, May 22, 2024 2:12:00 PM
Attachments: [db74a99d-3d38-4434-8f0c-dc5a068468615796a8e2-9c2b-4959-b5eb-66e1d555e5b2077eed95-a574-4878-9d1b-25b67fdcf2c9f514e621-4234-4b3e-8ff7-626ba2725bb458a59174-2267-4a5d-b76f-0979fcabc66cd23fe17-d25b-4784-9773-467177ae964dd1330935-c0e3-4c76-8164-465fc93529c24f1ae184-2c81-47e5-aa5c-08414ed5192460e89cab-ad1e-4729-8373-848b665872bb9527f2ab-28aa-40ce-aa71-f962fad4c28aimage001.png](#)

Good Afternoon, Erwin. I had been working with Gero Schaefer on the completion of the Privacy and Security Assessment for the Transact Campus One Care – Library Services.

Gero, in the completion of IT Security review portion, s. 29(1)(a)&(b)

s. 29(1)(a)&(b) so I can move forward with the PSA and have Justin Gourgouvelis complete the IT Security Review.

Thank you for your assistance.

Gayle Faires (*she/her*)

Analyst, Information and Privacy Office
Office of General Counsel
MacEwan University

E: FairesG@macewan.ca



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FW: Competitive Bids - Heads UP - NRFP 23-24-1347 Student Card

From Wael Kassab <kassabw@macewan.ca>
Date Wed 2024-01-17 8:10 PM
To Gayle Faires <FairesG@macewan.ca>
Cc Angel McVittie <McVittieA@macewan.ca>; Mauro Sanchez <mauro.sanchez@macewan.ca>

Hello Gayle,

I got the responses below from Transact to your comments on the PSA draft for One Card Project.

Kindly let me know if you require further clarifications.

Best Regards,

Wael Kassab
Senior Advisor, Procurement and Contract Services

Tel: (780) 633-3696
kassabw@macewan.ca



From: s. 20(1) @Transactcampus.com>
Sent: Tuesday, January 16, 2024 8:23 AM
To: Wael Kassab <kassabw@macewan.ca>
Cc: s. 20(1) @Transactcampus.com>
Subject: RE: Competitive Bids - Heads UP - NRFP 23-24-1347 Student Card

EXTERNAL: Use caution.

Hi Wael,

Please see inline answers in green below.

Thanks,

s. 20(1)

transactcampus.com/canada

From: s. 20(1) @Transactcampus.com>
Sent: January 12, 2024 5:27 PM
To: Wael Kassab <kassabw@macewan.ca>
Cc: s. 20(1) @Transactcampus.com>
Subject: RE: Competitive Bids - Heads UP - NRFP 23-24-1347 Student Card

Hi Wael,

I will work with our team to compile answers to these questions.

If MacEwan's legal team would like to have a call with our Legal team and that will make the contract review easier, please let me know and I can arrange that.

Thanks,

s. 20(1)

From: Wael Kassab <kassabw@macewan.ca>
Sent: January 12, 2024 2:18 PM
To: s. 20(1) <Transactcampus.com>
Cc: s. 20(1) <@Transactcampus.com>
Subject: RE: Competitive Bids - Heads UP - NRRFP 23-24-1347 Student Card

CAUTION: External Email

Hello s. 20(1)

Happy new year. The contract review is taking much longer than anticipated. Your contract template details are massive.

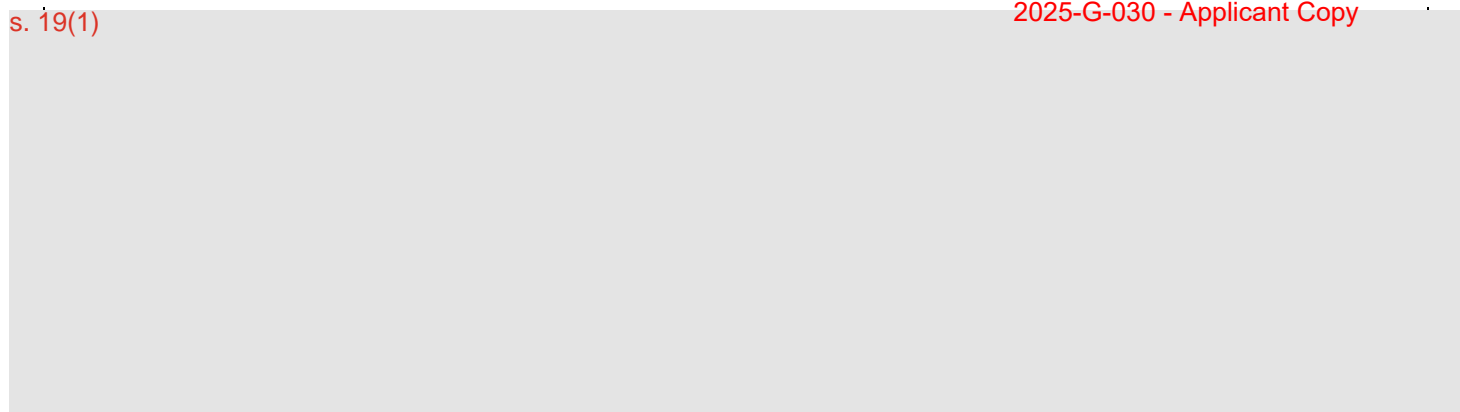
I have few questions,

s. 19(1)



s. 19(1)

s. 19(1)



Best Regards,

Wael Kassab

Senior Advisor, Procurement and Contract Services

Tel: (780) 633-3696

kassabw@macewan.ca



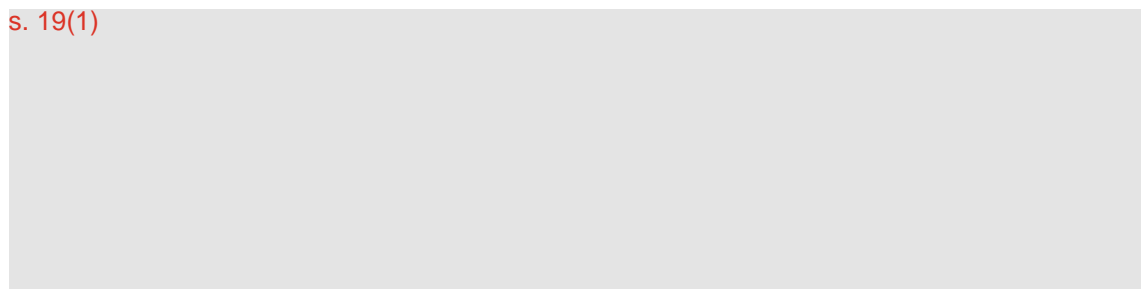
From: s. 20(1) @Transactcampus.com
Sent: Friday, January 5, 2024 3:34 PM
To: Wael Kassab <kassabw@macewan.ca>
Cc: s. 20(1) @Transactcampus.com
Subject: RE: Competitive Bids - Heads UP - NRFP 23-24-1347 Student Card

EXTERNAL: [Use caution.](#)

Hi Wael,

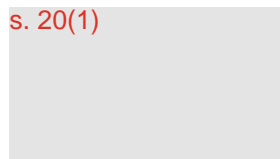
To enable the online web deposits, here are the onetime fees:

s. 19(1)



Thank you,

s. 20(1)



transactcampus.com/canada

From: s. 20(1)
Sent: January 4, 2024 7:11 PM
To: Wael Kassab <kassabw@macewan.ca>
Cc: s. 20(1) @Transactcampus.com
Subject: RE: Competitive Bids - Heads UP - NRFP 23-24-1347 Student Card

Hi Wael,

Let me pull down a quote and get back to you as soon as possible.

Thanks,

s. 20(1)



From: Wael Kassab <kassabw@macewan.ca>
Sent: January 4, 2024 5:56 PM
To: s. 20(1) @Transactcampus.com>
Subject: RE: Competitive Bids - Heads UP - NRFP 23-24-1347 Student Card

CAUTION: External Email

Hello s. 20(1)

s. 19(1)

Best Regards,

Wael Kassab
Senior Advisor, Procurement and Contract Services

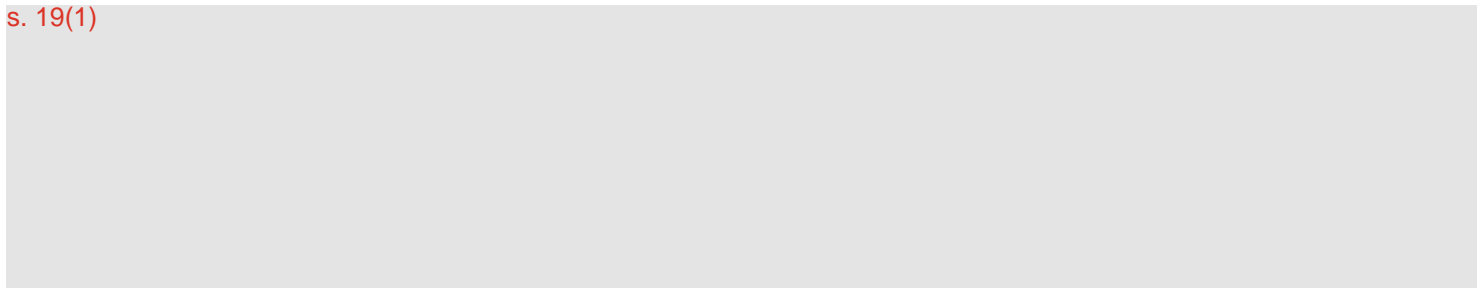
Tel: (780) 633-3696
kassabw@macewan.ca



From: s. 20(1) @Transactcampus.com>
Sent: Thursday, January 4, 2024 12:46 PM
To: Wael Kassab <kassabw@macewan.ca>
Subject: RE: Competitive Bids - Heads UP - NRFP 23-24-1347 Student Card

EXTERNAL: Use caution.

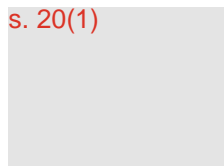
s. 19(1)



Please let me know if you have any additional questions.

Thanks,

s. 20(1)

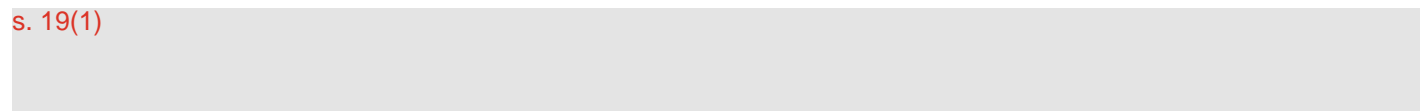


From: Wael Kassab <kassabw@macewan.ca>
Sent: January 4, 2024 2:33 PM
To: s. 20(1) @Transactcampus.com>
Subject: RE: Competitive Bids - Heads UP - NRFP 23-24-1347 Student Card

CAUTION: External Email

Thanks s. 20(1)

s. 19(1)



Best Regards,

Wael Kassab

Senior Advisor, Procurement and Contract Services

Tel: (780) 633-3696

Kassabw@macewan.ca



From: s. 20(1) <@Transactcampus.com>
Sent: Thursday, January 4, 2024 12:19 PM
To: Wael Kassab <kassabw@macewan.ca>
Subject: RE: Competitive Bids - Heads UP - NRFP 23-24-1347 Student Card

EXTERNAL: Use caution.

s. 19(1)

Thanks,

s. 20(1)

From: Wael Kassab <kassabw@macewan.ca>
Sent: January 4, 2024 2:15 PM
To: s. 20(1) <@Transactcampus.com>
Subject: RE: Competitive Bids - Heads UP - NRFP 23-24-1347 Student Card

CAUTION: External Email

Thanks s. 20(1)

Is this accurate?

Will this project require that payments be processed?

Yes No Unknown N/A

If yes, are those payments being processed in a manner compliant with the Payment Card Industry Data Security Standard (PCI DSS)?

Yes No Unknown

Best Regards,

Wael Kassab

Senior Advisor, Procurement and Contract Services

Tel: (780) 633-3696

Kassabw@macewan.ca



From: s. 20(1) <@Transactcampus.com>
Sent: Thursday, January 4, 2024 12:08 PM
To: Wael Kassab <kassabw@macewan.ca>
Subject: RE: Competitive Bids - Heads UP - NRFP 23-24-1347 Student Card

EXTERNAL: Use caution.

Hi Wael,

I have answered a couple questions in the document. If you feel we can provide input on anything else, please let me know.

Thanks,

s. 20(1)

From: s. 20(1)

Sent: January 3, 2024 12:20 PM

To: Wael Kassab <kassabw@macewan.ca>

Subject: RE: Competitive Bids - Heads UP - NRFP 23-24-1347 Student Card

Hi Wael,

Upon further review, this looks like an internal document. I think we can answer some questions, but some of it may have to be filled on the MacEwan side.

Thanks,

s. 20(1)

From: s. 20(1)

Sent: January 3, 2024 11:25 AM

To: Wael Kassab <kassabw@macewan.ca>

Subject: Re: Competitive Bids - Heads UP - NRFP 23-24-1347 Student Card

Hi Wael,

Happy New Year to you also. Yes, I will arrange for this to be filled out.

s. 20(1)

Sent from my iPhone

On Jan 3, 2024, at 11:19 AM, Wael Kassab <kassabw@macewan.ca> wrote:

CAUTION: External Email

Good Morning s. 20(1)

Hally New Year!

Could you please get me the attached Questionnaire completed and sent back to me.

Best Regards,

Wael Kassab

Senior Advisor, Procurement and Contract Services

Tel: (780) 633-3696

Kassabw@macewan.ca

<image001.png>

<Privacy and Security Assessment Intake Questionnaire 2023 02 22.docx>

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IPO Privacy Risk Assessment Tool

Purpose of Risk Assessment:	Internal IPO document for PSA Review	Overall Rating: Acceptable - Meets all of the requirements Detailed Rating: Excellent - Exceeds all the requirements Very Good - Exceeds most of the requirements Good - Exceeds some of the requirements Acceptable - Meets all of the requirements Marginally Acceptable - Acceptable at minimally adequate level Not Acceptable - Does not meet basic requirements - further consultation may be required
Project Name:	Transact One Card	
Project Contact:	Angel McVittie, IT Project Manager and Wael Kassab, Senior Advisor, Procurement Contract Services	
Department Name:	Library Services	
Completed By:	Gayle Faires	
Date Reviewed:	8/22/2024	
Information Classification:	Confidential	
Privacy Rating	Excellent - Exceeds all the requirements Very Good - Exceeds most of the requirements Good - Exceeds some of the requirements Acceptable - Meets all of the requirements Marginally Acceptable - Acceptable at minimally adequate level Not Acceptable - Does not meet basic requirements - further consultation may be required	
PROJECT OVERVIEW - What is the business solution that you are seeking and how it will be used?	<p>Campus one Card for all students and Staff. Will allow MacEwan University to provide students a solution to upload an online photo, print a plastic card, provision a mobile credential, mobile credential use at the Library, gaining entry into the Sports and Wellness Centre as well as using the mobile credential for access to student printing.</p> <p>The product is expected to cover the entire scope as described in the contract. The assessment will identify all reader devices and campus systems that will be in scope as part of Mobile Credential (12 MRD5 Devices for use at the Library, Athletics Access Control, and Printing services.</p> <p>Noted that Phase Two of the project is not being implemented at this time - 'will include expansion of use case of the Transaction System to include adding Monetary Transactions/Payment features (such as at the Bookstore, Laundry, Vending) as well as expanding the scope of Mobile Credential use for Parking and Access Control.'</p> <p style="color: blue;">Understanding that an ammendment/subsequent PSA would be required if this is implemented and this has been relayed to the Project Manager and will be added as a recommendation to the PSA assessment.</p>	
Vendor Background Information:		
Is there an existing/previous relationship with MacEwan?	No	
Is there a relationship with other Cdn PSIs?	Transact states Trusted by more than 1,8000 Higher Education Institutions. No details found on the website.	
Will this lead to a Contract/MOU/Information Sharing Agreement?	Review of contract commenced in January 2024, in July 2024 the requirements were still be worked out and the Contract was not yet signed. IPO questions responded to November 5, 2024 and a copy of the signed contract dated August 24, 2024 provided for review.	

<p>Personal Information Collection, Use, and Disclosure</p>	<p>Define the personal information elements and list the legislation that authorizes or supports the collection, use, and disclosure of personal information. Detail reference to the section of the FOIP ACT applicable (listed below) or other program legislation.</p>
<p>Identify All Data Elements</p>	<p>Data Elements: Name, MacEwan email, Student Number/ID and Photograph</p> <p>MacEwan Cardholder Agreement The MacEwan ID/Library card is issued to registered MacEwan students and to faculty and staff and is the official MacEwan identification card and library card. The Library is responsible for the production, distribution and management of the MacEwan Campus One Card (ID/Library card). Use of this card is subject to the terms and conditions below, which the cardholder acknowledges upon receipt of the card.</p> <p>s. 19(1)</p>
<p>Authorization under the FOIP Act</p>	<p>Legal Authority of Collection:</p> <p>MacEwan: Personal information is collected for the production, distribution and management of the MacEwan Campus One Card (ID/Library card).</p> <p>Purpose of collection of information 33 No personal information may be collected by or for a public body unless (c) that information relates directly to and is necessary for an operating program or activity of the public body. (n) the information is collected for the purpose of managing or administering personnel of the Government of Alberta or the public body,</p> <p>Vendor: Transact collects Name, MacEwan email, Student Number/ID and Photograph for the campus one card to deliver the contracted services and allow full use of the application functionality as purchased by the client (MacEwan).</p>
	<p>Legal Manner of Collection:</p> <p>MacEwan Manner of collection 34(1) - directly from the individual</p>

	<p>Legal Use of Personal Information:</p> <p>Use and Service MacEwan: Personal information is used for the production, distribution and management of the MacEwan Campus One Card (ID/Library card).</p> <p>39(1) A public body may use personal information only (a) for the purpose for which the information was collected or compiled or for a use consistent with that purpose, (b) if the individual the information is about has identified the information and consented, in the prescribed manner, to the use, or (c) for the purpose for which that information may be disclosed to that public body under section 40, 42 or 43</p> <p>(4) A public body may use personal information only to the extent necessary to enable the public body to carry out its purpose in a reasonable manner.</p> <p>Vendor: To deliver the contracted services and allow full use of the application functionality as purchased by the client (MacEwan).</p>
	<p>Legal Authority to Disclose:</p> <p>MacEwan: The personal is disclosed when using the application to produce the One Campus Card.</p> <p>Disclosure 40(1) Disclosure of personal information (a) in accordance with Part 1, (c) for the purpose for which the information was collected or compiled or for a use consistent with that purpose. (x) for the purpose of managing or administering personnel of the Government of Alberta or the public body,</p>
	<p>Legal Consistent Purpose of the Act</p> <p>Consistent Purpose 41 For the purposes of sections 39(1)(a) and 40(1)(c), a use or disclosure of personal information is consistent with the purpose for which the information was collected or compiled if the use or disclosure; (a) has a reasonable and direct connection to that purpose, and (b) is necessary for performing the statutory duties of, or for operating a legally authorized program of, the public body that uses or discloses the information.</p>
<p>Use of Generative Artificial Intelligence (AI)</p>	<p>N/A</p>
<p>Privacy Protection</p>	<p>Provide an assessment and rating of the vendor and their ability to protect personal information. This information can be found in the RFP proposal, vendor privacy policy on their website, HECVAT, and ITSec's evaluation. * include relevant sections from the documents as needed, provide evidence here:</p>

<p>Privacy Policy - provided/public-facing policy</p>	<p>Privacy Policy is public facing - https://www.transactcampus.com/legal/privacy-policy Privacy policy on line clearly alerts that 'Transact collects personal information in the course of providing its products and services to Clients (this would be MacEwan). We process this information in our role as a service provider according to the instructions of our Clients. If you have questions about the privacy practices of our Clients, or if you wish to exercise your privacy rights with respect to this information, we recommend that you contact our Clients directly. Our Clients entrust us with the personal information of their employees and their users, who are often students. Transact cares about privacy and safeguarding personal information, and we take these obligations seriously.</p> <p>Privacy Officer – Legal Department Transact Campus Inc. 18700 N. Hayden Rd. Suite 230 Scottsdale, AZ 85255</p> <p>Rating - Acceptable - privacy compliance overall is well documented for user's of their site for, collection, use, disclosure, etc. Access and corrections for this project would be through MacEwan University.</p>
<p>Protection of PI; IT Security, Physical Security - list all the things to look for</p>	<p>IT Security Review - Proceed with technical requirements. Recommendations provided in the PSA back in January 2024. The recommendations were being considered with the review of the Contract. New Security review was completed Nov 22, 2024.</p> <p>IPO - Information from Transact - in the contract 6. DATA SECURITY</p> <p>s. 19(1)</p> <p>Rating - Acceptable - Agree with ITS recommendation to proceed with technical requirements.</p>
<p>Location of Platform</p>	<p>Information we maintain may be stored in or outside of the United States. This Platform is intended for use in the United States and is subject to the laws of the United States, which may not provide the same level of protections as those in your own country.</p> <p>The Vendor head office is in the United States.</p> <p>Rating - Acceptable -US is acceptable for storage</p>
<p>Access Controls of Administrators</p>	<p>MacEwan: 5 Authorized Administrators.</p> <p>Vendor: Transat provided details for inclusion in the PSA. s. 19(1)</p> <p>Rating - Good - small amount of Authorized Transact staff have access as well as MacEwan.</p>

<p>Monitoring (regularly monitored or audited, procedures, frequency)</p>	<p>MacEwan: No monitoring.</p> <p>Vendor: s. 19(1)</p> <p>Rating - Acceptable - logs available.</p>
<p>Information Management</p>	<p>Identify the sections within the MacEwan Retention Schedule and how it would meet the requirements under the FOIP Act. Describe the Vendor' retention (contract, terms of use, privacy policy etc.) and provide a rating.</p>
<p>Records Management (Retention/Disposition Schedules)</p>	<p>MacEwan: (current retention) - AA10 Library Services a) Patrons' information that is maintained on the Symphony integrated library system b) Staff, students and fitness centre users' photographs on Guard Card, an identity management system. Library Services 1Y – D 3Y – D A patron's personal information will be purged from Symphony if the patron is inactive for 3 years. Personal information on Guard Card will be deleted if an account has not be edited in 3 years.</p>
<p></p>	<p>Vendor: Transat response to Records Retention - s. 19(1)</p> <p>Rating - Good - MacEwan is in control of the data</p>
<p>Information Rights</p>	<p>Describe what are the options to access the information, for correction, the right to be forgotten Who is responsible to update the personal information? Vendor or MacEwan</p>
<p>Right of Access to Personal Information held: - to know what PI is being held</p>	<p>Handled by MacEwan University in consultation with the Vendor.</p>
<p>Right to Correction</p>	<p>Handled by MacEwan University in consultation with the Vendor.</p>
<p>Access for Information Requests</p>	<p>Handled by MacEwan University in consultation with the Vendor.</p>
<p>Right for Erasure (not a legal requirement, this would exceed expectations)</p>	<p>Handled by MacEwan University in consultation with the Vendor.</p>

	<p>Rating - Good - MacEwan in control.</p>
Breach Reporting	<p>Describe the vendor's procedure and process responding to a security breach of personal information. This information can be found in the RFP proposal, vendor privacy policy on their website, HECVAT, and ITSec's evaluation. Provide evidence here:</p>
Breach Reporting (procedures, audit capabilities)	<p>Vendor: From the Contract - S. 19(1)</p> <p>[Redacted content]</p> <p>IPO will recommend notification timeline line (24 hours, 48 hours, etc.)</p> <p>Rating - Acceptable -no additional information on process</p>



Outlook

PSA Transact - Campus One Care - Library Services

From Gayle Faires <FairesG@macewan.ca>

Date Fri 2024-02-02 3:27 PM

To Gero Schaefer <schaeferg2@macewan.ca>

Hi Geo. I have uploaded the draft PSA for your input. I have a few comments in there for you before I am done.

Thanks.

Gayle



RE: PSA for Transact Campus One Card Solution

From Gayle Faires <FairesG@macewan.ca>
Date Mon 2024-12-02 9:49 AM
To Angel McVittie <McVittieA@macewan.ca>

Hi. Thank you for your fast response. Since this may never be implemented then we will go forward with the PSA for sign-off with a recommendation that a Subsequent PSA be completed if this does go forward.

No further action by you at this time.

Thank You.

Gayle Faires (*she/her*)
Analyst, Information and Privacy Office
Office of General Counsel
MacEwan University

E: FairesG@macewan.ca



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From: Angel McVittie <McVittieA@macewan.ca>
Sent: Monday, December 2, 2024 9:22 AM
To: Gayle Faires <FairesG@macewan.ca>
Subject: RE: PSA for Transact Campus One Card Solution

Morning!

I can see about getting that info if required but payment features may never be implemented. The scope of Phase 2 has not been determined yet.

From: Gayle Faires <FairesG@macewan.ca>
Sent: Monday, December 2, 2024 9:13 AM
To: Angel McVittie <McVittieA@macewan.ca>
Subject: FW: PSA for Transact Campus One Card Solution

Good Morning, Angel. In finalizing the PSA with IT Security s. 19(1)

s. 19(1)

If it is easier to have a short meeting to discuss, please let me know and I will arrange and include Alex from IT Security.

Thank you for your assistance.

Gayle Faires (*she/her*)

Analyst, Information and Privacy Office
Office of General Counsel
MacEwan University

E: FairesG@macewan.ca



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Privacy and Security Assessment

Project Name: Transact – Campus One Card Solution	Date of Submission: January 5, 2024. Updated November 5, 2024
Department: Library	Est. Date of Implementation: TBD as of July 2024
Project Manager/Owner: Angel McVittie, IT Project Manager	Email: mcvittiea@macewan.ca

A Privacy and Security Assessment (PSA) assesses and advises on risk for new or substantially modified projects, programs, systems, platforms, and activities (hereinafter referred to as “projects”).

When do I need a PSA?

- Developing a new project that collects personal information;
- Introducing a new IT system that accesses or stores personal information;
- Participating in a new data-sharing initiative with other organizations;
- Changing a program or system access so that new collections or uses of information happen, or those who have access change;
- Outsourcing the management or security of personal information or data to a third-party.

How To Complete a PSA

- We will need information from you, your project team, and any third-party participants. Complete **Section A: Project Summary** and **Section B: Personal Information** of the PSA Intake Questionnaire as thoroughly as possible, and submit your request to BOTH privacy@macewan.ca and informationsecurity@macewan.ca.
 - Only if a Vendor has been chosen, complete **Section C: Privacy Protection**, and submit your request to BOTH privacy@macewan.ca and informationsecurity@macewan.ca.
- Please include a copy of an RFP proposal and/or a Contract, Information Sharing Agreement, and/or Service Agreement.
- In the context of IT Security, we request that you reach out to the vendor to obtain, if applicable, a copy of the following documents:
 - HECVAT Report (Higher Education Community Vendor Assessment Toolkit): You can access the report template at the following link: <https://library.educause.edu/resources/2020/4/higher-education-community-vendor-assessment-toolkit>. This report is to be provided by the vendor as a part of their documentation.
 - Alternatively, if a current HECVAT report is unavailable, we also accept the submission of a Statement on Standards Attestation Engagements (“SSAE”) 16 for Service Organization Controls (“SOC”) 1 and SOC 2 reports from the vendor.

Please submit these documents directly to informationsecurity@macewan.ca.

Timelines

Once a vendor has been selected, please allow up to 2 weeks for initial review of the PSA. Review could take up to 4 weeks during busy periods, such as at the start of an academic term and at yearend. Exceptions may be made for time-sensitive assessments.

If the IPO determines that a Privacy Impact Assessment, which entails a more in-depth analysis, is warranted the IPO will initiate a consultation with the Project Manager/Owner.

Section A: Project Summary – Overview for PSA Assessment

Project Description/Background

What is the business solution that you are seeking and how it will be used?

Campus one Card for all students and Staff. Will allow MacEwan University to provide students and staff with a solution to upload an online photo, print a plastic card, provision a mobile credential, mobile credential use at the Library, gaining entry into the Sports and Wellness Centre as well as using the mobile credential for access to student printing.

How will this product/service achieve that business solution?

The product is expected to cover the entire scope as described in the contract. The assessment will identify all reader devices and campus systems that will be in scope as part of Mobile Credential (12 MRD5 Devices for use at the Library, Athletics Access Control, and Printing services.

Project Snapshot (Note: left double click the grey box to check off)

Project State	<input type="checkbox"/> Substantial change <input type="checkbox"/> In Production <input checked="" type="checkbox"/> Under Development <input type="checkbox"/> Other
System Management	<input type="checkbox"/> Vendor Managed <input type="checkbox"/> Centrally Managed <input type="checkbox"/> Individually Managed <input checked="" type="checkbox"/> Departmentally Managed
Project Audience	<input type="checkbox"/> Small group of users <input checked="" type="checkbox"/> Campus <input type="checkbox"/> Public <input checked="" type="checkbox"/> Department/Business Unit/Functional Unit
Number of Users	<input type="checkbox"/> 1-10 <input checked="" type="checkbox"/> 1,001-10,000 <input type="checkbox"/> 11-100 <input type="checkbox"/> 101-1,000 <input type="checkbox"/> 10,001+
Does this project require data migration? Student demographic information will come from the SIS system data integration.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Unknown <input type="checkbox"/> N/A
Does any part of this project involve cloud services?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Unknown <input type="checkbox"/> N/A
If yes, what type?	<input type="checkbox"/> Software as a Service (SaaS) <input type="checkbox"/> Platform as a Service (PaaS) <input type="checkbox"/> Infrastructure as a Service (IaaS) <input checked="" type="checkbox"/> Hosted
Does this project involve a third-party vendor? Vendor Information (if applicable)	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Unknown <input type="checkbox"/> N/A Has a Vendor been selected? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No To be filled out once Vendor is known. Company Name Transact Campus Product Name Transaction System Module Name Release/Version # Vendor Contact Person s. 20(1) Vendor Phone & Email s. 20(1) s. 20(1) @transactcampus.com

s. 19(1)

s. 20(1)

s. 20(1)

s. 20(1)

@transactcampus.com

<p>Will this project require that payments be processed for individuals by the Vendor? If yes, are those payments being processed in a manner compliant with the Payment Card Industry Data Security Standard (PCI DSS)?</p> <p>Phase Two of the project may include expansion of use case of the Transaction System to include adding Monetary Transactions/Payment features (such as at the Bookstore, Laundry, Vending) as well as expanding the scope of Mobile Credential use for Parking and Access Control.</p> <p>The Transact Project Manager will contact MacEwan to initiate the project if going forward, at which time the completion of a Subsequent PSA would be required.</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> Unknown <input type="checkbox"/> N/A</p> <p><input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Unknown</p>
<p>Will this project include the use of Generative Artificial Intelligence (AI) components? If, yes please provide a description:</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> Unknown <input type="checkbox"/> N/A</p>

Section B: Personal Information for Collection, Use and/or Disclosure

Will this project involve Personal Information¹ Yes No

Is this a new use of personal information that was already collected for another purpose?

Yes No N/A

Identify All Data Elements

<input checked="" type="checkbox"/> name	Personal Health Information
<input type="checkbox"/> home address	<input type="checkbox"/> Medical information including health card number,
<input type="checkbox"/> phone number	<input type="checkbox"/> medical history, <input type="checkbox"/> psychiatric history, <input type="checkbox"/> medication
<input checked="" type="checkbox"/> email address (personal or MacEwan)	history, <input type="checkbox"/> laboratory test results, <input type="checkbox"/> diagnostic images,
<input type="checkbox"/> marital status	<input type="checkbox"/> immunization records, any other health information
<input type="checkbox"/> ethnicity	related to identifiable individuals
<input type="checkbox"/> employment history	Personal Identifying Numbers
<input type="checkbox"/> payroll information	<input checked="" type="checkbox"/> Employee/Student number, <input type="checkbox"/> client or license
<input type="checkbox"/> educational history	number, <input type="checkbox"/> Health Card number, <input type="checkbox"/> SIN, <input type="checkbox"/> bank card
<input type="checkbox"/> gender	information (credit or debit), <input type="checkbox"/> bank account number
<input type="checkbox"/> DOB	
<input type="checkbox"/> financial transactions involving the individual	<input type="checkbox"/> Other types of information , either alone or in
<input checked="" type="checkbox"/> photograph of an individual (identifiable)	combination, would identify an individual or their location
<input type="checkbox"/> passport information or photocopy	(e.g., geospatial data, Internet Protocol (IP) address,
<input type="checkbox"/> criminal record check	transaction logs, web analytics tracking).
Other (please list):	Please provide details:

Information Classification Standard

What is the information classification² of the data in this project? Classify all data that the system stores, processes, transmits, or any other critical information assets in your system. If there are multiple levels, use the rating of the highest classified data element.

Restricted Confidential Internal Public

Note: The personal information collected is considered 'Confidential' in accordance with the University Information Classification Standard.

¹ Personal Information is identifiable information about an individual. This is defined in section 1(n) of Alberta's *Freedom of Information and Protection of Privacy Act* (FOIP Act)

² Refer to the University Information Classification Standard for more information or contact IPO.

Section C: Privacy Protection – Complete when Vendor known

Will a Contract, Information Sharing Agreement, or a Service Agreement be required for this project?

Yes No N/A Describe: *(type, requires legal review, etc.)* Contract November 5, 2024.

Please attach a copy or draft copy if available.

External Stakeholders

Are there any other external stakeholders who are participating in this project such as other Universities, Public Bodies, etc.? Yes No If yes, who?:

Role Based Access Controls

Complete the table or attach a separate access controls document *(if applicable)*. Include MacEwan Departments and third parties who have access to project information.

Job Title MacEwan Dept.	User Role	# People in this role	Type of access (Read, Write, Edit)	Description of information this user can access
Campus Service Team	Administrators	5	(Read, Write, Edit)	Read, Write, Edit
Job Title Vendor		# People in this role	Type of access (Read, Write, Edit)	Description of information this user can access

s. 19(1)

Job Title	User Role	# People in this role	Type of access (Read, Write, Edit)	Description of information this user can access
MacEwan Dept.				

s. 19(1)

Monitoring**By MacEwan Dept: -**

Are information logs for this project regularly monitored or audited? Yes No N/A

If yes, by who?

How frequently is it done (if applicable)? Monthly Weekly Never

Is there a procedure? If yes, please attach or describe

The personal information collected for the Library card is considered minimal and low risk. In addition, there are limited staff (5 Administrative Users) with access to the system. Reasonable that regular monitoring of access logs would not be required by MacEwan.

By Vendor:

s. 19(1)

Notification

If you are collecting Personal Information, will MacEwan or the Vendor be providing a Notification of Collection of Personal Information?³ Yes No Unknown N/A

If yes, please describe: Communication on the new card process will be sent out prior to implementation.

The current MacEwan Cardholder Agreement - The MacEwan ID/Library card is issued to registered MacEwan students and to faculty and staff and is the official MacEwan identification card and library card. The Library is responsible for the production, distribution and management of the MacEwan ID/Library card. Use of this card is subject to the terms and conditions listed in the agreement, which the cardholder acknowledges upon receipt of the card.

³ Requirement of Alberta's Freedom of Information and Protection of Privacy Act (FOIP)

Retention

What is MacEwan Records Retention Schedule period for which this information must be retained by the project before destruction or archive occurs? Link to: [Records Retention Schedule](#)

Please describe: **MacEwan (current retention) - AA10**

Library Services

- a) Patrons' information that is maintained on the *Symphony* integrated library system
- b) Staff, students and fitness centre users' photographs on *Guard Card*, an identity management system.

Library Services

1Y – D

3Y – D

A patron's personal information will be purged from *Symphony* if the patron is inactive for 3 years.

Personal information on *Guard Card* will be deleted if an account has not been edited in 3 years.

What is the Vendor Retention? (retention information may be included in vendor privacy policy, contract or terms of use etc.)

Please describe: **s. 19(1)**


[Redacted]

[Redacted]


To be completed by the Information and Privacy Office and IT Compliance and Information Security

Privacy and Security Assessment

PRIVACY	
Review date:	January 5, 2024. Finalized with additional information November 5, 2024
Current contract reviewed:	Yes – 1 st draft reviewed, and the final contract provided November 5, 2024, was reviewed.
Contract expiry date:	August 2029
Vendor's privacy policy reviewed:	YES
Information classification:	Confidential
Privacy Evaluation Comments:	<p>RISK ASSESSMENT ON THE FOLLOWING:</p> <ol style="list-style-type: none"> Data <ul style="list-style-type: none"> Collection, use, disclosure, and disposition of personal information Privacy Policy covers collection, use, disclose and disposition. Limited personal information required to administer the One Card. Collection authorized under the FOIP Act. Privacy Policy Public facing https://www.transactcampus.com/legal/privacy-policy Meets Privacy Policy requirements for users of their site for collection, use and disclosure. Access and corrections for this project would be through MacEwan. Retention Policy MacEwan retention schedule in place for Library Services. Vendor -s. 19(1) [REDACTED] Location of platform Vendor states the platform is intended for use in the United States and is subject to the laws of the United States, which may not provide the same level of protections as those in your own country. Generative Artificial Intelligence (AI) N/A

	<p>2. Access Controls</p> <ul style="list-style-type: none">• Controls allowing only authorized access to personal information MacEwan: Campus Service Team - Five Administrators Vendor: s. 19(1) <p>3. Breach Reporting</p> <ul style="list-style-type: none">• s. 19(1) <ul style="list-style-type: none">• Audit capabilities Vendor: s. 19(1) <p>Overall Risk Rating: Meets privacy and information standards. IPO Recommendations:</p> <ol style="list-style-type: none">1. A process should be in place to ensure that MacEwan users who are no longer authorized to access the system are removed as soon as possible.2. MacEwan should request the Vendor’s notification on breach reporting be within a timeframe (e.g. 24 or 48 hours).3. Phase Two of the project may include expansion of use case of the Transaction System to include adding Monetary Transactions /Payment features (such as at the Bookstore, Laundry, Vending) as well as expanding the scope of Mobile Credential use for Parking and Access Control. <p>The Transact Project Manager will contact MacEwan to initiate the project if going forward, at which time the completion of a Subsequent PSA would be required before implementation.</p>
<p>Information and Privacy Office Analyst</p>	<p>Name: Gayle Faires</p> <p>Gayle Faires Signed with ConsignO Cloud (2024/12/02) Verify with verifio.com or Adobe Reader.</p> 



IT SECURITY	
Reports reviewed:	11/22/2024
Bitsight	YES
HECVAT	NO
SOC 2	YES
SSAE 16	NO
Other	Explanation:
Info Security Evaluation: Comments:	<p>Overall Risk Rating: PROCEED - With Technical Requirements</p> <p>TransAct has a mature infrastructure s. 19(1). Overall, Transact has an A rating across the board. SSO is being used for account access.</p> <p>Explanation:</p> <p>RISK ASSESSMENT:</p> <ol style="list-style-type: none"> 1. Security Infrastructure Limited information about their security was shared privately or publicly. s. 19(1), it is reasonable to assume they have a robust security infrastructure. s. 19(1) 2. Data Rights & Privacy Protection Data Rights are a concern; according to privacy, they adhere to the right to delete in areas where it is enforced only (i.e., California – CCPA). There is no clear guidance outside of areas where the law does not enforce it. 3. Endpoint & Host Security Transact host data in the cloud in both Azure and AWS. The controls in place were considered acceptable s. 19(1) 4. Data & Access Management Transact supports integration for SSO, various 3rd party student information systems (SIS), information(file) systems, and transaction systems to adhere to compliance within the organization. 5. Regulatory Compliance s. 19(1) no concerns with the infrastructure or controls.


	<p>Transact maintains PCI-DSS compliance, validated on the VISA PCI compliance website. Transact maintains TX-Risk and Authorization Management Program (TX-RAMP) certification as well.</p> <p>6. Security & Vulnerability Testing</p> <p>Transact aligns to the methodologies of OWASP and NIST. They state the product team includes security training tools and processes which follow those frameworks. s. 19(1)</p> <p>7. Incident Reporting & Response</p> <p>There is no formal incident reporting & response publicly shared. There is a public status page which contains a historical record of incidents. https://status.transactcampus.com/</p>
<p>Information Security and Compliance Analyst</p>	<p>Name: Alex Syvitski</p> <p>Alex Syvitski <small>Signed with ConsignO Cloud (2024/12/02) Verify with verifio.com or Adobe Reader.</small></p> 


Acknowledgements

This page will be prepared for electronic signatures upon completion of the PSA review.

Signing below constitutes your recommendation of this project and cognizance of the risk(s), risk rating(s), and action plan(s) (if applicable) which have been identified during the assessment process.

Signature:	 <small>Signed by Eva Revitt (2024/12/05) Verify with verifio.com or Adobe Reader.</small>	
Name:	Project Owner/Manager Eva Revitt, Dean, Library	

Signature:	Jennifer Stanton <small>Signed with ConsignO Cloud (2024/12/05) Verify with verifio.com or Adobe Reader.</small>	
Name:	Lead, Information and Privacy Office Jennifer Stanton	

Signature:	Thomas Wong Matthews <small>Signed with ConsignO Cloud (2024/12/06) Verify with verifio.com or Adobe Reader.</small>	
Name:	Director, Cybersecurity and Chief Information and Security Officer IT Compliance and Information Security Thomas Wong Matthews	