

Section 1 - Overview & PIA Initiation

Government Institution: Royal Canadian Mint (RCM)

Official Responsible for the PIA

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Head of the government institution or Delegate for section 10 of the *Privacy Act*

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Name of Activity: Ecommerce Business - Digital Experience Platform

Description of the class of record and personal information bank :

Institution specific class of record:

E-Commerce and Direct Sales Class of Record;
Under Development (Marketing, advertising, and analytics)

Institution specific personal information bank:

Retail Purchase & Order Fulfillment Processing Personal Information Bank (RCM PPU 015);
Under Development (Marketing, advertising, and analytics)

Legal Authority for activity:

Royal Canadian Mint Act

Description Summary:

The RCM is in the process of significant business and digital transformation to enhance business capabilities and replace systems that are nearing end of life. As part of this “One Mint” strategic transformation, the RCM is replacing the Mint.ca platform that serves as the foundation of its ecommerce business with a new platform, referred to as the “Digital Experience Platform” (DEP).

PIA Scope:

The RCM is not fundamentally altering this ecommerce business, as many of the existing processes and activities will generally remain the same, despite existing on a new platform. The new platform will however alter some aspects of how personal information is collected, used, stored, and disclosed from a technical perspective and will introduce some limited new functionality. This PIA assesses the ecommerce business as it is intended to be implemented at the operational stage of the DEP. This includes the Optimizely DXP, which is the central component of the DEP, and certain aspects of other

integrated systems such as Adobe Analytics, Adobe Audience Manager¹, Optimizely Delivra, Microsoft Dynamics AX 2012 (DAX), the Chase Orbital Gateway Hosted Payment Form Service, Chase Safetech, Genesys Cloud, PayPal, and PowerReviews. The PIA only considers aspects of the ecommerce business involving the collection, use, disclosure and retention of personal information. It does not consider components of the ecommerce business that deal with other potentially sensitive information, such as pricing or other commercial information.

Section 2 - Risk identification and categorization

The following section contains standardized risks identified in the PIA report per the TBS requirements for a core PIA. The common, numbered risk scale is utilized where appropriate in ascending order: the first level (1) represents the lowest level of potential risk for the risk area; the fourth level (4) represents the highest level of potential risk for the given risk area.

A) Type of program or activity

Risk scale - 2: Administration of program or activity and services.

B) Type of personal information involved and context

Risk scale – 3: Social Insurance Number, medical, financial or other sensitive personal information or the context surrounding the personal information is sensitive; personal information of minors or of legally incompetent individuals or involving a representative acting on behalf of the individual.

C) Program or activity partners and private sector involvement

Risk scale – 1: Within the institution (among one or more programs within the same institution); and

Risk scale - 4: Private sector organizations, international organizations or foreign governments.

D) Duration of the program or activity:

Risk scale – 3: Long-term activity.

E) Program population

Risk scale – 3: The program's use of personal information for external administrative purposes affects certain individuals.

¹ Going forward, the Mint will no longer use Adobe Audience Manager and will explore new tools to perform audience-based and personalized advertising.

F) Technology & privacy

Does the new or modified program or activity involve the implementation of a new electronic system, software or application program including collaborative software (or groupware) that is implemented to support the program or activity in terms of the creation, collection or handling of personal information?

Yes

Does the new or modified program or activity require any modifications to IT legacy systems and/or services?

No

The new or modified program or activity involves the implementation of one or more of the following technologies:

Enhanced identification methods?

No

Use of Surveillance?

No

Use of automated personal information analysis, personal information matching and knowledge discovery techniques?

Yes

G) Personal information transmission

Risk scale – 2: The personal information is used in a system that has connections to at least one other system.

H) Privacy breach risk impact

Potential risk that in the event of a privacy breach, there will be an impact on the individual or employee?

Yes

Potential risk that in the event of a privacy breach, there will be an impact on the institution?

Yes