

SAMPLE PRIVACY IMPACT ASSESSMENT¹

Version 1.0

September 22, 2023

This model was designed by the Commission d'accès à l'information. It is a first draft that will evolve over time. If you have any comments about this template, please contact us at veille@cai.gouv.qc.ca. Please note that we will not necessarily respond to these comments, but we will take them into account when considering future updates to this tool.

This template has been produced to facilitate the formal documentation, in the form of a report, of a Privacy Impact Assessment (PIA). It complements the accompanying guide available on the Commission's website.

This template is provided as a general example. Using it is not mandatory. We suggest that you adapt it to the context of your organization, or to the scope of your evaluation. You can also develop your own model. Whatever tool you use, remember that your PIA approach and report should be tailored to your particular project.

You will come across the following symbols and codes as you read:

→ SEE THE
ACCOMPANYING
GUIDE, SECTION [X].

Refer to the accompanying guide for more information.

Purple passages

Clarification of expected content or an example to assist with your reflections.

 [Text]

Invitation to attach a document to the PIA report, if applicable.

¹ This document is an unofficial translation provided as a courtesy by Dentons Canada LLP's Privacy and Cybersecurity Group. This document is intended for informational purposes only.

Quebec CAI – PIA Template Form
Dentons Unofficial Translation

Text fields sometimes contain suggestions in the form of drop-down lists. In all cases, you can change their content. **The space occupied by each of these fields is not an indication of how long the corresponding text should be.**

[Your organization's logo]

[Title]

Privacy Impact Assessment

[Name of organization]

Document date: *Click or press here to enter a date.*

Last revision: *Click or press here to enter a date.*

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EVALUATION SUMMARY

This section summarizes the actions you have taken to ensure that you have met all your PIA obligations. It can also be used as a checklist.

Depending on the context, this summary could be distributed to the public as a best practice. Be careful, however, about details that may be confidential.

→ SEE ACCOMPANYING GUIDE, SECTION 4.3

IDENTIFICATION OF THE PERSON RESPONSIBLE FOR THE ASSESSMENT		
Name of the person responsible	<i>Click here to enter text.</i>	
Title and/or responsibility	<i>Click here to enter text.</i>	
Management and/or department	<i>Click here to enter text.</i>	
Contact	<i>Click here to enter text.</i>	
OTHER PEOPLE INVOLVED IN THE ASSESSMENT		
Name	Title	Organization
<i>Click here to enter text.</i>	<i>Click here to enter text.</i>	<i>Click here to enter text.</i>
<i>Click here to enter text.</i>	<i>Click here to enter text.</i>	<i>Click here to enter text.</i>
<i>Click here to enter text.</i>	<i>Click here to enter text.</i>	<i>Click here to enter text.</i>
<i>Click here to enter text.</i>	<i>Click here to enter text.</i>	<i>Click here to enter text.</i>
<i>Click here to enter text.</i>	<i>Click here to enter text.</i>	<i>Click here to enter text.</i>
PROJECT DESCRIPTION		
Brief description	<i>Click here to enter text.</i>	
Project start date	<i>Click or press here to enter a date.</i>	
Project duration (or other relevant timeframe information)	<i>Click here to enter text.</i>	
The project involves personal information.	Yes	No
	<input type="checkbox"/>	<input type="checkbox"/>

Complete the following section only if the project involves personal information.

PRIVACY IMPACT ASSESSMENT SUMMARY		
The project involves the mandatory completion of a PIA by law.	Yes	No
	<input type="checkbox"/>	<input type="checkbox"/>

Quebec CAI – PIA Template Form
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If yes , indicate the law concerned and the applicable article(s) → SEE ACCOMPANYING GUIDE, SECTION 1	<i>Choose an element or write free text.</i>	
Status of this report	<input type="checkbox"/> New	<input type="checkbox"/> Modification of an existing report - specify: <i>Click or press here to enter text.</i>
As part of this assessment, the project, its objectives and scope were defined .	Yes <input type="checkbox"/> <small>see section 1</small>	No <input type="checkbox"/>
The personal information inventory and mapping have been completed.	Yes <input type="checkbox"/> <small>see section 2</small>	No <input type="checkbox"/>
The scope of the assessment is proportional to the sensitivity of the personal information involved in the project, the purpose of its use, its quantity and distribution , and its storage medium .	Yes <input type="checkbox"/> <small>see section 2</small>	No <input type="checkbox"/>
The relevant actors were involved in the assessment, and their roles and responsibilities were clarified.	Yes <input type="checkbox"/> <small>see section 3</small>	No <input type="checkbox"/>
The organization has ensured that it complies with its obligations and principles regarding the protection of personal information .	Yes <input type="checkbox"/> <small>see section 4</small>	No <input type="checkbox"/>
The organization has identified the privacy risks generated by the project, targeted their causes and assessed their probability and potential consequences .	Yes <input type="checkbox"/> <small>see section 5</small>	No <input type="checkbox"/>
The organization has strategies in place to avoid or reduce these risks effectively.	Yes <input type="checkbox"/> <small>see section 5</small>	No <input type="checkbox"/>
Evaluation follow-up mechanisms have been set up.	Yes <input type="checkbox"/> <small>see section 6</small>	No <input type="checkbox"/>

1. PROJECT DESCRIPTION AND SCOPE

This section of the report should make it easy to understand: the nature of the project; the context in which it is being carried out; the reasons for its implementation and the objectives pursued; the initial situation and the target situation; the timetable for completion and the breakdown into sub-projects (for large and very large-scale projects); its scope; and so on.

→ SEE ACCOMPANYING GUIDE, SECTIONS 2.1 AND 2.2



RELATED PIA REPORTS, IF APPLICABLE

Outline of the project

Click or press here to enter text.

Project schedule

Click or press here to enter text.

Statement and justification of project objectives

Click or press here to enter text.

Demonstration that the project is proportionate to the objectives and risks of invasion of privacy

Click or press here to enter text.

Determining the scope of the assessment

Click or press here to enter text.

2. ROLES AND RESPONSIBILITIES

This section of the report should clearly identify the people, administrative units or organizations involved in the assessment, as well as the division of roles and responsibilities within these stakeholders.

→ SEE ACCOMPANYING GUIDE, SECTION 2.5

Stakeholders involved in the PIA process

Name	Title	Management/department	Organization	Role in the process	Reason for involvement
<i>Click or press here to enter text.</i>	<i>Click or press here to enter text.</i>	<i>Click or press here to enter text.</i>	<i>Click or press here to enter text.</i>	<i>Click or press here to enter text.</i>	<i>Click or press here to enter text.</i>
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Summary of consultations

This section can be used to summarize any consultations you've held with external stakeholders. For example, if you have held discussions with a committee of potential users, you could outline your approach and its impact on your project.

Click or press here to enter text.

3. PERSONAL INFORMATION INVOLVED AND SCOPE OF ASSESSMENT

This section of the report should identify the personal information collected (including created or inferred), used, disclosed and retained in the course of the project, and the categories of people to whom it relates.

It is also suggested that you include a mapping of the points of interaction between the information and the organization or its partners: categories of people who will have access to personal information and reasons for doing so, means of collection, means of disclosure, means of processing and retention, and so on. You can use tables like those below, texts, diagrams or any other format that suits your needs.

These elements will help you explain the scope you have given to the PIA.

→ SEE ACCOMPANYING GUIDE, SECTIONS 2.3 AND 2.4

Inventory of personal information involved



DETAILED INVENTORY OF PERSONAL INFORMATION, IF APPLICABLE

CATEGORIES OF PERSONS WHOSE INFORMATION IS CONCERNED

Category	Details
<input type="checkbox"/> Customers	<i>Specify</i>
<input type="checkbox"/> Organization staff	<i>Specify</i>
<input type="checkbox"/> Other(s)	<i>Specify</i>
Approximate number of concerned persons:	<i>Click or press here to enter text.</i>

NATURE OF PERSONAL INFORMATION

This list is not exhaustive. Other groupings are possible.

Remember to include any information you create or infer (e.g. rating, score, evaluation note, unique numbers, profile).

Grouping	Details
<input type="checkbox"/> Identity information	<i>Specify</i>
<input type="checkbox"/> Medical information	<i>Specify</i>
<input type="checkbox"/> Biometric information	<i>Specify</i>
<input type="checkbox"/> Financial information	<i>Specify</i>
<input type="checkbox"/> Educational information	<i>Specify</i>

Grouping	Details
<input type="checkbox"/> Employment information	<i>Specify</i>
<input type="checkbox"/> Legal information / background	<i>Specify</i>
<input type="checkbox"/> Technological information	<i>Specify</i>
<input type="checkbox"/> Profile information	<i>Specify</i>
<input type="checkbox"/> Geolocation information	<i>Specify</i>
<input type="checkbox"/> Family/social information	<i>Specify</i>
<input type="checkbox"/> Recordings (video, audio, etc.)	<i>Specify</i>
<input type="checkbox"/> Other	<i>Specify</i>

SOURCE OF PERSONAL INFORMATION

Source	Details
<input type="checkbox"/> Persons concerned themselves	<i>Specify</i>
<input type="checkbox"/> Staff members	<i>Specify</i>
<input type="checkbox"/> Federal public agency	<i>Specify</i>
<input type="checkbox"/> Provincial public agency	<i>Specify</i>
<input type="checkbox"/> Company	<i>Specify</i>
<input type="checkbox"/> Computer system / connected object	<i>Specify</i>
<input type="checkbox"/> Other	<i>Specify</i>

SENSITIVITY OF PERSONAL INFORMATION

This section should help you understand the sensitivity analysis.

Click or press here to enter text.

PURPOSES FOR WHICH PERSONAL INFORMATION IS USED OR DISCLOSED

Click or press here to enter text.

Mapping the flow of personal information

 **DETAILED MAPPING (E.G. DIAGRAM) OF THE FLOW OF PERSONAL INFORMATION, IF APPLICABLE**

MEANS USED TO PROCESS PERSONAL INFORMATION

Lifecycle phase	Details
Means of collecting the information	<i>Specify</i>
Means of using the information	<i>Specify</i>
Means of disclosing the information	<i>Specify</i>
Means of storing the information (include details of storage location)	<i>Specify</i>
Means for destroying information or, if necessary, anonymizing it	<i>Specify</i>

CATEGORIES OF PERSONS WHO WILL HAVE ACCESS TO PERSONAL INFORMATION

These people may be located both within the organization and externally (e.g. subcontractors).

Role	Number of people in this role	Access type	Information to which these persons will have access	Explanation of the need for these people to have access to information
<i>Click or press here to enter text.</i>	<i>Click or press here to enter text.</i>	<i>Choose an item or specify.</i>	<i>Click or press here to enter text.</i>	<i>Click or press here to enter text.</i>
<i>Click or press here to enter text.</i>	<i>Click or press here to enter text.</i>	<i>Choose an item or specify.</i>	<i>Click or press here to enter text.</i>	<i>Click or press here to enter text.</i>
<i>Click or press here to enter text.</i>	<i>Click or press here to enter text.</i>	<i>Choose an item or specify.</i>	<i>Click or press here to enter text.</i>	<i>Click or press here to enter text.</i>
<i>Click or press here to enter text.</i>	<i>Click or press here to enter text.</i>	<i>Choose an item or specify.</i>	<i>Click or press here to enter text.</i>	<i>Click or press here to enter text.</i>

Justifying the scope of the PIA

This section should explain the scope of your PIA. It must be proportionate to the sensitivity of the information concerned, the purpose of its use, its quantity, its distribution and its storage medium.

→ [SEE ACCOMPANYING GUIDE, SECTIONS 2.4](#)

Click or press here to enter text.

4. COMPLIANCE WITH PRIVACY OBLIGATIONS AND PRINCIPLES

This section of the report should identify the measures or means deployed or used to meet the obligations and principles of privacy protection arising from the Access Act or the Private Sector Act, or from other local or international laws, regulations or standards applicable to the project. The source of these obligations should be indicated.

→ SEE ACCOMPANYING GUIDE, SECTIONS 2.6 AND 3.1

Applicable obligations

This table is suggested, but you can use any format or methodology to suit your needs.



LEGAL ANALYSIS (OPTIONAL)

Law / Regulation / Standard / Other	Applicable sections / provisions, if any	Measures taken
<i>Click or press here to enter text.</i>	<i>Click or press here to enter text.</i>	
<i>Click or press here to enter text.</i>	<i>Click or press here to enter text.</i>	
<i>Click or press here to enter text.</i>	<i>Click or press here to enter text.</i>	
<i>Click or press here to enter text.</i>	<i>Click or press here to enter text.</i>	

Specific criteria to be assessed by the PIA

If the PIA you are conducting must conclude that certain criteria have been met, as is the case for non-consensual communications for research purposes, for example, explain how each of these criteria has been met.

→ SEE ACCOMPANYING GUIDE, APPENDICES 1 TO 5


Click or press here to enter text.

5. IDENTIFICATION OF RISKS AND MITIGATION STRATEGIES

In particular, this section of your report should describe the privacy risks generated by your project and their consequences for the individuals concerned. It should also present the strategies put in place to eliminate or mitigate these risks, as well as an analysis of the effect of these measures on the residual level of risk.

If you already have a risk analysis template, use it in this section. If your organization does not have such a model, you can use the following tables, separated by phase of the personal information life cycle, as a guide.

→ SEE ACCOMPANYING GUIDE, SECTIONS 3.2 AND 3.3

-  SAFETY ANALYSIS(ES), IF APPLICABLE
-  RELEVANT POLICIES / PROCEDURES REGARDING THE MANAGEMENT OF PERSONAL INFORMATION, IF APPLICABLE
-  RELEVANT INDUSTRY CERTIFICATION(S), IF ANY

Legend

P: Probability S: Severity R: Risk level (P × S)
 VL: Very low L: Low H: High VH: Very high

Risks at the information gathering point

#	Risk description	Causes	Consequences	Before applying measures			Mitigation strategy (existing or new measures)	Following the application of		
				P	S	R		P	S	R
#	Text	Text	Text	Choose	Choose	Level	Text	Choose	Choose	
#	Text	Text	Text	Choose	Choose	Level	Text	Choose	Choose	
#	Text	Text	Text	Choose	Choose	Level	Text	Choose	Choose	

DETAILS

Click or press here to enter text.

Risks of using personal information

#	Risk description	Causes	Consequences	Before applying measures			Mitigation strategy (existing or new measures)	Following the application of		
				P	S	R		P	S	R
#	Text	Text	Text	Choose	Choose	Level	Text	Choose	Choose	
#	Text	Text	Text	Choose	Choose	Level	Text	Choose	Choose	
#	Text	Text	Text	Choose	Choose	Level	Text	Choose	Choose	

DETAILS

Click or press here to enter text.

Communication risks

#	Risk description	Causes	Consequences	Before applying measures			Mitigation strategy (existing or new measures)	Following the application of		
				P	S	R		P	S	R
#	Text	Text	Text	Choose	Choose	Level	Text	Choose	Choose	
#	Text	Text	Text	Choose	Choose	Level	Text	Choose	Choose	
#	Text	Text	Text	Choose	Choose	Level	Text	Choose	Choose	

DETAILS

Click or press here to enter text.

Storage, destruction and/or anonymization risks

#	Risk description	Causes	Consequences	Before applying measures			Mitigation strategy (existing or new measures)	Following the application of		
				P	S	R		P	S	R
#	Text	Text	Text	Choose	Choose	Level	Text	Choose	Choose	
#	Text	Text	Text	Choose	Choose	Level	Text	Choose	Choose	
#	Text	Text	Text	Choose	Choose	Level	Text	Choose	Choose	

DETAILS

Click or press here to enter text.

Other risks

#	Risk description	Causes	Consequences	Before applying measures			Mitigation strategy (existing or new measures)	Following the application of		
				P	S	R		P	S	R
#	Text	Text	Text	Choose	Choose	Level	Text	Choose	Choose	
#	Text	Text	Text	Choose	Choose	Level	Text	Choose	Choose	
#	Text	Text	Text	Choose	Choose	Level	Text	Choose	Choose	

DETAILS

Click or press here to enter text.

Reassessing proportionality

[→ SEE ACCOMPANYING GUIDE, SECTION 3.3](#)

Considering your PIA as a whole, does the solution you propose to achieve your objectives (your project) still appear proportionate in view of the residual risks? In the event of a complaint by an affected party or an audit by a regulatory body, will you be prepared to demonstrate that the solution is proportional?

Click or press here to enter text.

PROJECT FOLLOW-UP BASED ON ANALYSIS

- Continue without modification
 Continue with modifications
 Abandon or suspend

Click or press here to enter text.

6. ACTION PLAN

This section of your report should describe the concrete actions that follow the conclusion of the PIA, in particular to implement the new strategies identified above.

Each residual risk should have a person responsible for implementing the measures identified and managing the event should it materialize.

→ SEE ACCOMPANYING GUIDE, SECTIONS 3.4

Action to be taken	Related risk(s)	Risk management manager(s)	Target date	Completion date
<i>Click or press here to enter text.</i>	<i>Click or press here to enter text.</i>	<i>Click or press here to enter text.</i>	<i>Click here to enter a date.</i>	<i>Click here to enter a date.</i>
<i>Click or press here to enter text.</i>	<i>Click or press here to enter text.</i>	<i>Click or press here to enter text.</i>	<i>Click here to enter a date.</i>	<i>Click here to enter a date.</i>
<i>Click or press here to enter text.</i>	<i>Click or press here to enter text.</i>	<i>Click or press here to enter text.</i>	<i>Click here to enter a date.</i>	<i>Click here to enter a date.</i>
<i>Click or press here to enter text.</i>	<i>Click or press here to enter text.</i>	<i>Click or press here to enter text.</i>	<i>Click here to enter a date.</i>	<i>Click here to enter a date.</i>

7. APPROVAL OF REPORT AND VERSIONS

This section allows a senior manager in your organization to officially approve the content of the PIA report. It is also intended to document the evolution of the document.

Approval

I certify that the information contained in the sections of this report and the controls relating to this information are reliable and that they correspond to the situation as it existed on the date of signature of this privacy impact assessment report.

Signature of responsible authority

[Name]

[Title]

Approval date: *Click or press here to enter a date.*

Date of next scheduled revision: *Click or press here to enter a date.*

Assessment update logging

Date	Manager	Modifications
<i>Click or press here to enter a date.</i>	<i>Click or press here to enter text.</i>	<i>Click or press here to enter text.</i>
<i>Click or press here to enter a date.</i>	<i>Click or press here to enter text.</i>	<i>Click or press here to enter text.</i>
<i>Click or press here to enter a date.</i>	<i>Click or press here to enter text.</i>	<i>Click or press here to enter text.</i>

ATTACHED DOCUMENTS

To ensure that your report is complete and easy to refer to later, we suggest that you attach certain relevant documents, such as the following.

Document	Attached	Not applicable
Detailed inventory of personal information	<input type="checkbox"/>	<input type="checkbox"/>
Mapping the circulation of personal information	<input type="checkbox"/>	<input type="checkbox"/>
Agreement on collecting/disclosing personal information	<input type="checkbox"/>	<input type="checkbox"/>
Relevant policies/procedures regarding the management of personal information	<input type="checkbox"/>	<input type="checkbox"/>
Relevant sector certification(s)	<input type="checkbox"/>	<input type="checkbox"/>
Other project-related evaluations		
Related PIA reports	<input type="checkbox"/>	<input type="checkbox"/>
Safety analysis	<input type="checkbox"/>	<input type="checkbox"/>
Legal notices	<input type="checkbox"/>	<input type="checkbox"/>
Other	<input type="checkbox"/>	<input type="checkbox"/>