

Brightspace D2L

Part 1	
Resource Type (Digital or Application)	Digital
Application/Software Title (with links)	Brightspace D2L https://sd62.onlinelearningbc.com/
Developer/Vendor	Desire2Learn (D2L)
Privacy Policy, Terms of Use (Links)	D2L Privacy Policy
Description of Application and its Educational Value (Refer to "About Us" page, if applicable) What is the initiative? Describe your initiative in enough detail that a reader who knows nothing about your work will understand the purpose of your initiative and who your partners and other stakeholders are. Describe what you're doing, how it works, who is involved and when or how long your initiative runs.	Brightspace is a cloud-based learning management system (LMS) used by K-12 schools, colleges/universities, and organizations. It provides a central hub where courses, assignments, discussions, resources, and assessments live online, supporting both in-person and remote learning.
Part 2	
Is this initiative a data-linking program under FOIPPA? <i>If yes, this PPIA must be submitted to the Office of the Information and Privacy Commissioner (OIPC). A data linking program is when multiple distinct data sets are used in conjunction with each other. (E.g. MyED information used in School Messenger)</i>	No
Is this initiative a common or integrated program or activity (CIPA)? <i>If yes, this PPIA must be submitted to the Office of the Information and Privacy Commissioner (OIPC). A CIPA is a program or activity that provides one or more services through a public body either working collaboratively or on behalf of other public bodies or agencies.</i>	No
What Personal Information (PI) is involved? <i>List all the PI elements that will be collected, used, and/or stored through the use of this app by (but not limited to): students, staff, parents, and vendors, even unintentionally. If the answer is 'none', then skip to PART 5 and submit this PPIA to the Privacy Officer for completion.</i>	<ul style="list-style-type: none"> • Student full name • Email address • Username and password • Educational background info • Student course enrollment • Date and time courses were last accessed by student • Time spent on particular assignments • Name of school(s) attended • Student Personal Education Numbers (PENS) • Course completions and grades • Grades and assessment scores • Student course content loaded by school district or school

	<ul style="list-style-type: none"> • Student completion or grade score or proficiency scale • Student activity logs • Quiz and assignment responses
Use <i>What is the PI used for (purpose)?</i> <i>Will the PI be used to make decisions that directly affect individuals? Does the vendor/provider use collected PI for other purposes, e.g., to advertise its services to students, teachers or parents?</i>	<ul style="list-style-type: none"> • For teachers to manage and deliver online courses, including evaluating student progress and assigning grades. • For students to access course materials, complete assignments, take quizzes and tests, participate in online discussions, and communicate with their instructors and peers • For parents / guardians to view their child's activity on the platform to see how their child is progressing in their courses, to communicate with their child's teacher, ask questions, and get updates on their child's academic performance.
Disclosure <i>Who will/might access the PI?</i> <i>How might the vendor/provider share the collected PI? What disclosure to 3rd parties might occur (which 3rd parties) and the type of PI being disclosed/shared. How might disclosed PI be used (see above)?</i>	Personal information (PI) may be accessed by D2L staff, the user's institution (e.g., school or organization), and authorized instructors or administrators for educational and support purposes.
Security <i>Describe the measures put in place, including those implemented internally and by the provider, to secure the PI and to prevent unauthorized access to the PI. Describe the technical and physical measures in place to protect the PI.</i>	<ul style="list-style-type: none"> • Brightspace by D2L secures personal information (PI) using TLS encryption, role-based access controls, and secure cloud hosting via AWS. • Internally, D2L enforces confidentiality agreements, annual privacy and security training, and ISO 27001 and SOC 2 compliance. • Physical safeguards include off-site encrypted backups and real-time security monitoring to prevent unauthorized access.
Part 3	
Will any PI be stored outside Canada? <i>Yes or No. If No, skip to PART 4</i>	No
Is any of the PI '<u>sensitive</u>'? <i>Click on link above to determine if PI is considered sensitive</i>	Yes
Where is the PI being stored? <i>Where, what regions are the PI being stored in, including backups. What hosting providers are being used?</i>	Personal information involved in the use of Brightspace is stored and backed up in Amazon Web Services (AWS) servers within Canada.
Part 4	
Ownership and Retention of PI <i>Who owns the PI, according to applicable contracts/agreements. Describe the provisions, controls and guarantees in place on the retention of PI: storage before expiry, backups, destruction/deletion of PI</i>	<ul style="list-style-type: none"> • Personal Information (PI) is stored securely in Amazon Web Services (AWS) servers within Canada with encryption in transit and at rest, backed up for data availability and reliability,

	<p>and subject to retention policies defined by the institution.</p> <ul style="list-style-type: none"> • Data can be deleted upon request, and D2L supports purge tools and restores only within a limited window (typically 30 days) after deletion.
Accuracy of PI <i>Describe the provisions that allow individuals to request corrections to their PI held within the application/service</i>	User can request corrections to their personal information (PI) by contacting their institution (e.g., school or school district) that manages the Brightspace account. D2L acts as a data processor and will assist the institution in updating or correcting PI as needed.
Part 5	
Recommendation <i>Recommendation for Approval, Abeyance/Suspension (pending further review) or Rejection, based on a review and assessment of Privacy Risk. For an approval, provide any applicable conditions of use and/or other risk mitigation measures advised to achieve an acceptable level of privacy risk</i>	Approved.
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