

PERSONAL vs. CONTACT INFORMATION

Personal Information

Identifiable Individual

Contact Information

“Personal Information”

Under the FIPPA, “**personal information**” is defined as “*recorded information about an identifiable individual other than contact information.*”

“**Contact information**” is defined as “*information to enable an individual at a place of business to be contacted and includes the name, position name or title, business telephone number, business address, business email or business fax number of the individual.*”

Therefore, personal information comprises all recorded information about an identifiable individual, with the exception of the names and business contact information of employees, volunteers, and service providers.

You may have heard the terms “personally identifiable information” and “protected health information” used to identify different types of personal information. These terms are not used in the FIPPA, which does not distinguish between different categories of personal information.

“Identifiable Individual”

Information is only considered to be personal information if it is about an identifiable individual. Individuals may be identified using their name or another unique number or characteristic, eg. photograph, SIN, fingerprint, employee number, or student ID. Any information that has a precise, direct connection with one of these personal identifiers is personal information. For example:

- a. John Smith is 40 years old.
- b. Sally Wang is a student.
- c. Student Number 123456 failed the Biology exam.
- d. The Dean of the Faculty of Engineering is sick today.

To determine whether information is about an identifiable individual, the Privacy Commissioner of Canada has formulated the following test: *Information will be about an identifiable individual where there is a serious possibility that an individual could be identified through the use of that information, alone or in combination with other available information.*

Example: Student Grade Lists

A professor has prepared a list of students and their grades. He attempts to “de-identify” the students by listing them by their student IDs rather than their names. Does this list contain personal information?

Yes. Students do not always keep their IDs confidential. Therefore, there is a serious possibility that third parties will be able to use the IDs in the list to identify some of those students and find out their grades. For this reason, the list contains personal information.

Caution should be exercised before releasing any data that was derived from underlying personal information, even if it has been de-identified. Information technology provides powerful tools for analyzing and linking data. It may be possible for someone to re-identify individuals by combining seemingly innocuous bits of available data. This is sometimes called the “mosaic effect”.

“Contact Information”

Information is not considered to be personal information if it is contact information, which is the kind of information that appears on a business card. Contact information is defined as *“information to enable an individual at a place of business to be contacted and includes the name, position name or title, business telephone number, business address, business email or business fax number of the individual.”*

For example, the business contact information of VIU employees, faculty members, volunteers, and service providers is considered to be contact information and much of it is posted on VIU’s website for public viewing.

Student’s names, mailing addresses, email addresses, and phone and fax numbers are not considered to be contact information under the FIPPA. This is because students attend VIU in a personal rather than a business capacity. **All information about students, including their names, is personal information** and is protected under the FIPPA.