



PIA Summary for Public Posting

Customer Relationship Management (CRM) System PIA

January 2017

1. About Destination Canada

The Canadian Tourism Commission, operating as Destination Canada (DC), is a Crown Corporation wholly owned by the Government of Canada. Established in 2000, DC was created to lead the Canadian tourism industry in marketing Canada as a four-season tourism destination. DC's legislated mandate is to: sustain a vibrant and profitable Canadian tourism industry; to market Canada as a desirable tourist destination; to support a cooperative relationship between the private sector and the governments of Canada, the provinces, and the territories with respect to Canadian tourism; and to provide information about Canadian tourism to the private sector and to the governments of Canada, the provinces, and the territories. It fulfills its mandate by working with various levels of government to conduct research and to administer marketing initiatives that increase international visits and tourism revenue. DC also works alongside several international partners to help promote Canadian tourism.

2. About the Project

As Canada's national tourism promoter, DC works closely with provincial/territorial governments and the tourism industry to market Canada as a destination for leisure and business travel. Its marketing efforts cover: consumer direct marketing, travel trade promotion, travel media relations and business events.

Whereas direct marketing is focused on consumer needs and interests, travel trade promotion helps to connect Canadian tourism operators – many of which are small or medium-sized enterprises – with new markets that would be difficult for them to reach on their own. Business event services help meeting organizers bring corporate, association and incentive events to Canada.

In support of its work with tourism operators and event organizers, DC also works closely with federal, provincial and territorial partners. Working collaboratively with government organizations is critical in promoting the interests of the tourism industry as a whole, and in sustaining a vibrant and profitable tourism industry across Canada. Collaboration between all levels of government, and the shared commitment to tourism it engenders, also helps to align tourism, trade and diplomatic activities.

Ensuring sustainable growth in Canada's tourism sector requires the close alignment of marketing efforts between industry and government organizations. Supporting a cooperative relationship between the private sector and governments is central to DC's legislative mandate. In order to better support the delivery of key products and services, DC has identified a need to improve its customer relationship management activities.

In support of those activities, DC has procured and implemented a CRM system. The system, once operational, is intended to better integrate, coordinate and automate DC's sales, marketing, and customer support efforts, and to better identify and manage the needs of its external partners and stakeholders (e.g., industry partners, vendors, and destination marketing organizations). The CRM is also expected to help build business relationships with new and existing partners in both industry and government.

Whereas DC's existing sales and business development applications have resulted in incomplete, fragmented, and sometimes overlapping data sources, the CRM system is expected to provide management with a single, centralized location for all sales and marketing information. The system is also expected to better track and report on sales and marketing communications and engagements, and in doing so, provide a better overall view of DC's sales and marketing activities and results.

DC's CRM initiative is focused on the activities of its Business Events Canada (BEC) division. Although some CRM systems have the ability to analyze customer data, DC does not intend to use its CRM for direct marketing to consumers. Personal information to be collected for input to the CRM system will be limited to contact information from corporate partners only. As planned, the system will not include advanced analytical capabilities, and will not be used for data mining, correlation, or pattern recognition in relation to consumers. Corporate information collected will not be shared, except with the party's consent, and only then to respond to client opportunities. Internally, information contained in the CRM system may be used for sales, business analysis, and corporate reporting purposes.

3. Scope of the Privacy Impact Assessment

Although DC is not itself named in the Schedule to the *Privacy Act*¹, it reports to Parliament through the Minister of Innovation, Science and Economic Development of Canada (previously the Minister of Industry). As such, and in keeping with its designation as a Crown Corporation, DC abides by the Act and its supporting policies and directives, as established by TBS.

Under the TBS [Policy on Privacy Protection](#), all federal institutions subject to the *Privacy Act* are required to undertake an assessment of the privacy impacts associated with the development or design of new programs or services involving personal information (or when making significant changes to an existing program or service). This PIA report provides evidence of compliance with those requirements.

The CRM PIA was completed under the direction of the DC's Executive Director for Business Events Canada (BEC). Consultations with DC's Information Technology and Facilities Management group, along with its Access to Information and Privacy unit and Legal Services group were undertaken as needed.

¹ [Privacy Act](#) (R.S.C., 1985, c. P-21).

4. Privacy Analysis

Based on the results of the PIA, inherent risks arising from the implementation of DC's CRM are considered to be moderate to low. Recommendations from the CRM PIA, as adopted, are expected to reduce those risks to a negligible level.

5. Risk Area Identification and Categorization

A: Type of Program or Activity	Level of Risk to Privacy
<p>Program or activity that does NOT involve a decision about an identifiable individual. Personal information is used strictly for statistical / research or evaluations including mailing list where no decisions are made that directly have an impact on an identifiable individual.</p>	<input checked="" type="checkbox"/> 1
<p>Personal information is used to make decisions that directly affect the individual (i.e. determining eligibility for programs including authentication for accessing programs/services, administering program payments, overpayments, or support to clients, issuing or denial of permits/licenses, processing appeals, etc...).</p>	<input type="checkbox"/> 2
<p>Personal information is used for purposes of detecting fraud or investigating possible abuses within programs where the consequences are administrative in nature (i.e., a fine, discontinuation of benefits, audit of personal income tax file or deportation in cases where national security and/or criminal enforcement is not an issue).</p>	<input type="checkbox"/> 3
<p>Personal information is used for investigations and enforcement in a criminal context (i.e. decisions may lead to criminal charges/sanctions or deportation for reasons of national security or criminal enforcement).</p>	<input type="checkbox"/> 4
B: Type of Personal Information Involved and Context	Level of risk to privacy
<p>Only personal information provided by the individual – at the time of collection – relating to an authorized program & collected directly from the individual or with the consent of the individual for this disclosure / with no contextual sensitivities.</p> <p>The context in which the personal information is collected is not particularly sensitive. For example: general licensing, or renewal of travel documents or identity documents.</p>	<input checked="" type="checkbox"/> 1
<p>Personal information provided by the individual with consent to also use personal information held by another source / with no contextual sensitivities after the time of collection.</p>	<input type="checkbox"/> 2

Social Insurance Number, medical, financial or other sensitive personal information and/or the context surrounding the personal information is sensitive. Personal information of minors or incompetent individuals or involving a representative acting on behalf of the individual.	<input type="checkbox"/> 3
Sensitive personal information, including detailed profiles, allegations or suspicions, bodily samples and/or the context surrounding the personal information is particularly sensitive.	<input type="checkbox"/> 4
C: Program or Activity Partners and Private Sector Involvement	Level of risk to privacy
Within the department (amongst one or more programs within the department)	<input type="checkbox"/> 1
With other federal institutions	<input type="checkbox"/> 2
With other or a combination of federal/ provincial and/or municipal government(s)	<input type="checkbox"/> 3
Private sector organizations or international organizations or foreign governments	<input checked="" type="checkbox"/> 4
D: Duration of the Program or Activity	Level of risk to privacy
One time program or activity: Typically involves offering a one-time support measure in the form of a grant payment as a social support mechanism.	<input type="checkbox"/> 1
Short-term program: A program or an activity that supports a short-term goal with an established "sunset" date.	<input type="checkbox"/> 2
Long-term program: Existing program that has been modified or is established with no clear "sunset".	<input checked="" type="checkbox"/> 3
E: Program Population	Level of risk to privacy
The program affects certain employees for internal administrative purposes.	<input type="checkbox"/> 1
The program affects all employees for internal administrative purposes.	<input type="checkbox"/> 2
The program affects certain individuals for external administrative purposes.	<input type="checkbox"/> 3

The program affects all individuals for external administrative purposes.	<input type="checkbox"/> 4
F: Technology and Privacy	Level of risk to 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 substantial modifications to IT legacy systems and / or services?	No
The new or modified program or activity involves the implementation of potentially privacy invasive technologies?	No
G: Personal Information Transmission	Level of risk to privacy
The personal information is used within a closed system. No connections to Internet, Intranet or any other system. Circulation of hardcopy documents is controlled.	<input type="checkbox"/> 1
The personal information is used in system that has connections to at least one other system.	<input checked="" type="checkbox"/> 2
The personal information may be printed or transferred to a portable device.	<input type="checkbox"/> 3
The personal information is transmitted using wireless technologies.	<input type="checkbox"/> 4
I: Risk Impact to the Individual or Employee	Level of risk to privacy
Inconvenience.	<input checked="" type="checkbox"/> 1
Reputation harm, embarrassment.	<input type="checkbox"/> 2
Financial harm.	<input checked="" type="checkbox"/> 3
Physical harm.	<input type="checkbox"/> 4
H: Risk Impact to the Department	Level of risk to privacy

<p>Managerial harm.</p> <p>Processes must be reviewed, tools must be changed, change in provider / partner.</p>	<input checked="" type="checkbox"/> 1
<p>Organizational harm.</p> <p>Changes to the organizational structure, changes to the organizations decision-making structure, changes to the distribution of responsibilities and accountabilities, changes to the program activity architecture, departure of employees, reallocation of HR resources.</p>	<input type="checkbox"/> 2
<p>Financial harm.</p> <p>Lawsuit, additional moneys required reallocation of financial resources.</p>	<input checked="" type="checkbox"/> 3
<p>Reputation harm, embarrassment, loss of credibility.</p> <p>Decrease confidence by the public, elected officials under the spotlight, departmental strategic outcome compromised, government priority compromised, and impact on the Government of Canada Outcome areas.</p>	<input type="checkbox"/> 4