

# PIAs: What is Personal Information?

### What is Personal Information?

Some public bodies may require assistance in determining what is considered personal information. Personal information is defined in section 2(u) of the **Access to Information and Protection of Privacy Act, 2015** (ATIPPA, 2015):

- (u) "personal information" means recorded information about an identifiable individual, including
  - (i) the individual's name, address or telephone number;
  - (ii) the individual's race, national or ethnic origin, colour, or religious or political beliefs or associations;
  - (iii) the individual's age, sex, sexual orientation, marital status or family status;
  - (iv) an identifying number, symbol or other particular assigned to the individual;
  - (v) the individual's fingerprints, blood type or inheritable characteristics;
  - (vi) information about the individual's health care status or history, including a physical or mental disability;
  - (vii) information about the individual's educational, financial, criminal or employment status or history;
  - (viii) the opinions of a person about the individual, and
  - (ix) the individual's personal views or opinions, except where they are about someone else.

A well-written privacy impact assessment (PIA) will contain specific identification of individual data fields and not just general categories. For example, rather than indicating "name", indicate if first, middle, and last name are collected.

Context can be key. For example, a business may use a personal mailing address as a business address. While the address is considered personal information as defined by ATIPPA, 2015, it may not represent an unreasonable invasion of privacy if that personal information relates to an individual's business activities; that is, they are acting in a professional capacity in the context of the information.

### Preliminary Privacy Impact Assessments (PPIA) and Personal Information

If conducting a PPIA or a threshold assessment to determine if a full PIA needs to be completed, a different level of detail may be warranted. For example, some PPIA templates contain checklists for various types of personal information. OIPC recommends that information about the context of this data be included. For example, is the information collected for customer service, complaints, human resources, finance, purchasing, information technology, security, legal services, or for other purposes? This context may be an important part of the assessment.

## Personal Information Inventory

To assist public bodies in developing an inventory of personal information, the following table includes types or categories of personal information and examples of information that may be collected under each category. Please note that this list of personal information is not exhaustive. A public body may have other types of personal information in its custody and or under its control, or additional information that may be considered personal information due to context. There must be a reasonable expectation that an individual can be identified from the information (either alone or when combined with other information) for the information to qualify as personal information.

Type or Category of Personal Information	Examples of Category Descriptions Please note descriptions are for assistance purposes and should only be considered examples, not an exhaustive list of subcategories.
Name	<ul style="list-style-type: none"> <li>• First</li> <li>• Last</li> <li>• Middle</li> </ul>
Address	<ul style="list-style-type: none"> <li>• Street Address</li> <li>• Mailing Address</li> <li>• City</li> <li>• Postal Code</li> <li>• Province</li> </ul>
Telephone number	<ul style="list-style-type: none"> <li>• Area Code</li> <li>• Home Number</li> <li>• Cell Number</li> <li>• Business Number</li> </ul>
Race, national or ethnic origin, colour, or religious or political beliefs or associations	<ul style="list-style-type: none"> <li>• Legal Entitlement to Work in Canada</li> <li>• Religion</li> <li>• Place of Birth</li> <li>• Membership in or Support for Political Parties</li> </ul>
Age	<ul style="list-style-type: none"> <li>• Date of Birth</li> <li>• Year of Birth</li> <li>• Age at Time of Collection</li> </ul>
Sex	
Sexual orientation	
Marital status or family status	<ul style="list-style-type: none"> <li>• Single</li> <li>• Married</li> <li>• Divorced</li> <li>• Co-Habitation/Common Law</li> <li>• Widowed</li> </ul>

Identifying number, symbol or other particular assigned to the individual	<ul style="list-style-type: none"> <li>• MCP</li> <li>• Driver's License</li> <li>• Social Insurance Number</li> <li>• Employee Number</li> <li>• IP Address</li> <li>• Other</li> </ul>
Fingerprints	
Blood type	
Inheritable characteristics	<ul style="list-style-type: none"> <li>• Genetic Information</li> </ul>
Information about the individual's health care status or history, including a physical or mental disability	<ul style="list-style-type: none"> <li>• Self-identification as an individual who, for the purposes of employment, consider them to be disadvantaged due to a long term or recurring disability</li> <li>• Medicals for Employment Purposes</li> <li>• WHSCC Information</li> <li>• Pregnancy Status</li> </ul>
Information about the individual's educational status or history	<ul style="list-style-type: none"> <li>• Highest Level of Education Received</li> <li>• Grades</li> <li>• Academic Achievements</li> <li>• Disciplinary Action (Suspensions, Expulsions, etc.)</li> </ul>
Information about the individual's financial status or history	<ul style="list-style-type: none"> <li>• Bankruptcies</li> <li>• Direct Deposit Information</li> <li>• Wage Garnishments</li> <li>• Deductions from Cheques</li> <li>• Collection Agency Information</li> </ul>
Information about the individual's criminal status or history	<ul style="list-style-type: none"> <li>• Vulnerable Sector Check</li> <li>• Certificates of Conduct</li> <li>• Direct questioning if they have been convicted of a crime; if they are legally entitled to operate a vehicle, etc.</li> </ul>
Information about the individual's employment status or history	<ul style="list-style-type: none"> <li>• Resume Information</li> <li>• Disciplinary actions, such as suspensions and terminations</li> <li>• Complaint information, such as Labour Relation Board Decisions</li> <li>• WHSCC Details</li> <li>• Specific payroll deduction details, such as wage garnishments, health insurance coverage, etc.</li> <li>• Leave status (long term disability, parental leave, sick leave, etc).</li> </ul>

The opinions of a person about the individual	
The individual's personal views or opinions, except where they are about someone else	

PIAs should include details of any additional information that is collected. For example, video surveillance will capture more than a single field of personal information. When listing all collected information, consider if non-personal information could be combined or linked to enable the identification of an individual.

Office of the Information and Privacy Commissioner  
PO Box 13004, Station A  
St. John's, NL A1B 3V8  
Phone: (709) 729-6309  
Toll Free: 1-877-729-6309  
[commissioner@oipc.nl.ca](mailto:commissioner@oipc.nl.ca)  
<https://www.oipc.nl.ca>