



Memorandum
Sent via email

Ref: 100120

Date: October 2, 2013

To: Ministry Assistant Deputy Ministers, Ministry Chief Information Officers,

Re: Data Residency and Tokenization

There has been a steady increase in interest in the use of foreign-based services and applications, particularly those that are cloud-based. However, the data residency provisions in the *Freedom of Information and Protection of Privacy* (FOIPPA), which require that personal information in the custody or control of a public body not be stored or accessed outside of Canada without authorization, have been a barrier to the use of these services and applications.

Vendors have begun to address this “data-residency” issue in innovative ways. As an example, Force.com, and CypherCloud offer solutions that allow sensitive or personal information to remain in Canada. Using tokenization – a method of substituting specified data fields for arbitrary values – these solutions allow for the use of foreign-based services while remaining within the residency-based restrictions of FOIPPA.

As of September 23rd, 2013 the Province has signed a contract for services with Salesforce.com which will allow ministries to use this new solution. While the signing of this contract is a significant step forward in providing cost effective application hosting options for ministries, it does not mean that ministries may freely implement this service without appropriate privacy, standards and security reviews. The use of foreign-based services are still subject to the legislative and policy requirements for a Privacy Impact Assessment and Security Threat and Risk Assessment, and the configuration of these applications and the means through which the residency-based requirements of FOIPPA are met must still be assessed.

My area, specifically the Information Security Branch, Architecture and Standards Branch and Legislation, Privacy and Policy Branch are working to develop guidelines and standards that will help ministries in their tokenized implementations of foreign-based services. In the meantime, if your area is developing initiatives that will use Salesforce, CypherCloud or any other data residency or tokenized solution please contact Sharon Plater, Director, Strategic Privacy and Policy, Office of the Chief Information Officer, at Sharon.Plater@gov.bc.ca or by phone, at 250 356-0322 and Derek Rutherford, Director, Application Architecture and Standards, Office of the Chief Information Officer at Derek.Rutherford@gov.bc.ca or by phone at 250 356-7915.

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Thank you for working with us to meet your own, and MTICS', obligations under the FOIPPA.

A handwritten signature in black ink, appearing to read "B. Hughes". The signature is fluid and cursive, with the first letter of each word being capitalized and prominent.

Bette-Jo Hughes
Associate Deputy Minister and
Government Chief Information Officer
Province of British Columbia

pc: John Jacobson, Deputy Minister, Ministry of Technology, Innovation and
Citizens' Services
Ian Bailey, A/Chief Technology Officer, OCIO