

Section 1 - Overview & PIA Initiation

Government Institution: Royal Canadian Mint (Mint)

Official Responsible for the PIA

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Head of the government institution or Delegate for section 10 of the *Privacy Act*

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Name of Activity: Masters Club Loyalty Program

Description of the class of record and personal information bank:

Institution specific class of record:

Institution specific personal information bank:
Under Development

Legal Authority for activity:

Royal Canadian Mint Act

Description Summary:

The [Masters Club Loyalty Program](#) for numismatic consumers has been in place since 1998 and has evolved to meet customers' changing needs over the years. The Masters Club Program is not new but underwent a redesign process throughout 2020 and the revised program was launched in January 2021. The program is now comprised of seven-tiers with benefits associated with each tier level, including early access, exclusive coins, free gifts, newsletters, contests, events, and with every dollar spent members earn points. These points can be redeemed for future purchases and customers can sign up at any time. Benefits begin at \$250 spend and as members move up in the tiers, benefits increase. The Masters Club is available to "business-to-consumer" (B2C) customers within Canada and the United States only.

PIA Scope:

The Mint's Loyalty Program is the core of every customer interaction from the very beginning of the customer lifecycle, offered seamlessly across all channels, to provide members with the opportunity to be rewarded for spend and engagement. The PIA analyzed the personal information practices associated with the Masters Club in accordance with legal and policy requirements and ensured that any privacy risks were identified with a related mitigation plan. The program modifications do not involve significant

changes to how, or the purposes for which, the Mint collects, uses or discloses personal information within the scope of the program. The privacy impact of these modifications is therefore minimal. As PIAs are evergreen documents, the Mint commits to revisiting the report's content in the event of substantive changes to the personal information management practices associated with the Loyalty Program.

Section 2 - Risk identification and categorization

The following section contains standardized risks identified in the PIA report per the TBS requirements for a core PIA. The common, numbered risk scale is utilized where appropriate in ascending order: the first level (1) represents the lowest level of potential risk for the risk area; the fourth level (4) represents the highest level of potential risk for the given risk area.

A) Type of program or activity

Risk scale - 2: Administration of program or activity and services.

B) Type of personal information involved and context

Risk scale – 1: Only personal information, with no contextual sensitivities, collected directly from the individual or provided with the consent of the individual for disclosure under an authorized program.

C) Program or activity partners and private sector involvement

Risk scale – 1: Within the institution (among one or more programs within the same institution); and

Risk scale - 4: Private sector organizations, international organizations or foreign governments.

D) Duration of the program or activity:

Risk scale – 3: Long-term activity.

E) Program population

Risk scale – 3: The program's use of personal information for external administrative purposes affects certain individuals.

F) Technology & 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?

No

Does the new or modified program or activity require any modifications to IT legacy systems and/or services?

No

The new or modified program or activity involves the implementation of one or more of the following technologies:

Enhanced identification methods?

No

Use of Surveillance?

No

Use of automated personal information analysis, personal information matching and knowledge discovery techniques?

Yes

G) Personal information transmission

Risk scale – 2: The personal information is used in a system that has connections to at least one other system.

H) Privacy breach risk impact

Potential risk that in the event of a privacy breach, there will be an impact on the individual or employee?

Yes

Potential risk that in the event of a privacy breach, there will be an impact on the institution?

Yes