PIA01762 — REMO Videoconferencing

PIA REVIEW – EXECUTIVE REPORT

PREFACE

This document forms part of UBC Safety and Risk Services (SRS) PrISM's internal documentation for support and administration of the Privacy Impact Assessment (PIA) Review Process. In particular, it documents the final report of the specified PIA review.

This segment serves to provide and record document control capabilities for this document.

Controlled Document

The template and final report documents are controlled documents. The master electronic versions of each reside on the SRS TeamShare S-drive. Any copies or versions not provided directly by the SRS PrISM team, or which have a broken chain of custody, are not to be considered as official copies.

Document Control

The following sub-sections provide a record of the base document template revision history and control.

CONTRIBUTORS

CONTRIBUTOR	DEPARTMENT	POSITION	
Christian Stockman	Safety and Risk Services	Privacy and Information Security Risk Advisor	

Figure 1 - Major Document Revision Approval History

TEMPLATE REVISION HISTORY

REVISION #	DATE	REVISED BY	DESCRIPTION
1.0	2021-01-28	Christian Stockman	Report Creation

Figure 2 - Document Revision History and Revision Summary

TEMPLATE REVISION APPROVAL

REVISION #	DATE	REVISED BY	DESCRIPTION
1.00	2021-01-28	Nathan Powless	Initial release of document

Figure 3 - Major Document Revision Approval History

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PART 1: GENERAL INFORMATION & OVERVIEW

1.1 Executive Summary

An instructor in the UBC Physics and Astronomy Department is using REMO (https://remo.co) videoconferencing within their classes for teaching and learning. REMO allows similar functionality to other popular videoconference platforms, such as HD video & audio (including recording), group screen sharing, and the ability to conduct polls or Q&A voting. REMO does not require download or installation, offers countdown timers for speed networking, and allows for enhanced breakout room functionality for large groups. The ability to individually assign each of the participants (320 in this case) to breakout rooms is not not possible with the existing MS Teams or Zoom setup at UBC.

The instructor intends to use REMO for the 2020 and 2021 academic terms, and will cease using this service once in-person classes resume.

1.2 Description of the Program, System, Application, or Initiative Assessed

An instructor in the Physics and Astronomy department would like to use Remo video conferencing software to teach classes. Proposed classes include Physics 341 and 1517, taught by the same instructor.

Use of REMO would be discontinued once in-person classes resume.

RISK CLASSIFICATION

The inherent privacy risk classification level of this PIA submission is **4 - High**.
The residual risk classification level of this PIA submission at closure is **3 - Medium**.

1.3 Scope of PIA

Use of REMO videoconference system within the Physics and Astronomy department, as outlined in the PIA request. REMO's video streams are shared between users via its video routers. Video streams can be recorded and downloaded. Remo also has a YouTube livestream feature where video streams are uploaded and stored on YouTube. This is useful for users who don't want to use Remo but still wish to participate in video conferences. REMO also allows for virtual business cards using LinkedIn profiles, has the ability to sell sponsorships, as well as hosting paid for free events. These aforementioned use cases have not been reviewed in the context of this PIA, and require additional privacy review. In addition, Protonmail (suggested third party alias tool) has not been reviewed in the context of this PIA.

1.4 Elements of Information or Data

REMO requires users to create a personal account, and allows users to opt-out of receiving promotional information. At a minimum, registration requires first/last name, email address (username), and password. Administrators (i.e. faculty) may be required to submit payment information, such as a credit card, as required, if they choose to opt for the paid service. The instructor has noted students who wish not to supply their personal email may sign up for an alias email (Protonmail has been suggested as an alternative as it collects no personal information). Optional collection of additional personal information is possible by completing the REMO profile, including linking to users' social media accounts or adding a profile picture. These features are optional, and students are not encouraged to do this.

REMO uses tracking cookies for some of the aforementioned purposes, including authentication, website status, personalization, security, analysis and for cookie consent.

REMO collects personal information from customers, as follows (per Remo's Privacy Policy):

- Account – valid email address or Google authentication (not authorized by this PIA), optional display name, optional profile picture
- Usage information – Metadata including IP address, geographical location, browser type, and version, operating system, referral source, length of visit, page views and website navigation paths, as well as information about the timing, frequency and pattern of use of the Service.
- Correspondence Information – Optional, for participants of focus groups, contests, activities, or events, or for users who apply for a job, interact with our social media accounts, or otherwise communicate with REMO.
- Product and Marketing Communications – Optional, for subscribing to REMO's newsletters, digest emails, or activity notifications.
- Customer Support Information – Personal information gathered when contacting REMO for support (i.e. contact via support@remo.co), using Account, Workspace, Event, Transaction, and Usage Information for responses.

1.5 Storage or Access Outside of Canada (including back-ups and recovery)

REMO stores personal information outside of Canada, hosted on Amazon Web Services (AWS) and Google Cloud servers in the USA.

Per REMO: "We store the information we collect from you on servers in the United States. For development and testing purposes, the information we collect from you may also be stored on desktop and laptop computers used by Remo employees in the U.S. and other countries.We use Cloud technology by Google, AWS (Amazon), and MongoDB with data center and DR sites in the USA with their well known and highly secured access and data security. Further detailed information are available on their websites."

1.6 Data-Linking Initiative

In FIPPA, "data linking" and "data-linking initiative" are strictly defined; if a project is a data linking initiative, it must comply with specific requirements under the Act related to data-linking initiative	
1. *Personal information from one database is linked or combined with personal information from another database;*	**No**
2. *The purpose for the linkage is different from those for which the personal information in each database was originally obtained or compiled;*	**No**
3. *The data linking is occurring between either (1) two or more public bodies or (2) one or more public bodies and one or more agencies.*	**No**
This project is not considered a data linking initiative as contemplated under s.(36) of FIPPA.	

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1.7   Is this a Common or Integrated Program or Activity?

In FIPPA, "data linking" and "data-linking initiative" are strictly defined; if a project is a data linking initiative, it must comply with specific requirements under the Act related to data-linking initiative.	
1. *Personal information from one database is linked or combined with personal information from another database;*	**No**
2. *The purpose for the linkage is different from those for which the personal information in each database was originally obtained or compiled;*	**No**
3. *The data linking is occurring between either (1) two or more public bodies or (2) one or more public bodies and one or more agencies.*	**No**
This project is not considered a common or integrated program or activity as defined in Schedule 1 of FIPPA	

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PART 2:   PROTECTION OF PERSONAL INFORMATION

2.1   Personal Information Flow Diagram / Table

Users register with REMO for an account to access the service. Instructor provides session login information to students. Students are able to join the class and breakout rooms as outlined by the instructor. All users are able to interact and chat with one another, and instructors are able to record.

The names and e-mail addresses submitted to REMO are stored by Remo in the students' Remo accounts. The names provided by the students are used to address students who raise their hand during the class. Apart from this, the information submitted to Remo is not accessed by us or used by UBC staff in any way.

A screenshot of a typical REMO interface follows:
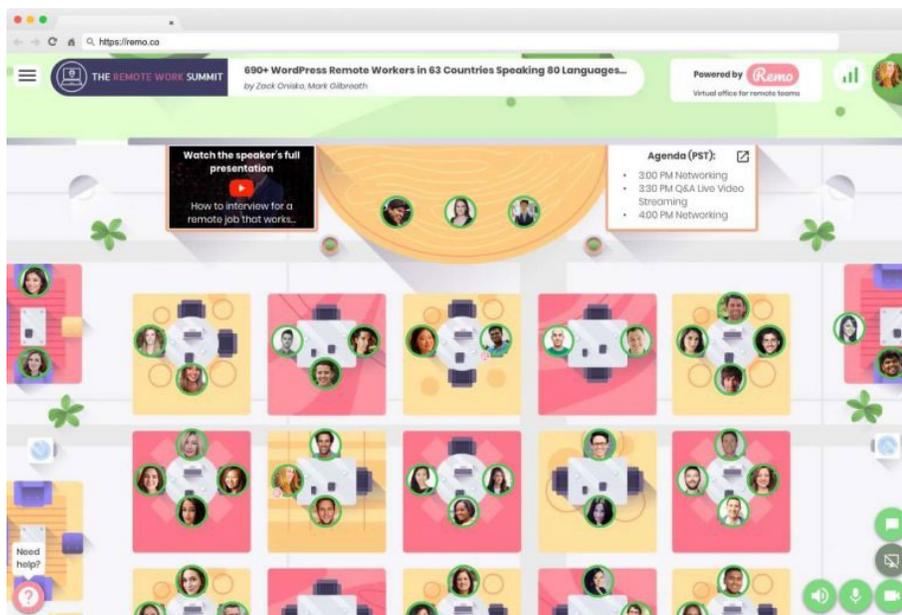
Breakout rooms allow for 1:1 and group discussion and chat, as follows:

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2.2   Risk Mitigation Table

The following table indicates the associated risk levels as applicable and the potential or intended mitigation steps.

Category: Privacy					
Risk	**Ref#**	**Inherent Likelihood**	**Inherent Impact**	**Response**	**Residual Risk**
PI stored / accessible outside of Canada	RK0020220	4 - High	4 - Major	Accept	3 - Medium
	Mitigation Plan: Users will be required to consent to having their PI stored outside of Canada. PI to be stored outside of Canada will be limited, based on collecting the minimum required to register for a REMO account (name and email).				
Over collection of personal information	RK0020218	4 - High	4 - Major	Mitigate	2 - Low
	Mitigation Plan: Users will be encouraged to supply only their name and email at registration, no other PI. Consent will be obtained for personal information collected at registration.				
Category: Security					
Risk	**Ref#**	**Inherent Likelihood**	**Inherent Impact**	**Response**	**Residual Risk**
Weak or absence of administrative security controls	RK0020223	4 - High	4 - Major	Mitigate	3 - Medium
	Mitigation Plan: Access is limited to users on a need-to-know basis at REMO (e.g. technical support), and to the faculty and teaching support staff within the UBC Department				

Figure 4 - Risk Mitigation Table

2.3   Collection Notice

In this course, students will be required to use REMO, an online collaboration platform. This offers a virtual classroom experience that closely simulates being in a real classroom, allowing you to interact with peers seated at your virtual table. You will be prompted to set up a REMO account the first time that you follow a link to a REMO event. During the account creation process, REMO will ask for your name and e-mail address. By providing this information to REMO, you are consenting to the storage of this information in the United States. If you choose not to provide this consent, you may use an alias (e.g. first name and initial) and/or a non-identifying e-mail address set up specifically for joining REMO. If you would like such an e-mail address, one option is to sign up for a free ProtonMail account <link to external site>.

The UBC Faculty of Science Department of Physics and Astronomy uses REMO to collect personal information. REMO will collect names and personal email addresses of individuals. This information is collected under the authority of Sections 26(c) and 26(d) of the BC Freedom of Information and Protection of Privacy Act (FIPPA), and is used for academic research and education purposes. UBC Faculty of Science will not disclose this information to third parties, except where required by law. REMO and its affiliates my process and/or store personal information outside of Canada. REMO's Privacy Policy governs the collection and use of data (https://remo.co/privacy-policy/). Should you have any questions or concerns about the information collected, or the privacy and security of that information, please contact the Director, Finance and Operations at paul.deleon@ubc.ca.
Do you consent to having your personal information collected and/or stored outside of Canada? YES/NO.

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2.4 Consent for Storage/Access Outside of Canada & Opt-Out Procedure (If Any)

Students will be required to consent to use the platform and have their personal information stored outside of Canada.

2.5 Consent Withheld Procedure

For students who do not provide consent, they can participate anonymously by providing a fake name/email address. Users are able to use a third party email provider, ProtonMail, to register for an email address that is not linked to their identity.

Per project: "Since Remo only requires a username/email address to use the service, if students don't consent then they can choose their own username and register for/use a Protonmail email account. If students don't want their voice/video recorded, they can use the in-app chat feature to ask questions or communicate with other students. The instructor also moves any recordings to Canvas.

PART 3: SECURITY OF PERSONAL INFORMATION

3.1 Physical Security Measures

This project is required to comply with UBC Policy SC14 and applicable UBC Information Security Standards.

3.2 Technical Security Measures

This project is required to comply with UBC Policy SC14 and applicable UBC Information Security Standards.

3.3 Security Policies, Procedures, and Standards

This project is required to comply with UBC Policy SC14 and applicable UBC Information Security Standards.

The UBC PIA team has had limited visibility into or access to REMO's own information security policies, practices, or standards. However, REMO has responded to UBC's Vendor Requirements & Risk Assessment Questionnaire (used when no third party audit certification is present). These responses, in addition to publicly available documentation, assert REMO employs robust standards and practices, including AES-256 data encryption, and a desire to adhere to industry security standards (e.g. SOC attestation and ISO certification, in advance of receiving these). These assertions could not be substantiated, however, as REMO has not completed a third-party audit certification.

3.4 Tracking Access / Access Controls

Access to personal information is limited to the faculty instructor, selected TAs, and REMO support staff for to troubleshooting.

PART 4:   ACCURACY, CORRECTION, AND RETENTION

4.1   Updating and Correcting Personal Information
Not applicable

4.2   Decisions That Directly Affect an Individual
This project does not captures personal information that directly affects an individual.

4.3   Records Retention and Disposal
This project is required to comply with UBC Records Management Policies.

Instructor has confirmed that participant lists will not be retained. Recordings of classes do not include any student audio video, or personal information, and are retained until the end of the semester and then deleted.

REMO privacy policy also indicates a "right to be forgotten" (i.e. a data erasure right). Users who choose to exercise that right must reach out to REMO directly.

PART 5:   FURTHER INFORMATION

5.1   Systematic Disclosures of Personal Information
The initiative does not involve the systemic disclosure of personal information.

5.2   Access for Research or Statistical Purposes
This project is not related to research and statistical purposes.

5.3   Other Applicable Legislation and Regulations
There are no other applicable legislation or regulations for this review or for this initiative.

PART 6:   ACCESS AND PRIVACY MANAGER COMMENTS

6.1   Information or Materials Reviewed

REMO: User Terms of Service, Privacy Policy, Cookie Notice, Security Whitepaper, Data Protection Addendum, Password Policy. Access Control Policy, Vulnerability Policy, as well as information publicly available on the REMO web site and provided by the vendor.

The documents reviewed are outlined in the following table:

Information Reviewed	Date Received
How Remo Processes Sensitive Information _ Remo Help Centre.pdf	2020-11-18 01:30:27
Information Remo Collects about Users _ Remo Help Centre.pdf	2020-11-18 01:30:27
Remo-Security-Whitepaper-1.pdf	2020-11-18 01:30:28
REMO_Screenshot.jpg	2021-01-28 17:55:48
REMO_Screenshot_Group.jpg	2021-01-28 18:05:31
What Security Standards does Remo Adhere to_ _ Remo Help Centre.pdf	2020-11-18 01:30:27
[REMO] Access Control Policy (Password policy included).pdf	2020-11-18 01:30:27
[REMO] Business Continuity Policy.pdf	2020-11-18 01:30:27
[REMO] Change Management Policy.pdf	2020-11-18 01:30:27
[REMO] Data Breach Policy.pdf	2020-11-18 01:30:27
[REMO] UBC (1).xlsx	2020-11-18 00:30:24
[REMO] Vulnerability Policy.pdf	2020-11-18 01:30:27

6.2   Information or Materials Not Available for Review

Security attestation (e.g. SOC 2 Type 2) or certification (e.g. ISO 27001) are not available for REMO, as the parent company is a start up. Detailed security information about sub-processors, including AWS, Google Cloud, MongoDB, Stripe, Chargebee, Freshworks, was also not reviewed. Protonmail was also not subject to PIA review.

6.3   Analysis and Summary

The information provided for the review has established that REMO videoconferencing software and the associated use, as presented by the Physics and Astronomy Department, can be used in the proposed manner in compliance with FIPPA and UBC policies.

The following are the key factors in that determination:

- Personal information is collected, stored, and accessed within Canada, and disclosed outside of Canada with appropriate consent.
- Access to REMO will be limited to authorized individuals with valid login credentials and appropriate access authorities.
- Information is kept secure during transmission and at rest.

Accordingly, REMO can be used as proposed subject to the conditions of approval set out in the next section.

6.4   Conditions of Approval

An additional PIA is required for the following:

- Use beyond April 2021 requires additional consultation with UBC privacy staff.
- Implementation of revised Recommended Collection Notice.
- Instructor to discourage adding profile photos and use of third-party authentication methods (Google), and encourage creation of alias account to use REMO (requires only a name/alias and email address).
- A new PIA is required for any change in use, enhancement or integration with other software, or use of functionality, including virtual business cards using LinkedIn profiles, selling sponsorships of branding on REMO, hosting paid events, YouTube streaming capability.

6.5   Review and Distribution

This refers to the report approval process. The Owner is accepting the accuracy of the data provided to PrISM for this review and the risk responses. The Owner is responsible for the on-going operational activities and must ensure that this project continues to meet legislative and legal requirements, along with Information Systems Policy (SC14) requirements. Any change in PI collection or use will require new PIA.

Assessment Acceptance
Paul de Leon

This refers to the report distribution, including Requestor, Project Manager, Owner, and assigned Risk Advisor.

Distributed To
Requestor: Nathan Powless **Project Manager:**   Nathan Powless **Owner:** Paul de Leon **Risk Advisor:** Christian Stockman

PIA Request History:

PIA Request Date	Report Created
2020-08-14 10:41:12	2021-01-28 10:48:38