PIA01821 — Hopin (BRIMM Short Course)

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	YYYY.MM.DD	Christian Stockman	Report Creation

Figure 2 - Document Revision History and Revision Summary

TEMPLATE REVISION APPROVAL

REVISION #	DATE	REVISED BY	DESCRIPTION
1.00	2020-10-30	Manager Name	Initial release of document

Figure 3 - Major Document Revision Approval History

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PART 1: GENERAL INFORMATION & OVERVIEW

1.1 Executive Summary

The UBC Vancouver School of Economics (VSE) Bachelor of International Economics (BIE) Career Networking Night would like to implement technology to allow for virtual interactions in light of the COVID-19 pandemic. Existing technologies, including Zoom and MS Teams, are geared towards meetings and lecturing, and are not ideal for mimicking the experiences of the career networking night.

The BIE will implement HOPIN (hopin.to), a UK-based platform that is designed for hosting virtual events with multiple interactive areas that are optimized for connecting and engaging. HOPIN allows for large group and smaller group events and interactions to occur concurrently, as well as virtual employment 'booths'. Virtual networking and exchanging of contact information is also possible, as attendees can move in and out of rooms just like an in-person event.

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

BRIMM will be running short courses on Economic Mineral Exploration, and will be using its web site to collect names, emails, and company affiliation. Users will also make use of UBC ePayment via a redirect to complete payment for the courses. The range of courses would all be within the same vein as this current one – mining courses (mainly on economic issues) targeted at working industry members. The timeframe is quite broad as we're a small team, with new courses rolling out in the next year or two.

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

Inclusions: Use of BRIMM's WordPress-hosted ecosystem to collect PI used for course administration Exclusions: WordPress platform, Gravity Forms plugin, Lifter LMS, and UBC ePayment platform.

1.4 Related PIAs

Not applicable.

1.5 Elements of Information or Data

Name, email (also used as username), password, company affiliation, and autogenerated ID number used to cross-reference payment processing details.

Analytics data may also be gathered and reviewed by Monster Analytics (not reviewed or in scope for this PIA).

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

WordPress database and all backups are hosted on AWS Canada (Central) in Montreal.

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1.7   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 is not a data linking initiative.	

1.8   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**
Not applicable.	

PART 2:   PROTECTION OF PERSONAL INFORMATION

2.1   Personal Information Flow Diagram / Table

Users will visit the WordPress-hosted BRIMM web site to register using their name and email via the Gravity Forms plugin. Personal information collected is retained within the same SQL-based WordPress database that hosts the BRIMM web site contents. Users' email and password will be used for future login purposes. Users are then redirected from the BRIMM WordPress web site to the UBC ePayment page to complete payment. Users' PI is also used to populate the Lifter LMS, a system embedded within WordPress which hosts the BRIMM courses. Lifter LMS data, such as course details and completion records, is also saved within the WordPress SQL database. Communications with users (e.g. email correspondence) is conducted using UBC's email servers.

All personal information, including backups, is stored within Canada and is not shared with third parties. The WordPress ecosystem and data is maintained by administrators from Sparkjoy Studios, a Vancouver-based web-development service.

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**
Over collection of personal information	RK0020353	4 - High	4 - Major	Mitigate	2 - Low
	Mitigation Plan: PI collected is minimum required to register users for courses, allow login to LMS, and conduct communications.				
PI stored / accessible outside of Canada	RK0020313	4 - High	4 - Major	Mitigate	2 - Low
	Mitigation Plan: All PI is retained within a database that is accessible only to a limited number of Sparkjoy Studios and BRIMM staff, and will not be shared externally.				

Figure 4 - Risk Mitigation Table

2.3   Collection Notice

The Bradshaw Research Initiative for Minerals and Mining (BRIMM) collects and stores personal information for the purpose of participation in short courses on Economic Mineral Exploration. BRIMM will collect name, email, and company affiliation as part of your use of the system. 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). Personal information collected by BRIMM will be used for the purposes of enrolling you in the BRIMM MiningEd program, for access into the course learning management system, and for course administration. Your personal information will be stored within Canada, and will not be disclosed except where required by law. Should you have any questions or concerns about the information collected, or the privacy and security of that information, please contact Dana Caudle, BRIMM Research Administrator, at 604 822-1807 or info@brimm.ubc.ca.

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

Not applicable.

2.5   Consent Withheld Procedure

Not applicable.

PART 3:   SECURITY OF PERSONAL INFORMATION

3.1   Physical Security Measures

Project is required to comply with UBC Information Security Policy (SC-14).

3.2   Technical Security Measures

Project is required to comply with UBC Information Security Policy (SC-14).

3.3   Security Policies, Procedures, and Standards

Project is required to comply with UBC Information Security Policy (SC-14) is project is required to comply with UBC Policy.

3.4   Tracking Access / Access Controls

Access to elements of the WordPress ecosystem includes 12-14 users at Sparkjoy Studios (only two with complete access), and 4-5 administrators at BRIMM.

PART 4:   ACCURACY, CORRECTION, AND RETENTION

4.1   Updating and Correcting Personal Information

Not applicable.

4.2   Decisions That Directly Affect an Individual

Not applicable.

4.3   Records Retention and Disposal

Username and password will be retained, as required, in order to allow users to login for future courses, and will be disposed per UBC Records Retention requirements.

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

There are no other applicable legislation or regulations for this review or for this initiative.

5.3   Other Applicable Legislation and Regulations

There are no other applicable legislation or regulations for this review for this initiative.

PART 6: ACCESS AND PRIVACY MANAGER COMMENTS

6.1 Information or Materials Reviewed

BRIMM web site, discussions and correspondence with Sparkjoy Studios.

6.2 Information or Materials Not Available for Review

WordPress, Gravity Forms plugin, and Lifter LMS technical and security documentation.

6.3 Analysis and Summary

The information provided for the review has established that the event registration via WordPress and use of ePayment, as presented by BRIMM, 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, used, and disclosed in accordance with FIPPA;
- Personal information is collected, stored, and accessed within Canada;
- Access to the course registration and payment information will be limited to BRIMM and Sparkjoy Studios staff with valid login credentials with appropriate access authorities;
- The ePayment platform has met PCI compliance requirements;
- Information is kept secure during transmission and at rest.

Accordingly, the sue-case may proceed as proposed subject to the conditions set out in the next section.

6.4 Conditions of Approval

- BRIMM must adhere to requirements outlined in PIA Implementation Checklist.
- PI stored must be limited to that required to ensure successful course registration only.
- PI must be disposed per UBC Records Retention requirements.

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
Owner - Dana Caudle

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

Distributed To
Requestor: Dana Caudle **Project Manager:** Dana Caudle **Owner:** Dana Caudle **Risk Advisor:** Christian Stockman

PIA Request History:

PIA Request Date	Report Created
2020-10-07 16:14:55	2020-10-30 11:42:26