

# PIA01886 – uSend/Sendy

PIA REVIEW – EXECUTIVE REPORT

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## 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	2021-08-31	Christian Stockman	Report Creation

Figure 2 - Document Revision History and Revision Summary

#### TEMPLATE REVISION APPROVAL

REVISION #	DATE	REVISED BY	DESCRIPTION
1.00	2021-08-31	Mark Belsito	Initial release of document

Figure 3 - Major Document Revision Approval History

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## PART 1: GENERAL INFORMATION & OVERVIEW

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### 1.1 Executive Summary

UBC uses a dedicated on-premise version of Sendy (sendy.co) to send newsletters and conduct email campaigns for faculty, staff, students and third parties. UBC Sendy has a very simple user interface and requires minimal personal information to be collected. It also allows for basic email campaign management and reporting (e.g. tracking if recipients have opened the message, tracking general location data) UBC Sendy is compliant with FIPPA residency requirements.

Submission was required due to request by UBC Cybersecurity to ensure all internal newsletter tools are compliant and may be whitelisted for the UBC-wide external email banner requirements. Requests for use are made directly to UBC IT CoolTech. A signed Memorandum of Understanding (MOU) outlining usage expectations if required to be signed by each client group.

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

The uSend service uses Sendy as its platform. It is a light-weight mass email communication tool used by communicators across campus. It is installed locally on a virtual server on premise. Up until now, it has existed as a proof of concept. At this point, there is a desire to turn it into an official service.

#### 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 **2 - Low**.

### 1.3 Scope

UBC Sendy use by UBC client groups, in the manner outlined within this PIA.

### 1.4 Data Elements

UBC Sendy requires names and email addresses for newsletter sending purposes. Some users may supply personal email addresses for this purpose. The tool also offers click tracking for each email campaign.

### 1.5 Data-Linking Initiative

This project is not considered a data linking initiative as contemplated under s.(36) of FIPPA.

### 1.6 Is this a Common or Integrated Program or Activity?

This project is not considered a common or integrated program or activity as defined in Schedule 1 of FIPPA.

## PART 2: PROTECTION OF PERSONAL INFORMATION

### 2.1 Personal Information Flow Diagram / Table

Names and email addresses are uploaded individually or via \*.CSV file. The service automatically generates the completed email, embedding the user’s name and sending to the correct email addresses in batches. The service uses UBC email servers for this purpose. No data is routed externally. Personal information (i.e. records of recipients) may be retained indefinitely without manual intervention to ensure data is periodically removed.

The environment consists of a primary and backup front end server, a database server and a couple mail relay servers that handle mail flow.

A screenshot of the service follows:

The screenshot displays the 'SUBERNOVA' interface for managing subscriber lists. It includes a sidebar with navigation options like 'All campaigns', 'New campaign', 'All templates', and 'View all lists'. The main area shows 'Subscriber lists' with a search bar and buttons for 'Add subscribers', 'Delete subscribers', 'Mass unsubscribe', and 'Export all subscribers'. Below this is a 'Subscribers activity chart' showing a line graph of activity from October 2019 to September 2020. A notification banner indicates that 8 emails were skipped from a recent import. At the bottom, a table lists subscribers with columns for Name, Email, Last activity, Status, Unsubscribe, and Delete.

Name	Email	Last activity	Status	Unsubscribe	Delete
jaxp haet	fyvl@yahoo.co.uk	Sep 24, 2020, 04:19AM	Unsubscribed	✓	🗑️
wpok gipu	efeg@googlemail.com	Jun 19, 2020, 10:57PM	Subscribed	🗑️	🗑️
motl vhuz	epis@gmail.com	Apr 08, 2020, 04:19AM	Bounced	-	🗑️
upqf npzn	tidm@hotmail.co.uk	Apr 08, 2020, 04:19AM	Subscribed	🗑️	🗑️
mgek siuh	rwke@asia.com	Apr 08, 2020, 04:19AM	Subscribed	🗑️	🗑️
zaia axyo	qgar@gmail.com	Apr 08, 2020, 04:19AM	Subscribed	🗑️	🗑️
ugkz zcvs	btwq@hotmail.co.uk	Apr 08, 2020, 04:19AM	Unsubscribed	✓	🗑️
gpyl jliu	grug@gmail.com	Apr 08, 2020, 04:19AM	Subscribed	🗑️	🗑️
ibdf niva	zznk@live.com	Apr 08, 2020, 04:19AM	Subscribed	🗑️	🗑️
mlvd tdpd	sdz@icloud.com	Apr 08, 2020, 04:19AM	Marked as spam	-	🗑️
llae eatv	wry@icloud.com	Apr 08, 2020, 04:19AM	Subscribed	🗑️	🗑️

## 2.2 Risk Mitigation Table

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

Category: Security					
Risk	Ref#	Inherent Likelihood	Inherent Impact	Response	Residual Risk
Retaining PI longer than necessary	RK0020854	4 – High	3 - Significant	Mitigate	2 - Low
	<b>Mitigation Plan:</b> Units should remove personal information collected within a reasonable time after the email campaign has concluded, in line with UBC Records Retention Policies (indefinite retention is not authorized).				
Inadequate controls for volume of personal information	RK0020610	4 – High	4 - Major	Mitigate	2 - Low
	<b>Mitigation Plan:</b> Access to the service should continue to be limited to units who have signed the MOU and accepted its conditions. UBC should consider expanding enterprise-wide support model outlined within MOU to ensure appropriate use, security and management of personal information.				

Figure 4 - Risk Mitigation Table

## 2.3 Collection Notice

Not applicable.

## 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

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

## 3.2 Technical Security Measures

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

## 3.3 Security Policies, Procedures, and Standards

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

## 3.4 Tracking Access / Access Controls

Not applicable.

## PART 4: ACCURACY, CORRECTION, AND RETENTION

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### 4.1 Updating and Correcting Personal Information

Not applicable.

### 4.2 Decisions That Directly Affect an Individual

This project does not capture personal information that directly affects an individual.

### 4.3 Records Retention and Disposal

This project is required to comply with UBC Records Management Policies.

## PART 5: FURTHER INFORMATION

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### 5.1 Systematic Disclosures of Personal Information

This project does not involve the systemic disclosure of personal information.

### 5.2 Access for Research or Statistical Purposes

This project does not involve the disclosure of personal information for research or statistical purposes as contemplated under s.(35) of FIPPA.

### 5.3 Other Applicable Legislation and Regulations

This project is not subject to other applicable legislation or regulations.

## PART 6: ACCESS AND PRIVACY MANAGER COMMENTS

### 6.1 Information or Materials Reviewed

Information Reviewed	Date Received
uSend Memorandum of Understanding.docx	2021-09-01 00:25:25

### 6.2 Analysis and Findings

The information provided for the review has established that UBC Sendy and the associated use-case, as presented by UBC IT Cool Tech, 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;
- Access to UBC Sendy is limited to UBC staff with valid login credentials and appropriate access authorities;
- Personal Information is kept secure during transmission and at rest.

Accordingly, UBC Sendy can be used as proposed subject to the following conditions of approval.

### 6.3 Conditions of Approval

- Adherence to UBC Records Retention Policy (personal information must be purged after a specified time period). See Risks Table.

### 6.4 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
Mark Belsito

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

Distributed To
<b>Requestor:</b> Mark Belsito, Manager <b>Project Manager:</b> Mark Belsito, Manager <b>Owner:</b> Mark Belsito, Manager <b>Risk Advisor:</b> Christian Stockman, Information Security Risk Advisor

*PIA Request History:*

PIA Request Date	Report Created
2020-12-14 11:04:13	2021-08-31 17:28:50