# PIA02301 — Airtable for Transfer Credit Portal

**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 | 2022-08-16 | Christian Stockman | Report Creation |

*Figure 2 - Document Revision History and Revision Summary*

### TEMPLATE REVISION APPROVAL

| REVISION # | DATE | REVISED BY | DESCRIPTION |
|---|---|---|---|
| 1.00 | 2022-08-16 | Alexandra Wai | 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 Go Global team is using Airtable cloud-based software to track issues and bugs for their Transfer Credit Portal (TCP) upgrade project. The TCP is a web-based application that includes PI but has security features in its development (e.g. access controls, CWL integration, etc.). The Airtable bugs log (for which this PIA is being requested) is peripheral to the TCP and may make reference to a particular student record within the TCP in its description of an issue (e.g. a Package ID number, a URL link to the page with the issue, a screen shot of the issue, etc.).

The Airtable does not provide access to the TCP itself. The Airtable is a temporary system used to log and track systems issues related to the TCP while systems support is being worked out internally (being transferred from SCS to UBC IT). Once the TCP systems support is fully transitioned to UBC IT, this Airtable will be decommissioned. A timeline for decommissioning has not yet been established because the resourcing for a systems support team/staff for the TCP is still being worked out. UBC IT will have ongoing access to the Airtable in future as support for the TCP will be within their domain and may need to refer to the Airtable bugs log to troubleshoot.

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

This PIA is requested for a project document (Airtable) related to the Go Global Transfer Credit Portal Development project (PIA 2019.05-097).

An Airtable was used for project management and tracking purposes for the Go Global TCP Redevelopment Systems project (see PIA 2019.09-169). The Airtable document's ownership was transferred from Student Communications Services (SCS) to Go Global (GG) on March 11, 2022 as the project owner for the TCP.

While the TCP system launched as a minimally viable product (MVP) in January 2022, there are remaining systems issues (bugs, feature tweaks, new feature releases, etc.) that have been documented on the Airtable's QA issues log. Ongoing TCP systems support and systems development for any remaining unreleased features has been transferred from SCS to UBC IT. Since SCS will no longer be supporting the TCP, there is a need to transfer the ownership of this project document. The team within UBC IT who will take over TCP systems support has requested that a PIA be completed for the Airtable document.

The Airtable document is used to log and track any systems issues discovered about the TCP. Systems issues are identified, described in detail and documented on the Airtable so that the TCP systems support team (currently being resourced) can address and resolve them later.

### 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

Use of Airtable SaaS for issue tracking by UBC users authorized to use the application on behalf of the University

## 1.4 Related PIAs

A related PIA assessment completed for the Go Global TCP was PIA 2019.05-097.

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## 1.5    Data Elements

In its systems issue documentation, some possible PI that could be included are:

- student name
- student ID number
- transfer credit package ID number
- faculty/department
- Go Global partner school
- academic courses taken at the partner school
- faculty/staff user name

Most of the systems issues on the Airtable bugs log are general in nature and do not include specific PI. However, some issues might have PI if the bug is localized to a specific record in the TCP.

The PI will be used as reference to a particular systems issue within the TCP. It will allow the TCP systems support staff to investigate the IT issue in its context to a record in the TCP (where applicable) so that they can resolve the issue or bug.

PI recorded and collected through the Airtable will only be staff/faculty user name as the reporter of a TCP systems issue.

Other PI (e.g. student info) is not directly collected through the Airtable. The PI may happen to be present as contextual information in reference to the logging and description of bugs and other systems issues in the Go Global TCP. Any PI that might be on the Airtable is already existing in the separate TCP system.

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

Airtable servers are hosted outside of Canada in the USA in data centers that are SOC 1, SOC 2 and ISO 27001 certified. The personal information data elements are not considered to be sensitive in the context of FIPPA legislation or UBC Information Security Standards, therefore an enhanced PIA was not completed for this initiative.

## 1.7    Data-Linking Initiative

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

## 1.8    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

None provided.

### 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** |
| **PI stored / accessible outside of Canada** | RK0021122 | 4 - High | 4 - Major | Mitigate | 2 - Low |
| | **Mitigation Plan:** Airtable servers are located outside of Canada and may contain personal information, should that detail be required in the context of a bug or issue discovered with the TCP software. | | | | |
| **Not ensuring individuals are informed about collection** | RK0021213 | 4 - High | 4 - Major | Mitigate | 2 - Low |
| | **Mitigation Plan:** Students are provided notice that their personal information may be collected at the outset when they sign up for Go Global. Technical support and troubleshooting for systems and services that may contain their personal information would be reasonable and expected. | | | | |
| **Over collection of personal information** | RK0021214 | 4 - High | 4 - Major | Mitigate | 2 - Low |
| | **Mitigation Plan:** Personal information collected will be the minimum required. Staff will be trained to ensure any issues discovered that may require screenshots or other evidence are limited and cut out any unnecessary personal information (e.g. a screenshot of a portion of a page rather than the entire page). | | | | |

*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

### 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

### 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

Overall, the information provided was deemed reasonable to provide an understanding of operating privacy and security controls, and deemed acceptable.

## 6.2 Analysis and Findings

The information provided for the review has established that the project and associated use-case, as presented, can be used in the proposed manner. Based on the information provided, our review has concluded that there are no significant privacy or information security risks introduced by this project. We do, however, recommend the project ensure that it continues to fully comply with the FIPPA legislation and the UBC Information Security Standards.

## 6.3 Conditions of Approval

None Specified.

## 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 |
|---|
| Alexandra Wai |

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

| Distributed To |
|---|
| **Requestor:** Alexandra Wai, Global Engagement Advisor |
| **Project Manager:** Alexandra Wai, Global Engagement Advisor |
| **Owner:** Alexandra Wai, Global Engagement Advisor |
| **Risk Advisor:** Christian Stockman, Information Security Risk Advisor |

*PIA Request History:*

| PIA Request Date | Report Created |
|---|---|
| 2022-03-30 11:52:29 | 2022-08-16 12:21:05 |