PIA02408 — Everything Card for Alumni UBC

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
Taylor Bohn	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	2023-06-23	Taylor Bohn	Report Creation

Figure 2 - Document Revision History and Revision Summary

TEMPLATE REVISION APPROVAL

REVISION #	DATE	REVISED BY	DESCRIPTION
1.00	2023-06-23	Jessica Chan	Initial release of document

Figure 3 - Major Document Revision Approval History

TABLE OF CONTENTS

TABLE OF FIGURES

PRIVACY MATTERS
@ UBC

PART 1:   GENERAL INFORMATION & OVERVIEW

1.1   Executive Summary

The alumni UBC volunteer program intends on using Everything Card to distribute gift cards to volunteers. Everything Card is owned by Esiance and provides an online platform that will enable UBC to send branded, customized emails that includes gift codes. These gift codes allow the recipient to select a gift card from a predetermined list of stores.

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

Everything Card is an online platform that allows for branded, customized emails to be sent to recipients, that includes gift codes. These gift codes allow the recipient to select the store of their choosing to redeem the gift code through.

The digital solution allows the alumni UBC volunteer program to appreciate and celebrate its volunteers (the recipients).

RISK CLASSIFICATION

The inherent privacy risk classification level of this PIA submission is **2 - Low**.
The residual risk classification level of this PIA submission at closure is **2 - Low**.

1.3   Scope of PIAs

Use of Everything Card by the alumni UBC volunteer program to distribute gift cards to volunteers on behalf of the University.

1.4   Related PIAs

None are applicable.

1.5   Data Elements

The data elements provided by UBC are name and email address of the recipient.

At time of redemption the recipient may need to provide a shipping address for the gift card if they opt for a physical gift card. Details as to what is purchased with the gift card will remain between the volunteer and the store, they choose to redeem the gift card with. Esiance only has visibility into what gift card the volunteer selects and confirmed this information would not be shared.

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

The vendor has specified personal information is stored on Azure and uses services that are in both Canada and the US. The personal information data elements are not considered sensitive in the context of FIPPA legislation or UBC Information Security Standards, so an enhanced PIA is 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

1. Volunteer name and email are uploaded to Everything Card platform via manual entry or imported via CSV.
2. Volunteer receives an email from "hello@everythingcard.ca" inviting them to redeem a gift card for a preset value from a list of stores.
3. Volunteer creates an Everything Card account which requires a password.
4. If the Volunteer opts to receive a physical gift card a shipping address will need to be provided.
5. Once redeemed the volunteer will be able to use the gift card for their preferred store at their leisure.
6. 7 days after the sending an Everything Card invitation volunteer personal information is permanently removed from Esiance's systems.
7. Some data may be retained longer if the Volunteer opts to receive a physical gift card. (See section 4.3 Records Retention and Deletion for details).

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**
Use of PI for alternate purpose	RK0021671	4 - High	3 - Significant	Mitigate	2 - Low
	USE - "Personal information is used only for the purposes identified in the notice and only if the individual has provided implicit or explicit consent, unless a law or regulation specifically requires otherwise". **Mitigation Plan:** Esiance shall only collect, and use recipient information provided by UBC for the purpose of administering, processing, and fulfilling the provision of gift card(s) to recipients, which may include notifying and providing customer support to the recipient. If Esiance wishes to collect, use, or disclose recipient personal information for any other purpose, then Esiance must first obtain the recipient's direct, express, and informed consent.				
PI stored / accessible outside of Canada	RK0021194	4 - High	2 - Minor	Accept	2 - Low
	The vendor has specified personal information is stored on Azure and uses services that are in both Canada and the US. **Mitigation Plan:** The risk associated with this is low due to the changes in FIPPA. However, it is a risk that will need to be accepted as some individuals may not want this to occur.				

Figure 4 - Risk Mitigation Table

2.3 Collection Notice

Recommended Privacy Notice:

The UBC volunteer program will collect personal information which includes volunteer name and email. Personal information will be used to inform volunteers of future opportunities and to commend past volunteers. This information is collected according to the terms under section 26(c) of the FIPPA.

Your provided name and email may be temporarily stored outside of Canada as it will be shared with Everything Card. If you have questions about the collection, use, and/or disclosure of your personal information or you wish to have this information deleted please contact XXXXXXXXX.

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

No longer required by FIPPA, best practice would be to notify individuals at the time of collection.

2.5 Consent Withheld Procedure

Not applicable.

PART 3:   SECURITY OF PERSONAL INFORMATION

3.1 Physical Security Measures

If the tool was to be implemented, it would be required to comply with UBC Policy SC14 (Information Systems Policy) and applicable UBC ISS (Information Security Standards).

3.2 Technical Security Measures

If the tool was to be implemented, it would be required to comply with UBC Policy SC14 (Information Systems Policy) and applicable UBC ISS (Information Security Standards). However, the tool is not approved for use.

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

Each UBC employee who is provided access to the Everything Card platform will have their own account. For the alumni UBC volunteer program, Jessica Chan and a program coordinator will have access. This may change in the future, but access will remain limited to UBC employees who require access.

PART 4:   ACCURACY, CORRECTION, AND RETENTION

4.1   Updating and Correcting Personal Information

Volunteers will be able to reach out to the department via email to have their information updated or deleted. Additionally, they will also be able to sign into Everything Card themselves and update their information as required.

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.

The data handling process for Full-length invitation data and end-user delivery data associated with the EverythingCard invitation is as follows, according to Esiance policies:

- Full-length invitation data: When an EverythingCard invitation is sent, the full-length invitation data is stored temporarily in their systems but is permanently removed within 7 days.
- End-user delivery data: When a recipient redeems the EverythingCard, they provide delivery data which may include a physical shipping address for the gift card delivery.
- Data retention: The delivery data collected from the recipient is held for 30 days after the gift card is delivered. This retention period is to ensure proper delivery and provide adequate customer service.
- Data redaction: After the 30-day retention period, the data is redacted. This means that sensitive information is removed, and only certain non-sensitive details might be retained for customer support purposes.
- Permanent removal of full-length data: After the redaction process, the full-length data is permanently removed from their systems.
- Retrieval of transactions: Even after full-length data is removed, customers can still retrieve their transaction information for customer support purposes. To do this, they need to provide their full email address and transaction confirmation number, which is matched against stored hashes of such data.

PART 5:   FURTHER INFORMATION

5.1   Systematic Disclosures of Personal Information

This project does not involve the systemic disclosure of personal information. Esiance does not share confidential personal information or gift card information with third parties, except in the case where gift card data may be provided to the original merchant, for the purpose of transaction review.

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

This project does not involve the systemic disclosure of personal information. Esiance does not share confidential personal information or gift card information with third parties, except in the case where gift card data may be provided to the original merchant, for the purpose of transaction review.

Information Reviewed	Date Received
230620 Everything Card - Responses to Security Questions.docx	2023-07-14 19:59:45
EverythingCard Information Security Overview.pdf	2023-07-14 19:59:41
EverythingCard_Email Deliverability.pdf	2023-07-14 19:59:43

6.2 Analysis and Findings

Volunteer personal information is stored outside of Canada; however, this information is not sensitive. Ideally, volunteers would be informed when their information is collected that their personal information may be provided to Everything Card to receive a gift card as a thank you for their efforts.

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
Jessica Chan

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

Distributed To
Requestor: Jessica Chan, Associate Director, Alumni Engagement **Project Manager:** Jessica Chan, Associate Director, Alumni Engagement **Owner:** Jessica Chan, Associate Director, Alumni Engagement **Risk Advisor:** Taylor Bohn, Information Security Risk Advisor

PIA Request History:

PIA Request Date	Report Created
2022-07-26 09:30:03	2023-07-19 07:02:40