

PIA02434 – TikTok - Advertising Automatic Matching

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	David McCaughan	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 PIA review has assessed that the processes, applications, and/or use cases as described cannot or will not be implemented in a manner which complies with BC FIPPA and/or UBC Policy SC14 and the associated UBC Information Security Standards (ISS).

Please refer to the **Observed Privacy & Information Security Risks** and **Analysis & Findings** sub-sections of this PIA Summary Report for additional details.

Should you elect to proceed with this initiative regardless, you should advise your Administrative Head of Unit as they will assume responsibility and accountability for any associated risks.

THIS INITIATIVE SHOULD NOT PROCEED

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

For the last year APSC/UBC Engineering communications has been using TikTok for marketing communications to students.

Recently they have been exploring the marketing and advertising opportunities within the platform. Similar to what Facebook, Google, LinkedIn offer in order for TikTok ads to target individuals effectively, they require a tracking code to be added to the site. Within this code that can be added, there's a feature called: TikTok Automatic Advance Matching. The marketing purpose of this feature is to be able to collect emails (and phone numbers), which will be passed from the forms on our websites back to TikTok ads. TikTok's algorithms will then try to match the email with their users to 'match'. If 'matched' this would allow UBC to serve greater targeted ads to match the user's behavior and/or serve ads based on our targeting and advertising settings.

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 **4 - High**.

1.3 Scope

The scope of the PIA focuses on the Automatic Advance Matching service offered by TikTok and how information would be collected and shared with TikTok. This excludes any past, current and future marketing communications sent on the platform by the APSC/UBC Engineering communications team.

1.4 Related PIAs

Not Applicable.

1.5 Data Elements

- Email - Student and/or Staff
- Phone Numbers - Student and/or Staff
- Ad/Event Information - Information about the ad a TikTok user has clicked or an event that was triggered.
- Timestamp - Time that the pixel event fired.
- IP Address - Used to determine Geographic location.
- User Agent - Used to determine the device make, model, operating system and browser information.
- Cookies - 1st and 3rd party cookies.

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

If implemented personal information shared with TikTok via the Automatic Advance Matching service would have been stored in datacenters operated by TikTok in both the US and Singapore.

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

No personal information flow was created as use of the tool is not permitted.

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
Inadequate controls for volume of personal information	RK0021218	4 - High	4 - Major		4 - High
	Mitigation Plan: For reasons related to this risk and others use of the Automatic Advance Matching service/tool is not permitted.				
Inadequate third-party information sharing controls	RK0021446	4 - High	4 - Major		4 - High
	Mitigation Plan: For reasons related to this risk and others use of the Automatic Advance Matching service/tool is not permitted.				
PI stored / accessible outside of Canada	RK0021216	4 - High	4 - Major		4 - High
	Mitigation Plan: Mitigation Plan: For reasons related to this risk and others use of the Automatic Advance Matching service/tool is not permitted.				

Figure 4 - Risk Mitigation Table

2.3 Collection Notice

Not applicable as University Counsel determined that no personal information would be directly shared with TikTok meaning use of the Automatic Advance Matching service is not permitted.

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

Not applicable as University Counsel determined that no personal information would be directly shared with TikTok meaning use of the Automatic Advance Matching service is not permitted.

2.5 Consent Withheld Procedure

Not applicable as University Counsel determined that no personal information would be directly shared with TikTok meaning use of the Automatic Advance Matching service is not permitted.

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). However, the tool is not approved for use.

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

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.

3.4 Tracking Access / Access Controls

Not applicable as University Counsel determined that no personal information would be directly shared with TikTok meaning use of the Automatic Advance Matching service is not permitted.

PART 4: ACCURACY, CORRECTION, AND RETENTION

4.1 Updating and Correcting Personal Information

Not applicable as University Counsel determined that no personal information would be directly shared with TikTok meaning use of the Automatic Advance Matching service is not permitted.

4.2 Decisions That Directly Affect an Individual

Not applicable as University Counsel determined that no personal information would be directly shared with TikTok meaning use of the Automatic Advance Matching service is not permitted.

4.3 Records Retention and Disposal

Not applicable as University Counsel determined that no personal information would be directly shared with TikTok meaning use of the Automatic Advance Matching service is not permitted.

PART 5: FURTHER INFORMATION

5.1 Systematic Disclosures of Personal Information

Not applicable as University Counsel determined that no personal information would be directly shared with TikTok meaning use of the Automatic Advance Matching service is not permitted.

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

Automatic Advance Matching:

<https://ads.tiktok.com/help/article?aid=10007891>

Additional information:

Privacy Policy:

<https://ads.tiktok.com/i18n/official/policy/privacy>

Data Terms:

<https://ads.tiktok.com/i18n/official/policy/business-products-terms>

Pixel Tracking Variables:

<https://ads.tiktok.com/help/article?aid=10028>

Advertising Terms:

<https://ads.tiktok.com/i18n/official/policy/advertising-terms>

Custom Audience Terms:

<https://ads.tiktok.com/i18n/official/policy/custom-audience-terms>

Data Transfer Terms:

<https://ads.tiktok.com/i18n/official/policy/controller-to-controller>

6.2 Analysis and Findings

University Counsel has determined that UBC will not directly share personal information with TikTok or other social media platforms. This means that the use of the Automatic Advance Matching service is not permitted by any facility/department at UBC.

6.3 Conditions of Approval.

There are no conditions in which the use of the Automatic Advance Matching service/tool is permitted for use at UBC.

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
David McCaughan

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

Distributed To
Requestor: David McCaughan, Associate Director of Marketing & Recruitment Project Manager: : David McCaughan, Associate Director of Marketing & Recruitment Owner: : David McCaughan, Associate Director of Marketing & Recruitment Risk Advisor: Taylor Bohn, Information Security Risk Advisor

PIA Request History:

PIA Request Date	Report Created
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