PIA02487 — SmartWay2 Display and Booking System

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	2023-04-03	Christian Stockman	Report Creation

Figure 2 - Document Revision History and Revision Summary

TEMPLATE REVISION APPROVAL

REVISION #	DATE	REVISED BY	DESCRIPTION
1.00	2023-04-03	Dustin Sheridan	Initial release of document

Figure 3 - Major Document Revision Approval History

TABLE OF CONTENTS

PRIVACY MATTERS
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TABLE OF FIGURES

PART 1:   GENERAL INFORMATION & OVERVIEW

1.1   Executive Summary

The UBC Department of Electrical and Computer Engineering (ECE) would like to implement SmartWay2, a booking service, in the MacLeod building. The service is hosted in the USA and UK, and makes use of a card reader for booking and checking in at workstations. Personal information collected would be minimized to business contact information. IN addition, users wishing to book a space will not be able to see who else has made booking, as there is a setting in the web application that makes the booking information private (who booked it and for what) so that users can only see when a room is booked.

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

We are looking to integrate the SmartWay2 display and room booking system into the newly-renovated MacLeod building. This system would display room schedules for the teaching laboratories, as well as booking for a small number of rooms. The intended users for this project are the faculty and staff of Electrical and Computer Engineering - with bookings for students/other groups made through the staff. This system includes a card reader to enable staff/faculty to book and check-in.

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

Review of SmartWay2 for implementation by UBC ECE within MacLeod building only, for scope as outlined within this PIA only.

1.4   Data Elements

Personal information collected included user name (first and last), contact information (email), CWL and user/employment group. Some of this information will be used to validate access when users scan their UBC Cards as workstation card readers.
-    Contact information will be used to confirm booking.
-    User/Employment group will be needed to establish who has privileges to book which room.
-    CWL / name as identifier to confirm who has booked a space.

PI would be obtained from UBC's user directory as well as CWL integration.

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

Personal information is stored on OSCAR EMR servers hosted securely at UBC.

1.6   Data-Linking Initiative

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

1.7   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 data flow was provided for this initiative.

2.2 Risk Mitigation Table

Category: Security					
Risk	**Ref#**	**Inherent Likelihood**	**Inherent Impact**	**Response**	**Residual Risk**
PI stored / accessible outside of Canada	RK0021275	4 - High	4 - Major	Mitigate	2 - Low
Mitigation Plan: Personal information collected will be stored within the application database secured by AWS (Canada). Data will be limited to data deemed business contact information and therefore not protected under FIPPA.					

Figure 4 - Risk Mitigation Table

2.3 Collection Notice

A standard collection notice must be provided at the time personal information is collected.

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

Not required.

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.

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PART 6:   ACCESS AND PRIVACY MANAGER COMMENTS

6.1   Information or Materials Reviewed
Overall provided information was deemed reasonable to provide an understanding of operating privacy and security controls.

6.2   Analysis and Findings
Based on the information provided, our review has concluded there are no significant privacy or security risks introduced by this project or use-case. The project may proceed in the proposed manner as long as it continues to fully comply with the FIPPA legislation and the UBC Information Security Standards, subject to the conditions of approval in the next section.

6.3   Conditions of Approval
Completion of Data Access Request via UBC Enterprise Data Governance group, is required for access to user data sets for validation (in progress).

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
Darla La Pierre

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

Distributed To
Requestor: **Project Manager:** Dustin Sheridan, Senior Manager **Owner:** Darla La Pierre, Manager, Business Operations **Risk Advisor:** Christian Stockman, Senior Advisor, Privacy and Information Security Risk

PIA Request History:

PIA Request Date	Report Created
2022-10-27 09:50:15	2023-04-03 20:48:28