PIA Guidelines: Event Registration and Shopping Cart Tools

Overview

This document provides Privacy Impact Assessment (PIA) guidelines for expected use of UBC's most frequently used event registration and shopping cart tools, and explains how to ensure that these tools comply with BC's *Freedom of Information and Protection of Privacy Act* (FIPPA) requirements and UBC's Information Security Standards.

The following tools are covered by these guidelines:

- *ePly* an external event registration and e-payment application service
- *ePayment* UBC's internal e-payment application, for use with a standalone web form configuration or in a virtual point-of-sale terminal configuration

These guidelines do not apply to the use of other third-party event registration and shopping cart tools (e.g. Eventbrite, EventsAIR). Many of these tools are not compliant with FIPPA because they store personal information (PI) outside Canada. A PIA request must be submitted if you are planning to use these or any other tools and will be collecting PI. For more information about how to submit a PIA request, refer to the Privacy Matters PIA web page.

General Requirements

These services should be used within the University community for most purposes as follows:

- *ePly* for self-service web forms for events and shopping carts provided by *ePly* and integrated with UBC's payment gateway
- *ePayment* for custom-code applications integrated with UBC's payment gateway. *ePayment* serves as a gateway that redirects the shopping cart to a UBC-hosted page (where credit card information is typed) for payment processing

You may be required to submit a supplementary PIA request depending on a number of factors, such as the nature of PI collected, how such information is used, shared or disclosed, and where it will be stored. For information about what constitutes PI, refer to the Fact Sheet *What Is Personal Information?*.

Supplementary PIA Required

A supplementary PIA is required if any of the following factors apply:

- Any of the following or similar types of high-risk PI elements are collected or accessed: date of birth, SIN number, government-issued identification, personal health information, biometric data, gender identity, financial information (e.g. bank account or credit card number)
- PI will be collected that is not **necessary** for the purpose of payment processing or event registration (e.g. demographic information or personal information to be shared with vendors)
- PI will be accessed by, disclosed to, or obtained from another unit within UBC
- PI will be accessed by, disclosed to, or obtained from a third party external to UBC (other than the event organizer, *ePly* or *ePayment*) for purposes other than payment processing or event registration
- PI will be used for marketing or promotional purposes, or disclosed to the general public
- A third party external to UBC is involved in the project and/or will be supporting the use of the tool (e.g. troubleshooting, data backup)

(continued)

Supplementary PIA Not Required

If none of the above factors are applicable, then you are not required to complete a supplementary PIA. Generally speaking, if you are using these tools for the sole purpose of payment processing and/or event management support (e.g. confirming reservations, checking attendance, assigning seats, and accommodating special needs such as accessibility or dietary preferences), and if you are not disclosing the information for any other purpose, you can use the tool without preparing a supplementary PIA. However, you are still required to provide a privacy notification on your web form (see below).

A supplementary PIA is also not required if your use of these tools is part of a research project that has received Research Ethics Board approval, or if you are using these tools as a student for academic purposes. However, you should still follow the Tips and Reminders below.

Tips and Reminders

Administrators should always adhere to the following principles when creating event registrations or shopping carts and managing data collected using these tools:

- **Collect only the information you need**: These tools should collect only the information that is absolutely necessary and avoid excess data collection. If PI is not required, do not collect it.
- **Conduct a security risk assessment**: Departmental system administrators can assess compliance using the Application Risk Assessment Tool if there is uncertainty about whether a web form meets security requirements.
- **Grant access to data sparingly**: Web form creators are responsible for ensuring that access to survey data containing PI is granted on a "need-to-know" basis to limit unintentional disclosure of PI.
- **Appoint consultants securely**: Ensure data is shared securely with third parties outside the University to avoid unintentional PI exposure. Disclosure of PI may only be done in accordance with an information sharing agreement or security and confidentiality agreement.

Privacy Notification

Under FIPPA, you must provide a privacy notification anytime PI is collected or used. As long as the individual sees the notification, it is not necessary for them to click "I agree." A sample privacy notification follows:

PRIVACY NOTIFICATION

When you register to attend an event, UBC collects personal information from you, such as your name, contact information, payment information, and personal dietary or accessibility requirements. UBC collects this information under the authority of section 26(c) of the British Columbia *Freedom of Information and Protection of Privacy Act* (FIPPA). This information will be shared with the event organizers and UBC's payment processer solely for the purpose of completing your event registration request and accommodating your needs during the event. Sharing your information with the event organizer may also result in your personal information being disclosed outside of Canada. UBC will not share this information with any other parties without your consent. Should you have any questions or concerns about the collection or use of this information, please contact <contact details>.

Contact Us

For questions about the information contained in these guidelines or the PIA process, please submit a PIA Inquiry.