PIA 01662 — Alibaba Cloud Acceleration Service

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
Lonsdale-Eccles, Michael	Safety and Risk Services	Director, PrISM Safety and Risk Services

Figure 1 - Major Document Revision Approval History

TEMPLATE REVISION HISTORY

REVISION #	DATE	REVISED BY	DESCRIPTION
0.10	2020-07-22	Lonsdale-Eccles, Michael	Authored
0.50	2020-12-21	Cheng, Grace	▪ Reformatted document to match PrISM styles ▪ Added additional information sections and segments ▪ Converted to MS WORD template

Figure 2 - Document Revision History and Revision Summary

TEMPLATE REVISION APPROVAL

REVISION #	DATE	REVISED BY	DESCRIPTION
1.00			Initial release of document

Figure 3 - Major Document Revision Approval History

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PART 1: GENERAL INFORMATION & OVERVIEW

1.1 Unit and Program Area

CAMPUS	UBC Vancouver
FACULTY OR DEPARTMENT	VP Finance and Operations
PROGRAM AREA	UBC IT – Network and Infrastructure Facilities
ADDITIONAL INFORMATION	N/A

Figure 4 - UBC Unit and Program Area

1.2 Contact Information

This should be the name of the UBC employee who owns the project or is most qualified to respond to questions regarding the PIA.

NAME	Eric Bourdon
TITLE / POSITION	Senior Manager, ITSV
FACULTY OR DEPARTMENT	Centre for Teaching, Learning, and Technology
UBC TELEPHONE NUMBER	604-822-0832
UBC E-MAIL ADDRESS	eric.bourdon@ubc.ca

Figure 5 - PIA Submission Contact Information

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

This project is to implement the Alibaba Cloud Global Acceleration service, which UBC is calling the International Secure Connection Service. The purpose of this service is to improve bandwidth performance issues for UBC international students located outside Canada. Currently, the service is set up for access in three locations in mainland China. UBC will continue to re-evaluate the services' performance and other access locations may be added at a later date. The service provides a dedicated internet path to North America and utilizes UBC's existing VPN and Firewall services to allow for encrypted traffic between the students and UBC. UBC students located close to the access locations will be able to take advantage of this service to access UBC teaching and learning resources via a more reliable internet service, which will give them an improved on-line learning experience.

The service does not store data. It creates a dedicated pathway to transmit data between the students in China and UBC. This data is encrypted using UBC's VPN.

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1.4   Scope of PIA

The PIA assessment is limited to the use of the Alibaba Cloud Global Acceleration service by UBC students in China. The students will use the service to access UBC resources faster than the standard experience of students in China.

1.5   Related PIAs

Not applicable

1.6   Elements of Information or Data

The data transmitted via this service could be any data a typical student might need to access from UBC or provide to UBC. This includes login credentials (e.g. CWL, password) and information related to the student's registration at UBC and their learning activities at UBC.

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

The initiative will not result in UBC storage of personal information outside of Canada.

1.8   Data-Linking Initiative

In FIPPA, "data linking" and "data-linking initiative" are strictly defined; if a project is a data linking initiative, it must comply with specific requirements under the Act related to data-linking initiatives.	
1. Personal information from one database is linked or combined with personal information from another database;	No
2. The purpose for the linkage is different from those for which the personal information in each database was originally obtained or compiled;	No
3. The data linking is occurring between either (1) two or more public bodies or (2) one or more public bodies and one or more agencies.	No
This is not a data linking initiative.	

1.9   Is this a Common or Integrated Program or Activity?

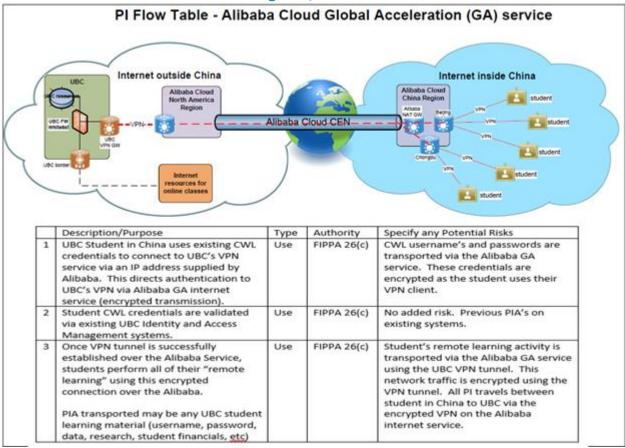| In FIPPA, "common or integrated program or activity" is strictly defined; where one exists it must comply with requirements under the Act for common or integrated programs and activities.	
1. This initiative involves a program or activity that provides a service (or services);	No
2. Those services are provided through: (a) a public body and at least one other public body or agency working collaboratively to provide that service; or (b) one public body working on behalf of one or more other public bodies or agencies;	No
3. The common or integrated program/activity is confirmed by written documentation that meets the requirements set out in the FIPPA regulation.	No

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PART 2: PROTECTION OF PERSONAL INFORMATION

2.1 Personal Information Flow Diagram / Table

	Description/Purpose	Type	Authority	Specify any Potential Risks
1	UBC Student in China uses existing CWL credentials to connect to UBC's VPN service via an IP address supplied by Alibaba. This directs authentication to UBC's VPN via Alibaba GA internet service (encrypted transmission).	Use	FIPPA 26(c)	CWL username's and passwords are transported via the Alibaba GA service. These credentials are encrypted as the student uses their VPN client.
2	Student CWL credentials are validated via existing UBC Identity and Access Management systems.	Use	FIPPA 26(c)	No added risk. Previous PIA's on existing systems.
3	Once VPN tunnel is successfully established over the Alibaba Service, students perform all of their "remote learning" using this encrypted connection over the Alibaba. PIA transported may be any UBC student learning material (username, password, data, research, student financials, etc)	Use	FIPPA 26(c)	Student's remote learning activity is transported via the Alibaba GA service using the UBC VPN tunnel. This network traffic is encrypted using the VPN tunnel. All PI travels between student in China to UBC via the encrypted VPN on the Alibaba internet service.

2.2 Risk Mitigation Table

The following table indicates the associated risk levels as applicable and the potential or intended mitigation steps.

Ref#	Risk	Category	Mitigation Strategy	Likelihood	Impact	Response	Residual Risk
RK0020072	Access to PI by Alibaba or other third parties, including credential harvesting (password and username collection)	Privacy	Contractually obligate vendor to maintain adequate security. In addition, require all users to access the service using the UBC VPN, which utilizes end-to-end encryption	4 - High	4 - Major	Mitigate	1 - Very Low
RK0020071	PI stored / accessible outside of Canada	Privacy	Information on various UBC systems (e.g. the Learning Management System, communication solutions, the Student Information Service Center) will be accessed by students from outside Canada. They will have access to their own PI through these systems, and if they choose to access or store this outside Canada, they are doing so with their own consent. They will also have access to a very limited amount of third party PI on these systems, such as the names and contact information of other students. However, the terms of use of these systems provide UBC with consent to allow access to this PI outside Canada	3 - Medium	2 - Minor	Accept	1 - Very Low

Figure 6 - 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

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PART 3:   SECURITY OF PERSONAL INFORMATION

3.1   Physical Security Measures

Project is required to comply with the physical security controls prescribed in the UBC Information Security Policy
(SC-14).

3.2   Technical Security Measures

Project is required to comply with the technical security controls prescribed in the UBC Information Security
Policy (SC-14).

The vendor is contractually obligated to refrain from collecting user data and to implement adequate technical
security controls to prevent access to information by third parties. Based on documentation received from the
vendor, UBC has concluded that the vendor has implemented such controls and has the technical capability to
maintain them.

As an additional layer of control, the solution must utilize UBC's existing VPN to add a layer of encryption for the
data and the user CWL credentials. This prevents the vendor and any other third parties from harvesting
credentials or collecting any other PI of the UBC students using the service.

3.3   Security Policies, Procedures, and Standards

Project is required to comply with the technical security controls prescribed in the UBC Information Security
Policy (SC-14).

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
Not Applicable

4.3   Records Retention and Disposal
Not Applicable

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PART 5:   FURTHER INFORMATION

5.1   Systematic Disclosures of Personal Information

The initiative does not involve the systemic disclosure of personal information.

5.2   Access for Research or Statistical Purposes

There are no other applicable Canadian legislation or regulations for this review or for this initiative.

5.3   Other Applicable Legislation and Regulations

We are not aware of other applicable legislation or regulations for this review or for this initiative.

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PART 6:   ACCESS AND PRIVACY MANAGER COMMENTS

6.1   Information or Materials Reviewed

This section indicates reference materials which were provided to support this review.

Information Reviewed	Date Received
Alibaba GA Data Flow Diagram.pdf	2020-06-22
Alibaba Cloud_ SOC2_Report _UBC.pdf (note, this does not relate to the accelerator service)	2020-07-23
Alibaba PI Inventory.pdf	2020-06-22
UBC International Student Internet Connectivity final.docx	2020-06-22

6.2   Information or Materials Not Available for Review

Not Applicable

6.3   Analysis and Decision

This project results in no additional collection, use or storage of personal information by UBC. However, without adequate control it does result in an increased risk of disclosure of personal information. Controls to mitigate this risk are stipulated within section 2.2 of this PIA and are considered sufficient to mitigate the risk.

6.4   Conditions of Approval

None Specified

6.5   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 UBC Policy SC14 requirements. Any change in PI collection or use will require new Risk Assessment.

Assessment Acceptance	Owner - Eric Bourdon

This refers to the distribution, including Requestor, Project Manager, Service Owner, and assigned PrISM analyst.

Distributed To	Requestor - Eric Bourdon
	Project Manager - Eric Bourdon
	Owner - Eric Bourdon
	Business Approver – N/A
	Risk Advisor – Michael Lonsdale-Eccles

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PIA Request History:

PIA Request Date	2020-06-20 12:06:50
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PIA Review Status	Final
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