PIA01988 — REMO Videoconferencing

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	2021-04-14	Christian Stockman		Report Creation

Figure 2 - Document Revision History and Revision Summary

TEMPLATE REVISION APPROVAL

REVISION #	DATE	REVISED BY		DESCRIPTION
1.00	2021-04-14	Ed Pitt-Brooke		Initial release of document

Figure 3 - Major Document Revision Approval History

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PART 1: GENERAL INFORMATION & OVERVIEW

1.1 Executive Summary

REMO allows similar functionality to other popular videoconference platforms, such as HD video & audio (including recording), group screen sharing, and the ability to conduct polls or Q&A voting. REMO does not require download or installation, offers countdown timers for speed networking, and allows for enhanced breakout room functionality for large groups. Some of this functionality offered by REMO is not available in the MS Teams and Zoom platforms currently in use at UBC. The UBC use-case aims to replicate a physical space and won't be using any special features or linking it to any external platforms.

UBC Graduate students in the Naval Architecture and Marine Engineering (NAME) program will be presenting their final ship design projects to members of industry. None of this information is confidential. Students and industry partners would be registered within REMO (via name and email collected via Qualtrics). A capstone presentation element will showcase the students' final projects for industry partners. The event's primary focus is on the extensive networking at virtual tables, 1:1, and breakout groups.

A previous review of REMO for was completed for a similar use-case (PIA01945).

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

Description: The Naval Architecture and Marine Engineering (NAME) program is hoping to do our annual Student Design Celebration on REMO conference (https://remo.co/conference/). The event is planned for April 29, and would involve student presentations to a group of Industry members and Alumni, with some networking time. Because REMO data is hosted in the US, and the platform would require us to email guests through the software, we will collect their consent to share their email through a Qualtrics form with a collection notice.

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 **3 - Medium.**

1.3 Scope of PIA

Use of REMO videoconference system for direct use by the NAME program. REMO's video streams are shared between users via its video routers.

Video streams can be recorded and downloaded. Remo also has a YouTube livestream feature where video streams are uploaded and stored on YouTube. This is useful for users who don't want to use Remo but still wish to participate in video conferences. REMO also allows for virtual business cards using LinkedIn profiles, has the ability to sell sponsorships, as well as hosting paid for free events. These aforementioned use cases have not been reviewed n the context of this PIA, and require additional privacy review.

1.4 Related PIAs

Reference	Description
PIA01945	Mechanical Engineering First-Year Networking Event
PIA01762	Remo Video Conferencing Software PIA

1.5   Elements of Information or Data

REMO requires users to create a personal account, and allows users to opt-out of receiving promotional information. At a minimum, registration requires first/last name, email address (username), and password. Personal information from students would be collected, business contact information from industry partners would be collected.

Optional collection of additional personal information is possible by completing the REMO profile, including linking to users' social media accounts (e.g. Facebook and LinkedIn) or adding a profile picture. These features are optional, and students are not encouraged to do this, though REMO will prompt at time of registration to include this optional information.

Per project: "Whether guests choose to enter their full names is optional. The platform will access their camera and microphone in order to allow for conversation and presentations. Presentations may be recorded, but no guest PI would be visible. It is not possible to record general conversation in this platform."

Additional information about data elements collected was submitted and reviewed by UBC privacy staff under PIA01762 and PIA01945.

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

REMO stores personal information outside of Canada, hosted on Amazon Web Services (AWS) and Google Cloud servers in the USA.

1.7   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.

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?

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.

This project is not considered a common or integrated program or activity as defined in Schedule 1 of FIPPA.

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PART 2: PROTECTION OF PERSONAL INFORMATION

2.1 Personal Information Flow Diagram / Table

Users register with REMO for an account to access the service. Participant names and e-mail addresses submitted to REMO are stored in the students' REMO accounts. Users are able to interact and chat with one another, organizers are able to record.

The event is private, In order to host a private event on REMO, event organizers would have to enter guests' email addresses in order to invite them. This would not be associated with their names at all, and is used by REMO to authenticate that they are permitted to access the private event. The organizers collect emails from students who sign up for our event through a Qualtrics registration form. Apart from this, the information submitted to REMO is not accessed by us or used by UBC staff in any way.

Screenshots of the REMO interface, typical breakout room (allowing private 1:1, table and group discussion and chat), and videoconference controls are presented as part of PIA01945 (also completed for the Department of Mechanical Engineering).

Additional information about personal information flow was submitted and reviewed by UBC privacy staff under PIA01762 and PIA01945.

2.2 Risk Mitigation Table

The following table outlines risk identified in relation to the project and recommended response plan.

Category: Security					
Risk	**Ref#**	**Inherent Likelihood**	**Inherent Impact**	**Response**	**Residual Risk**
Over collection of personal information	RK0020634	4 - High	4 - Major	Mitigate	3 - Medium
	Mitigation Plan: Users will be encouraged to supply only their name and email at registration (via Qualtrics). Event organizers to discourage providing additional personal information to REMO as part of user registration (e.g. adding profile photos) and use of third-party authentication methods (Google), and encourage creation of alias accounts to use REMO (requires only a name/alias and email address) as part of user registration. In addition, a privacy notification an consent statement will be required for all participants.				
Disclosing to or allowing unauthorized users access	RK0020633	4 - High	4 - Major	Mitigate	2 - Low
	Mitigation Plan: Recordings will be made by NAME staff, stored securely on UBC departmental servers, and accessed only on a need-to-know basis. No recordings will be made or uploaded to other platforms (e.g. YouTube).				
PI stored / accessible outside of Canada	RK0020624	4 - High	4 - Major		2 - Low
	Mitigation Plan: The project to implement privacy and consent notification and obtain consent from a student prior their personal information is collected, used and disclosed outside of Canada. This includes storage location, and technical and operation supports from outside of Canada.				

Figure 4 - Risk Mitigation Table

2.3   Collection Notice

The following consent notice is required for REMO registration: The UBC Department of Mechanical Engineering uses REMO, an online collaboration platform, for registration and attendance at events. Participants at the Naval Architecture and Marine Engineering (NAME) graduate students presentation event will be required to register with REMO. During the registration process, REMO will ask for your name and e-mail address. Your personal information is collected under the authority of Sections 26(c) and 26(d) of the BC Freedom of Information and Protection of Privacy Act (FIPPA), and will be used for registration and managing attendance at the event. You are also able to provide additional personal information at registration, including your photo and social media handles, but this is not required. By providing any personal information to REMO, you are consenting to the disclosure of that information outside of Canada. If you choose not to provide this consent, you may use an alias (e.g. first name and initial) and/or a non-identifying e-mail address set up specifically for joining REMO. The UBC Department of Mechanical Engineering will not disclose any personal information to third parties without your consent, except where required by law. REMO's Privacy Policy governs its collection and use of your personal information (https://remo.co/privacy-policy/). Should you have any questions or concerns about the information collected, or the privacy and security of that information, please contact the Community Engagement Officer at communications@mech.ubc.ca.

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

Students who present with REMO would be required to consent to use the platform and having their personal information stored outside of Canada. In addition, students will consent to having their images collected using the standard model release form in use at UBC.

2.5   Consent Withheld Procedure

Students will be required to participate in the event and present their final projects. However, they are not required to register to use REMO using their real names and email addresses. For students who do not provide consent, they can participate anonymously by providing a fake name/email address. Users are able to use a third party email provider (e.g. Protonmail). No presentations will be recorded.

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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).

The UBC PIA team has had limited visibility into or access to REMO's own information security policies, practices, or standards. However, REMO has responded to UBC's Vendor Requirements & Risk Assessment Questionnaire (used when no third party audit certification is present). These responses, in addition to publicly available documentation, assert REMO employs robust standards and practices, including AES256 data encryption, and a desire to adhere to industry security standards (e.g. SOC attestation and ISO certification, in advance of receiving these). These assertions could not be substantiated, however, as REMO has not completed a third-party audit certification.

3.4   Tracking Access / Access Controls
Per the project, four staff members working at the event will potentially have access to user information submitted by students: UBC MED Communications and Community Engagement Officer and three Mechanical Engineering Student Services advisors, who all have SISC access and are well versed in student privacy needs.

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.

The project has committed to removing all user data from the Qualtrics form and REMO by the end of the academic year. Separately, the REMO privacy policy asserts a "right to be forgotten" (i.e. a data erasure right). Users who choose to exercise that right must reach out to REMO directly.

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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

Documents reviewed in the course of this analysis include the following from REMO: User Terms of Service, Privacy Policy, Cookie Notice, Security Whitepaper, Data Protection Addendum, Password Policy. Access Control Policy, Vulnerability Policy, as well as information publicly available on the REMO web site and provided by the vendor. These documents were submitted and reviewed by UBC privacy staff under PIA01762 and PIA01945.

6.2   Analysis and Findings.

The information provided for the review has established that REMO videoconferencing software and the associated use, as presented by the NAME Program, can be used in the proposed manner in compliance with FIPPA and UBC policies.
The following are the key factors in that determination:

- Personal information is collected, stored, and accessed within Canada, and disclosed outside of Canada with appropriate consent.
- Access to REMO will be limited to authorized individuals with valid login credentials and appropriate access authorities.
- Information is kept secure during transmission and at rest.

Accordingly, REMO can be used as proposed subject to the conditions of approval set out in the next section.

6.3   Conditions of Approval

- A new PIA is required for any change in use, enhancement or integration with other software.
- Implementation of revised Recommended Collection Notice.

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
Ed Pitt-Brooke

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

Distributed To
Requestor: Ed Pitt-Brooke, Communications & Community Engagement Officer
Project Manager: Ed Pitt-Brooke, Communications & Community Engagement Officer
Owner: Ed Pitt-Brooke, Communications & Community Engagement Officer
Risk Advisor: Christian Stockman, Information Security Risk Advisor

PIA Request History:

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