

# PIA01767 – Cleanfeed

PIA REVIEW – EXECUTIVE REPORT

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## 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	2020-11-16	Christian Stockman	Report Creation

Figure 2 - Document Revision History and Revision Summary

#### TEMPLATE REVISION APPROVAL

REVISION #	DATE	REVISED BY	DESCRIPTION
1.00	2020-11-16	Murray Schellenberg	Initial release of document

Figure 3 - Major Document Revision Approval History

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## PART 1: GENERAL INFORMATION & OVERVIEW

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### 1.1 Executive Summary

Cleanfeed is an online tool for the transmission and recording of high-quality audio over the internet. It will be used to conduct linguistic fieldwork on endangered Indigenous languages.

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

To assess the platform Cleanfeed (cleanfeed.net) as an online tool for the transmission and recording of high-quality audio over the internet, particularly in relation to linguistic fieldwork on endangered Indigenous languages. Voices will be recorded over the internet and made available broadly (other UBC units, third parties, globally, etc.). The recordings will initially be used by the researchers for academic study. They will subsequently be preserved and held available (subject to cultural restrictions) for community members and other scholars to access for future use/analysis.

#### 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 of PIA

Voice recording software only; individual research use-cases are required to undergo Research Ethics Board approval and are not in scope for this review.

### 1.4 Elements of Information or Data

From Researcher:

Business contact information (name and email) is required to set up an account, as well as proprietary password. Payment information (credit card and billing address) is required to pay licensing fees; this information is retained in the Cleanfeed Subscription Center. Option to opt-in to Cleanfeed newsletters.

From Client:

Name of client who will be providing voice recordings, if inputted by the researcher (recommended alias). Email, if the researcher opts to use Cleanfeed to send the request for voice recording (recommend using the option to use UBC email to send a link to Cleanfeed instead). Voice recording (known to be recognizable) will be captured in the \*.WAV file format and stored within the user's browser, typically Google Chrome, until downloaded by the researcher. Cleanfeed does not have access to the voice recording. Voice recordings are used for research analysis, language teaching, and cultural teaching.

From Researcher and Client:

Computer and network connection (e.g. IP address, browser type, bandwidth) for analytics and to improve their software. This information is anonymized and retained in logs for analytics purpose, and securely disposed when no longer needed.

Note: Client name, email, and other personal information is typically collected by researchers and stored locally within faculty or departmental data centers. such collection is required to be approved by the Research Ethics Board.

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

Personal information, is stored on Cleanfeed servers hosted by Bytemark in the UK. Any personal information provided by the researcher is stored on these servers. Additional processing (e.g. analytics) occurs within the UK only, and is completed in-house by the Cleanfeed team.

### 1.6 Data-Linking Initiative

<i>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 initiative</i>	
1. <i>Personal information from one database is linked or combined with personal information from another database;</i>	<b>No</b>
2. <i>The purpose for the linkage is different from those for which the personal information in each database was originally obtained or compiled;</i>	<b>No</b>
3. <i>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.</i>	<b>No</b>
This is not a data linking initiative.	

### 1.7 Is this a Common or Integrated Program or Activity?

<i>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 initiative.</i>	
1. <i>Personal information from one database is linked or combined with personal information from another database;</i>	<b>No</b>
2. <i>The purpose for the linkage is different from those for which the personal information in each database was originally obtained or compiled;</i>	<b>No</b>
3. <i>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.</i>	<b>No</b>
Not applicable.	

## PART 2: PROTECTION OF PERSONAL INFORMATION

### 2.1 Personal Information Flow Diagram / Table

Researchers will set up an account that provides a simple dashboard view and ability to administer and manage voice recordings simultaneously. Clients are requested to provide voice recordings. Recording requests will be sent as links via UBC email, or Cleanfeed's embedded email service (not outsourced to a third-party). Clients are not required to have an account to use the service. On clicking the link, they are taken to a simple dashboard and may click 'record' when ready. Cleanfeed brokers the encrypted connection between the researcher and the client, and does not collect or store voice recordings. Rather, the audio file is stored within the researcher's browser space (typically Google Chrome) and made available to download locally. Cleanfeed is unable to access the voice recording.

Cleanfeed brokers the relationship between the researcher and the client. Data packets (voice recordings) are encrypted in transit, move between the researcher and client only, and are not stored by Cleanfeed to minimize security exposure and the need to house data.

With the exception of servers and data hosting, Cleanfeed does not use third party service providers for communications purposes or to conduct analytics. These activities are managed internally by the Cleanfeed team. Payment processing for researchers/administrators is completed by Stripe.

### 2.2 Risk Mitigation Table

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

Category: Privacy					
Risk	Ref#	Inherent Likelihood	Inherent Impact	Response	Residual Risk
PI stored / accessible outside of Canada	RK0020224	4 - High	4 - Major	Mitigate	2 - Low
	<b>Mitigation Plan:</b> Limited PI (primarily voice recording and user's IP address and metadata) will be stored in the UK, and processed outside of Canada. Users will be required to consent.				
Disclosing to or allowing unauthorized users access	RK0020222	4 - High	4 - Major	Mitigate	2 - Low
	<b>Mitigation Plan:</b> Only researcher initiating request has access to voice recordings and user contact information. This information is required to be kept separately and on-premise at UBC. Cleanfeed does not allow third parties to access recordings or personal information.				
Inadequate third-party information sharing controls	RK0020223	4 - High	4 - Major	Mitigate	2 - Low
	<b>Mitigation Plan:</b> Voice recordings remain encrypted within Cleanfeed's UK data center and are not shared. Users are not required to create an account or opt-in to use the software, and no contact information is collected.				
Retaining PI longer than necessary	RK0020294	4 - High	3 - Significant	Mitigate	2 - Low
	<b>Mitigation Plan:</b> Cleanfeed is not intended to be a data repository. Researchers will be required to download the audio files and save them locally within university data centers (as soon as possible and no later than research project completion).				

Figure 4 - Risk Mitigation Table



### 2.3 Collection Notice

The UBC Department of Linguistics uses the Cleanfeed audio recording tool to collect and store personal information. Cleanfeed will collect names and voice records of individuals. This 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 is used for academic research, language preservation and language education. It may also be archived for future access. Personal information collected by Qualtrics may be processed and/or reside outside of Canada, in the United Kingdom. UBC Linguistics will not disclose this information, except where required by law. Should you have any questions or concerns about the information collected, or the privacy and security of that information, please contact Murray Schellenberg, Research and Archives Manager, at 604-822-2976 or [murray.schellenberg@ubc.ca](mailto:murray.schellenberg@ubc.ca).

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

Users will provide consent to use Cleanfeed to facilitate voice recording as part of broader research consent required by Research Ethics Board.

### 2.5 Consent Withheld Procedure

If consent is withheld, researchers may opt to use Zoom, MS Teams, or a similar platform to conduct voice recording. These have significant audio limitations and are not preferred but would be used if a user declines to consent or withdraws consent.

## PART 3: SECURITY OF PERSONAL INFORMATION

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### 3.1 Physical Security Measures

Project is required to comply with UBC Information Security Policy (SC-14).

### 3.2 Technical Security Measures

Project is required to comply with UBC Information Security Policy (SC-14).

### 3.3 Security Policies, Procedures, and Standards

Project is required to comply with UBC Information Security Policy (SC-14). Privacy staff have had limited visibility into or access to Cleanfeed's own information security policies, practices, or standards. This review is completed based on information that is publicly available and has been provided by the project, as well as the Cleanfeed team.

### 3.4 Tracking Access / Access Controls

Researchers are required to have an account with Cleanfeed and sign into the site to administer and manage recording sessions. Users do not require an account. They will access the web site by clicking the link sent to them by the researcher via email.

## PART 4: ACCURACY, CORRECTION, AND RETENTION

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### 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

Personal information gathered by Cleanfeed may before the purposes of analytics is permanently anonymized, and removed per Cleanfeed's Terms of Service (this may take up to three months after deletion). Voice recordings remain on researcher's browsers until removed. Researchers are responsible for data retention and removal of recordings from their browsers once the project is completed.

## PART 5: FURTHER INFORMATION

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### 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

The recordings will initially be used by the researchers for academic study; they will subsequently be preserved and held available (subject to cultural restrictions) for community members and other scholars to access for future use/analysis. Access will be governed subject to Research Ethics Board requirements.

### 5.3 Other Applicable Legislation and Regulations

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

## PART 6: ACCESS AND PRIVACY MANAGER COMMENTS

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### 6.1 Information or Materials Reviewed

Cleanfeed Terms of Service (includes Privacy information), white paper, web site, and correspondence with vendor.

### 6.2 Information or Materials Not Available for Review

Bytemark (not reviewed, ostensibly ISO27001 compliant) is used to host Cleanfeed Tier 1 (data) and Tier 2 (encrypted communications) servers. Stripe (not reviewed) is used for researcher payment processing. No third-party sub-processors are used for communications or analytics.

### 6.3 Analysis and Summary

Personal information collected is limited to name (alias) and computer metadata (IP address, browser and network connectivity information). This information is securely stored outside of Canada. Privacy notification and consent statement are required. The information provided for the review has established that Cleanfeed can be used in the proposed manner in accordance with BC FIPPA and the UBC Information Security Standards. Accordingly, Cleanfeed can be used as proposed subject to the conditions set out in the next section.

## 6.4 Conditions of Approval

Researchers must: (a) use business contact information and departmental credit cards when registering an account (b) must receive consent from clients to use the service, (c) must remove all recordings from Cleanfeed when the project is completed.

## 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 Information Systems Policy (SC14) requirements. Any change in PI collection or use will require new PIA.*

Assessment Acceptance
Murray Schellenberg

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

Distributed To
<b>Requestor:</b> Murray Schellenberg <b>Project Manager:</b> Murray Schellenberg <b>Owner:</b> Murray Schellenberg <b>Risk Advisor:</b> Christian Stockman, Information Security Risk Advisor

*PIA Request History:*

PIA Request Date	Report Created
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