

PIA01823 – Hopin - Virtual Event Platform

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
Pimkae Saisamorn	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	YYYY.MM.DD	Pimkae Saisamorn	Report Creation

Figure 2 - Document Revision History and Revision Summary

TEMPLATE REVISION APPROVAL

REVISION #	DATE	REVISED BY	DESCRIPTION
1.00	YYYY.MM.DD	Stephen Zhu	Initial release of document

Figure 3 - Major Document Revision Approval History

TABLE OF CONTENTS

PREFACE	1
Controlled Document	1
Document Control	1
CONTRIBUTORS.....	1
TEMPLATE REVISION HISTORY	1
TEMPLATE REVISION APPROVAL	1
TABLE OF CONTENTS	2
TABLE OF FIGURES	4
PART 1: GENERAL INFORMATION & OVERVIEW	1
1.1 Executive Summary	1
1.2 Description of the Program, System, Application, or Initiative Assessed.....	1
1.3 Scope of PIA	2
1.4 Related PIAs.....	3
1.5 Elements of Information or Data.....	3
1.6 Storage or Access Outside of Canada (including back-ups and recovery).....	4
1.7 Data-Linking Initiative.....	4
1.8 Is this a Common or Integrated Program or Activity?.....	4
PART 2: PROTECTION OF PERSONAL INFORMATION	5
2.1 Personal Information Flow Diagram / Table	5
2.2 Risk Mitigation Table.....	6
2.3 Collection Notice	6
2.4 Consent for Storage/Access Outside of Canada & Opt-Out Procedure (If Any)	7
2.5 Consent Withheld Procedure	7
PART 3: SECURITY OF PERSONAL INFORMATION	8
3.1 Physical Security Measures	8
3.2 Technical Security Measures.....	8
3.3 Security Policies, Procedures, and Standards.....	8
3.4 Tracking Access / Access Controls.....	8
PART 4: ACCURACY, CORRECTION, AND RETENTION	8
4.1 Updating and Correcting Personal Information	8
4.2 Decisions That Directly Affect an Individual.....	8
4.3 Records Retention and Disposal.....	8

PART 5: FURTHER INFORMATION	9
5.1 Systematic Disclosures of Personal Information	9
5.2 Access for Research or Statistical Purposes	9
5.3 Other Applicable Legislation and Regulations.....	9
PART 6: ACCESS AND PRIVACY MANAGER COMMENTS.....	9
6.1 Information or Materials Reviewed	9
6.2 Information or Materials Not Available for Review	9
6.3 Analysis and Summary	9
6.4 Conditions of Approval.....	10
6.5 Review and Distribution	10

TABLE OF FIGURES

Figure 1 - Major Document Revision Approval History	i
Figure 2 - Document Revision History and Revision Summary	i
Figure 3 - Major Document Revision Approval History	i
Figure 4 - Risk Mitigation Table.....	6

PART 1: GENERAL INFORMATION & OVERVIEW

1.1 Executive Summary

The UBC Vancouver School of Economics (VSE) Bachelor of International Economics (BIE) Career Networking Night would like to implement technology to allow for virtual interactions in light of the COVID-19 pandemic. Existing technologies, including Zoom and MS Teams, are geared towards meetings and lecturing, and are not ideal for mimicking the experiences of the career networking night.

The BIE will implement HOPIN (hopin.to), a UK-based platform that is designed for hosting virtual events with multiple interactive areas that are optimized for connecting and engaging. HOPIN allows for large group and smaller group events and interactions to occur concurrently, as well as virtual employment 'booths'. Virtual networking and exchanging of contact information is also possible, as attendees can move in and out of rooms just like an in-person event.

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

The annual Bachelor of International Economics (BIE) Career Networking Night is the flagship career event for the VSE Career Centre. This event has a reputation for providing a casual and fruitful environment where students in the BIE program can connect with professionals for the purposes of mentorship, job seeking and real-world insight. In the past, the Vancouver School of Economics Career Centre has spent over \$10,000 on this event to create a truly valuable experience. By providing full catering services, a managed bar, and a supporting team of volunteers, as well as requiring full business formal attire, this event creates an impression on all attendees. In preparing students for the event, we also hold professional etiquette preparation seminars, and assemble both student and employer bios. Last year, over 100 students, and over 50 employers/partners attended this event in person.

In choosing a physical venue, we previously utilized a sizeable lounge and adjoining lecture hall - one of the rooms serving as a centre stage and place for employers to set up informational kiosks and the second room offering an area for spontaneous networking with food and drink.

BIE students have received interviews, jobs, and mentorship opportunities as a result of this event, and it is the main channel that the Bachelor of International Economics program utilizes to facilitate employment post-graduation for its students.

Why Hopin?

This year, given the pandemic, we are looking for a video conferencing platform which can best augment the in-person BIE Career Networking Night. Hopin caught our eye as the best mode of delivery. It is designed specifically for networking, and connecting people, with a focus on human interactions and using novel ways to overcome the barriers of online conferencing.

Reflecting on various networking events we have attended in recent months using both Hopin and other video calling platforms, we want to highlight the value of Hopin, over a tool such as Zoom. Hopin supports many forms of interaction, all conveniently accessible from the main page of a given event. For MC-related portions (opening speeches, etc.) there is a centre stage where all attendees can simultaneously receive information. For group level networking, employers are able to create booths, which students can enter and leave at will from the main event page, which is a feature not directly available with Zoom. In past events, such as the UBC Arts Career Fair, employers were assigned to separate zoom rooms, and students who were interested in speaking with a particular employer were

put in wait rooms to join. A consistent point of feedback received from this event was that the process of meeting employers by joining wait rooms felt very mechanical, and impeded the casual off-the-cuff interaction which networking events are valued for. It was observed that often times, these interactions became far more formal and information-oriented, due to the fragmentation across Zoom rooms and the event itself. Hopin booths have the option to display a recorded video, which would inform students of important information (company hiring cycles, job postings, posting requirements), allowing for more meaningful conversation and connection with employers. Additionally, the booths have an option to create private one-on-one rooms should multiple company representatives be present.

Most importantly, the key feature that Hopin provides in addressing the virtual-networking shortfall is the one-on-one network matching feature, which we are excited to take advantage of. This feature randomly matches students and employers together for a 7–10-minute conversation. The one-on-one feature will be indispensable in helping bridge the initial connection by offering a ‘speed-dating’ like atmosphere, and it will guarantee that spontaneous and unplanned interactions, typically impeded by the virtual format, will occur. While we could try to mimic this feature manually through Zoom breakout rooms, the process of transitioning students from room to room in randomly pairing them with employers would be so tedious and convoluted that the charm of that specific event portion would be lost. If the conversations themselves are 7-10 minutes, the logistics and administration of switching between rooms provides a huge opportunity for confusion when administered to 150-200 people simultaneously. The slowness and worry associated with each transition would also not be in-line with the polished user experience we want to have for the event.

Regarding Hopin’s security, we have been in contact with McMaster University, and received the following in regards to how their data privacy team has implemented Hopin:

“Regarding the security of the Hopin platform, Hopin provided a very extensive security report to our Manager of Information Technology and Services, who approved our use of the platform. We are able to run events on Hopin using only the names and organizational e-mail addresses of our students and staff, and under our current license we are able to request that this information is deleted from Hopin once an event has concluded.”

We have been in contact with our Hopin representative, Harriet Jopling, regarding access to this security report. She has informed us that this report is available upon signing a short NDA. If you would like to receive the Hopin security report, please contact Harriet at harriet@hopin.to. We have informed her that we are undergoing the PIA process and she knows to expect an email from your team. Please let us know if we can connect you with her to speed up the process.

To conclude, while Zoom can be adapted for certain features required for our event, networking events are valued for their informality and lack of structure, which spark fruitful and meaningful connections. This atmosphere, despite our extensive consideration and previous experience, is simply not possible with Zoom. Hopin was designed to overcome this issue, and offer a proven way of creating a virtual informal environment. So we have arrived at the firm conclusion that this platform is worth proposing to you as a valuable tool to be added to the set of currently available platforms at UBC.

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 HOPIN by VSE BIE for its Career Networking Night, as outlined within this PIA. Other use-cases are not sanctioned.

1.4 Related PIAs

Not applicable.

1.5 Elements of Information or Data

HOPIN collects the following information: First & Last Name, Email Address (aliases may be used)

Registration does not need to be done through HOPIN. a third-party tool can be used or personal information uploaded via CSV file. This is the recommended option for UBC's use-case, as it controls the personal information submitted and limits the potential for additional personal information to be disclosed, also avoiding the need for users to create individual accounts or login with social media (not sanctioned).

There are two “groups” of data: user data and event data. The minimum data for a user profile is first and last name and email as an identifier. The user can choose to add more data to their profile in the user profile section. If the profile is provisioned by the organizer, then profiles can be removed. If the user creates this profile themselves, they own the profile and relevant data and this can be not deleted on request. The user has the ability to delete their own profile at any time.

Other personal information may be directly or indirectly collected, including event data generated during the course of the event. This can include analytic data, IP addresses, chat logs etc. This can be exported at the end of an event for use by the organizer. Event data can be cleared from the platform at any time by the event organizer by deleting the event.

Per HOPIN: "We may collect, use, store and transfer different kinds of personal data about you which we have grouped together as follows:

- Identity Data which includes your image and first name, maiden name, last name, username or similar identifier, marital status, title, date of birth and gender. This may also include other audio-visual content which you appear in as you contribute to or interact with an Event.
- Contact Data which includes your home address, email address and telephone numbers.
- Transaction Data which includes details about payments you have made and other details of products and services you have accessed or used through the Hopin Event Platform. We do not store card details on our server. Credit and debit card payments are processed by Stripe on their secure payment server and all card details and fully encrypted and stored by them.
- Technical Data which includes your internet protocol (IP) address, your login data, browser type and version, hardware information, time zone setting and location, browser plug-in types and versions, operating system and website, and other technology on the devices you use to access the Hopin Event Platform.
- Profile Data which includes your username and password, purchases or orders made by you, your interests, volunteer record, preferences, feedback and survey responses.
- Usage Data which includes information about how you use our Platform, products and services.

Marketing and Communications Data which includes your preferences in receiving marketing from us and our third-party Platform Partners and your communication preferences.

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

HOPIN servers are located outside of Canada. All data (except for video/AR/VR) is hosted in Ireland. Video data is stored in the USA.

1.7 Data-Linking Initiative

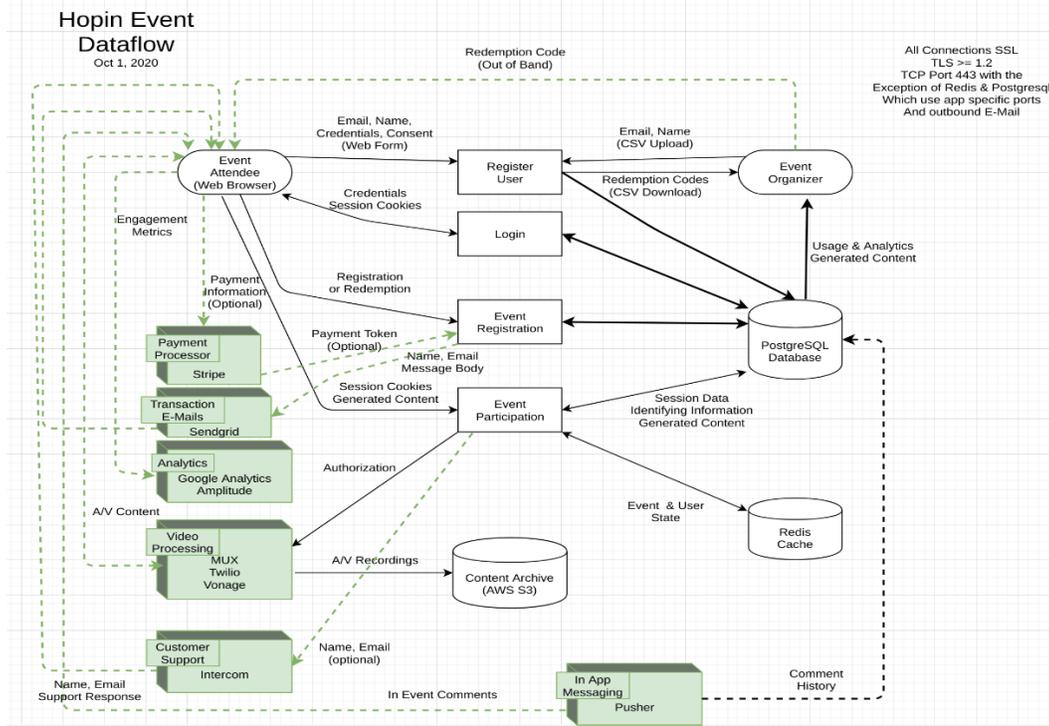
<i>In FIPPA, "data linking" and "data-linking initiative" are strictly defined; if a project is a data linking initiative, it must comply with specific requirements under the Act related to data-linking initiative</i>	
1. <i>Personal information from one database is linked or combined with personal information from another database;</i>	No
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>	No
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>	No
This is not a data linking initiative.	

1.8 Is this a Common or Integrated Program or Activity?

<i>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.</i>	
1. <i>This initiative involves a program or activity that provides a service (or services);</i>	No
2. <i>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;</i>	No
3. <i>This initiative involves a program or activity that provides a service (or services);</i>	No
Not applicable.	

PART 2: PROTECTION OF PERSONAL INFORMATION

2.1 Personal Information Flow Diagram / Table



If registering directly through Hopin, the attendee will also be asked to create a password:

hopin

Sign up to get started

Already registered? [Sign in](#)

First name (required) Last name (required)

Email address (required)

Password (required)

Password must be at least 6 characters.

By creating this account, you agree to Hopin's [Terms & Conditions](#) and the [Privacy Policy](#). (Required)

I agree to receive product updates and marketing communications from Hopin

[Sign up](#)

There are three options for collecting registrations with Hopin:

1. Hopin's registration system

- attendees/registrants must create a Hopin Account
- attendees/registrants will register/obtain a ticket on Hopin's registration system to enter your event
- the organizer can add custom registration fields to collect more data on your users. These will appear in the data analytics

2. Magic Link Solution (**SOLUTION TO BE USED BY UBC VSE**)

- Attendees/registrants register for your event on a 3rd party registration system OR the organizer will already have a CSV list of all the attendees for the event (first name, last name, and email are required)
- The organizer exports the attendee database from the 3rd party registration system (if using one) into a CSV file and imports that file into Hopin (using Hopin's template for this process)
- Once uploaded, Hopin will generate a unique URL code for each of your users based on their email
- Organizer will send this URL out either through a Hopin generated email, or organizer's own email
- Attendees will click on the link, agree to HOPIN's terms of service, and then be brought straight to the event reception page
- An account is made for attendees automatically and they do not need to register through Hopin

3. Zapier or direct integration

- If organizer's 3rd party registration system integrates with Zapier, Option #2 can be automated
- instead of manually uploading the attendee data through a CSV into Hopin, the Zapier/integration zaps the registration from the 3rd party system directly into Hopin and the email containing the magic link is sent automatically (either right away, or with an added delay)

2.2 Risk Mitigation Table

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

Category: Privacy					
Risk	Ref#	Inherent Likelihood	Inherent Impact	Response	Residual Risk
Over collection of personal information	RK0020463	4 - High	4 - Major	Mitigate	3 - Medium
	Mitigation Plan: Personal information collection will be limited to name and email address.				
PI stored / accessible outside of Canada	RK0020378	4 - High	4 - Major	Mitigate	3 - Medium
	Mitigation Plan: Users will submit name and email address only. Consent will be required for information stored outside of Canada.				

Figure 4 - Risk Mitigation Table

2.3 Collection Notice

The UBC Vancouver School of Economics (VSE) uses HOPIN, an online collaboration platform that allows users to interact with peers and industry partners in a variety of event settings. Participants at the 5th Annual BIE Career Networking Night will be required to register with HOPIN. 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. The UBC VSE will not disclose this information to employers or other third parties, except where required by law. All personal information will be removed from HOPIN within 30 days of the end of the event. By providing this information to the UBC VSE and HOPIN, you are consenting to the storage and/or access of this information outside of Canada by HOPIN and its affiliates. HOPIN's Privacy Policy governs the collection and use of data (<https://hopin.com/privacy>). 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 HOPIN. Should you have any questions or concerns about the information collected, or the privacy and security of that information, please contact the VSE Career Center Coordinator at VSE.Careers@ubc.ca.

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

Consent will be required for the collection and storage of personal information outside of Canada. UBC can also add their own privacy statement, and terms of service either by using custom fields on the HOPIN registration page for each event they host, or sent via email using HOPIN's custom email templates or UBC's email communication (preferred).

2.5 Consent Withheld Procedure

Students are not required to attend the event, but if they choose to do so, would be limited to accessing the event by using HOPIN.

Per HOPIN: "Students should not be forced to use Hopin if they do not wish to. All users must agree to our Terms of Service before they can create an account to attend an event on Hopin. Attendees/users may request deletion of their data from our servers at any time by emailing support@hopin.to."

PART 3: SECURITY OF PERSONAL INFORMATION

3.1 Physical Security Measures

This project is required to comply with UBC Policy SC14.

3.2 Technical Security Measures

This project is required to comply with UBC Policy SC14.

The minimum acceptable TLS standard in use by the company is TLS v1.2 for data in transit. All sensitive data in transit and at rest must be encrypted using strong, Advanced Encryption Standard (AES) industry-recognized algorithms.

3.3 Security Policies, Procedures, and Standards

This project is required to comply with UBC Policy.

Privacy staff have had limited visibility into or access to HOPIN'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 HOPIN team. HOPIN is preparing for its initial SOC 2 audit cycle in Q4/2020, and anticipates issuance of a SOC 2 Type I report in Q1/2021 and will immediately enter the auditing window for the SOC 2 Type II. HOPIN is aligning its policies and procedures against ISO27001 and does not anticipate a certificate of compliance before late 2021. Additional information may be found in HOPIN's Policy Packet. This information, in addition to publicly available documentation, indicate that HOPIN employs robust standards and practices, including AES-256 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 HOPIN has yet to complete third-party audit.

3.4 Tracking Access / Access Controls

Access to personal information will be limited to UBC VSE BIE staff on a need-to-know basis, and HOPIN technical support staff.

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

Project is required to adhere to UBC Records Retention policies. At the end of contract, data is scheduled for deletion. There is a 30-day grace period for the organizer to retrieve any data they require to satisfy data portability requirements. After this, data will be securely deleted from the platform. The servers for HOPIN are hosted in Europe, and while the project will be ensuring that all PI is deleted immediately following the event, the PI will be stored briefly on a European server.

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 legislation or regulations for this review or for this initiative.

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

6.1 Information or Materials Reviewed

HOPIN: Privacy Policy, Terms of Service (web), Terms and Conditions (printed), Company Policy Packet, Data Processing Agreement, Sub-processor Addendum, ISO27001 Certificate.

Documents reviewed are outlined in the following table:

Information Reviewed	Date Received
Hopin Data Flow Diagram.png	2021-01-13 22:59:40
Hopin Data Processing Agreement 16.09.2020.docx	2021-01-13 22:59:41
Hopin Policy Packet.pdf	2021-01-13 22:59:41
HOPIN Privacy Policy.pdf	2021-01-13 22:59:40
HOPIN Signup.png	2021-01-22 21:21:18
HOPIN Terms & Conditions.pdf	2021-01-13 22:59:40
Hopin Terms and Conditions.docx	2021-01-13 22:59:41
hopin-subprocessor-addendum.pdf	2021-01-13 22:59:41
Pasted image.png	2021-01-13 22:58:51
Screenshot 2021-01-19 at 18.16.14.png	2021-01-22 21:21:57
University of British Columbia, Security Requests.xlsx	2021-01-13 22:59:41

6.2 Information or Materials Not Available for Review

SOC2 Type 2 Report is in progress.

6.3 Analysis and Summary

The information provided for the review has established that the HOPIN software and the virtual networking event, can be used in the proposed manner in compliance with FIPPA and UBC policies and standards.

The following are the key factors in that determination:

- Personal information is collected, used, and disclosed in accordance with FIPPA.
- Personal information is collected, stored, and accessed within Canada, and outside of Canada with appropriate consent.
- Personal information is not disclosed to third parties.
- Access to HOPIN requires use of a valid login credentials with appropriate access authorities.
- Information is kept secure during transmission and at rest.

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

6.4 Conditions of Approval

- The UBC VSE will use the Magic Link (CSV file) upload of personal information only, other use-cases require another PIA; user registration into HOPIN must be completed by UBC staff using CSV files, to minimize disclosure, and to avoid user error in registration; users may not use their personal social media credentials to in conjunction with HOPIN (e.g. to register or log in).
- Change in use, including enhanced use not outlined within this review, or use of HOPIN for other purposes not disclosed within this review, requires a new PIA.
- Request to collect additional personal information beyond name and email, including student number, biography, photo, and picture, is not authorized by this PIA.
- Compliance with UBC's Implementation Checklist (<https://privacymatters.ubc.ca/pia-guidelines-tools>).

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
Owner - Nancy Clarke

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

Distributed To
Requestor: Oliver Gianacopoulos Project Manager: Stephen Zhu Owner: Nancy Clarke Risk Advisor: Christian Stockman

PIA Request History:

PIA Request Date	Report Created
2020-10-09 17:10:09	2021-01-28 10:23:05