

# PIA01839 – Envoke Email Marketing Platform

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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	2020-12-15	Pimkae Saisamorn	Report Creation

Figure 2 - Document Revision History and Revision Summary

#### TEMPLATE REVISION APPROVAL

REVISION #	DATE	REVISED BY	DESCRIPTION
1.00	2020-12-15	Doina Strusievici	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

Envoke will be used to send out email campaigns to students, alumni and subscribers on upcoming courses and programs, new offerings, webinars, reminders, and noteworthy events. UBC Extended Learning (ExL) uses its own website ([extendedlearning.ubc.ca](http://extendedlearning.ubc.ca)) to facilitate an email subscription process. Subscriber /Student emails are automatically extracted from ExL's student registration system (OASIS) and uploaded to Envoke on a periodic basis via batch process. The same information of unsubscribed users is updated to OASIS so that the subscriber list is kept up-to-date. Envoke also provides reporting capabilities and only aggregate information (no personal information) is displayed.

Currently, Envoke does not integrate with any UBC systems although there is plan for the integration between Envoke and OASIS. There will not be any CWL integration. Envoke is Canadian-based mass email provider. Envoke production and backup servers are internally managed and hosted by Envoke in Ontario and Quebec, Canada.

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

UBC ExL uses Campaigner to send out email campaigns to students, alumni and subscribers on upcoming courses and programs, new offerings, webinars, reminders, and noteworthy events. Contract with Campaigner ends Dec 31, 2020 and Marketing will implement Envoke, an email vendor that is Canadian based, used by other UBC units, FIPPA compliant and has passed previous PIA's. The switch over will take place from November – December 2020.

#### 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

The scope of this PIA is the implementation of Envoke for direct use by UBC staff who are authorized to use the product on behalf of UBC.

### 1.4 Related PIAs

Not applicable.

### 1.5 Elements of Information or Data

Students/Subscribers: first name, last name, email address.

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

Not applicable, Envoke production and backup servers are internally managed and hosted by Envoke in Ontario and Quebec, Canada.

### 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>	<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 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?

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

## PART 2: PROTECTION OF PERSONAL INFORMATION

### 2.1 Personal Information Flow Diagram / Table

First name, last name and email address of students or subscribers who sign to receive upcoming courses and programs, new offerings, webinars, reminders, and noteworthy events is uploaded to Envoke for mass emailing. The same information of unsubscribed users is updated to OASIS so that the subscriber list is kept up-to-date.

## 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
<b>Retaining PI longer than necessary</b>	RK0020412	4 - High	3 - Significant	Mitigate	3 - Medium
	Mitigation Plan:  The project to consult with the UBC Records Management Office to ensure the current data retention and destruction practices for information (e.g., subscribed contacts, inactive contacts, hard bounced contacts, unsubscribed contacts, student lists, etc.) stored in Envoke are consistent and aligned with the UBC Records Management Policies.				
<b>Inadequate controls for volume of personal information</b>	RK0020378	4 - High	4 - Major	Mitigate	3 - Medium
	Mitigation Plan:  The project to ensure that the following risk mitigation actions be implemented: <ol style="list-style-type: none"> <li>1) UBC data (production and backup) stored in Campaigner server is permanently destroyed in accordance with the UBC Information Security Standard #09 - Outsourcing and Service Provider Access.</li> <li>2) No high-risk or sensitive information contains in any Envoke email content due to the technical infeasibility of end-to-end email encryption.</li> </ol>				
<b>Inadequate third-party information sharing controls</b>	RK0020379	4 - High	4 - Major	Mitigate	3 - Medium
	Mitigation:  The project to arrange with Envoke to sign on the Security and Confidentiality Agreement (SACA) or another agreement that contains equivalent requirements before access to UBC data is provided and Envoke must agree to protect any information they may access and to comply with the FIPPA legislation. During the course of the review, it was noted that the Terms of Service has been signed by Envoke.				
Category: Security					
Risk	Ref#	Inherent Likelihood	Inherent Impact	Response	Residual Risk
<b>Weak or absence of information security design controls</b>	RK0020413	4 - High	4 - Major	Mitigate	
	Mitigation:  The project to ensure that the following risk mitigation actions be implemented and per suggested timelines by Envoke: <ol style="list-style-type: none"> <li>1. Active monitoring process/tool for intrusion attempts and cybersecurity events, e.g., simultaneous login from multiple locations, escalation of privileges, attacks against applications (CSS, CSRF). Target completion: May 2021</li> <li>2. Implementation of web application firewall protection for UBC-supported servers. Target completion: July 2021</li> <li>3. Use of non-production data in non-production environments. Target completion: July 2021</li> <li>4. Re-configuration of password requirements in accordance with the UBC Password Standard of 10 characters length and complexity. Target completion: June 2021</li> </ol>				

Figure 4 - Risk Mitigation Table

### 2.3 Collection Notice

Students and subscribers are given a standard personal information collection notice before they provide their personal information. This discloses the legal authority to collect information, the purpose for collection, and contact information for asking for clarification. It is expected that the students and subscribers will approach UBC ExL if they have any privacy questions about the use of Envoke. Such questions can be passed along to the PrISM team if necessary.

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

Consent model is not required by this project due to the storage, access and disclosure of PI primarily occur in Canada.

### 2.5 Consent Withheld Procedure

Consent model is not required by this project due to the storage, access and disclosure of PI primarily occur in Canada.

## PART 3: SECURITY OF PERSONAL INFORMATION

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### 3.1 Physical Security Measures

This project is required to comply with UBC Policy SC14 and applicable UBC Information Security Standards.

### 3.2 Technical Security Measures

This project is required to comply with UBC Policy SC14 and applicable UBC Information Security Standards.

### 3.3 Security Policies, Procedures, and Standards

This project is required to comply with UBC Policy SC14 and applicable UBC Information Security Standards.

### 3.4 Tracking Access / Access Controls

Envoke implements its own password requirements however it is not complied with the UBC Password Standard. Envoke's current password requirements are a minimum of 8 characters and pass a dynamic strength calculation similar to Passwordmeter. There are no predefined requirements such as for a certain number of symbols or uppercase characters. This observation is included in the risk mitigation table.

## PART 4: ACCURACY, CORRECTION, AND RETENTION

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### 4.1 Updating and Correcting Personal Information

The subscriber list is kept up-to-date.

### 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

Campaigner data deletion plan:

UBC data will be downloaded from Campaigner by end of contract (Dec 31, 2020). Once the account is closed, the data will be purged into Campaigner system. The deletion is designed to be non-recoverable within 30 days.

Envoke records retention and destruction practices:

- Subscribed contacts will be kept in the Envoke system as long as they wish to receive emails from UBC ExL.
- Inactive contacts (contacts who haven't opened an email for a period) or hard bounced contacts (bad emails) will be purged on a regular basis.
- Unsubscribed contacts will not be deleted from Envoke as UBC ExL wants to have a record of the subscription status for verification but these contacts won't receive emails unless it is "mandatory communication".
- For student lists, only data for contacts who registered for ExL courses in the past 2-3 years and have a subscriptions preference set to "yes" will be uploaded to Envoke.

It is recommended that the project consult with the UBC Records Management Office to ensure the current data retention and destruction practices for the above information stored in Envoke are consistent and aligned with the UBC Records Management Policies.

## 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

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.

## PART 6: ACCESS AND PRIVACY MANAGER COMMENTS

### 6.1 Information or Materials Reviewed

The provided information was deemed reasonable to provide an understanding of operating privacy and security controls.

### 6.2 Information or Materials Not Available for Review

Not applicable.

### 6.3 Analysis and Summary

The privacy and security risks were noted during our review. The project has accepted and agreed to implement the remediate actions as per the risk mitigation plan outlined above to minimize risk exposures and to comply with FIPPA and UBC Information Security Standards.

### 6.4 Conditions of Approval

The project to ensure the implementation of the risk mitigation actions during the post implementation phase of Envoke and as per timeline provided by Envoke.

### 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 - Doina Strusievici

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

Distributed To
<b>Requestor:</b> Doina Strusievici <b>Project Manager:</b> Doina Strusievici <b>Owner:</b> Doina Strusievici <b>Risk Advisor:</b> Pimkae Saisamorn

PIA Request Date	Report Created
2020-11-05 12:30:36	2020-12-15 22:38:59