

# PIA01851 – Slido

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	2020-12-16	Christian Stockman	Report Creation

Figure 2 - Document Revision History and Revision Summary

#### TEMPLATE REVISION APPROVAL

REVISION #	DATE	REVISED BY	DESCRIPTION
1.00	2020-12-16	Lindsay Callan	Initial release of document

Figure 3 - Major Document Revision Approval History

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## PART 1: GENERAL INFORMATION & OVERVIEW

### 1.1 Executive Summary

Slido is a software as a service Q&A and polling platform provided through a cloud-based infrastructure that enables real-time active engagement of participants at a meeting, training, workshop or event. Faculty and staff at UBC wish to use Slido with their virtual events in a variety of settings, including classes and meetings, including those held via Zoom and Pheedloop. UBC Faculty of Medicine Continuing Professional Development (CPD) unit wishes to use Slido for participant engagement.

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

UBC CPD offers medically accredited conferences which are currently offered virtually. To facilitate polls and Q&A we use Slido.com as a service to improve the processes as this system is far superior to the Q&A and polling in Zoom as our events gather thousands of people - Slido.com services better manage multiple users.

#### 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

Slido use for virtual meetings and events by UBC CPD, via Slido web site, integrated with videoconference capabilities.

Out of Scope: Review of privacy and security risks of Slido API integration with Zoom and Pheedloop; personal information gathered from non-administrative users of Slido mobile app.

### 1.4 Related PIAs

Reference	Description
PIA01880	Audience Response System using Slido
PIA01560	Using Slido in my classes

### 1.5 Elements of Information or Data

Slido does not have a way to formally register users, and users are not required to supply any personal information to use the service. Users join via a non-unique session ID supplied by the administrator. Slido administrators are required to create an account in order to run sessions. Personal information collected from administrators will be limited to names and business contact information.

On submitting a question, the user has the option to supply their name (or alias), otherwise the question will be submitted using the default setting, "Anonymous." Users may opt to submit their name, company ID and email as part of their session profile.

Personal information collected includes IP address and geolocation, as well and system logging data gathered by cookies (see table below).

Per Slido's Privacy Policy:

Category & Who it relates to	Controller	Legal Basis & Purpose
<u>Participant profile data:</u> name, email address and company (optional)	Customer	Contract with Customer: provision of the Services only (Service provision may include support, maintenance and protection of the Service in all cases)
<u>Participant content data in Enterprise plans:</u> questions, poll answers, ideas, chats - simply content shared by participants and related to a non-anonymous individual (optional)	Customer	Contract with Customer: provision of the Services only
<u>Participant content data in other plans:</u> questions, poll answers, ideas, chats - simply content shared by participants and related to a non-anonymous individual (optional)	Slido, Customer	Contract with Customer and/ or legitimate interest of provision, tailoring and improvement of our Services, development of new ones
<u>Organiser profile data + contact data of representatives</u> involved in the procurement, legal, IT & security and audit processes: name, email address, company	Slido, Customer	Contract and/ or legitimate interest of provision, tailoring and improvement of our Services, development of new ones and marketing This may include e.g. registration, account management, feedback, education, product news etc.
<u>Other organiser data:</u> video & voice	Slido, Customer	Consent and/ or legitimate interest of provision, tailoring and improvement of our Services, development of new ones and marketing This may include e.g. support, user experience research calls, testimonial
<u>Organiser purchase data:</u> e.g. invoices. We do not collect payment card information - this is collected directly by the payment gateway (optional)	Slido, Customer	Contract and/ or legitimate interest of provision, tailoring and improvement of our Services, development of new ones, sales and marketing This may include e.g. procurement, sales, contracting, reviews, billing, accounting, statistics etc.
<u>User technical data:</u> Most of this data is not personal data, but some may be in some circumstances. E.g.: - device data (e.g. hardware model, operating system version, unique device identifiers), - log data (e.g. your search queries, details about your connection such as IP address, date, time, edge-location, ssl-protocol, ssl-cipher or time-taken to serve you requested site, device event information such as crashes, system activity, hardware settings, browser type, browser language, the date and time of your request and referral URL) - location information (IP address) - unique application numbers - browser local storage and application data caches	Slido	Contract and/ or legitimate interest of provision, tailoring and improvement of our Services  Cookie Policy: <a href="https://www.slido/cookie-policy">https://www.slido/cookie-policy</a>
<u>Cookies and other trackers:</u> Essential, analytical and advertising cookies	Slido	Contract, consent and/ or legitimate interest of provision, tailoring and improvement of our Services, development of new ones and marketing

<u>Contact data of people reaching out to us:</u> E.g. on our web forms, chat, email, demo, contact us, newsletter, webinars, masterclasses, feedback etc. Usually name, email, company, rarely voice and video.	Slido	Consent and/ or contract with the person and/ or legitimate interest of provision, tailoring and improvement of our Services, development of new ones, sales and marketing
<u>Leads contact data:</u> usually name, email, company.	Slido	Consent and/ or contract with the person and/ or legitimate interest of provision, tailoring and improvement of our Services, development of new ones, sales and marketing
<u>Partners contact data:</u> e.g. events professionals. Usually name, email, company.	Slido	Contract and/ or legitimate interests of cooperation to provide the best Service possible

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

Slido is a company based in Slovakia, with offices around the world. Slido uses third party cloud service providers infrastructure by AWS based in Ireland, Germany, and the United States.

### 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 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>	<b>No</b>
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>	<b>No</b>
3. <i>The common or integrated program/activity is confirmed by written documentation that meets the requirements set out in the FIPPA regulation.</i>	<b>No</b>
Not applicable	

## PART 2: PROTECTION OF PERSONAL INFORMATION

### 2.1 Personal Information Flow Diagram / Table

Users will not be required to create an account to use the service, or download any software. The service can be accessed through via a link to the Slido web site (preferred) or via the mobile app (out of scope for this PIA). Users join a session by entering an administrator-generated event/session code. This code is not unique to the user and may be reused. Once inside the interface, users can submit questions, view questions submitted by other users, upvote others' questions and respond to polls.

Users have the option to submit their names (or an alias) when they submit a question, but the default option is to submit anonymously. Users also have the option, via a link in the interface (via a profile popup), to submit their name, company, and email address. This information is retained for the duration of the session. Per Slido: "To deliver the best interaction at this event, Slido may collect some information about you. With your consent, you allow the event organizer to use your name, email address with your activity in Slido. When you send a question with your name, it can be shown next to your question to other event participants as well as on a projection screen. Event organizers will be also able to see it in the event analytics and infographics report that can be shared publicly. Your email and company name will be available only to the event organizer. You can change or delete any information about you in My profile section if you wish so.

Account administrators will use their business contact information to register for and administer Slido accounts. After choosing their preferred plan, an administrator will need to sign up using their name, surname, an individual email address and a password via the website or the mobile app and create an account in order to create an event via the Service and use the features of their chosen plan.

For Zoom meetings, users will toggle between Zoom and Slido web sites. The web sites are not integrated. For Pheedloop, the Slido link is embedded from the back-end and displays live as a 'tab' that people also toggle to but it redirects to the Slido website. Slido will not have access to any private information stored on Pheedloop.

### 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
Indirect Collection of PI	RK0020421	4 - High	3 - Significant	Mitigate	2 - Low
	Mitigation Plan: In using the services Slido will collect user IP addresses (geolocation) and device data via cookies. Users will be provided a privacy notification and be required to consent prior to joining a session.				
Inadequate controls for volume of personal information	RK0020405	4 - High	4 - Major	Mitigate	1 - Very Low
	Mitigation Plan: Slido will be primarily used to collect questions and answers from videoconference participants. Users may submit their names as part of the Q&A process, but are not required to do so. Users are also not required to download or install any software to use the service.				

Figure 4 - Risk Mitigation Table

### 2.3 Collection Notice

Slido collects personal information, including IP address (geolocation), device data, and optional personal information you may provide, including name and email address. This information is collected for the purposes of enabling you to participate in remote learning question and answer sessions. You control how much personal information you disclose. This personal information is collected pursuant to s. 26 (c) of the BC Freedom of Information and Protection of Privacy Act (FIPPA), and will be stored outside of Canada. Use of Slido constitutes your acceptance of these terms. If you have any questions about the management of this personal information, please contact [lindsay.callan@ubc.ca](mailto:lindsay.callan@ubc.ca).

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

Users will be required to consent to having their IP address (geolocation), device data, and optional personal information (self-provided) stored outside of Canada. Using the software constitutes acceptance.

### 2.5 Consent Withheld Procedure

Use of Slido is not required for the course. Users who do not wish to have their IP address (geolocation), device data, and optional personal information collected may submit questions via alternative means, including directly to instructors by emailing the CPD.INFO email address.

## 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).

### 3.4 Tracking Access / Access Controls

Not applicable.

## 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

Slido maintains administrator data as long as the user account exists with them.

## 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

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 related to this review.

## PART 6: ACCESS AND PRIVACY MANAGER COMMENTS

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### 6.1 Information or Materials Reviewed

Slido: Privacy Policy, Terms of Service, Cookie Policy, Security Standards, Security Appendix, Data Processing Addendum, Processors (Service Providers), ISO 27001 certificate, web site, demo with project lead.

### 6.2 Information or Materials Not Available for Review

Privacy and security risks of Slido API integration with Zoom and Slido mobile app, and integration with Pheedloop (all out of scope for this review).

### 6.3 Analysis and Summary

The information provided for the review has established that Slido 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, used, and disclosed in accordance with FIPPA;
- Access to the service's administrator interface requires use of a valid login credentials with appropriate access authorities;
- Information is kept secure during transmission and at rest.

Accordingly, Slido can be used as proposed subject to the conditions outlined in the following section.

### 6.4 Conditions of Approval

1. An additional PIA is required for change in use or collection of personal information, or integrations with other UBC services in which personal information is collected or shared (including changes to integrations with Zoom and Pheedloop).
2. In advance of each session, administrators must request users to engage with Slido by using the web site version only, asking questions anonymously or using an alias, and avoid volunteering additional personal information.

## 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 - Lindsay Callan

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

Distributed To
<b>Requestor:</b> Lindsay Callan
<b>Project Manager:</b> Lindsay Callan
<b>Owner:</b> Lindsay Callan
<b>Risk Advisor:</b> Christian Stockman

*PIA Request History:*

PIA Request Date	Report Created
2020-11-18 08:33:00	2020-12-16 15:26:22