PIA01868 — Mailchimp for CTLT (Limited Scope)

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	2021-09-08	Christian Stockman	Report Creation

Figure 2 - Document Revision History and Revision Summary

TEMPLATE REVISION APPROVAL

REVISION #	DATE	REVISED BY	DESCRIPTION
1.00	2021-09-08	Caroline Luk	Initial release of document

Figure 3 - Major Document Revision Approval History

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PART 1:   GENERAL INFORMATION & OVERVIEW

1.1   Executive Summary

The UBC Centre for Teaching, Learning and Technology (CTLT) would like to use Mailchimp to send newsletters to faculty, staff and students. Mailchimp is a USA-hosted tool that is not compliant with FIPPA residency requirements, and is subject to express consent from individual users who wish to opt-into this service. Submission was required due to request by UBC Cybersecurity to ensure all internal newsletter tools are compliant and may be whitelisted for the UBC-wide external email banner requirements.

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

The Centre for Teaching, Learning and Technology was previously approved for Phase 1 of the implementation of External Email Security Warning Tag. As part of Phase 2, we have been requested to submit a PIA. We use the email tool Mailchimp to send out newsletters (CTLT Dialogues Newsletter, CTLT Events Newsletter, CTLT Edubytes Newsletter, CTLT Digest (Internal) and the Institute of Scholarship of Teaching and Learning Newsletter) to those who subscribe to our newsletters. We use the following email addresses: edu.bytes@ubc.ca, ctlt.newslettter@ubc.ca and ctlt.isotl@ubc.ca. Our CTLT Indigenous Initiatives Team uses the Campayn Email Tool to send out their Indigenous Initiatives newsletter, using the email address bronte.burnette@ubc.ca.

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

The scope of this review is Mailchimp for use by CTLT, in the manner outlined within this PIA.

1.4   Data Elements

Personal information collected includes: first name, last name and an email address.
The email addresses are used to help send regular email newsletters related to teaching and learning at UBC.

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

Mailchimp servers are hosted outside of Canada and consent will be required to collect personal information and use the service.

1.6   Data-Linking Initiative

This project is not considered a data linking initiative as contemplated under s.(36) of FIPPA.

1.7   Is this a Common or Integrated Program or Activity?

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

Personal information is collected in order to process a subscription request is collected directly from the individual subscriber.

The primary audiences for our newsletters are as follows:
- Dialogues – Majority are UBC faculty, staff, grad students, and alumni, with small amount of external higher education professionals
- Edubytes - Majority are UBC faculty, staff, grad students, and alumni, with small amount of external higher education professionals
- Digest – Internal CTLT staff only
- Events - Predominantly a UBC Audience including UBC Faculty, Staff, Grad Students, Postdocs, however also includes external professionals interested in higher education
- Indigenous Initiatives - UBC faculty & staff, students, the teaching & learning community at various post-secondary institutions, and Indigenous communities
- ISoTL - The main target audience is faculty members interested in learning about and engaging with the Scholarship of Teaching and Learning (SoTL). Secondarily, our newsletter caters to educational developers and students supporting this line of work

Collection is via online registration forms:
- https://ctlt.ubc.ca/about/newsletters/
- https://isotl.ctlt.ubc.ca/resources/newsletter/
- https://indigenousinitiatives.ctlt.ubc.ca/about/mailing-list/

This information stays within the CTLT for the purposes of sending out newsletters only.

Information is stored on Mailchimp servers for the CTLT Dialogues, Events, Digest, Edubytes, Institute of Scholarship of Teaching and Learning newsletters. Information is stored on Campayn's servers for the CTLT Indigenous Initiative's newsletter.

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
Not ensuring individuals are informed about collection	RK0020422	4 - High	4 - Major	Mitigate	2 - Low
	Mitigation Plan: Consent must be obtained from users to opt-in to having their personal information stored outside of Canada. This condition is also noted in the final assessment.				
PI stored / accessible outside of Canada	RK0021446	4 - High	4 - Major	Mitigate	2 - Low
	Mitigation Plan: Consent will be required to collect personal information and stored outside of Canada, as Mailchimp retains personal information within the USA.				

Figure 4 - Risk Mitigation Table

2.3 Collection Notice

Your personal information is collected under the authority of section 26(c) of the Freedom of Information and Protection of Privacy Act (FIPPA). This information will be used for the purpose of managing your newsletter subscriptions with UBC CTLT. By submitting your personal information, you are consenting to the storage of this information on a secure server located in the United States. Questions about the collection of this information may be directed to XXXXX@ubc.ca.

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

Not applicable.

2.5 Consent Withheld Procedure

Not applicable.

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).

3.4 Tracking Access / Access Controls

Not applicable.

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.

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 Regulation

This project is not subject to other applicable legislation or regulations.

PART 6:   ACCESS AND PRIVACY MANAGER COMMENTS

6.1   Information or Materials Reviewed
Not applicable.

6.2   Analysis and Findings
The information provided for the review has established that the software and the associated use-case, as presented by CTLT, 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 provided primarily in the context of business contact information;
- Personal information is collected, stored, and accessed within Canada, and outside of Canada with consent;
- Access to the software is limited to individuals with valid login credentials and appropriate access authorities;
- Personal Information is kept secure during transmission and at rest.

Accordingly, Mailchimp can be used as proposed subject to the following conditions of approval.

6.3   Conditions of Approval
- A change in the nature and type of personal information collected requires a new PIA;
- Adherence to UBC Records Retention Policy (personal information must be purged after a specified time period);
- Implementation of Consent Statement is required.

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
Caroline Luk

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

Distributed To
Requestor: Caroline Luk, Manager, Marketing and Communications **Project Manager:** Caroline Luk, Manager, Marketing and Communications **Owner:** Caroline Luk, Manager, Marketing and Communications **Risk Advisor:** Christian Stockman, Information Security Risk Advisor

PIA Request History:

PIA Request Date	Report Created
2020-11-30 15:37:39	2021-09-08 19:23:12