

PIA # and Name- 2302 Iris Conference from Seattle Tech

1 General Information

1. Name of Department, Branch and Program Area

UNBC Hospitality Services & UNBC Housing and Residence Life

2. Name of Program or Service Representative

Manager, Hospitality Services: Deb van Adrichem
Manager, Housing and Residence Life: Fiona Mo

3. When will the initiative take place? 8/2/23

4. Is this a one-time event?

Yes

No

5. Do you have an end date planned?

Yes

No

6. Describe the New Program or Service or the Change.

UNBC Hospitality Services and Housing & Residence Life want to use Iris Conference from Seattle TechSeattleTechnology Group to provide software for on-line registration services as well as Guest Accommodation property management. <https://www.seattletech.com/>

REGISTRATION SERVICES:

The contract with our current software provider, 'ePly by Personify', expires June 2023. Due to recent poor experiences and lack of support, we are no longer utilizing this provider. In addition, ePly is being replaced with a new product in July 2023.

GUEST ACCOMMODATION PROPERTY MANAGEMENT:

We currently have a contract with 'EMS by Accruent' and we utilize the software for Guest Accommodation bookings as well as space bookings on campus. We would like to continue using EMS for space bookings, and move all Guest Accommodation reservations to the purpose-built SeattleTech software.

7. Describe the Purposes, Goals and Objectives.

REGISTRATION SERVICES
UNBC Hospitality Services provides event management services to UNBC programs and departments to successfully host a variety of events such as: conferences, meetings, youth camps, banquets, fair vendors, fundraising events, etc... Online registration software collects registration information and payment from delegates/attendees. Our current software provider is not providing sufficient service and no longer meets expectations. Therefore, we want to establish a contract with a new provider and continue offering this service to campus.

GUEST ACCOMMODATION PROPERTY MANAGEMENT
UNBC Hospitality Services and Housing & Residence Life require an efficient, purpose-built, software solution for managing guest accommodation reservations. Our goal is to improve internal communications, external customer relations, and to maximize utilization of inventory. This will increase revenue generation and create efficiencies for staff and contractors. We require Guest Accommodation property management software to improve reservation process, increase sales, and create operational efficiencies.

8. Describe the Governance Model – who is ultimately accountable for the program or system.

UNBC Hospitality Services = Manager and team of staff
UNBC Housing & Residence Life = Manager and team of staff
Business Services = Director

9. List any Relevant PIAs

24-09 Cybersource

10. List of all interested parties impacted / Involved (i.e. who are you collecting information from, UNBC roles using PI, 3rd parties with whom you will share information)

Interested Party	Role in the initiative
Hospitality Services	Event Coordinators, Service Assistant, and Manager provide event management services and guest accommodation reservations
Housing & Residence Life	Operations Coordinator, Student & Guest Services Rep, and Manager provide guest accommodation operations and housekeeping
Finance	payment/merchant gateway and financial reconciliation
Customer / Event Attendee	internal and external customers submitting information for registrations and reservations
External Contractors	Food Service provider and Janitorial services
UNBC Security	monitor events and room reservations on campus

11. List any relevant contracts or software purchases. Be sure to follow [UNBC guidelines](#) regarding purchasing policies.

SeattleTech Cybersource

2 Collection and Use of Personal Information

12. What are the data or information elements involved in your initiative?

Data Element name, email, id#, grade	Rationale for collection, use or disclosure	Method of Collection or Disclosure	FIPPA Section (completed by Privacy)
customer contact information	rental agreements, reservation confirmations, invoices/receipts	Direct Indirect	26(c)
customer reservation details	dietary concerns , # of guests per suite, arrival and departure day/time, vehicle license/make/model for parking, name tags, delegate reports, etc...	Direct Indirect	26(c)
notification of payment	registration fees collected via Cybersource	Direct Indirect	26(c)
roommate lists	group booking room assignments	Direct Indirect	26(c)
signed rental agreements	license to use campus spaces requires signature	Direct Indirect	26(c)
		Direct Indirect	TBD
		Direct Indirect	TBD

13. Describe how [personal information](#) is to be collected

REGISTRATION
Online form completed by the event attendee. Payment is collected by UNBC approved payment gateway as part of completing the registration form.

GUEST ACCOMMODATION
Customer can either submit an online registration form or complete a fillable PDF and email conference@unbc.ca. Credit card information is phoned in separately, cheques/EFT's are also accepted. Details provided direct from the customer are entered into reservation system to create the rental agreement, issue invoices/receipts, etc... For group bookings, customer provides a roommate list which is saved in the reservation software to assign suites.

14. If you already have a collection notice, attach it as an appendix.

15. Please list all users of PI and Describe how personal information is to be used.

User (UNBC Roles e.g Governance officer)

How the info is used

Hospitality Services

Registration information will be used for collecting fees, customer relations, and creating delegate/attendee reports. For example: nametags and delegates kits, selecting appropriate meeting and dining space, and delivery of food and beverage services.

Housing & Residence Life

Reservation information is gathered for customer relations, tasks/reminders, searching suite availability, assigning suites, issuing reservation confirmations and contracts, group bookings, housekeeping status, guest check-in/out, invoicing.

Facilities, Security & Parking

will receive activity worksheets by email to track occupied spaces on campus in case of incident or emergency.

UNBC Finance

Hospitality Services will print financial reports for receipts, invoices, and reconciliation purposes. Summary information is provided to UNBC Finance

16. Do you use personal information in your initiative to make a decision about an individual?

Yes

No

17. If yes, do you have a retention schedule in place related to personal information used to make decisions?

Yes

No

18. If yes, please your approved information schedule as an appendix.

19. If you answered no, describe how you will ensure the information will be kept for a minimum of one year after it's used to make a decision that directly affects an individual.

Leading up to a reservation date:

Customer reservation files are retained in locked cabinets in the office until the reservation concludes.

Conclusion of a reservation:

All credit card information is destroyed when invoices/payments are processed. Reservation files and rental agreement are retained in the office for approximately one year. After one year, files are packed in boxes and moved to a locked storage room for another 6 years. Total retention of reservation information is 7 years.

3 Storage of Personal Information

20. Is any personal information stored outside of Canada?

Yes

No

21. Describe how PI information will be stored

For example, are you using a cloud storage (OneDrive), or Software as a Service (SaaS).

Iris Conference is an n-tier application utilizing an application web server. UNBC data is stored in a single tenant SQL Azure database. data will reside in Microsoft Azures [REDACTED].

As per Terms and Conditions of SaaS agreement with SeattleTechnology Group. Seattle Tech shall employ data security and security audit practices commonly used in the data management industry and update said procedures to stay abreast of common practices in the industry. Seattle Tech shall: (i) maintain appropriate administrative, physical, and technical safeguards to protect the security and integrity of the Service and Customer Confidential Information; (ii) protect the confidentiality of Customer data in the same manner that it protects the confidentiality of its own proprietary and confidential information of like kind, but in no event less than reasonable care, and (iii) upon UNBC's request, no more than once per year, provide UNBC with a copy of Provider's most recent SSAE 16(SOC2) Type 2 or similar third party annual audit report; ISO certification; and the results of vulnerability scans and penetration tests during the term of this agreement

22. Does your initiative involve digital tools, databases information systems?

Yes

No

If yes, please discuss with [UNBC Information Security](#) whether you also require a security and threat risk assessment

4 Research / Health System Use

23. Do you anticipate that data collected by this program / system will be used for research or health system use?

Yes

No

If "Yes" answer the following questions, if "No" please proceed to the next section.

24. Please explain and provide details of data state (aggregate, de-identified, anonymized etc.)

25. Will it be disclosed as part of Health System Use?

Provide details on the disclosure, including where and how personal information will be stored.

26. Will it be disclosed as part of Research / Open Data?

Provide details on the disclosure, including where and how personal information will be stored.

5 Disclosure

27. Will you be disclosing information to 3rd parties (i.e. non-unbc employees)?

Yes

No

If "Yes" answer the following questions, if "No" please proceed to the next section.

28. To whom will you be disclosing personal information? Provide details on the disclosure, including where and how personal information will be stored.

- Reservation reports will be emailed to service departments and contractors working on campus to provide event services and guest accommodation reservations. EG: housekeeping, janitorial, food services, security, facilities, parking.
- Delegate reports will be emailed or viewed online by the Event Host for the purpose of tracking session registration, total registration counts, and viewing payment status.
- Hospitality Services will generate delegate reports for name tags and agendas to be handed out to guests.
- Cybersource is the payment processor integrated into SeattleTech. Some information will be shared in order to reconcile payments. (See PIA 2409 for more information)

29. If personal information will be disclosed to anyone outside of Canada, provide details on the disclosure, including where and how personal information will be stored.

not applicable

6 Accuracy and Correction

30. How will you make sure that the personal information collected is accurate and complete?

Personal information will be provided directly by the customer with the online reservation form, or, by emailing a fillable pdf.

31. Do you have a process in place to correct personal information?

Yes

No

32. If yes, please describe your process below?

Staff will be provided with administrative privileges to edit reservation details within the software. Customer will be provided with a rental agreement and a Booking Confirmation with the all reservation details. Customer is required to sign each page of the rental agreement and the Booking Confirmation to acknowledge they have read and agree to the terms.

33. Describe the process of how you will make a note on the record, if you're not able to correct the record itself.

Not applicable

34. If you receive a request for correction from an individual and you know you disclosed their personal information in the last year, FOIPPA requires you to notify the other public body or third-party recipient of the request for correction. How will you ensure that you conduct these notifications when necessary?

Not applicable

7 Personal Information Banks

A personal information bank is a collection of personal information that is organized or searchable by the name of the individual or an identifying number, symbol, or other identifier. A personal information bank can be a simple list of personal information.

Personal information banks contain personal information that is:

- linked to an identifiable individual
- organized and capable of being retrieved by a personal identifier
- normally compiled for a single purpose

35. Will your initiative result in a personal information bank?

Yes

No

If "Yes", answer the following questions, if "No" please proceed to the next section.

36. Describe the business purpose for the information bank (i.e., account management of clients, student record management)

Customers who utilize the software for Registration purposes will be able to create and save a personal account to log-in to the Seattle Tech software. Creating a personal account to log-in to the software enables customers to store their personal information. It saves the customer time when they process multiple registrations. This is a feature that the customer will be able to choose (or not). They can use the software as a guest, or create an account. When an account is created a profile is also created which stores a registrants billing information. Profile information is not used to pre-fill any information on an Iris Registration form and is only used to pass over billing address to the payment gateway when making a payment.

37. If aggregate reports are generated, explain how Personal Information will be de identified or anonymized and by whom?

38. Describe the category of users and the information to which they will have access

Category of Users

Information accessed (i.e. contact info, grades, fee etc.)

39. Who is responsible for oversight of user access?

At Seattle Technology Group, Senior Developers are responsible for oversight of user access.
At UNBC, the Hospitality Services Manager is responsible for user access.

40. Who reads the audit logs, and how long are they kept?

[REDACTED]

41. What does the audit log track? How detailed is the data (e.g., date stamps, time stamps, access control number, IP address, etc.)? Does the audit log include the purpose of an access?

[REDACTED]

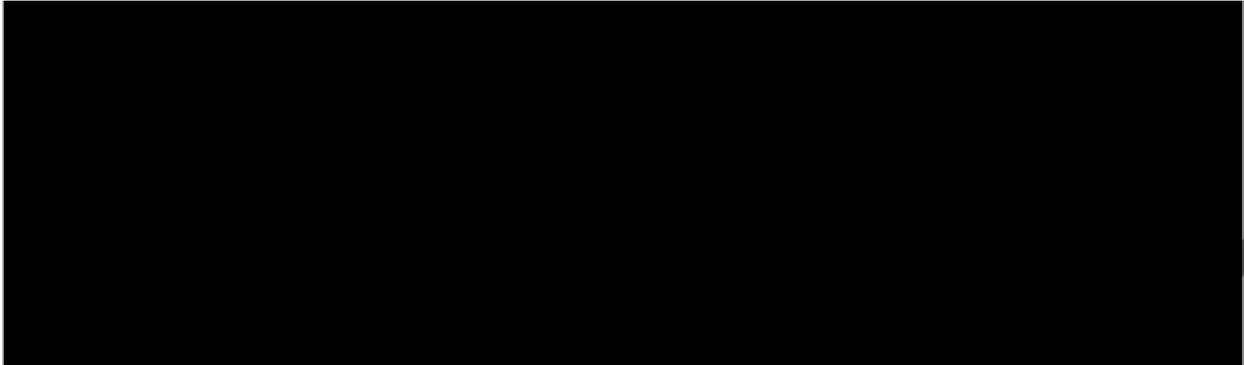
42. Are the audit logs immutable?

Yes No

43. Is there a separation of responsibility between those who supervise administration of the system, or security of the system, and those who verify the audit logs (e.g., does the auditor in the organization have a role, or is it the security department?)

Yes No

44. Is the system responsive or passive? For instance, is it possible to put a monitor on particular individuals (e.g., in a hospital setting, if a celebrity is admitted as a patient, etc.)? Will access produce an immediate response and not just a log entry for review months later?

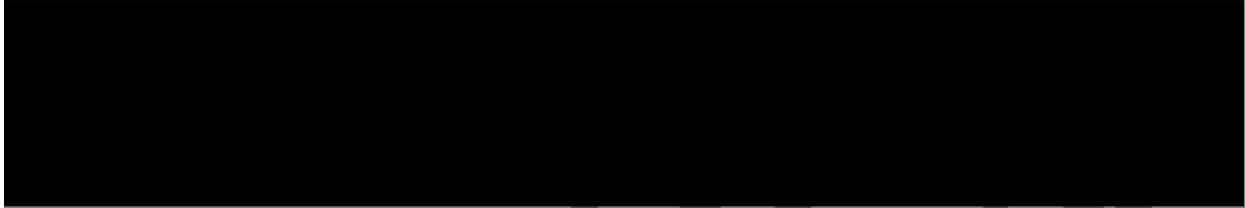


45. How will those found to abuse access privileges be sanctioned ?

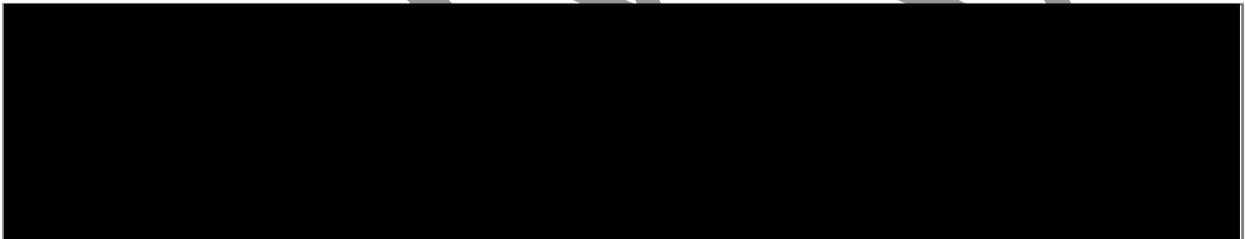
Seattle Technology Groups's Human Resource Security Policy states
"Policy violations are immediately escalated to Human Resources and company President. Corrective actions are determined based on severity, recurrence, and circumstances."

8 Privacy and Security Safeguards

46. Describe administrative safeguards (i.e. policy documents, procedures, or training).

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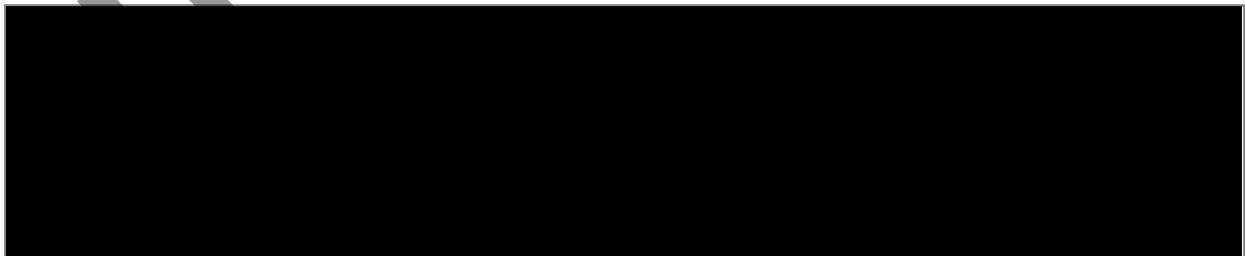
47. Describe physical safeguards (i.e. locked, filing cabinets, locked doors, or restricted areas).

A large black rectangular redaction box covering the answer to question 47.

48. Describe the controls in place to prevent unauthorized access to personal information (i.e. role-based access to software, access logs).

A large black rectangular redaction box covering the answer to question 48.

49. Describe technical safeguards (i.e. firewalls, encryption, or intrusion prevention systems).

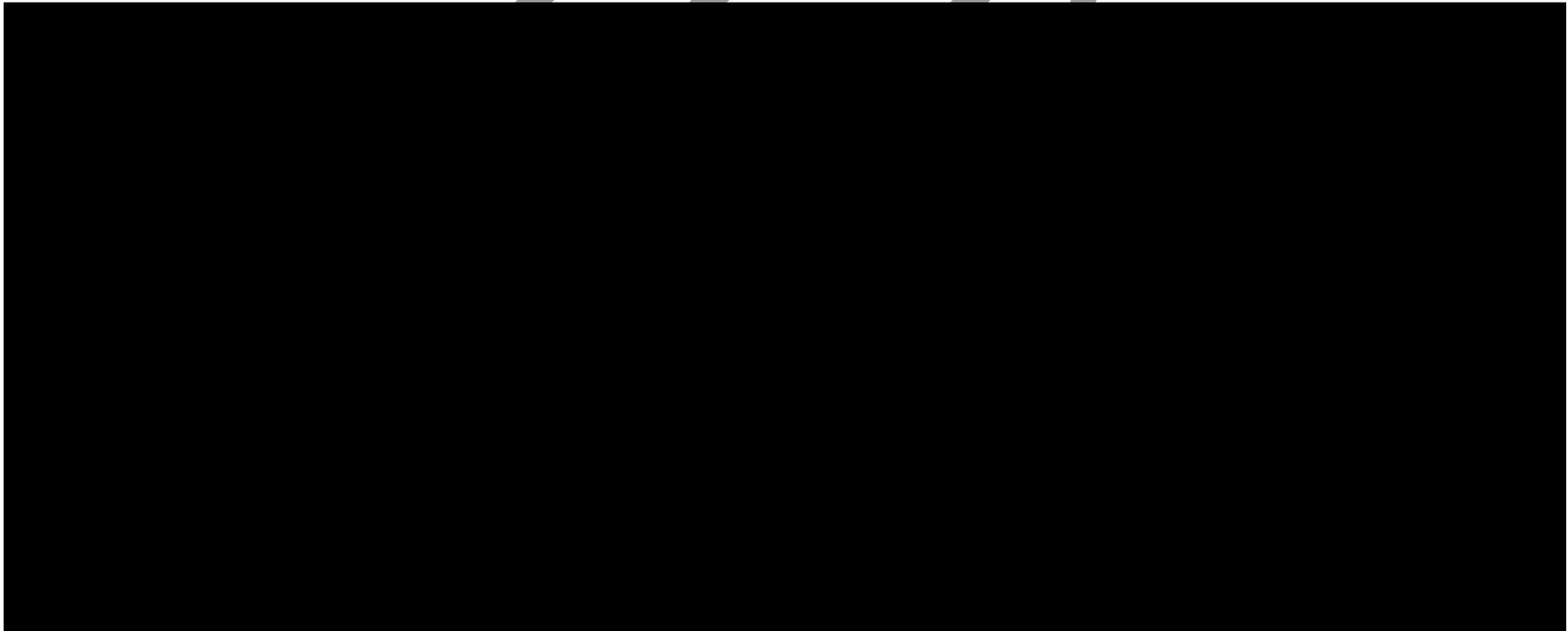
A large black rectangular redaction box covering the answer to question 49.

9 Privacy Risk Identification and Mitigation

50. Identify any privacy risks, even very unlikely ones, associated with the initiative and the mitigation strategies that will be implemented ([see risk classification table](#)).

Try to include at least one risk related to each step in the information cycle (collection, storage, access, disclosure, and destruction). **If you are disclosing or storing data outside of Canada you will need to identify additional risks related to storage/disclosure outside of Canada**

RISK	LIKELIHOOD	IMPACT	MITIGATION STRATEGY
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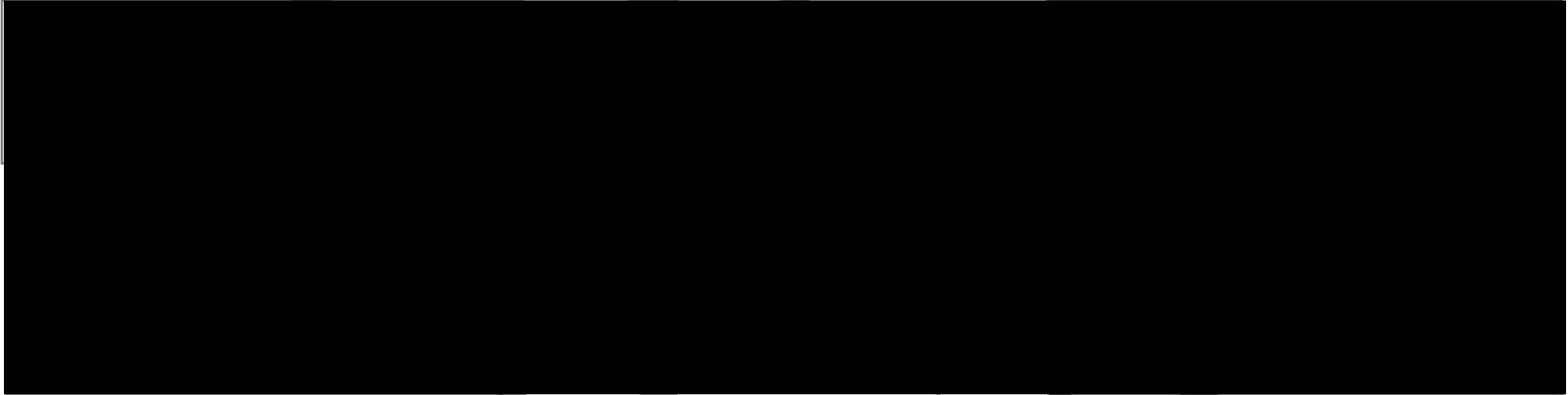


RISK

LIKELIHOOD

IMPACT

MITIGATION STRATEGY



[Redacted]

LOW
Moderate
High

LOW
Moderate
High

[Redacted]

[Redacted]

LOW
Moderate
High

LOW
Moderate
High

[Redacted]

COPY OF RECORD RELEASED JULY 31, 2024 IN RESPONSE TO FOI 24-18

10 Data Linking

In FOIPPA, “common or integrated program or activity” is strictly defined. Answer the following questions to determine whether your initiative qualifies as “a common or integrated program or activity” under the Act. If you answer “yes” to all 3 of these questions, you must comply with requirements under the Act for common or integrated programs and activities.

51. Does this initiative involve a program or activity that provides a service(s) through a public body and at least one other public body or agency working collaboratively to provide that service?

Yes

No

52. Does this initiative involve a program or activity that provides a service(s) through a public body that is working on behalf of one or more other public bodies or agencies?

Yes

No

53. The common or integrated program/activity is confirmed by written documentation that meets the requirements set out in the Regulations? (Privacy Officer will answer).

Yes

No

If this PIA addresses a common or integrated program, UNBC must submit this PIA to the Office of the Information and Privacy Commissioner and be subject to their examination, advice, and timelines.

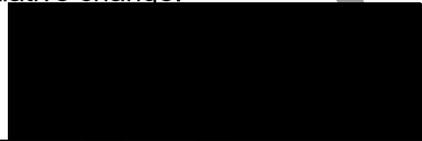
11 Conclusions and Approvals

Individual leading the Program/Project: Deb van Adrichem

Position: **Manager, Hospitality Services**

I confirm the information management practices in this initiative have been documented as accurately as I am aware. I commit to communicating appropriate information management practices to all individuals participating in this initiative. I commit to following the documented practices on this PIA, or arranging a PIA amendment if I am aware information management practices in this initiative change.

Signature: _____



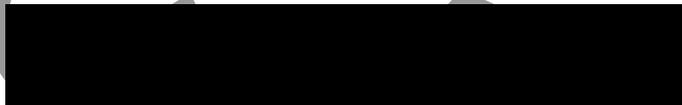
Date: _____

April 29 2024

Director/Dean Overseeing the Program/Project: **Director, Business Services**

I am accountable for overseeing my staff involved in this initiative to ensure they adhere to information management practices presented in this PIA. I will arrange for the project lead named above to contact the Privacy Officer to arrange a PIA amendment if required.

Signature: _____



Date: April 30, 2024

Name of Vice-President AVP Administration, Lisa Haslett

I confirm that this initiative to the best of my knowledge as written in the above sections, has information management practices that complies with policies and procedures of the University of Northern British Columbia.

Signature: _____



Date: May 15, 2024

Name of Privacy Officer: Christopher Ross

I confirm that this initiative to the best of my knowledge as written in the above sections, has information management practices that comply with British Columbia's Freedom of Information and Protection of Privacy Act.

Signature: _____



Date: June 21, 2024

12 Privacy Notice

All collection notices must include the:

- Purpose for the collection
- Legal authority for the collection
- Contact information for an employee of UNBC who can answer the individual's questions about the collection.

The employee should be able to explain why the personal information is being collected and how it will be used, retained, and disclosed.

The contact method should suit the collection method. For example, if you collect personal information through an online form, you could include an email contact.

You can use this template to write your draft collection notice:

Your personal information will be collected for [purpose]. If you have any questions about the collection of this personal information, please contact: name@unbc.ca.

This information is being collected by UNBC under FOIPPA 26(*).

13 Key Terms

“**personal information**” means recorded information about an identifiable individual, including,

- (a) information relating to the race, national or ethnic origin, colour, religion, age, sex, sexual orientation or marital or family status of the individual,
- (b) information relating to the education or the medical, psychiatric, psychological, criminal or employment history of the individual or information relating to financial transactions in which the individual has been involved,
- (c) any identifying number, symbol or other particular assigned to the individual,
- (d) the address, telephone number, fingerprints or blood type of the individual,
- (e) the personal opinions or views of the individual except where they relate to another individual,
- (f) correspondence sent to an institution by the individual that is implicitly or explicitly of a private or confidential nature, and replies to that correspondence that would reveal the contents of the original correspondence,
- (h) the individual’s name where it appears with other personal information relating to the individual or where the disclosure of the name would reveal other personal information about the individual.

Risk Classification Table

*Risk Levels	Likelihood	Harm
Low	Little possibility that the risk will occur due to mitigating factors	Compromise would likely not result in any significant harm to the privacy, safety, or economic standing of individuals or the corporation.
Moderate	A possibility that the risk will occur if no additional measures are taken.	Compromise would likely cause some harm to the privacy, safety, or economic standing of individuals or the corporation.
High	Near certainty that the risk will occur in the future if no corrective measures are taken.	Compromise would likely cause significant and immediate harm to the privacy, safety, or economic standing of individuals or the corporation.