



PIA01450 — DAE Alumni PBC Book Club

1.1 Executive Summary

DAE is providing UBC graduates an opportunity for free membership in an online book-club service. The book-club asks UBC DAE to confirm an applicant is eligible to join under the UBC offering. The book club service collects necessary personal information from applicants to confirm their eligibility under the UBC offering.

1.2 Project Description and Scope

Alumni UBC (specifically the UBC Alumni Relations Unit) is planning on launching an Alumni Book Club for UBC Alumni. This would consist of UBC Alumni signing up to a book club service hosted by PBC Guru (third-party service provider). The sign-up process would ask for some PII: name, email, grad year, program in order to verify the graduate was actually a grad. The sign-up process includes appropriate notifications to obtain informed consent regarding the handling of personal information, aligning with international data protection standards. No information would flow from UBC systems to PBC, but data collected by PBC would be sent back to UBC for the purposes of verification. No information save for name flows between users of the system unless the user chooses to share their information.

The proposed privacy statement (based on the generic statement crafted for DAE by Paul Hancock) is: **PRIVACY NOTIFICATION:** By checking this box you confirm that you are aware of the following: Alumni UBC uses PBC Guru in order to provide the UBC Alumni Book Club as a service to our members. In order to provide these services, PBC Guru asks you to provide personal information including name, email, graduation year, program. Please be aware that PBC Guru stores this information on servers located outside of Canada, and may provide this information to Alumni UBC and UBC under the authority of section 26(c) of the Freedom of Information and Protection of Privacy Act (FIPPA). We may also use your contact information to update our donor and alumni mailing lists, which are used by both Alumni UBC and UBC to keep donors and alumni informed about University news, events and initiatives, including fundraising. Any questions about the collection or use of this information should be forwarded to alumni.ubc@ubc.ca.

Completed under RCT - see historical Tracker; related documents are on the Network drive.

RISK CLASSIFICATION

The inherent privacy risk classification level of this PIA submission is 2 – **Low**.

The residual risk classification level of this PIA submission at closure is 2 – **Low**.

1.3 Risk Mitigation Table

Risk mitigation measures include ensuring all data handled by third-party services adheres to UBC's privacy standards and international data protection regulations.

1.4 Analysis and Findings

While certain graduate information may be publicly accessible, all personal data used for this service is handled with strict adherence to privacy laws to ensure confidentiality and security. Consequently, DAE's confirmation of such information does not pose a privacy or security concern. By applying to join the book-club, applicants consent to 'disclosure' (confirmation) of their e-mail address as part of the application process.

1.5 Conditions of Approval

None specified.

1.6 Review and Distribution

The Minister of Citizens’ Services Direction 2-21, [Privacy Impact Assessment Directions](#) requires that all PIAs “designate the appropriate level of position that holds accountability for a PIA, proportionate to the sensitivity of the personal information and/or the risks of the initiative” (s. D8).

Accountability is maintained by the role or position, regardless of who fills the role.

Under [UBC Policy SC14](#), Administrative Heads of Unit are responsible for:

- ensuring that UBC Electronic Information and Systems are secured with adequate controls, with particular care concerning User identification and validation measures;
- ensuring, as appropriate or required, that UBC Electronic Information within their area of responsibility is maintained, transmitted, and stored in a secure and consistent manner that adheres to all relevant University policies and standards;
- authorizing access for individuals to UBC Electronic Information and Systems within their area of responsibility;
- renewing, retiring, and revoking User authorizations within their area of responsibility.

Holding accountability for the privacy risks of this initiative includes:

- reviewing the mitigation strategies listed in the relevant risk tables and ensuring those strategies are maintained throughout the life of the initiative;
- ensuring accountability is transferred to any individual who assumes this role;
- if there are any changes to the initiative, including to the way personal information is collected, used, stored or disclosed, ensuring the PIA team is engaged, and if necessary, completing a PIA update; and
- understanding what your privacy obligations are, and if not, following up with the PIA team.

Assessment Acceptance	
Pradeep Nair	
Distribution	
Requestor: Pradeep Nair	
Project Manager: Pradeep Nair	
Owner: Pradeep Nair	
Risk Advisor: Robert Tremonti	
PIA Request Submission	Report Completion
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