PIA01534 — Oncehub Appointment System

PART 1: GENERAL INFORMATION & OVERVIEW

1.1   Executive Summary

The UBC Sauder School of Business MBA division uses Oncehub, an appointment scheduling system, to assist with booking advising appointments within the unit. Users are able to select appointment times and conveniently schedule discussion time slots with advisors.

This service has been in use since 2019 and will be phased out in 2022 as part of the implementation of a new CRM system based on the Salesforce platform, subject to a separate PIA. A new PIA will like likewise be required for the forthcoming replacement service.

1.2   Project Description

We require a system that allows students to conveniently sign up for appointment times on a system, and that allows a team of 4-6 Recruitment & Admissions Managers to manually and independently provide appointment times, and in varying time zones (as we do overseas appointments too). We would also require a system such as 10to8 that provides students with automatic and customizable reminders via text and email. The system we are looking at is known as 10to8: http://10to8.com PIA Advisor Note: The project has proceeded with Oncehub instead of 10to8 as outlined in the original project description above.

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

The scope of this assessment covers the implementation of an appointment scheduling tool by the business school staff who are authorized to use the product on behalf of UBC, as outlined in this PIA.

1.4   Data Elements

For advising appointments, the system collects essential contact information and academic program details.

For recruitments and admissions appointments, personal information collected includes first name, last name, email, mobile telephone number, location (country), program of interest, and resume/CV.

Oncehub also collects personal information via tracking cookies embedded within user's web browsers (e.g. Google Analytics) Users may opt out of using cookies at the start of a browsing session.

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

Includes storage outside of Canada using internationally recognized cloud services providers.

1.6   Data-Linking Initiative

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

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 FIPPA Schedule 1.

1.8   Related PIAs

PIA01785 - Sauder RHL Recruitment and Admissions System

PART 2: PROTECTION OF PERSONAL INFORMATION

2.1   Personal Information Flow Diagram/Table

Users navigate to the Sauder web page and provide their personal information via the embedded Oncehub portal, in order to schedule an appointment. Users are not required to create an account to use the service.

Advising appointments web form:

11/19/21, 3:22 PM   Advising Session (Vancouver) | Sauder School of Business at UBC, Vancouver, Canada

UBC SAUDER SCHOOL OF BUSINESS | **ROBERT H. LEE** GRADUATE SCHOOL

Advising Session (Vancouver)

Connect with a Recruitment & Admissions Manager at the Robert H. Lee Graduate School. Have your resume ready, ask questions about the program and get personalized tips during this invaluable advising session.

It is highly recommended that you visit our website to get an initial overview (ie. curriculum and admission requirements) of your preferred program prior to the advising session. Every prospective student is unique and this will enable us to have a more in-depth conversation on where you want to take your career.

Session Type:

- Video call

Program:

- UBC Full-time MBA
- UBC Master of Management
- UBC Master of Business Analytics
- UBC Bachelor + Master of Management Dual Degree
- UBC Professional MBA
- UBC JD/MBA
- UBC International MBA
- UBC MBA + MBAN Dual Degree

Date/time:

- Weekdays
- 8am – 4pm PST (30-minute sessions)

Please complete the form below and click on the "Submit" button. Our team will be in touch to set up a time for your meeting.

First Name *

Last Name *

Email *

Mobile phone *

Your location (city) *

Application Year *
- Select -

https://webforms.sauder.ubc.ca/1-1-coffee-chat-vancouver   1/2

11/19/21, 3:22 PM   Advising Session (Vancouver) | Sauder School of Business at UBC, Vancouver, Canada

Program *

[- Select -   ▼]

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 relationship with UBC. 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 mba@sauder.ubc.ca

[Submit]

Recruitment and Admissions web form:

11/19/21, 3:13 PM   UBC Sauder School of Business' Advising Chats - Online scheduling

Help

**UBC Sauder School of Business'
Advising Chats**

Hello! Please follow the instructions to book online with one of our Recruitment & Admissions Managers.

If you are considering a specific program, please book with the following:

- UBC Full-time MBA: Tina Hu

- UBC Professional MBA (part-time, weekend MBA based in Vancouver): Vivian Tran

- UBC Master of Management: Daria Patrusheva

- UBC Master of Business Analytics: Dinushi Fernando

- UBC MBA + MBAN Dual Degree: Dinushi Fernando

- UBC B+MM Dual Degree (for current UBC students or high school students only): Daria Patrusheva

https://go.oncehub.com/UBCSauderSchoolofBusinessAdvisingChats   1/3

- UBC International MBA (part-time,
weekend MBA based in Shanghai):
Weiyan Chen

- All UBC Vancouver Programs: Jade
Greer

Thank you.

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sauder.ubc.ca

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Powered by OnceHub

Provide information   Change selection

Team member	Dinushi Fernando (Change)
Meeting type	Group Advising Session
Time	Thu, Nov 25, 2021, 9:30 AM - 10:00 AM (Change) Canada; Pacific Time (Vancouver) (GMT-8:00)(Change)
Your name*	_____
Your email*	_____ Booking notifications will be sent to this email
Your mobile phone*	Canada (+1) Include area code

☐ OK to send me booking notifications via SMS

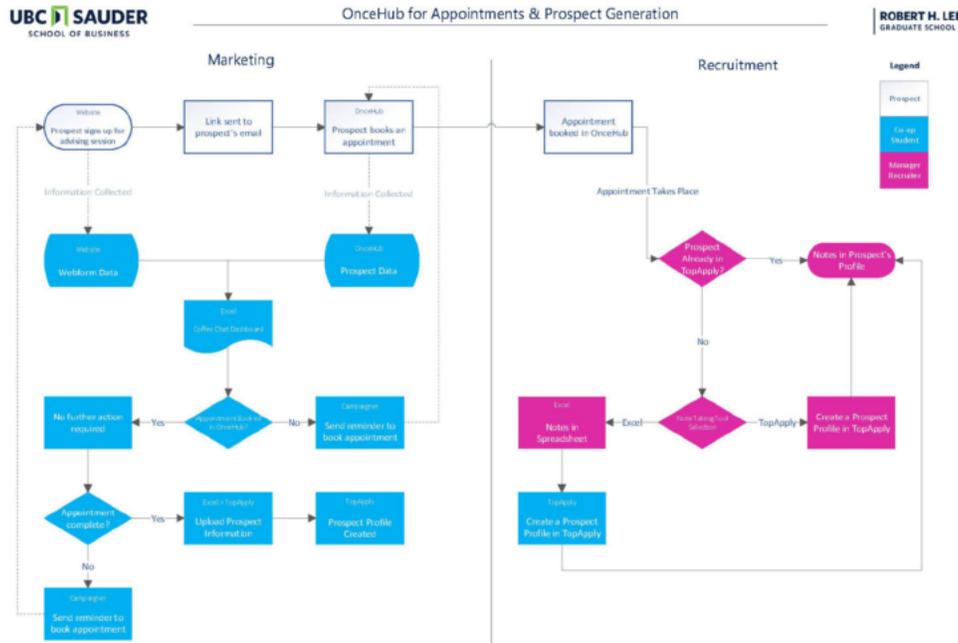|		
Resume/CV*	_____ Browse	Please upload the latest copy of your resume/CV, if available.
Country*	Please select	
What program are you interested in? *	Please select	If you're having trouble deciding, see here.
Have you started studying for the GMAT or GRE yet? (Not needed for B+MM)*	Please select	All of our full-time programs requires the GMAT or GRE.
I have read the Admissions Requirements webpage for the program of interest and I currently do not fall under any restrictions (degrees/work experience).*	☐ Yes, I have read the Admissions Requirements and do not fall under any restrictions.	Candidates who have not reviewed materials such as the website may have their appointments cancelled.

Done

In addition, the following data flow diagram has been provided in support of this PIA:

2.2   Risk Mitigation Table

Privacy Risks					
Description	**Reference #**	**Inherent Likelihood**	**Inherent Impact**	**Response**	**Residual Risk**
Retaining PI longer than necessary	RK0020973	4 - High	3 - Significant	Mitigate	3 - Medium
	Mitigation Plan: The project to consult with the UBC Records Management Office and develop a data retention and destruction plan for the personal information stored in Oncehub, AWS and Microsoft Azure. As part of this, the project should have Oncehub delete the data of servers (including backups) on a regular basis.				
PI stored / accessible outside of Canada	RK0020855	4 - High	4 - Major	Mitigate	3 - Medium
	Mitigation Plan: The project will enhance privacy notices and obtain consent before collecting, using, and disclosing personal information internationally. This includes storage location, and technical and operation supports from outside of Canada.				
Over collection of personal information	RK0020983	4 - High	4 - Major	Mitigate	3 - Medium
	Mitigation Plan: The project will ensure that only essential personal information is collected to facilitate the booking process. Unnecessary data fields will be evaluated and considered for removal to enhance privacy protection. Any additional information needed can be acquired through secure channels as appropriate.				

2.3   Collection Notice

The standard UBC consent notice has been applied on the Sauder web page where personal information is collected.

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

Users will be required to consent to having their personal information collected and stored outside of Canada. Users who elect to withhold consent for storage of their information outside of Canada are provided a different choice, typically an email option.

2.5   Consent Withheld Procedure

Users may reach out to the Sauder MBA program directly to schedule an appointment and are not required to use the Oncehub service, The PI will be collected from users when they complete the booking. The service is not required to book an appointment, however, as users will be told that they can contact the MBA Office directly for an appointment booking if they do not wish to use Oncehub. There will be a privacy and consent notification on the appointment booking page that users can see before booking an appointment.

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).

UBC requires data centres to comply with a detailed set of security requirements. Oncehub servers are hosted at AWS US. UBC has relied on publicly available documentation and vendor supplied documentation to establish a level of comfort over the physical security of AWS data centres. The physical security capabilities of AWS data centres meet the UBC standard.

3.4   Tracking Access/Access Controls

Sauder MBA staff as well as Oncehub technical support teams will have access to personal information contained within the platform.

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.

A data retention and destruction plan has not been made available and it is recommended that the project consult with the UBC Records Management Office for the records retention and destruction guidelines. This observation is included in the risk mitigation table.

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 FIPPA s. (35).

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 following documents have been reviewed in the context of this PIA. The provided information was deemed reasonable to provide an understanding of operating privacy and security controls.

6.2   Analysis and Findings
The information provided for the review has established that Oncehub and the associated use-case, as presented by the UBC Sauder School of Business, can be used in the proposed manner in compliance with FIPPA and UBC policies and standards.

The following are the key factors in that determination:
- Personal information is collected, stored, and accessed within Canada, and outside of Canada with appropriate consent;
- Personal information is not disclosed to third parties external to authorized UBC staff members;
- Access to the service requires use of a valid login credentials with appropriate access authorities;
- Information is kept secure during transmission and at rest.

Privacy and security risks were noted during our review. Specifically, concerns were raised about the overcollection and retention of personal information within the Oncehub service, and the need to address these risks. The project has been made aware of the recommended remediation actions as outlined in the risk mitigation plan to minimize risk exposures and to comply with FIPPA and UBC Information Security Standards. Accordingly, Oncehub can continue be used as proposed subject to the conditions outlines in the following section.

6.3   Conditions of Approval
- Implementation of the recommended risk mediations to limit overcollection and data retention risks.
- A new PIA will be required for the replacement service as well as any further integrations with other UBC tools/services.
- Any email plugin use that requires advisors to share their login credentials is not authorized.

6.4   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
Kevin Ly

Distribution
Requestor: Kevin Ly **Project Manager**: Kevin Ly **Owner**: Kevin Ly **Risk Advisor**: Christian Stockman, Information Security Risk Advisor

PIA Request Submission	Report Completion
2020-06-02	2021-12-03