Name of Department/Unit	Continuing Studies	Project ID	2024-08; Amendment 1
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In the following questions, delete the descriptive text and replace it with your own.

1. **Provide an overview of the changes to the original project.**

While drafting the SlideRoom PIA it was determined that Continuing Studies (CS) was also using SlideRoom for the intake of student applications for the UX Design Cohort Program under a separate license. At the time, it was determined that the CS instance would be assessed in an Amendment to the PIA given the timing of the Undergraduate and Graduate Studies enrolment window. This Amendment will outline CS's use of SlideRoom for processing UX Design Cohort Program applications.

Overview

SlideRoom is a comprehensive software as a solution system (SaaS) used to accept and review application forms, references, portfolios, and payments in one secure location. SlideRoom's online platform is predominately used by schools or other institutions to receive applications, particularly those with digital portfolios. This allows applicants to easily include images, videos, music, or any other media they've created, along with their application.

Application Submission

Applicants must create an account to access SlideRoom and submit their portfolio and any other application requirements. During account set-up, applicants use their personal email address and create a unique password for their log-in credentials. They are also required to accept SlideRoom's Terms of Use and Privacy Policy. After creating a SlideRoom account, applicants are sent an email with an activation link to finalize account creation and sign in to SlideRoom.

SlideRoom applications (also defined by SlideRoom as "portfolios") are not public, so each portfolio a student creates is in response to the instructions and required items established by the institution they are applying to, and each institution establishes their own programs, or application opportunities in SlideRoom. Programs that are currently available and accepting applications are visible in each institution's unique SlideRoom applicant portal.

Once signed in and after locating a program, applicants can click its name to view a detailed breakdown of all its requirements. They can begin applying by completing a form to provide their basic information, and then they can respond to any questions and media requests made by the program of their choice. After submitting their application, applicants can log back into their SlideRoom account to access past submissions. From here, they can view and print their application or download the media they submitted, but they cannot edit or submit changes to any previously submitted applications.

Additionally, applicants must pay a minimal fee to submit their SlideRoom portfolio ($35 USD for CS applications). Each subsequent submission requires a separate payment. Payments are processed by SlideRoom's third-party PCI compliant payment provider, Authorize.net.

Figure 1 – Landing Page for ECU SlideRoom CS Applicants (Current as of November 2024)
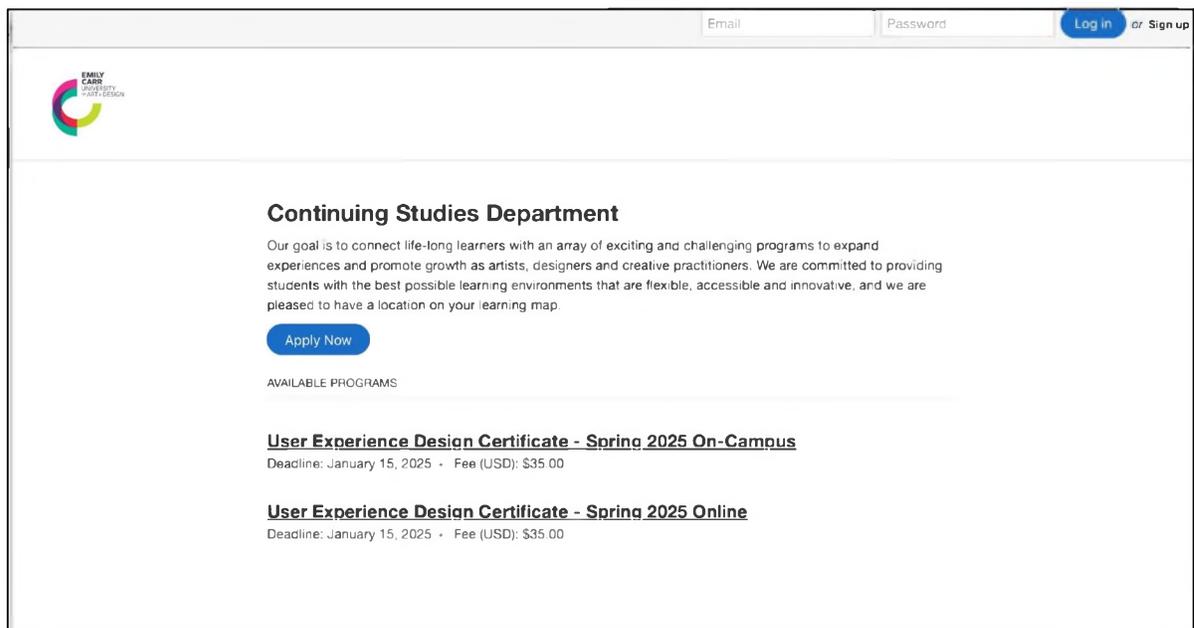
Use of SlideRoom to Date

Prior the Spring 2023 intake, email was used to collect new applications for enrolment in the CS program. For the Spring 2023 intake, CS obtained a license for SlideRoom (the "basic" version of the license, which is held by CS's Executive Director) and started collecting applications via SlideRoom.

Application Review

Once an applicant submits their application, the institution's reviewers can view and score the applications assigned to them. They can review all the media submitted as part of the portfolio section of the application and highlight or comment on any item that stands out, contact references, and review supporting documentation. Reviewers are assigned applicants by individuals who hold administrator accounts in SlideRoom.

Within Continuing Studies, review of applications is completed by the CS Manager and Programs Coordinator. To complete their review, they must access SlideRoom's reviewer site (https://review.slideroom.com), which is separate from ECU's CS SlideRoom applicant portal. Once in the reviewer site, reviewers complete their review in accordance with specifications determined by CS, which may include scoring different parts of the application using a pre-defined scoring matrix, reviewing the applicant's visual and audio portfolio and reviewing reference letters or contacting references. Review of transcripts is also currently completed in SlideRoom and has been flagged as a risk that must be resolved prior to the 2026 intake cycle.

Post-Review Activities

Once the applications have been evaluated, each institution contacts its applicants as necessary to inform the applicant of their admission's status.

Within CS, the CS Manager and Programs Coordinator finalize the status of the application, and the decision is communicated to the applicant via standard ECU CS admissions procedures. Applications and supporting files are downloaded to the CS M365 SharePoint and stored in a Programs Folder.

Applications are also archived on SlideRoom to account for FIPPA requirements to retain documentation about an individual should a decision be made about them for a minimum of one year.

2. **Describe changes to the data elements involved as a result of the change.**

The following personal information elements have been captured by SlideRoom for CS applicants.

To note: SlideRoom shares basic "Profile Details" with other institutions where an applicant applies to more than one institution via SlideRoom.

SlideRoom Profile Data
Account login
- Email address
- Password

Profile Details
- Mandatory
    - Registered as individual or organization

- First name
- Last name
- Primary address
- Country
- Phone number
- Optional
  - Suite/apt number
  - Postal code
  - Region

Application Data

- Any responses to questions posed by ECU via the application that may require a response that is personal in nature or where the application's description includes information about themselves or others
- Any voice recordings or video (voice plus image) created in response to questions / requirements outlined by ECU for the applicant
- Transcripts uploaded by the applicant (post-secondary, high school)

Reference Data (compulsory until Spring 2024 cohorts, optional from Fall 2024 cohort)

- Reference first and last name (potentially business contact information or personal depending on the nature of the relationship)
- Reference phone number and email address (potentially business contact information or personal depending on the nature of the relationship)
- Relationship to the applicant
- Ranking of the applicant's skills
- Opinions about the applicant provided by the reference (personal information of the applicant)
- Where applicable, upload of a separate reference letter to accompany information provided directly to SlideRoom

Other Forms and Documentation

- Study or Work Permit,
- Permanent Resident card (if any)
- English Proficiency Test Scores

Reviewer Scores (personal information of the applicant)

- Evaluation scores are collected; to note, the comment functionality is not used by CS when reviewing applications.

Other Personal Information Collected by SlideRoom and Not Accessible to or Collected by ECU

- First and third-party cookie data
- Device information
- IP address

- Any troubleshooting or customer service requests provided directly from the applicant to SlideRoom
- Applicant's credit card information to process application fee
  - Processed by a PCI-compliant third-party, Authorize.net, not SlideRoom, and confirmation of processing is provided to ECU via SlideRoom once the applicant completes payment to submit the application.

3. **Does the change involve any revisions to governance, accountability of the data or legal agreements reported in the original PIA? If yes, describe.**

Governance of the information collected by SlideRoom remains under ECU's oversight; however, the CS instance licensee is different than the Undergraduate and Graduate licensee.

As noted in the original PIA, the licensing agreement does not include the standard FIPPA privacy schedule, and the privacy schedule is not included in the CS agreement as well.

No FIPPA collection notice is provided on the log-in page for the CS SlideRoom instance at this time.

Part 2 – Protection of Information

4. **Describe any changes to the storage, access of personal information outside of Canada.**

All information submitted via SlideRoom is stored outside Canada on SlideRoom's AWS instances; the AWS East region is where production servers are located with multi-availability zones, and the West region is the secondary site (backups). CS does not have the option of uploading and storing sensitive forms, such as transcripts, via EPBC, and as such, all supporting files (e.g., transcript, study permit) are uploaded to SlideRoom at this time.

Applications and supporting files are exported from SlideRoom and transferred to the CS M365 SharePoint in a Programs Folder. Access to the Programs Folder is granted only to CS Programs Team. Applications are also archived within SlideRoom at the end of the academic year.

5. **Do the changes result in the project being considered a data-linking initiative or a common or integrated program or activity? If yes, please provide full details.**

No

6. **Is the data flow of personal information impacted by the change? If so, please provide updated diagram and table.**

Data flow specific to CS SlideRoom applications is included below:

Use this column to describe the way personal information moves through the initiative step by step as if you were explaining it to someone who does not know about your initiative.	Collection, use, disclosure	FOIPPA authority	Personal Information
1. Applicant signs up for account via SlideRoom and accepts SlideRoom's Terms of Use and Privacy Policy. *To note: ECU FIPPA collection notice is NOT provided to applicants before sign-in.*	Collection	26(c)	Yes
2. Applicant submits application, portfolio, all supporting documentation, and completes answers to questions requested by ECU via the SlideRoom application.	Collection	26(c)	Yes
3. Applicant submits payment via SlideRoom's third-party payment processing platform, Authorize.net prior to submitting application (where applicable).	Use; Disclosure	32(a); 33(2)(u)	Yes
4. ECU CS staff with authorization to access SlideRoom complete review of applications and record evaluation scores.	Use	32(a)	Yes
5. Where references are required, ECU CS staff contact reviewers with information provided by applicant (email address); CS collects additional information from reviewer about the applicant via a SlideRoom form.	Collection; Use	26(c); 32(a)	Yes

6. ECU CS Program Manager uses evaluation scores and reference opinions (where applicable), and a decision is made about the student's application.	Use	32(a)	Yes
7. ECU CS informs the applicant of the institution's acceptance decision	Use	32(a)	Yes
8. ECU retains applications for a minimum of one year in accordance with FIPPA requirements.	Retention	31	Yes
9. Applications on SlideRoom are exported and archived locally until end of retention timeframe. Applications are also archived on SlideRoom at the end of each academic year.	Use; Storage; Retention	32(a); 30; 31	Yes

7. **If the change(s) result in new risks, or resolves risk previously identified, please describe in the table below.**

Risk Mitigation Table			
	Risk	**Mitigation Strategy**	**Risk Level**
1.	The legislative requirement, as outlined in the FIPPA regulations, to complete a PIA assessment for disclosure outside of Canada was not completed for use, disclosure and storage of personal information outside Canada. This means that ECU has demonstrated non-compliance with FIPPA as an assessment for disclosure outside of Canada was not completed and controls not implemented to mitigate such risks. Furthermore, the ECU Collection Notice was not provided on the SlideRoom sign-on page detailing standard requirements for ECU's collection of personal information under FIPPA. Students must also be notified about the	Disclosure outside of Canada assessment and risk mitigation table completed in the original PIA. Both are applicable to this Amendment as well. Privacy notice created for Undergraduate and Graduate SlideRoom log-in page to be added to CS SlideRoom log-in page as soon as possible.	High

	storage of their personal information outside of Canada.		
2.	No contractual obligations are in place between SlideRoom and ECU for the protection of personal information in accordance with FIPPA obligations. No formal contract with SlideRoom exists other than acceptance of the Customer Terms of Use upon initial sign-up for SlideRoom by ECU administrators.	As a service provider to ECU, SlideRoom must review and confirm acceptance of the FIPPA privacy protection schedule for cloud service providers. This acceptance by SlideRoom must be completed for each license held by ECU – Undergraduate / Graduate and CS.	High
3.	Upload of documentation that contains sensitive personal information to SlideRoom.	CS to determine alternative approach for collecting sensitive documentation. SlideRoom cannot be used to capture supporting files such as transcripts, student permits, permanent resident cards etc. An alternative mechanism must be in place before the next intake is opened. CS has noted that Craft CMS may be the best solution in the interim.	High
4.	No standard data retention and destruction procedure implemented for ECU's CS SlideRoom instance, resulting in SlideRoom retaining and backing up applications in the USA that are no longer necessary and should be destroyed.	All applications submitted prior to the current intake year to be exported from SlideRoom for local secure storage and deleted from SlideRoom. Once 2024 intake applications have reached the one-year retention period, complete similar process as above, with 2025 intake recommended as the last intake cycle to be hosted via SlideRoom.	High

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| | | For 2026 application intake (opens in September 2025), it is recommended to migrate application submission to Slate to mitigate risks associated with disclosure and storage of sensitive personal information outside of Canada (SlideRoom has indicated it will not be offering AWS Canada hosting at this time). This means that a SlideRoom license would no longer be required as of the 2026 intake cycle given duplicity of platforms with the introduction of Slate. | |

Part 3– Security of Information

8. Describe any revisions/additions to the privacy and security safeguards (physical, administrative and technical) resulting from the change.

CS must determine a mechanism for collecting supporting documentation from CS applicants to ensure no sensitive personal information is collected and stored by SlideRoom. It has been suggested that Craft CMS be used in the interim, prior to the transition to Slate.

9. Are there any changes to the access model and/or access controls? If yes, describe.

All information and files are transferred to CS M365 SharePoint in a Programs Folder. Access is given only to CS Programs Team. The CS Manager and Programs Coordinator are provided with administrative access to SlideRoom. When reviewing SlideRoom accounts with CS, it was determined that more accounts than required had been provisioned, and CS would be reviewing and removing all excessive accounts.

10. Describe any revisions related to access auditing as a result of the change.

None – see above regarding ad-hoc access and account audits.

Part 4 – Accuracy, Correction + Retention

11. **Describe any changes to how personal information is updated or corrected.**

    None – see original PIA.

12. **Describe any updates to the records retention and/or disposition schedule for personal information as a result of the change.**

    None – see original PIA.

Part 5 – Further Information

13. **Does the change result in new systematic disclosures of personal information than was reported in the original PIA? If yes, please explain.**

    No.

14. **Does the change result in access to personally identifiable information for research or statistical purposes not previously documented in the PIA?**

    No.

Part 6 – Program Area Signatures

This PIA is based on a review of the material provided to the Privacy Office as of the date below. If, in future any substantive changes are made to the scope of this PIA, a PIA Update must be completed and submit it to Privacy Office.

Department Manager	Signature	Date

		22nd Jan 2025
Sandeep Sidhu	Signature	Date
Chief Information Officer		

Adrian Tees		22nd Jan 2025
Adrian Tees	Signature	Date
Privacy Officer		

A final copy of this PIA (with all signatures) must be delivered to privacy@ecuad.ca for record keeping.