



Privacy Impact Assessment

Emily Carr University of Art + Design

SlideRoom Application Management System

PIA# 2024-08

Part 1 – General Information

Name of Department/Unit	Office of the Registrar; Student Services	Project ID	2024-08
PIA Drafter	Kaitlyn Gutteridge		
Email	kgutteridge@ecuad.ca	Phone	778-833-0628
Project Sponsor	Kathryn Verkerk, Registrar, Executive Director of Enrollment		
Email	kverkerk@ecuad.ca	Phone	
Project Manager	Kathryn Verkerk, Registrar, Executive Director of Enrollment		
Email	kverkerk@ecuad.ca	Phone	

In the following questions, delete the descriptive text and replace it with your own.

1. What is the initiative?

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, 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



Privacy Impact Assessment

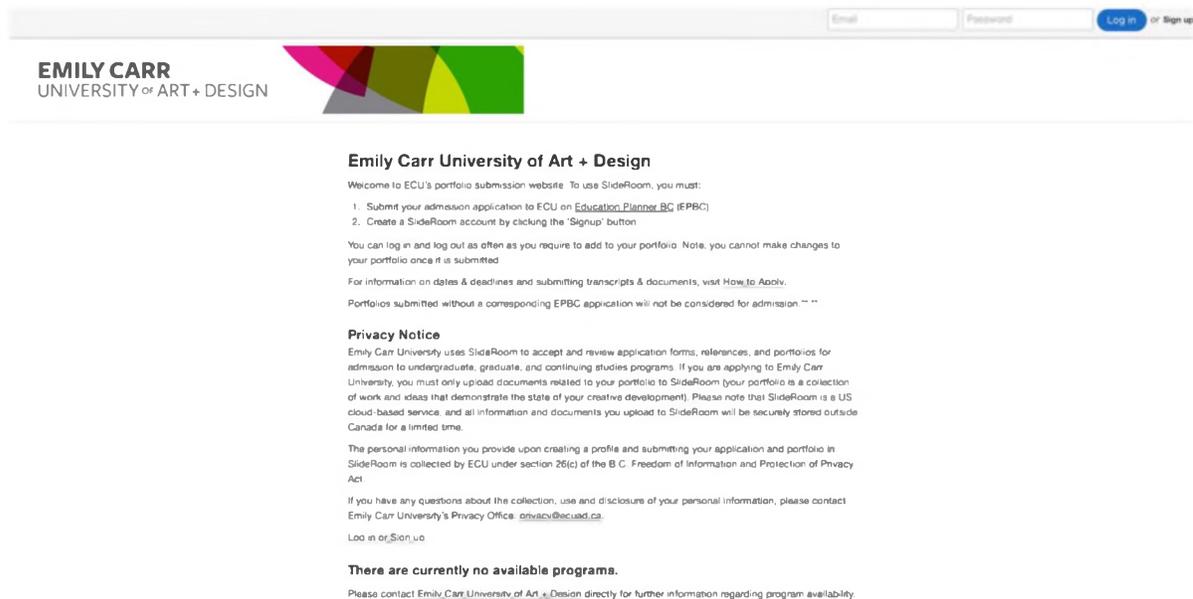
Emily Carr University of Art + Design

SlideRoom Application Management System

PIA# 2024-08

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.

Figure 1 – Landing Page for ECU SlideRoom Applicants (Current as of September 11, 2024)



At ECU, SlideRoom has been in place for use since 2009 for undergraduate and graduate admissions and its use has expanded over time¹.

SlideRoom's use by graduate studies is outlined below:

- In 2009, graduate applicants only uploaded a portfolio (images, videos of their art).
- From 2010 to 2016, graduate applicants uploaded a portfolio (images, videos), statement of intent and their curriculum vitae.
- From 2017-2018, the applicant uploaded a portfolio, statement of intent, curriculum vitae and recommendations from referees.

¹ To note: During the drafting of this PIA, it was discovered that while Continuing Studies accepts applications via SlideRoom, a separate account and SlideRoom license was obtained by the Continuing Studies Office. Consequently, a PIA addendum that outlines Continuing Studies use of SlideRoom will be added to this PIA upon completion.



Privacy Impact Assessment

Emily Carr University of Art + Design

SlideRoom Application Management System

PIA# 2024-08

- In 2019, a video component was added, requesting each applicant to upload a video of themselves answering a question (in most videos the applicant's face is visible, and their voice is audible).
- In 2021, academic credential questions were added, requesting the applicant to provide the following details: school they went to, degree they hold, GPA, length of program, and year of graduation.
- In 2023, the applicant's transcript was requested for upload as well as their Education Planner BC reference number.

SlideRoom's use by undergraduate studies is outlined below:

- Since SlideRoom became available, portfolio application requirements for undergraduates have included a combination of images (jpgs), video or sound files, PDF files, and written text in response to question prompt. Other elements of personal information may be collected as requested through responses to questions and standard applicant profile requirements.
- In 2023, applicants were also requested to upload their transcripts as well as their Education Planner BC reference number.
- To note: references have not been collected for undergraduate applicants to date.

Additionally, applicants must pay a minimal fee (at the time of writing it was \$12 USD) to submit their SlideRoom portfolio. Each subsequent submission requires a separate payment. Payments are processed by SlideRoom's third-party PCI compliant payment provider, Authorize.net.

Starting this year (September 2024) for the 2025 intake cycle, use of SlideRoom for processing of undergraduate and graduate applications for admission to ECU will be as follows:

- Applicants complete the standard ECU application via SlideRoom and upload their portfolio.
- Applicants submit their transcript via the secure Education Planner BC (EPBC) file upload mechanism, which is hosted by EduCloud and managed by ECU IT.
- ECU IT will oversee management of the solution and license for both graduate and undergraduate Admissions teams, providing support for account provisioning, managing roles and associated privileges, maintaining SlideRoom controls and providing day-to-day assistance with troubleshooting and/or other technical issues.

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.

At ECU, faculty reviewers are assigned by graduate and undergraduate Admissions teams to review the applications for each intake cycle. At the time of writing, many administrator accounts were



Privacy Impact Assessment

Emily Carr University of Art + Design

SlideRoom Application Management System

PIA# 2024-08

active in SlideRoom, and it was unclear which roles from the Admissions teams require administrator access and who controls reviewer assignment activities. Furthermore, many reviewer accounts were also active in SlideRoom; some dating back to last login recorded in 2019 and others were no longer employees at ECU. It was unclear which reviewer accounts are still active and required for the 2025 intake and review cycle.

Once assigned applications to review, reviewers are sent a link to the applications assigned to them via ECU's SlideRoom administrators. The reviewer must create a SlideRoom account prior to accessing SlideRoom's reviewer site (<https://review.slideroom.com>), which is separate from ECU's SlideRoom applicant portal. Once in the reviewer site, reviewers complete their review in accordance with specifications provided by the Admissions team. This may include scoring different parts of the application using a pre-defined scoring matrix, leaving comments, reviewing the applicant's visual and audio portfolio and reviewing reference letters or contacting references. Reviewers are only permitted to view applications assigned to them. However, they can view comments from other faculty reviewers assigned to the same application if the administrator has turned on settings to permit reviewers to see other reviewers' comments (this was activated for graduate studies applicants but turned off for undergraduate studies at the time of writing).

In the past, where transcripts were provided with the application on SlideRoom, review of transcripts was completed in SlideRoom. For the 2025 intake cycle, reviewers and Admissions team representatives with a need to review transcripts will be granted access privileges to view the transcripts uploaded to the EPBC server (viewing window via SharePoint). Transcripts will be securely stored on the EPBC server (encrypted at rest and in transit) and will not be downloaded locally to ECU's network. Access permissions will be administered by ECU IT.

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.

At ECU, the Admissions team subsequently reviews the application scores in addition to other application requirements and determines the status of the application. The decision is communicated to the applicant via standard ECU Admission's procedures. In the past, Admissions may have downloaded a copy of past applications to have on file to prepare faculty for classes, support student's professional development and engage in program evaluation and quality improvement activities. No consistent policy or procedures were developed for local download and use of SlideRoom applications.

In the past, applications were 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. Given applicants can challenge the decision provided by ECU regarding their application, ECU



Privacy Impact Assessment

Emily Carr University of Art + Design

SlideRoom Application Management System

PIA# 2024-08

retained these applications in SlideRoom. At the time of writing, applications archived on SlideRoom had not been purged for a number of years.

Moving forward, all SlideRoom applications submitted for the 2024 intake cycle and this upcoming 2025 intake cycle (opens September 2024), will be stored on SlideRoom for the purposes of completing the review and decision-making process, and having the applications easily accessible for any applicants who challenge a decision. All applications submitted prior to the 2024 intake cycle will be securely downloaded and archived in ECU's local secure network (after which any copies stored on SlideRoom will be purged). This means that one year of past applications plus the current year of applications will be accessible on SlideRoom. Workflows and supporting policies and procedures are under development to provide guidance for this process. ECU Admissions will extract reviewer scores from the pre-2024 applications for evaluation and reporting purposes, and once confirmation has been provided by Admissions that scores have been extracted and stored in Colleague, ECU IT will dispose of the records.

Transcripts submitted prior to the 2024 intake cycle will also be exported from SlideRoom and hosted on ECU's local secure network. ECU Admissions will extract transcript-related information (e.g., GPA) for evaluation and reporting purposes, and once confirmation has been provided by Admissions that scores have been extracted and stored in Colleague, ECU IT will dispose of the records.

2. What is the scope of this PIA?

The following activities are in and out of scope of the PIA:

In Scope:

- Use of SlideRoom for receipt and review of undergraduate and graduate applications from 2009 to present day.
- SlideRoom's physical, technical and administrative controls for the protection of personal information.
- ECU's policies and processes throughout the application submission cycle to ensure protection of personal information and FIPPA compliance.

Out of Scope:

- Physical, technical, and administrative controls in place for the EPBC server – will be reviewed separately in a forthcoming PIA.
- Continuing Studies SlideRoom PIA addendum – will be completed upon submission of this PIA and appended to the PIA.

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



Privacy Impact Assessment

Emily Carr University of Art + Design

SlideRoom Application Management System

PIA# 2024-08

The following personal information elements have been captured by SlideRoom for ECU applicants. Depending on the intake year, some elements may or may not have been captured, with an increasing number and sensitivity of elements captured since 2019.

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 (2022 onwards)

Reference Data

- 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



Privacy Impact Assessment

Emily Carr University of Art + Design

SlideRoom Application Management System

PIA# 2024-08

- 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

Reviewer Scores and Comments (personal information of the applicant)

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.

4. Does the initiative include personal information?

Yes – as outlined in Question 3, the list contains personal information.

Part 2 – Collection, Use and Disclosure

This section will help you to identify the legal authority for collecting, using, and disclosing personal information and to confirm that all personal information elements are necessary for the purpose of the initiative.

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.	Collection	26(c)	Yes



Privacy Impact Assessment

Emily Carr University of Art + Design

SlideRoom Application Management System

PIA# 2024-08

<i>ECU standard FIPPA collection notice was not provided on the sign in page to date (will be provided for September 2025 submissions).</i>			
2. Applicant submits application/portfolio, completes answers to questions and provides additional information as requested by ECU via the SlideRoom application (video; references; responses to descriptive questions).	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. Student submits transcripts, which accompany SlideRoom application, via EPBC secure upload mechanism (ECU managed hosted by EduCloud).	Collection	26(c)	Yes
5. ECU Admissions staff with authorization to access SlideRoom access applications, assign reviewers and set viewing / editing permissions for the applications.	Use	32(a)	Yes
6. ECU faculty reviewers receive email notification to complete application review; sign in to SlideRoom and provide review score.	Use	32(a)	Yes
7. Where references are required, ECU Admissions contact reviewers with	Collection; Use	26(c); 32(a)	Yes



Privacy Impact Assessment

Emily Carr University of Art + Design

SlideRoom Application Management System

PIA# 2024-08

information provided by applicant (email address); admissions collect additional information from reviewer about the applicant via SlideRoom form.			
8. ECU Admissions accesses applicant's transcripts via the SharePoint view into the EPBC server and uses the transcript information to inform the decision-making process.	Use	32(a)	Yes
9. ECU Admissions collects reviewer scores (and reference opinions where applicable), and a decision is made about the student's application.	Collection; Use	26(c); 32(a)	Yes
10. ECU Admissions informs the applicant of the institution's acceptance decision	Use	32(a)	Yes
11. ECU retains applications for a minimum of one year in accordance with FIPPA requirements.	Retention	31	Yes
12. Applications on SlideRoom are exported and archived locally until end of retention timeframe. Application scores and transcript information are extracted and retained in Colleague prior to destruction of application files.	Use; Storage; Retention	32(a); 30; 31	Yes
13. Transcripts stored on EPBC server are stored, archived and destroyed in accordance with ECU records retention requirements.	Storage; Retention	30; 31	Yes



Privacy Impact Assessment

Emily Carr University of Art + Design

SlideRoom Application Management System

PIA# 2024-08

Optional: Insert a drawing or flow diagram here or in an appendix if you think it will help to explain how each different part is connected.

5. Collection Notice

If you are collecting personal information directly from the individual the information is about, FOIPPA requires that you provide a collection notice (except in limited circumstances). Review the [sample collection notice](#) and write your collection notice below. You can also attach the notice as an appendix.

No collection noticed has been provided to students to date. The following collection notice will be provided for the 2025 intake cycle on the ECU SlideRoom log-in site:

Emily Carr University uses SlideRoom to accept and review application forms, references, and portfolios for admission to undergraduate, graduate, and continuing studies programs. If you are applying to Emily Carr University, you must only upload documents related to your portfolio to SlideRoom (your portfolio is a collection of work and ideas that demonstrate the state of your creative development). Please note that SlideRoom is a US cloud-based service, and all information and documents you upload to SlideRoom will be securely stored outside Canada for a limited time.

The personal information you provide upon creating a profile and submitting your application and portfolio in SlideRoom is collected by ECU under section 26(c) of the B.C. Freedom of Information and Protection of Privacy Act.

If you have any questions about the collection, use and disclosure of your personal information, please contact Emily Carr University's Privacy Office: privacy@ecuad.ca.

Part 3– Storing Personal Information

6. Is any personal information stored outside of Canada?

Yes, 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).

Transcripts submitted via the EPBC upload server are stored and backed up in Canada (EduCloud datacentres in Vancouver and Kamloops, B.C.).

7. Where and how are you storing the personal information involved in the initiative?



Privacy Impact Assessment

Emily Carr University of Art + Design

SlideRoom Application Management System

PIA# 2024-08

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).

Transcripts submitted via the EPBC upload server are stored and backed up in Canada (EduCloud datacentres).

Applications exported from SlideRoom will be stored and archived on ECU’s local, secure network; final storage location is under review at this time.

8. Does the initiative involve sensitive personal information? If yes, where and how are you storing the personal information involved in the initiative?

Yes, depending on the information an applicant submits in the application package and video responses requested by the Admissions Office, the personal information may be considered sensitive. Transcripts also contain sensitive personal information. See Questions 6 and 7 for storage location of sensitive personal information.

Part 4 – Assessment of Disclosure Outside of Canada

Complete this section if you are disclosing sensitive personal information to be stored outside of Canada. Otherwise continue to Part 5.

9. Is the sensitive personal information stored by a service provider?

Yes

Name of service provider	Name of cloud infrastructure and/or platform provider(s) (if applicable)	Where and how is the sensitive personal information stored (including backups)?
1. SlideRoom	AWS Cloud Computing Services	<p>AWS East region is where production servers are located with multi-availability zones (located in Virginia, USA, with most datacentres in Northern Virginia, and Ohio, USA).</p> <p>AWS West region is the secondary site, where backup servers are located (located in California and Oregon, USA).</p>



Privacy Impact Assessment

Emily Carr University of Art + Design

SlideRoom Application Management System

PIA# 2024-08

10. Describe the contractual terms in place (if applicable).

A standalone contractual agreement is not entered into between ECU and SlideRoom; rather ECU signs on to SlideRoom’s [Customer Terms of Use](#) upon submission of the yearly license payment.

No FIPPA privacy protection schedule has been agreed to by SlideRoom to date.

Relevant items to note as per the Customer Terms of Use:

- *The Institution [ECU] owns and retains all rights, titles, and interests in and to the data that is unique to the Institution, and Liaison’s use and possession thereof is on the Institution’s behalf. The Institution may access and copy any of the data in Liaison’s possession at any time, and Liaison shall reasonably facilitate such access and copying promptly after the Institution’s request. Notwithstanding the above, Liaison reserves the right to use properly de-identified Institution data in an aggregated manner. Since the Institution will be a tenant of our platform, it is expected that common applicant data is shared by all participants.*
- *Upon confirmation of a client data breach, the client would be notified within 48 hours (2 business days).*

11. Are you relying on an existing contract, such as an enterprise offering from BCNet?

No – the contract has been procured directly by ECU.

12. What controls are in place to prevent unauthorized access to sensitive personal information?

See section 17 for additional information – all controls apply for sensitive and non-sensitive personal information.

13. Provide details about how you will track access to sensitive personal information.

See section 17 for additional information – all controls apply for sensitive and non-sensitive personal information.

14. Describe the privacy risks for disclosure outside of Canada?

Privacy risk	Impact to individuals	Likelihood of unauthorized collection, use, disclosure, or storage	Level of privacy risk (low, medium, high)
Inadequate data security controls for AWS US instances,	Medium	Low	Low/Medium



Privacy Impact Assessment

Emily Carr University of Art + Design

SlideRoom Application Management System

PIA# 2024-08

which could lead to a cybersecurity attack and privacy breach			
<p>Risk Response:</p> <ul style="list-style-type: none"> ▪ SlideRoom to comply with FIPPA privacy protection schedule for cloud service providers. ▪ SlideRoom to store only current and one previous year applications; all applications dating earlier than the 2024 intake cycle will be export and stored locally (deletion from SlideRoom will take place). Long term plan to move application processing to Slate and decommission SlideRoom to be considered. ▪ Liaison, SlideRoom’s parent company, has completed a SOC 2 report and is ISO 27001 compliant (SlideRoom is anticipate for inclusion in the 2024 audit cycle). ▪ AWS Cloud Computing Services has developed a very robust compliance program, with many industry certifications to demonstrate external assurance of the controls in place within the AWS computing infrastructure. More information can be found here. 			
<p>Is there any outstanding risk? If yes, please describe.</p> <ul style="list-style-type: none"> ▪ Minimal outstanding risk will be present with the implementation of the mitigations described here. 			

Privacy risk	Impact to individuals	Likelihood of unauthorized collection, use, disclosure, or storage	Level of privacy risk (low, medium, high)
Privacy laws in USA, including the Patriot Act, and specific states whereby the data will be stored, processed and backed up, do not provide equivalent personal information protection controls and access rights as FIPPA	High	Low	Medium
<p>Risk Response:</p> <ul style="list-style-type: none"> ▪ SlideRoom to comply with FIPPA privacy protection schedule for cloud service providers. ▪ SlideRoom to store only current and previous year applications; all applications dating earlier than the 2024 intake cycle will be export and stored locally (deletion from SlideRoom will take place). Long term plan to move application processing to Slate and decommission SlideRoom to 			



Privacy Impact Assessment

Emily Carr University of Art + Design

SlideRoom Application Management System

PIA# 2024-08

be considered.
<ul style="list-style-type: none">▪ ECU to undertake privacy investigation into storage of personal information outside of Canada prior to November 2021 FIPPA amendment and determine approach for reporting FIPPA non-compliance.
Is there any outstanding risk? If yes, please describe.
<ul style="list-style-type: none">▪ Minimal outstanding risk will be present with the implementation of the mitigations described here.

Part 5 – Security of Personal Information

This part captures information about the privacy aspects of securing personal information. People, organizations, or governments outside of your initiative should not be able to access the personal information you collect, use, store or disclose. You need to make sure that the personal information is safely secured in both physical (e.g., your office building or work environment) and technical (e.g., online cloud service) environments.

15. Does the initiative involve digital tools, databases, or information systems? Yes

The SlideRoom platform is hosted in a multi-tenant AWS US environment; information is logically separated by institution via partitioning keys and enforced in the application data layer. All sensitive data is encrypted in transport and at rest using AES 256. SSL / TLS 1.2 or newer if required by the application APIs. Encryption keys are stored at secure off-site locations.

The EPBC upload site has been developed in accordance with ECU’s information security policy and standards and EduCloud’s security controls to ensure industry best practices are in place for the secure transmission and storage of student personal information. Additional information about the EPBC upload site will be documented in a forthcoming PIA.

16. Do you or will you have a security assessment to help you ensure the initiative meets the reasonable security requirements?

SlideRoom has completed a HECVAT and provided it to ECU IT for review and comment. In addition, Liaison, SlideRoom’s parent company, has undergone a SSAE 18/SOC 2 audit. SlideRoom was not included in the 2023 audit scope but is anticipated to be in scope for the 2024 audit. At the time of writing, it was in the process of completing the Cloud Security Alliance (CSA) self-assessment for SlideRoom and anticipated to receive Cloud Security Alliance STAR certification for SlideRoom in September 2024 (confirmation pending).



Privacy Impact Assessment

Emily Carr University of Art + Design

SlideRoom Application Management System

PIA# 2024-08

Liaison uses NIST SP 800-53 Rev 5 to manage its overall Information Security Program and has implemented Operational Best Practices for NIST 800 171 using AWS Configuration rules.

SlideRoom is PCI-DSS compliant, uses Secure Sockets Layer (SSL) when transmitting data and uses industry trusted payment processor, Authorize.net to process any credit card transactions facilitated via SlideRoom. SlideRoom does not store any credit card information.

17. Controlling and tracking access - Please check each strategy that describes how you limit or restrict who can access personal information and how you keep track of who has accessed personal information in the past. Insert your own strategies if needed.

Strategy	Yes / No and please describe
<p>We allow employees only in certain roles access to information</p> <p><u>ECU</u> Role-based access control is native to the application and does not rely on infrastructure dependencies (e.g. LDAP, Active Directory, etc.). There are well-defined roles with associated permissions that provide features and functions in the system. End-users in the system are segregated by principal type (administrator, applicant, reviewer). Additionally, administrators are able to assign itemized permissions per role where appropriate, limiting scope of access, and available actions including:</p> <ul style="list-style-type: none"> ▪ Reviewer can/cannot review other reviewers' comments ▪ Reviewer can/cannot review attachments uploaded by applicants ▪ Reviewer can/cannot see the applicant's identity information ▪ Reviewer can/cannot see applications from previous intake cycles <p>While SlideRoom provides role-based access control and ECU has activated roles and permissions to date, no standardized process for commissioning and decommissioning accounts and assigning account permissions for SlideRoom has been implemented. This has resulted in historical users with active accounts who should have had accounts decommissioned and a significant amount of administrator accounts.</p> <p><u>SlideRoom</u> Access to ECU information by SlideRoom employees is restricted (administrator rights) and auditable. For those assigned with administrator rights, they are assigned a global administrator role that grants access to all institutional accounts and information necessary to perform their duties. Generally, all</p>	<p>Yes</p>



Privacy Impact Assessment

Emily Carr University of Art + Design

SlideRoom Application Management System

PIA# 2024-08

<p>write-activities in the system are logged to an auditing system. Multi-factor authentication is required for administrator access to ECU information. Privileged access reviews are conducted quarterly for appropriateness.</p>	
<p>Employees that need standing or recurring access to personal information must be approved by the appropriate authority</p> <p><u>ECU</u> No standardized process for commissioning and decommissioning accounts and assigning account permissions for SlideRoom has been implemented to date. Reviewers are assigned via the administrators responsible for overseeing application review within the Admissions Office; however, reviewer approval is not revoked upon completion of the review process. It is unclear which role at ECU has been responsible for providing administrator rights to the platform in the past. Moving forward, ECU IT will oversee account provisioning and establish a clear and consistent approach for determining standing and recurring access to SlideRoom.</p> <p><u>SlideRoom</u> Liaison, SlideRoom’s parent company, conducts a background verification check on all candidates for employment, contractors, and third parties. Background verifications are carried out under relevant laws, regulations, and ethics and are proportional to the business requirements. The classification of the information and the perceived risks are assessed. All Liaison employees must adhere to a security awareness training program that is automated and audited for participation and successful completion.</p>	<p>Yes</p>
<p>We use audit logs to see who accesses a file and when</p> <p><u>ECU</u> SlideRoom captures a timestamp for the user’s last sign-in (reviewer and administrator). It was unclear at the time of writing if any additional activities were logged and made available for auditing purposes. ECU has requested additional information from SlideRoom and will update this PIA upon receipt.</p> <p><u>SlideRoom</u> Generally, all write-activities by administrator accounts in SlideRoom are logged to an auditing system. Privileged access reviews are conducted quarterly for appropriateness. SlideRoom also records events to an audit log for changes to a user account via the API.</p>	<p>Under review</p>



Privacy Impact Assessment

Emily Carr University of Art + Design

SlideRoom Application Management System

PIA# 2024-08

<p>Additional strategies:</p> <p><u>Password Requirements</u></p> <p>Custom password requirements are not configurable via SlideRoom. To create a SlideRoom account, the user must create a password that is:</p> <ul style="list-style-type: none"> ▪ Length of 10 characters or more ▪ Mix of uppercase and lowercase letters ▪ Include numbers (0-9) or symbols (!@#\$%^&*+-) <p>The password reset procedure for "forgot password" is accomplished through an email address validation flow. General password change is provided through the web interface and requires entry of the existing password. Password aging requirements are not in place and SlideRoom does not currently have plans to support password aging.</p>	<p>Yes</p>
---	------------

Part 6 – Accuracy, Correction + Retention

In Part 6 you will demonstrate that you will make a reasonable effort to ensure the personal information that you have on file is accurate and complete.

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

SlideRoom allows its users the right to access their information or modify information previously provided. Prior to submission, applicants may access their information and content from their user account in the 'My Account' section of the SlideRoom website.

After the application is submitted, any applicant who seeks access, or who seeks to correct, amend, or delete their own inaccurate data, must direct the query to ECU. Standard ECU procedures for requests to correct or amend information will apply upon receipt of a request.

19. Does your initiative use personal information to make decisions that directly affect an individual(s)?

Yes, personal information submitted by the applicant will be used to make a decision about the applicant's admissions status (approve or deny).

20. Do you have a retention schedule in place related to personal information used to make decisions? Retention and/or disposition schedule that will ensure that personal information is kept for at least one year after it is used in making a decision directly affecting an individual?



Privacy Impact Assessment

Emily Carr University of Art + Design

SlideRoom Application Management System

PIA# 2024-08

At the time of writing, applications dating back to 2009 were stored in SlideRoom, and an approach to information archiving and deletion had not been established for use of SlideRoom across program areas.

SlideRoom's contractual requirements for storage and retention

SlideRoom will archive all applications and supporting information for a period of 90 days after the completion of the contract, and upon written notification from ECU will attempt to delete or archive or returned the applications and supporting information to ECU. To note: all applications and supporting information can be extracted at any time via SlideRoom's product's export tools. The exports can be scheduled nightly or on demand.

Information stored within ECU's secure network

Where information has been exported from SlideRoom in the past and used within ECU, it is unclear whether the applications have been retained and/or destroyed to date. Moving forward, all applications will be retained on SlideRoom for the current intake year and one year prior (2024 and 2025). After this intake cycle, only current intake cycle applications will be stored on SlideRoom, and the previous year will be exported for secure retention and storage on ECU's local secure network. Application scores will be extracted from applications once transferred to ECU and uploaded to Colleague, and then applications will be deleted (synced with FIPPA retention period). For transcripts stored on EPBC, a similar approach will be adopted: relevant transcript information will be extracted from transcripts and uploaded to Colleague, and then transcripts will be deleted (synced with FIPPA retention period).



Privacy Impact Assessment

Emily Carr University of Art + Design

SlideRoom Application Management System

PIA# 2024-08

Part 7 – Additional Risks

In the table below describe any additional risks that arise from collecting, using, disclosing, or storing personal information in your initiative that have not been addressed by the questions on the template. Add new rows if necessary.

Possible Risk	Response	Risk Level
<p>Risk 1: Applicant’s consent was not collected for use, disclosure, and storage of personal information outside of Canada prior to the November 2021 FIPPA amendment.</p> <p>The legislative requirement, as outlined in the FIPPA regulations, to complete a PIA assessment for disclosure outside of Canada not completed for use, disclosure and storage of personal information outside Canada post-November 2021.</p> <p>Prior to the 2021 amendment, this means that ECU was not in compliance with FIPPA as personal information was not authorized for use, disclosure, and storage outside of Canada (consent required).</p> <p>Post-2021 amendment, this means that ECU remained in non-compliance with FIPPA (lower risk status than pre-2021) as an assessment for disclosure outside of Canada was not completed and controls not implemented to mitigate such risks.</p>	<ol style="list-style-type: none"> 1. Current PIA completed to address post-2021 compliance requirements and disclosure outside of Canada assessment. 2. Privacy investigation to be launched for pre-2021 disclosure outside of Canada and appropriate notification to OIPC and applicants completed (as determined by investigation). 3. Privacy notice to be added to SlideRoom log-in page for 2025 intake cycle. 4. 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. 	High
<p>Risk 2: No standard data retention and destruction procedure implemented for ECU’s SlideRoom instance, resulting in</p>	<ol style="list-style-type: none"> 1. All applications submitted prior to 2024 intake year to be exported from SlideRoom for local secure storage and deleted from 	High



Privacy Impact Assessment

Emily Carr University of Art + Design

SlideRoom Application Management System

PIA# 2024-08

Possible Risk	Response	Risk Level
<p>SlideRoom retaining and backing up years of applications that are no longer necessary and should be destroyed in the USA.</p>	<p>SlideRoom. Once Admissions has collected application scores and transcript-related information for upload to Colleague, all applications to be destroyed from ECU storage.</p> <ol style="list-style-type: none"> 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. 	
<p>Risk 3: 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.</p>	<ol style="list-style-type: none"> As a service provider to ECU, SlideRoom must review and confirm acceptance of the FIPPA privacy protection schedule for cloud service providers. 	High
<p>Risk 4: While drafting the PIA, during our review of ECU's SlideRoom instance, it was discovered that routine account audits were not regularly completed in the past. Some users were still active who had not logged into the system since 2019, and other users had active accounts who were no longer employed by ECU. Given SlideRoom does not integrate with ECU's SSO nor provides comprehensive activity logs, this increases the risk of providing individuals with access to ECU student personal information who are not authorized, leading to potential FIPPA non-compliance.</p>	<ol style="list-style-type: none"> Immediately, Admissions staff to work with ECU IT to complete an audit of all reviewer and administrator accounts on SlideRoom and decommission any accounts that have not been active since 2024 or do not require access given job requirements. With the support of ECU IT, Admissions staff to develop account commissioning and decommissioning procedure, which includes specifications for account privileges, provisioning of super-user accounts, and regular access and account privileging audits. Yearly, before the next cycle of reviewers are required for application review, complete an account audit of active accounts and decommission inactive / unnecessary accounts prior to adding new reviewers (and administrators). 	High



Privacy Impact Assessment

Emily Carr University of Art + Design

SlideRoom Application Management System

PIA# 2024-08

Possible Risk	Response	Risk Level
	4. For 2026 application intake (September 2025), migrate application submission to Slate to mitigate risks associated with lack of SSO integration and platform duplication (Slate and SlideRoom).	
Risk 5: Following on Risk 4, the number of administrators accounts active for SlideRoom did not follow best practice for limiting super-user / administrator accounts to only those with a need to know and in accordance with the principle of least privilege access.	1. With the support of ECU IT, Admissions staff to develop account commissioning and decommissioning procedure, which includes specifications for account privileges, provisioning of super-user accounts, and regular access and account privileging audits.	High
Risk 6: During the drafting of this PIA, it was discovered that while Continuing Studies accepts applications via SlideRoom, a separate account and SlideRoom license was obtained by the Continuing Studies Office.	1. A separate assessment of the Continuing Studies instance must be completed to determine the privacy and security risks and associated mitigations. A PIA addendum that outlines Continuing Studies use of SlideRoom will be added to this PIA upon completion.	High

Please ensure Parts 7 and 8 are attached to your submitted PIA.



Privacy Impact Assessment

Emily Carr University of Art + Design

SlideRoom Application Management System

PIA# 2024-08

Part 8 – 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.

<i>Department Manager</i>	Signature	Date
Sandeep Sidhu		16 Sept 2024
Sandeep Sidhu <i>Chief Information Officer</i>	Signature	Date
Adrian Tees		16 Sep 2024
Adrian Tees <i>Privacy Officer</i>	Signature	Date

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