Zoom Privacy Impact Assessment

Project Code	TBD
Submission Date	April 30, 2020
Administrative Authority	Wency Lum, Associate Vice-President University Systems & CIO
Author and Contact Information	Garry Sagert, Director UVic Online Systems, gsagert@uvic.ca
Reviewed By	Brad Weldon, Chief Privacy Officer and General Counsel, cpo@uvic.ca Nav Bassi, Director and Chief Information Security Officer, navbassi@uvic.ca
Review Date	April 30, 2020; updated July 30, 2020

Purpose:

University Systems is implementing Zoom video conferencing as an enterprise service for students, faculty and staff. A key driver for implementation is for instructional use of Zoom as a teaching tool, but Zoom will be available to UVic members for a multitude of uses including administration, general collaboration and meetings, student services, public/virtual events and gatherings, and general research.

The primary focus of this Privacy Impact Assessment is on the instructional use of Zoom video conferencing. Use of video conferencing was necessary because effective March 16, 2020, UVic transitioned from face-to-face to alternative modes of instruction and evaluation for the remainder of the term in response to the BC Provincial Health Officer's direction to post-secondary institutions. This transition was done expeditiously using the existing technologies at UVic, such as CourseSpaces (Learning Management System), BlueJeans, the existing video conferencing service available through BCNET as well as Blackboard Collaborate (web-conferencing platform used primarily by HSD).

The recent announcement by the Provost that Summer Session 2020 will be delivered through online learning requires the delivery of approximately 700 courses to undergraduate and graduate students. The existing tools are not adequate for the mode, class size, scale and scope required to deliver these courses fully online. As such, University Systems and the Division of Learning and Teaching Support and Innovation (LTSI) have been working together to deploy the Zoom video conferencing platform to enable remote learning, teaching, collaboration, and providing services at the University of Victoria.

The purpose of this Privacy Impact Assessment (PIA) is to assess risks associated with the Zoom video conferencing platform, and document how Zoom will be configured and managed to remain compliant with BC Freedom of Information and Protection of Privacy (FIPPA) legislation.

Roles:

The role of University Systems is to configure and operate the Zoom video conferencing platform for general meetings.

UVic Privacy Impact Assessment Template v2.0

The role of LTSI is to support faculty and instructional staff with the effective use of Zoom in a virtual classroom environment.

The role of the Privacy Office is to review this document and provide guidance regarding privacy policy and legislative compliance and risks to the University.

1.0 Privacy Context

1.1 Description

Zoom Video Communications provides remote conferencing services using a cloud-based Software as a Service (SaaS) platform. Zoom is headquartered in San Jose, California and uses AWS (Amazon Web Services) cloud-based data centres around the world. In the standard configuration, data provided by users may be stored on any of these data centres. Zoom offers an option to store data in Canada but its Canadian service offering is not identical to its global service. UVic will be implemented in the US tenant to be ready for the summer start of term on May 4, and may transition to a Canadian tenant in the future, but will remain in the US tenant for the Fall 2020 term. The requirement for a Canadian tenant has been specified in the UVic contract with Zoom. This PIA is based on the standard configuration, i.e. storage outside Canada and will be revised to reflect the updated configuration within Canada when it occurs.

UVic is planning to use Zoom for remote learning purposes as well as administrative purposes. It is already being used by several other large educational institutions for these purposes.

A Zoom Meeting refers to a video conferencing meeting that's hosted using Zoom. When users join these sessions they are given the option to turn on their webcam or microphone. Sessions can potentially be recorded by the meeting host onto their local device (cloud recording is disabled and will remain so while Zoom is in the US tenant). Sessions can be enabled for both desktop and mobile applications. Zoom meetings can be synced to calendars, and users delivering the session can upload an image or short looping video to customize their background.

Regarding Zoom support, it is expected that support of Zoom by UVic IT will be focused on user administration, connectivity and support of users to be able to connect in to a session. This may include the Windows/Mac app, web-based interfaced or mobile app. Being a cloud-based service, most of the support solutions will be leveraging from the information and tools provided by Zoom. Zoom offers Outlook application plugins for meeting joining and meeting/session creation. Support by LTSI will focus on leveraging pedagogical features of Zoom in a virtual classroom environment.

A number of guidance documents have been created by University Systems and LTSI to assist staff and faculty in the delivery of classes via Zoom. University Systems is intentionally minimizing custom documentation and linking directly to Zoom's own documentation because Zoom is regularly updating the service and keeping their own documentation current.

1.2 Privacy Issues Related to this Project

As the Zoom platform in its current configuration uses AWS data centres around the world, our default strategy will focus on consent as the means of supporting disclosure outside of Canada. Simultaneously we will pursue configurations which will potentially maintain Canadian data residency when they provide equivalent performance to the US option.

While Zoom supports connections with pseudonyms and without accounts, these have the unfortunate side-effect of reducing privacy and security via "Zoombombing" events, therefore we are proposing that all connections require accounts authenticated via @uvic.ca credentials. "Guest" access with pseudonyms and without accounts is still permitted, but they will go into a virtual waiting room and need to be admitted at the discretion of the meeting host.

UVic Privacy Impact Assessment Template v2.0

1.3 Privacy Impact Assessment Scope

The scope of this PIA is limited to the use of Zoom standard service offerings as acquired under the University of Victoria's campus-wide license for teaching, learning, research, and administration. We are planning to transition to a Zoom configuration that will maintain Canadian data residency, however this was not available at the time of our initial deployment and currently Zoom advises that Canadian tenant users may experience performance issues and reduced functionality (see Appendix A), so this PIA assumes non-Canadian data residency and will continue to do so until such time as a decision is made to switch to the Canadian tenant.

1.4 Related Privacy Impact Assessments

We reviewed PIAs for Zoom services from the University of British Columbia and BC Government Ministry of Education for K-12 deployment in the preparation of this PIA.

1.5 Elements of Information or Data

Data	Description	Usage
Identifiers	Name, user name, email address	Zoom uses this to maintain account profile, enable service logon, display identity in meetings or classes
UVic Affiliation	Department, course	UVic faculty and staff use this to enable or facilitate group or course participation, determine appropriate settings for specific groups
Preferences	General information about Zoom preferences	Zoom uses this to configure user experience according to personal preferences
Device	Information about user device, network, and internet connection, such as IP address(es), MAC address, other device ID (UDID), device type, operating system type and version, and client version	Zoom uses this to optimize user experience and services
Usage	Information about usage of or other interaction with the service	Zoom uses this to optimize user experience and services
Content	Information uploaded, provided, or created while using the service	Other users may access this information in accordance with their participation in activities facilitated on the Zoom platform

Users are required to refrain from exposing or commenting on personally identifiable information of other users while using the Zoom platform, and this is agreed upon as part of the terms of service and consent gathering process. Users will be reminded of this rule on the first day of classes and course outlines for courses that are using Zoom.

2.0 Protection of Personal Information

2.1 Storage or Access outside of Canada

In its standard configuration, Zoom leverages the Amazon Web Services (AWS) global network and stores some information including name, user name, email address, UVic affiliation, preferences, device, and usage on servers outside Canada. UVic continues to pursue Canadian Data residency at AWS Montreal but currently Zoom advises that Canadian tenant users may experience performance issues and reduced functionality (see Appendix A), so there is currently no timeline for Canadian tenancy.

Meeting audio, video, and chat are generally transitory and not stored or recorded. Zoom does not automatically record or store any meeting content. Zoom offers the option to save meeting recordings to the Zoom Cloud, however this has

UVic Privacy Impact Assessment Template v2.0

been disabled as part of the UVic configuration until we receive confirmation of Canadian data residency at AWS Montreal. In the meantime, meeting organizers or instructors who wish to record meetings may do so using the option to store recordings locally onto their computing equipment. Recordings may subsequently be uploaded and/or further distributed in other FIPPA-compliant tools such as Kaltura or CourseSpaces.

Zoom uses the following third-party service providers, which are also outside of Canada, as part of its platform:

- AWS (Amazon Web Services): Cloud hosting and infrastructure (storage of customer data)
- Zuora: Billing and payment processor – UVic site license invoiced centrally, not to individual users
- Mandrill: Transactional email service – UVic SSO eliminates need for user contact via Zoom email service
- RingCentral: Cloud-based support services – Used by UVic support staff, not individual users
- Zendesk: Cloud-based telephony provider – Not used by UVic, nor part of future service plans

While personal information may be disclosed to any of these providers, typical use cases and storage in the UVic implementation involve only AWS, therefore we focus our assessment on the storage of personal information within the global AWS network.

2.2 Personal Information Flow Diagram and/or Personal Information Flow Table

Personal Information Flow Table – Typical Learning Use Case			
	Description/Purpose	**Type**	**FIPPA Authority**
1.	Instructor sends invitations to participate in Zoom session directly to students' UVic email addresses using FAST or CourseSpaces class lists. No data stored by Zoom.	Use Disclosure	32(a), 33.1(b)
2.	Student accepts invitation; name and login name is stored on Zoom server (assuming it is personally identifiable).	Collection Disclosure	26(c), 33.1(1)(b)
3.	Metadata about Zoom session is stored on Zoom server (assuming login name is personally identifiable).	Collection, storage outside Canada	26(c), 33.1(1)(p.1)
4.	If unrecorded, Zoom session flows through Zoom server for processing, and is not stored.	Disclosure	33.1(1)(p.1)
5.	If recorded, Zoom session is stored on the host user's local storage inside Canada.	Collection	26(c)
6.	Zoom administrators may monitor session, at UVic's request, in order to install, implement, maintain, repair, troubleshoot or upgrade the system.	Collection Disclosure	26(c), 33.1(1)(p)

Personal Information Flow Table – Typical Administrative Use Case			
	Description/Purpose	**Type**	**FIPPA Authority**
1.	Employee sends invitations to participate in Zoom session directly to other employees. Name, user name, email address, and department is contact information, and not personal information.		Schedule 1
2.	Employee invites an individual who is not a student or employee. Individual will be required to consent to disclosure outside of Canada.	Use Disclosure	32(a), 33.1(b)

UVic Privacy Impact Assessment Template v2.0

3.	Employee accepts invitation; contact information is stored on Zoom server.		Schedule 1
4.	Individual who is not a student or employee accepts invitation; name, user name, and email address is stored on Zoom server.	Collection,* Disclosure*	26(c),* 33.1(1)(p.1)*
3.	Metadata about Zoom session is stored on Zoom server.	Collection, Disclosure	26(c), 33.1(1)(p.1)
4.	If unrecorded, the Zoom session flows through Zoom server without being stored.	Disclosure	33.1(1)(p.1)
5.	If recorded, the Zoom session is stored in the host user's local storage inside Canada.	Collection	26(c),
6.	Zoom administrators may monitor session, at UVic's request, in order to install, implement, maintain, repair, troubleshoot or upgrade the system. No data stored.	Collection Disclosure	26(c), 33.1(1)(p)

* only applies if the individual is a community member and provides a personally identifiable name or login name

2.5 Risk Mitigation Table

Risk Mitigation Table				
	Risk	**Mitigation Strategy**	**Likelihood**	**Impact**
1.	Non-compliance with FIPPA requirement that personal information not be stored or accessible outside of Canada without consent.	In administrative meetings, meeting hosts are advised not to record meetings where personal information is discussed. In learning sessions, students are advised of the option to anonymize themselves. All users are required not to disclose personal information about third parties unless UVic had the consent of those third parties.	Low	Medium
2.	Non-compliance with FIPPA - privacy notification requirement.	All users receive a detailed privacy notification at sign-up for the Zoom service. Students are advised of the use of the Zoom tool in the course syllabus.	Low	Low
3.	Meeting organizers may not wish to have their information, including contact information, shared with Zoom	Guidance for faculty and staff in place. Faculty member names, uvic.ca email addresses, titles, or department are not personal information in this context, as defined in FIPPA. Employees are not required to share any personal information during the session.	Low	Low
4.	Users may already have the Zoom app and may wish to use it	Attending users who have downloaded the app have already consented to the terms of use, including storage of information outside of Canada. If they choose, they may uninstall the app and attend	High	Low

UVic Privacy Impact Assessment Template v2.0

		meetings with a browser and/or pseudonym. Hosting Users will be instructed to use the UVic Zoom client.		
5.	Unauthorized interception or access to personal information transmitted by or stored in the system	Zoom has reasonable security controls in place. It uses encryption and UVic administrators will ensure that identified vulnerabilities have been patched. Also, UVic global configuration and policies minimize the sensitive personal information that will be collected and stored.	Low	High
6.	Meeting owner will share meeting recordings with unauthorized individuals	Instructors and staff receive privacy training. They are aware of the principles that govern the protection of privacy and the disclosure of personal information.	Low	Low
7.	Personal information is retained longer than required	We have limited this risk by limiting the amount of personal information stored by Zoom.	Low	Low
8.	Users are not appropriately authenticated, leading to unauthorized access to personal information	Access to UVic faculty, staff and students is via Netlink ID. Access to community members is via emailed invitation. However, any recipient can email the invitation to others without limitation. Program design, through limiting the sensitivity of recorded information, limits this risk.	Low	Low
9.	Faculty or staff may not have appropriate security controls in place if they are delivering classes while working remotely.	UVic has as guidance in place for remote working. Instructors and staff receive privacy training.	Low	Low
10.	Vendor may change terms of use of the service.	UVic will negotiate its enterprise license to mitigate this.	Low	Medium
11.	Zoom may give or sell personal information to third parties	Zoom may share non-identifying metadata with service providers and advertisers. Students can opt out of marketing in Zoom settings.	High	Low
12.	Meeting organizer may choose to use a non-UVic Zoom account that allows for cloud recording and other non-FIPPA compliant practices	Instructions from University Systems and LTSI clearly indicate how to use the UVic Zoom account that contains appropriate configurations. Instances of non-compliance will be handled on a case-by-case basis.	Medium	Medium

UVic Privacy Impact Assessment Template v2.0

3.0 Security of Personal Information

3.1 Please describe the physical security measures related to the initiative (if applicable).
Zoom is primarily hosted within the global AWS network. The security of Zoom is certified by SOC2, TRUST3, and the EU-US privacy shield.

3.2 Please describe the technical security measures related to the initiative (if applicable).
The University of Victoria has established a number of settings and configurations to ensure the security and privacy of the Zoom platform, including but not limited to:

- Require a password for meetings
- Enable waiting room, with automatic meeting entry to users that have signed in to UVic tenant
- Disable cloud recording (recordings can be stored locally and subsequently uploaded to other platforms)
- Disable instant messaging (IM) outside of meetings
- Disable the ability to post files in meeting IM
- Only meeting host can start sharing (i.e. take over sharing) when someone else is sharing
- Disable attention tracking
- Enable users to rename themselves

Furthermore, Zoom states that it[1]:

- Submits privacy practices to independent assessment and certification with Trust Arc
- Undergoes an annual SSAE-16 SOC 2 audit by a qualified independent third-party
- Performs regular vulnerability scans and penetration tests to identify new threats
- Executes "Data Protection Agreements" for adequate transfer mechanisms
- Protects data in transit by TLS 1.2 using 256-bit Advanced Encryption Standard (AES-256)
- Leverages the physical and environmental protection of our TIER 1 data center providers. Zoom's hosting facilities have 24/7 manned security and monitoring
- Does not monitor, view, or track the video or audio content of meetings or webinars
- Does not share customer data with third parties (other than those noted above)
- Limits retention of accounts to 30 days after termination to assist with product reactivation upon request. After 30 days, the account is permanently deleted

3.3 Does your department rely on security policies other than the Information Security Policy?
No.

3.4 Please describe any access control and/or ways in which you will limit or restrict unauthorized changes (such as additions or deletions) to personal information.
Administrative functions within the UVic Zoom environment are managed by Client Technologies within University Systems, in conjunction with teaching and learning support from LTSI. Zoom admin accounts have been limited to only those personnel who require them, have separate usernames/passwords from normal Zoom user accounts, and are protected with multi-factor authentication offered by Zoom. Normal user accounts are managed automatically using NetLink single-sign-on which is maintained by Development Services within University Systems.

3.5 Please describe how you track who has access to the personal information.
Changes to administrative capabilities are requested and tracked through Request Tracker (rt.uvic.ca).

---

[1] https://blog.zoom.us/wordpress/2018/11/12/zoom-serves-canadian-healthcare-pipeda-phipa-compliance/

UVic Privacy Impact Assessment Template v2.0

4.0 Accuracy/Correction/Retention of Personal Information

4.1 How is an individual's information updated or corrected? If information is not updated or corrected (for physical, procedural or other reasons) please explain how it will be annotated? If personal information will be disclosed to others, how will the university notify them of the update, correction or annotation?

Individuals are able to update or correct their account details by contacting the appropriate administrative authority at the University of Victoria (e.g. Human Resources, Office of the Registrar) to update their name, or University Systems to update their Netlink ID, which are used as data sources for attribute release to Zoom.

4.2 Does your initiative use personal information to make decisions that directly affect an individual(s)? If yes, please explain.

Real-time participation in meetings (e.g. interviews) or classes may result in decisions that directly affect and individual, however the Zoom platform itself is incidental to those decisions.

4.3 If you answered "yes" to question 4.2, please explain the efforts that will be made to ensure that the personal information is accurate and complete.

Individuals participating in live meetings or classes via Zoom are responsible for raising any issues or concerns with the instructor or meeting organizer.

4.4 If you answered "yes" to question 4.2, do you have approved records retention and 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?

Recorded information will not be used to make any decisions that directly affect an individual.

5.0 Further Information

5.1 Does this initiative involve systematic disclosures of personal information? If yes, please explain.

This initiative does not involve the systematic disclosure of personal information.

5.2 Does the program involve access to personally identifiable information for research or statistical purposes? If yes, please explain.

This initiative does not involve disclosure of personal information for research purposes.

5.3 Will a personal information bank (PIB) result from this initiative?

No, the Zoom platform is not the authoritative source of any personal information.

UVic Privacy Impact Assessment Template v2.0

5.0 Comments and Signatures

Associate Vice-President University Systems & Chief Information Officer: Wency Lum

Comments:	
Date:	
Sign-Off:	

Administrative Authority: [[Name]]

Comments:	
Date:	
Sign-Off:	

Portfolio Manager: [[Name]]

Project Comments:	
Date:	
Sign-Off:	

UVic Privacy Impact Assessment Template v2.0

IT Projects

The following leaders in each functional area can refer you to an appropriate subject matter expert to help develop the technical elements of your project plan and ensure it is complete.

Service Area	Impact? (Y/N)	Leader	Expert Consulted	Date of Consultation
Senior Management				
Associate Vice-President University Systems and Chief Information Officer		Wency Lum		
Director, Academic & Admin Services, and Chief Information Security Officer		Nav Bassi		
Director, Infrastructure Services		Ron Kozsan		
Director, UVic Online Services		Garry Sagert		
Academic & Administrative Services and Information Security Office				
Client Technologies		Lance Grant		
Computer Help Desk		Marcus Greenshields		
Desktop Support Services		David Street		
Information Security Office		Eric van Wiltenburg		
Infrastructure Services				
Data Centre Services		Kim Lewall		
Network Services		Jane Godfrey		
Research Computing Services		Ryan Enge		
UVic Online Services				
Development Services		Ivan Petrovic		
Production and Technical Support		Rizwan Bashir		
Project Management Process and Budget				
Administrative Officer		Trish Kearley		
Project Management Office		Scott Thompson		
Other Consultations				
Privacy Office		[Expert Consulted]		

UVic Privacy Impact Assessment Template v2.0

[Department/Unit]	[Expert Consulted]		

Other Projects and Consultation

Department/Unit	Expert Consulted	Comments	Date of Consultation
Privacy Office			

Revision History

Version	Date	Author	Comments
1.0	April 6, 2020	Garry Sagert	Initial Version
1.1	April 21, 2020	Brad Weldon	Edits per CPO review
1.2	April 29, 2020	Garry Sagert	Accepted CPO edits, additional edits per CPO recommendation
1.3	May 5, 2020	Nav Bassi/Garry Sagert	Additional clarifications
1.4	July 2, 2020	Nav Bassi	Revised to indicate that the relocation to the Canadian tenant is to be determined

UVic Privacy Impact Assessment Template v2.0

Appendix A - Canadian Data Centre relocation request performance disclaimer

Overview:

By default, Zoom customers are provisioned in the US data centres allowing them to take advantage of the worldwide network of Zoom collaboration media servers. In this configuration, Zoom servers in the US securely store customer account data at rest, including account information, chat, and cloud recordings.

Zoom offers clients the ability to have their call media and customer data routed and stored at rest in Canada upon request.

There are a few items to consider before you request to move your account to the Canadian data centre, they include:

1. Zoom Meetings media (audio/video/content) will be restricted to the Zoom data centres in Canada. At this point, there is a Zoom data centre on the East and West coast of the country.

   What does this mean for your users? Users in Canada shouldn't experience any changes in the service, however, if a user joins a Zoom meeting from a distant location, they will traverse the public internet to connect to the Canadian data centre where the meeting is pinned vs using the worldwide network of Zoom data centres which may result in reduced platform performance (packet loss, jitter, lower-quality connectivity).

2. Zoom CRC (Cloud Room Connector) ports are unable to register legacy SIP/H323 endpoints for calendaring integration (one button join capabilities). *We do not have a timeline for when this functionality will be available.*

3. Zoom Marketplace / LTI Integrations may send data outside of Canada, which may result in account data being synchronized with the Zoom US servers. We encourage you to reach out to the marketplace partner to confirm.

4. Zoom Phone is not available for accounts in the Canadian data centres. *We do not have a timeline for when this functionality will be available.*

UVic Privacy Impact Assessment Template v2.0