

# Google Apps for Education Student Privacy Information

Information Technology Directorate

## Introduction

Google Apps for Education provides students with access to twenty-first century learning tools to support their education. This flyer provides information on the data collected during a student's use of Google Apps and Google's commitment to managing that data.

## What data is collected?

Use of Google Apps will mean that student personal information and data will be collected by Google for the purposes of providing the Google Apps services to students. This personal information will include the student's DEC username and school email address and all personal information that is contained in a Google Apps service; such as information or data contained in a student's calendar or email (including text, images, photographs, sound and multimedia).

## How is the data used?

Google stores and processes personal information solely for the purposes of providing the Google Apps service. Google scans Gmail to keep its customers secure and to improve their product experience. In Gmail for Google Apps, this includes virus and spam protection, spell check, relevant search results and features like Priority Inbox and auto-detection of calendar events. Scanning to provide product features is done on all incoming emails and is 100% automated.

**Google Apps services do not collect or use student personal information and data for advertising purposes or to create advertising profiles.**

As part of providing its services, Google may also collect device information, log and location information as detailed in Google's Privacy Policy.

**Google will only disclose this data at the direction of the NSW Department of Education and Communities or if compelled to do so by law.**

## Is the data secure?

Google is committed to protecting the privacy and security of all of their users, including students. Google has strong security systems in place to keep personal information secure, including an encrypted HTTPS connection.

Google's physical data centre access is restricted to authorised personnel and multiple layers of physical security are implemented. Google personnel are only able to access user data in extremely limited circumstances and subject to rigorous approval and oversight.

## When is the data deleted?

Unless required by law, Google will delete Customer-Deleted Data from its systems within 180 days of the Department deleting a student's account.

## Where is the data?

Google holds user data in its data centres that are located around the world.

## Google Privacy Information

Further information on how Google handles and uses personal information may be accessed at:

- [http://www.google.com/apps/intl/en/terms/education\\_terms.html](http://www.google.com/apps/intl/en/terms/education_terms.html)
- [https://www.google.com/intx/en/enterprise/apps/terms/dpa\\_terms.html](https://www.google.com/intx/en/enterprise/apps/terms/dpa_terms.html)
- <http://www.google.com/policies/privacy/>
- <http://www.google.com/about/datacenters/>

Complaints regarding Google's management of this service should be directed to Google or the Office of the Australian Information Commissioner.

## NSW Privacy Information

- <http://www.dec.nsw.gov.au/about-us/plans-reports-and-statistics/privacy>
- <http://www.ipc.nsw.gov.au/>

Complaints regarding the DEC's management of this service can be made through the Department's complaint handling process.

- <http://www.dec.nsw.gov.au/about-us/how-we-operate/how-we-handle-complaints>



# Microsoft Office 365 Student Privacy Information

Information Technology Directorate

## Introduction

Microsoft Office 365 (O365) provides students with access to twenty-first century learning tools to support their education. This flyer provides information on the data collected during students' use of O365 and Microsoft's commitment to managing that data.

## What data is collected?

Users control the information that is transferred to, and stored by, Microsoft in O365. This may include text, images, photographs, sound and multimedia.

In addition, in the course of using the O365 service and in order to deliver the service, Microsoft's systems will generate some information such as logs about user access to the O365 services.

## How is the data used?

Microsoft does not use this collected information to track users' online activities or build profiles for behaviour analysis or other commercial purposes.

Microsoft does not use, access or collect this data for any other reason other than to provide the O365 services

to users - in particular, Microsoft will not use or disclose user data for advertising purposes.

NSW DEC has ensured through its contract with Microsoft governing the delivery of O365, that there are a number of express commitments relating to user data. These include:

- Ownership of user data rests at all times with users, and not Microsoft.
- Microsoft will meet stringent international standards that are generally acknowledged as the benchmark for providers of Online Services.
- Microsoft will demonstrate that it has met its user data commitments via an annual audit by an independent third party auditor.

## Is the data secure?

Physical data centre access is restricted to authorised personnel and multiple layers of physical security are implemented. Microsoft personnel are only able to access user data in extremely limited circumstances and subject to rigorous approval and oversight.

Microsoft use subcontractors to perform a variety of support services for O365. Examples of these include, physical hardware maintenance, technical support and facilities services (eg, security guards at data centre locations).

**Microsoft will only disclose data at the direction of the NSW DEC or if compelled to do so by law.**

The O365 service incorporates a large number of privacy controls. Privacy controls are enabled by default for all customers of O365 and schools are able to activate or deactivate these privacy controls so as to meet their needs.

## When is the data deleted?

Microsoft will remove all user and associated data from its systems when NSW DEC removes a user account from the system.

## Where is the data?

For the O365 service, user data is stored predominantly in data centres situated in Hong Kong and Singapore.

## Microsoft Office 365 Privacy Information

Microsoft's approach to privacy, security and transparency with O365 is accessible at <http://www.trustoffice365.com>.

### Further information:

- <http://www.microsoft.com/en-us/twc>
- <http://www.microsoft.com/contracts>
- <http://www.microsoft.com/online/legal/v2/?docid=43>

Complaints regarding Microsoft's management of this service should be directed to Microsoft or the Office of the Australian Information Commissioner.

## NSW Privacy Information

- <http://www.dec.nsw.gov.au/about-us/plans-reports-and-statistics/privacy>
- <http://www.ipc.nsw.gov.au/>

Complaints regarding the DEC's management of this service can be made through the Department's complaint handling process.

- <http://www.dec.nsw.gov.au/about-us/how-we-operate/how-we-handle-complaints>

# Privacy Options for Complaint Resolution

Information Technology Directorate

## Introduction

The Department provides access to Microsoft Office 365 and Google Apps for Education for staff and students. Specific privacy information sheets have been developed for each service. If you have a complaint about the handling of your child's information, please consider the information in this flyer to ensure your complaint can be resolved effectively.

## What happens if I have a complaint about the way my child's information has been dealt with?

Under NSW and Australian privacy legislation the personal information of your children is protected.

If you have a complaint about how your child's information has been dealt with, you have a legal right to make a complaint. The way in which you complain depends on who you consider has not protected your child's personal information.

## What happens if my complaint is about how a government school has dealt with my child's information?

The Department of Education and Communities has clear privacy procedures which are underpinned by the Privacy and Personal Information Protection Act 1998 (NSW) and the Health Records and Information Privacy Act 2002 (NSW) – together known as “the privacy legislation”. You can find out more about these Acts and how the Department deals with personal information from the links in DEC Information below.

If you consider that a government school, or the Department of Education and Communities, has not protected your child's personal information you can seek an Internal Review under the privacy legislation. That requires the Department to consider the conduct complained of and, if appropriate, seek to remedy any misuse of personal information. If you have such a complaint you can submit it on the

Department's Privacy Internal Review Application Form. Or you can contact the DEC Privacy Contact Officer on 9561 8151.

Such a complaint is overseen by the NSW Privacy Commissioner, and if you are not satisfied with the Department's handling of a complaint, or want further advice about privacy, you can contact the Information and Privacy Commission of NSW.

## What if I think Google or Microsoft have misused my child's personal information?

Both Google and Microsoft have privacy policies which indicate how they deal with complaints.

As Google and Microsoft are private corporations, they are subject to the Commonwealth Privacy Act 1988. If you are not satisfied by the way Google or Microsoft have dealt with your complaint you can also raise such issues with the Office of the Australian Information Commissioner.

### DEC Information

- Learning Tools - Privacy Information Sheets
  - <http://www.schools.nsw.edu.au/learning/learning-tools/index.php>
- How the Department of Education and Communities deals with personal information
  - <http://www.dec.nsw.gov.au/about-us/plans-reports-and-statistics/privacy>
- Privacy Internal Review Application Form
  - <https://www.det.nsw.edu.au/media/downloads/about-us/plans-reports-and-statistics/privacy/privacy-review-form.pdf>

### NSW Privacy Information

- Information and Privacy Commission - <http://www.ipc.nsw.gov.au/>

### Australian Privacy Information

- Office of the Australian Information Commissioner - <http://www.oaic.gov.au/>