



February 12, 2016

The Honorable Al Franken
United States Senate
309 Hart Senate Office Building
Washington, DC 20510

Dear Senator Franken:

Thank you for your letter of January 13, 2016, concerning Google Apps for Education and Chromebooks. We have always been firmly committed to keeping student data private and secure. We appreciate the opportunity to explain our products and the steps Google takes to protect our users' information.

Ensuring educators and students can learn and work together fits naturally with Google's mission to organize the world's information and make it universally accessible and useful. Google believes that technology levels the playing field and enables anyone to learn, anywhere. That's why we build easy-to-use solutions that give teachers and administrators more time to educate and students more time to learn.

One example is Google Apps for Education (GAFE), a free and secure set of productivity tools. Schools set up and make available to students the GAFE core services, such as Gmail, Google Calendar, Groups, and Drive, which includes Docs (word processing), Sheets (spreadsheets) and Slides (presentations).

With GAFE, students can collaborate on projects in real-time from across the room or across the world. They can find and interact with the information they need, become creators and more engaged and active learners — and, ultimately, become better prepared for twenty-first century careers. For teachers, distributing and collecting homework and providing students one-on-one feedback become easier and more effective.

GAFE services may be used on any device with a modern web browser. Many schools choose to use Chromebooks, which are affordable and durable laptops that can be used to access GAFE services and the rest of the Internet, under the schools' management. Chromebooks, like, GAFE, have world-class security, which is critical to ensuring privacy of students' personal data.

Another example is Chrome Sync, a feature popular with both Chromebooks and the Chrome browser that enables Google Account holders to log into any Chromebook or Chrome browser

and find all their apps, extensions, bookmarks, and frequently visited sites. Each community and school district is different. Technology like Chrome Sync gives schools the flexibility they need to develop a system that works best for their community, whether this means one device per student or shared devices across classes. For students, this means that they can get to work, right away — even when a school doesn't provide a device for each student, Chrome Sync makes a Chromebook instantly feel like the student's own.

Digital literacy is an important component of ensuring the privacy and security of students' personal information. So we work with experts to develop programs — such as the [Online Safety Roadshow](#) — that teach students what they can do to stay safe and secure online.

Below are responses to your specific questions.

1. When a student is signed in to their GAFE account but is not using one of the GAFE services, what kind of data does Google collect on an individual student?

School administrators determine which services students can access and use. The GAFE core services are Calendar, Classroom, Contacts, Drive, Docs, Gmail, Forms, Groups, Sheets, Sites, Slides, Talk/Hangouts and Vault. Administrators control access to these GAFE core services as well as services outside of the GAFE core services. Schools may permit students to access additional Google services (like YouTube, Maps, and others) beyond the GAFE core services if they obtain the consent of a parent for minor students, and if the use is for educational purposes.

Before we address those additional Google services, we would like to explain Google's practices with respect to the GAFE core services. In GAFE, Google collects both personal data, like a student's name and email address, as well as other information about how the services are used, such as the type of device and the IP address of the user's network. How Google collects and uses information with GAFE accounts is described in the [Google Apps for Education Privacy Notice](#). Google's use of information in GAFE core services is limited by the [Google Apps for Education agreement](#) and the [Data Processing Amendment](#) (which schools can accept in the GAFE Admin console). Google uses students' personal data in GAFE core services only to provide these services, so students can do things like communicate using email and collaborate on assignments using Google Docs. There are no ads in GAFE core services, and student data in these services is not used for advertising purposes.

If a school permits access to one of Google's additional services outside the GAFE core services, such as Google Maps, Google collects the information described in our [Privacy Policy](#). The information we collect in these services is similar to that collected from any other Google user, and includes:

- Information the user gives us, including personal information like name, email address, or telephone number.

- Device information (such as your hardware model, operating system version, unique device identifiers, and mobile network information including phone number).
- Log information, including user entries like maps queries, the network's IP address, and device event information such as crashes, system activity, hardware settings, browser type, browser language, the date and time of the request and referral URL.

If any of this data is associated with a student's GAFE account — which may happen when a student is logged into their GAFE account — we consider it to be the student's personal information. As we promise in the [GAFE Privacy Notice](#), no K-12 student personal information is used to target ads, and in some services we show no ads at all. In Google Search, for example, we show no ads when K-12 students are logged in to their GAFE accounts.

As described in more detail in response to question two, below, users who have Chrome Sync enabled (whether on a Chromebook or using the Chrome browser) will have additional information about their browser settings stored in their GAFE Account, including browsing history, any saved apps, extensions, bookmarks, and passwords. In addition, Chromebooks collect anonymous usage statistics and crash reports about users' interactions with Chrome features. These statistics and crash reports are collected anonymously, meaning that we do not associate them with your Google Account when we collect them.

2. When a student is using a Chromebook but is not using one of the GAFE services, what kind of data does Google collect on an individual student?

There is very little difference between the data collected from a student using Google services on a Chromebook versus using a Google service on any other device, which we describe above. By default, Chromebooks anonymously collect usage statistics and crash reports, which involve information about the usage of Chrome features. Other than that, the fact that you are accessing a Google service, such as Gmail or Google Search, with a Chromebook does not cause Google to receive any additional or different information about you. Note that school administrators may restrict the websites and services accessible via the Chromebook, whereas other devices may not be so limited.

Users who have Chrome Sync enabled (whether on a Chromebook or using the Chrome browser) will have additional information about their browser settings stored in their Google Account, including browsing history, any saved apps, extensions, bookmarks, and passwords. See our [Help Center to learn more about Chrome Sync](#). If any of this data is associated with a student's GAFE account — which is the case when a student is logged into a Chromebook with Chrome Sync enabled with their GAFE account — we consider this data to be the student's personal information and do not use it to target ads.

3. If Google does collect any individualized data on a student, such as browsing information or viewing habits, when a student is using a Chromebook or is logged

in to their GAFE account but is not using one of GAFE services, please address the following questions:

a. For what purposes does Google collect this information?

In GAFE core services, students' personal data is used only to provide the services themselves. In Google's additional services, Google collects information for the purposes described in the [GAFE Privacy Notice](#) and our [Privacy Policy](#), such as providing, maintaining, and developing our services, and protecting users from harm. We specifically promise in our [GAFE Privacy Notice](#) that K-12 students' personal information is not used to target ads.

b. Is it necessary to collect all of this information for the provision of GAFE services or to deliver other valuable features that may be relevant for educational purposes?

Personal information collected in GAFE core services is used solely to provide those services. Schools are responsible for compliance with the Children's Online Privacy Protection Act of 1998, including obtaining parental consent for collection of students' personal information in GAFE core services. School administrators choose which, if any, additional Google services outside of the GAFE core services to allow their students to access. Many of these non-GAFE services, such as Search, Earth, Maps and YouTube, have functions which schools find educationally relevant and valuable. Those services may use information such as browsing or viewing information to improve services and make them more relevant for users, and for other purposes permitted by the Google [Privacy Policy](#). If an administrator allows access to any of these non-GAFE services, they may do so only for educational purposes and with parental consent for any students under 18.

c. Has Google ever used this kind of data to target ads to students in Google services, either in the GAFE services or other Google services, such as Google Search, Google News, Google Books, Google Maps, Blogger, or YouTube?

Since GAFE was launched, ads in the GAFE core services have always been off by default. In 2014, we [took the additional step](#) of removing the "enable/disable" toggle for ads in the GAFE Admin console. This change ensured that ads would always remain off in GAFE core services and that users' data in these services would not be used for advertising purposes — a commitment that is reflected in our [Apps for Education agreement](#).

Many of our additional services outside of the GAFE core services normally show targeted ads (which is how we offer them for free). We have worked to restrict use of K-12 student personal information: our [GAFE Privacy Notice](#) promises not to use any K-12 student personal information to target ads, including in services outside the GAFE core services. In some products, like Search and Maps, we have removed the ads altogether for signed in K-12 GAFE

users, while other services may show only contextual ads to these users. Contextual ads are selected without reference to any user profile or other personal information about the user.

d. Has Google ever used this kind of data for its own business purposes, unrelated to the provision of Google’s educational offerings?

Google may use the data from additional services outside of the GAFE core services for the purposes described in our [Privacy Policy](#), which include, for example, product improvement and product development. We make further commitments for GAFE users in our [GAFE Privacy Notice](#), including a commitment not to use personal information from K-12 GAFE users to target ads. In other respects, the additional services outside of the GAFE core services work for students just as they do for any other user. We require school administrators to obtain parents’ consent for minor students for our data collection and use if they enable these additional services for students. Personal information collected in core GAFE services is used solely to provide those services.

e. Is it possible to make this data collection opt-in?

Google provides controls to administrators over GAFE core services and the additional services in the Admin console to assist them in restricting student access to those services if they wish to do so. Furthermore, schools must obtain parental consent for minor students to Google’s collection of the data we have described and to the use of any additional services beyond the GAFE core services. In addition to administrator controls over services and settings in the GAFE Admin console, each student’s account also has access to [controls offered to every Google account](#) (some of which can also be controlled through the Admin console), and these can be used to reflect school policies and parental consents.

f. Does Google share this information with additional parties?

We don’t sell GAFE data or any of our [users’ personal data](#). We do not share personal information with third parties except in the few exceptional circumstances described in the [Google Apps for Education agreement](#) and our [Privacy Policy](#), such as when schools ask us to share it or when we are required to do so by law.

4. Google has indicated that it compiles data aggregated from student users of Chrome Sync, anonymizes the data, and uses it to improve its services. Can you expand on how the aggregated information is treated? For example, does this include sharing the aggregated data with third parties for research purposes or otherwise?

As we mentioned in our [blog post](#), we compile aggregated and anonymized data from all users of Chrome Sync who sync their browsing history and have not encrypted their Chrome Sync data with a sync passphrase. Before using this data we completely remove identifying

information about individual users. In most cases, this is accomplished by aggregating the data and reducing the information to a count — for example, we might use the fact that a web page has been seen by thousands of users. There is no way to personally identify any user based on this count. This aggregated, anonymized Chrome Sync data is used to improve Google's products, primarily web search, by helping to detect mobile friendly pages, pages which have stopped serving content, and downloads of malware. Unless required by a valid law enforcement request, we do not share aggregated Chrome Sync data with any third parties, for research purposes or otherwise.

5. Can you describe Google's relationship with school districts and administrators that choose to use Google for Education products and services? Apart from publicly available privacy policies, does Google offer any explanation to parents, teachers, and education officials about how student information is collected and used?

Google offers a [privacy and security site](#), including detailed FAQs, to schools and parents considering or using GAFE services. It contains much of the information described in this letter, including information about the Student Privacy Pledge, Chromebooks, and use of additional Google services outside of the GAFE core services.

Our [GAFE Privacy Notice](#) reflects our commitment to disable targeted ads based on personal information in all Google services for K-12 students. We provide a [Help Center](#) and message board where administrators can find help. Through the Admin console, we provide 24/7 phone and email support.

We enable educators to connect with each other because we find that peers are the most helpful resources. For teachers, there are Google Educator Groups run for educators by educators to share practices in-person or online. They can compare notes about how they use tools, which tools they do and don't allow for certain grade levels of students, and other important information. For all educators we offer the [Google for Education Training Center](#), a set of online resources we created with educators for educators.

We reach out to school leaders, educators, and parents through channels like our Google for Education newsletter, Google for Education [Twitter](#) and [G+](#) accounts, and the [Google for Education blog](#). We regularly meet with organizations that represent state administrators and school leaders, present at and participate in conferences, and host webinars that include information about privacy and security.

6. Can you describe all the contexts and ways in which both school administrators and parents of students using Google for Education products and services have control over what data is being collected and how the data are being used?

Google's educational products are designed to be deployed and managed by school

administrators and teachers, so they have control over whether and how Google services are available to students. Schools also act on our behalf to obtain parental consent for minor students to use Google services outside the GAFE core services, and to the collection or use of data involved in those additional services. As noted above, schools are responsible for compliance with the Children's Online Privacy Protection Act of 1998, including obtaining parental consent for collection of students' personal information in GAFE core services.

Administrators have fine-grained control over many of the services they deploy. For example, a school administrator may choose to limit the access of middle school students to Google Drive and Docs, but allow high school students to also access Gmail. A school administrator may also choose to allow students to exchange email only with recipients within the district, the school, or even just their class. Schools can also block student access to Google services outside of the GAFE core services, like YouTube and Blogger. In addition to administrator controls over services and settings in the GAFE Admin console, each student's account also has access to [controls offered to every Google account](#) and these can be used to reflect school policies and parental consents.

For those schools that use Chromebooks, Chrome Sync is on by default (in accordance with feedback from schools that have highlighted this as a crucial feature), but an administrator can disable it for all students, or just for some groups. Our [Help Center](#) describes how to turn off services in the Admin console. Individual students also have control over Chrome Sync. Students can [choose what to sync](#) in settings. Users also can elect to set a [sync passphrase](#). When you set a sync passphrase, your data is still stored in your Google account, but it is encrypted with your passphrase so Google can't read it. Regardless of whether students use this feature, however, Google uses the personal data stored in Chrome Sync data purely to provide features in Chrome for that person, for example allowing students to securely access their own browsing data and settings across devices.

We appreciate the chance to explain Google's privacy and security practices of Google Apps for Education and Chromebooks. Please let us know if we can address any other questions you might have or be a resource to you on our shared goals of improving student performance and protecting students' privacy and security.

Sincerely,

A handwritten signature in blue ink that reads "Susan Molinari".

Susan Molinari

Vice President, Public Policy and Government Relations, Americas
Google