

**Final improvement plan Google ChromeOS and Chrome browser on Chrome devices.**

In 2022 SIVON, SURF and Google worked together to come to an agreement to deliver a processor version of managed ChromeOS by the end of August 2023. The result is an Education agreement where Google is primarily a data processor (while retaining its controller role for certain limited purposes) and an agreed development plan with product changes in ChromeOS. Furthermore, the Privacy Company conducted a privacy assessment which leads to further mitigation measures (below). Upon delivery of the completed product, SIVON will verify the new functionality.

The table below is copied from the report “20230629 Chrome inspection report v1.1” dated 29<sup>th</sup> of June 2023 commissioned by the Privacy Company. This table has been populated with two extra columns. One to reflect Google statement to mitigate a specific risk. The final column is a risk assessment after mitigation measures have been implemented (rest risk). For a comprehensive overview of school measures we have created a manual for schools “Handleiding ChromeOS en Chrome-browser.pdf”.

| Issue                          | Recommended mitigating measures schools   | Mitigating measures taken by Google                                 | Additional information from Google  | Risk after implementing measures                                    |
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| <b>DSAR results incomplete</b> | Continue to block access to the Chrome Web Store and the Google Play Store.   | Commitment to do an individual assessment of each DSAR              | The new version of managed ChromeOS, ready by end of August '23, will include the Service Data Downloader and Domain-wide takeout for DPChromeOS. These two features will help customers fulfill DSAR requests they receive in their role as data controllers after accepting the DPChrome OS processor agreement. The Service Data Downloader contains user-email or device serial number-keyed Service Data and the Domain-wide takeout contains user-email keyed Customer Personal Data from Chrome/OS services for which we are a data processor (i.e. Essential Services for which we collect user or device identifiable data).<br>Upon release of the new services SIVON/SURF will assess that tooling makes an adequate DSAR possible and if the risk is mitigated.<br><br>Chrome Sync is a Workspace Core Service for EDU accounts, so is already covered by the commitments made by Google in the Workspace agreements, including the Cloud Data Processing | Low/None<br><br>After release date, SIVON will verify the new tools |
|                                | Use the guidance from SIVON to inform students how to request access with the school, and with Google                                 | Google is a processor for the Domain-wide TakeOut tool for admins   |   |   |
|                                |   | Google is a processor for the individual TakeOut tool for end users |   |   |
|                                | Google has agreed to publish documentation what Diagnostic / Telemetry Data the Essential Chrome Services collect, to the extent they |   |   |   |

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|  |   | <p>collect user or device associated data at all</p> <p>Google has published more information about its data retention policies</p> <p>Google will offer a Service Data Downloader to admins (second half of 2023)</p>   | <p><b>Addendum.</b> Google confirms that Chrome sync will be an Essential Service under the new Chrome ToS and that Chrome sync data will be included in the Service Data Downloader.</p> <p>Google Play user content and customer data is integrated with Takeout which allows controllers to perform DSARs. Play has no plans to become a data processor, and therefore won't integrate with the Service Data Downloader tool.</p>   |                 |
| <p><b>DSAR refusal explanation insufficient</b></p>        | <p>Use the available admin event logs to provide access to personal data.</p> | <p>The new version of the managed ChromeOS will include services to access the data such as the Service Data Downloader and Diagnostic Information Tool (DIT, a Telemetry Data viewer developed for Workspace)</p> <p>Google has published an improved explanation why it may refuse access to some personal data.</p> <p>Google has published documentation what categories of personal data, relating to what service, are available in the event logs for admins.</p> | <p>The new version of managed ChromeOS will include services &amp; documentation such as the Service Data Downloader and telemetry viewer, to help data controller customers fulfill DSARs.</p> <p>Information is reflected in documentation of the diagnostic information tool released with Google Workspace.</p> <p>For DPChromeOS, Google is planning to publish documentation to explain which data types are collected by which service.</p> <p>Google has published Help Center articles about the new diagnostic information tool (DIT). For DPChromeOS, Google will add new published documentation about the Essential Services and what diagnostic / telemetry data is collected by these services (only services which collect user or device associated data), and release the Service Data Downloader.</p> | <p>Low/None</p> |
| <p><b>Lack of purpose limitation data Takeout tool</b></p> | <p>Keep on disabling the <i>Workspace Additional Services</i>.</p>            | <p>Google has become a data processor for the admin and end user Takeout tools.</p>  | <p>Google is a data processor with respect to processing data carried through Takeout via customer instruction.</p> <p>Domain wide takeout is rolled out by Google in November 2022: <a href="https://support.google.com/a/answer/12940323">https://support.google.com/a/answer/12940323</a></p>   | <p>Low/None</p> |

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|  |   |   | For information on how to export Chrome Sync data, please see <a href="https://support.google.com/chrome/answer/10248834?hl=en">https://support.google.com/chrome/answer/10248834?hl=en</a> . Which Sync data can be exported will depend upon the user's (and their organization's) Chrome Sync settings.   |   |
| <b>Lack of purpose limitation ChromeOS and browser</b>                         | Sign-up for the new processor agreement.  | The processor agreement for the managed ChromeOS and browser contains two limitative lists of purposes, for Google as processor, and for agreed further processing by Google as controller for its legitimate business purposes.                | Google confirms that "Processor Service Data" is defined in the new DPChromeOS ToS, and simply refers to Service Data that Google will now process as a data processor, in accordance with the customer's instructions. The Service Data being collected is the same for both roles, data controller and data processor. The same piece of Service Data is processed for different purposes depending on the role. Google may still process Service Data as a controller for its Legitimate Business Purposes, as agreed with SURF, SIVON and SLM. | Low/None  |
|  | Do not enable the <i>Optional Chrome Services</i> , for which Google continues to act as controller (already disabled for new customers). |   |  |   |
| <b>Lack of purpose limitation Sync data outside of Workspace for Education</b> |   | Based on the processor agreement for the managed ChromeOS and browser, Google is a data processor for Chrome Sync, both for the Content and Diagnostic Data (separate from Workspace for Education, where Sync is already a processor service). | Upcoming DPChromeOS product offering will provide similar terms as Workspace for Education when it comes to Chrome Sync - therefore it is not necessary to disable Chrome Sync for customers that have accepted the new Chrome processor agreement.  | Low/None<br><br>Chrome Sync may collect data of a sensitive nature such as logins, passwords and bookmarks which is transferred to the USA. We advise to either encrypt sync data |

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|  |  |  |  | or switch the sync feature off. |
| <b>Lack of purpose limitation (Managed) Play Store and Chrome Webstore</b> | Disable access to all <i>Additional Services</i> in Workspace, including the (managed) Play Store and the Chrome Webstore. If schools wish to enable students to use selected allowed apps, they must distribute these apps via their own network. For browser extensions they can apply Force install, without users having to visit the Chrome webstore. |  | <p>Managed Google Play, which is the service that allows an organization to configure how its users interact with Google Play and apps, is currently a data processor product with respect to user-generated data.</p> <p>In the Chrome Admin Console, the Chrome Web Store Toggle is by default turned OFF. This is to disallow students from having default access to the Chrome Web Store (CWS), and from downloading extensions. Chrome Web Store only collects and processes license data from users, and users can access, download, and remove license information from their profiles via the My Extensions and Apps tab in the Chrome Web Store settings. Google has no plans for CWS to be a data processor product. Please note that consent is not relied on as a legal basis for processing personal data by the CWS.</p> | Low/None                        |
| <b>No valid ground for transfer of personal data to the USA</b>            | Sign up for the new processor agreement including the new SCC and apply all data minimisation measures from the updated guidance from SIVON  | Google has become a data processor for the managed ChromeOS and browser, including the SCC C2P Module 2 for the transfer to the USA. | <p>SCC C2P Module 2 and SCC P2P Module 3 have been incorporated into the Chrome DPA, and will cover the new version of managed ChromeOS.</p> <p><a href="https://chromeenterprise.google/terms/scc/controller-to-processor/">https://chromeenterprise.google/terms/scc/controller-to-processor/</a><br/> <a href="https://chromeenterprise.google/terms/scc-google-exporter/processor-to-processor/">https://chromeenterprise.google/terms/scc-google-exporter/processor-to-processor/</a></p>   | Low/None                        |
|  | Disable SafeSites with a registry setting (consider use of a third party filter).  | Google has not replied to the request to allow for local filtering instead of transferring URLs to the USA with the IP addresses.    | <p>SafeSites: IP addresses are logged for usage analysis, debugging purposes and bug analysis and the retention period is 7 days.</p> <p>SafeSearch in Chrome: No data is collected by the Chrome/ChromeOS team.</p>   | Low/None                        |
|  | In case Workspace cannot be used, Chromebooks  | Google offers central admin management options for the   | The following resource addresses this proposed mitigating measure:<br><a href="https://chromeenterprise.google/policies/#BlockThirdPartyCookies">https://chromeenterprise.google/policies/#BlockThirdPartyCookies</a>  | Low/None                        |

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|  | can still be used if schools centrally enforce all privacy-friendly settings, including disabling of access to google.com and youtube.com, either by enforcing use of a proxy server to block functionality on the local network, or through manual URL blocking options in the admin console. | guest mode on managed Chromebooks, including blocking of third party cookies.  |  |   |
|  | Disable Sync by setting the policy <i>SyncDisabled</i> to <i>true</i> or ensure that students use a self-managed local passphrase to encrypt the Sync data   | Google is considering the request to develop a policy for admins to centrally enforce use of encryption with locally held keys, in the end user devices. | Chrome Sync is a Workspace Core Service for EDU accounts, so is already covered by the commitments made by Google in the Workspace agreements, including the Cloud Data Processing Addendum. Chrome Sync will also be an Essential Service under the new Chrome agreement.<br><br>Centrally managed encryption functionality is under consideration. | Low/None<br><br>Encryption is required to protect sensitive data being transferred to the USA |
|  |  | In the future: possibly rely on a new adequacy decision for the USA for the transfer of all personal data.   |  |   |
| <b>Privacy unfriendly default settings</b> | Enforce the recommended privacy-friendly settings whenever possible.   | Privacy Sandbox trials are disabled for users under 18.  | Privacy Sandbox features are OFF by default. Users in the EEA are presented with an opt-in prompt to make a choice about whether they want to participate in the trials.<br><br>Furthermore, we restrict Privacy Sandbox trials participation for users under 18.  | Low/None<br><br>Follow privacy friendly settings as set out In “handleiding”                  |

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|                             |   | Google has not responded to the request to improve the tracking protection features in the Chrome browser when third party cookies are blocked, the DNT signal is enabled and website preloading is disabled. For example, by blocking traffic to Google services where Google does not act as data processor (such as analytics and fonts). |  | Low/None |
|                             | Disable the Privacy Sandbox for all users (or select K-12 setting to block by default). | Google will give admins controls to block ads personalization and measurement as part of Privacy Sandbox in the processor version of managed ChromeOS.   | Google will give admins controls to block ads personalization and measurement as part of Privacy Sandbox.          | Low/None |
| <b>Lack of transparency</b> | Disable access to the (managed) Play Store and Chrome Webstore.                         | Google has not announced any measures.   | Play has no plans to become a data processor, and therefore won't integrate with the Service Data Downloader tool. | Low/None |

**Previous commitments made by Google for a processor version of managed ChromeOS (and Chrome browser running on managed ChromeOS)**

Per negotiations with SIVON / SURF / SLM, Google will become a processor of personal data contained in both Customer Data and/or Service Data, which is processed by Essential Services, with carve-outs that personal data contained in Service Data may also be processed by Google as a controller, if permitted by one of the negotiated "Legitimate Business Purposes".

An Essential Service is a service that Google has determined is critical for ChromeOS or Chrome-on-ChromeOS to function correctly for the targeted user segment (Dutch EDU and public entity customers). All other services are classified as Optional Services, for which Google retains its data controller role over personal data.

Google to develop “switches” to disable optional services for ChromeOS/Browser so that system administrators can switch optional Services “off”

Optional Services that do not process personal data: this category of Optional Services is not disabled in its default settings.

Optional Services that do process personal data: this category of Optional Services, are (to be) disabled in its default settings for new customers.

### Essential Services

#### ChromeOS services

##### Enterprise Management

- Enrollment / Device Verification: Enterprise Enrollment is a process that marks a device as belonging to a particular organization and enforces the device policies admins set in the Google Admin console.
- Policy Management: Policy Management allows admins to push policies and settings to their devices or their managed Google Account (Chrome profile).
- User & Device Reporting: User & Device Reporting allows admins to see insights about the Chrome OS devices in their organization.
- Kiosk Mode: Kiosk mode is a session that runs a single Chrome/ Android app, after admins enroll a Chrome OS device into an organization and turn on Kiosk mode.
- Managed Guest Sessions: With managed guest sessions, multiple users can share the same Chrome OS devices without having to sign in to their Google Account.

##### Workspace

- Google Drive Syncing: Google Drive Syncing allows you to easily access files stored on Google Drive directly on your Chromebook.

##### Device Service

- Location Service: Location Service on Chromebook estimates a user’s geolocation based on a combination of nearby WiFi access points and/or IP addresses assigned to Chromebooks. This is then used for tasks such as setting timezones, providing websites in the correct language, and alerting users

to possible unauthorized log-ins.

#### User Services

- Spell-Check (Basic): Spell check helps you review and correct your spelling on your devices. You can check for spelling errors on your computer when you enter text into input fields on the web.
- Application Platform Metrics: Application Platform Metrics collects pseudonymous ChromeOS app usage.
- Calculator: The Calculator app provides you with simple calculation functions on ChromeOS devices.
- Camera app: A built-in camera app to provide high-quality camera experiences across the Chrome OS ecosystem.
- Canvas app: A built-in drawing app for Chromebooks users to express themselves, play around, and grow as artists.
- Cursive app: A built-in notebook app for Chromebooks to provide an experience that matches paper's speed and latency.

#### Chrome browser services

##### User Services

- Translate: When you come across a page written in a language you don't understand, you can use Google Translate to translate the page.
- Chrome Sync: Chrome Sync saves your bookmarks, history, passwords and other settings to your Google Account, so that you can easily log-into other devices without needing to recalibrate the browser from scratch.
- Safe Browsing: SafeBrowsing helps protect you against known phishing, social engineering, malware, unwanted software, malicious ads, intrusive ads, and abusive websites or extensions with DP-compliant hash-based URL detection. Google plans to make client-side detection and other advanced SafeBrowsing features DP-compliant after August 2023.
- Safe Sites: Safe Sites uses Safe Search API to inspect URLs users attempt to visit for explicit content (the content of the webpage itself is not transferred and analysed by Google).

##### Update Service

- Chrome Update: Chrome Update ensures that the latest version of Chrome is distributed to you, with the latest security updates and protections.
- Chrome Variations: Chrome Variations is the Chrome experimentation framework used to roll out or



roll back a feature and to ensure it's working as intended.

ChromeOS and Chrome browser shared services

- User Metrics: User Metrics sends usage statistics to Google.
- Crash Reports: Crash Reports are used by Google to identify and prioritize fixes for Chrome.