



The
University
Of
Sheffield.

Data Security and Privacy with Google

Factsheet

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Before use, check to verify that this is the current version.

For the current version please refer to <https://www.sheffield.ac.uk/cics/google/security>

Version and Ownership

Version	Date	Author(s)	Comments
0.1	24/08/2018	Carl Dean	Document review creation
0.2	30/08/2018	Carl Dean	Changes made based on comments
1.0	09/10/2018	Chris Willis, Head of Information Security	Approved

Overview

This factsheet summarises the University of Sheffield's assessment of the risks to information security and privacy that may arise with the use of the Google's G Suite for Education.

Services Covered

The University provides email and calendar services through the Google's G Suite for Education suite service.¹ Other Google Apps, including Drive, Sites and Contacts are also available as part of this suite, for a full list of apps included please consult the what's included section of G Suite for Education suite service.

Privacy

An assessment of G Suite for Education against the applicable data protection legislation (including GDPR and UK Data Protection Act 2018) and the University's own privacy policies concluded that the University is satisfied that personal data is being processed appropriately:

- The University has a modified contract with Google, based on Google's standard terms and conditions for education customers in the EEA.
 - The contract specifies how and where different types of data will be held and processed by Google.
 - The contract specifies that both Google and the University must abide by a comprehensive Privacy Policy.²
 - The contract has specific clauses that cover when and how data will be processed and the retention periods for data.
 - Both the contract and Privacy Policy are clear that data will not be shared with third parties except where required to do so by law.
- The University has enabled admin console options to be in line with GDPR and EU model contract clauses.
- Google will only process personal data in accordance with applicable data protection legislation.
- The University has assessed the risk in relation to the US Patriot Act is satisfied that the increased risk presented by this is very small and is manageable.
 - The US Patriot Act has strict legal processes that must be followed, and Google make it clear in their Privacy Policy that they will only respond to lawful requests where there is evidence that the correct processes have been followed.

Information Security

After assessment the University is satisfied that the security controls put in place by Google are sufficient to protect University information:

- Google's security is trusted by the world's leading organisations. G Suite meets the stringent privacy and security standards based on industry best practices.
- Google publicly provide information on their security on their G Suite web pages.³

¹ <https://edu.google.com/higher-ed-solutions/g-suite/>

² <https://policies.google.com/privacy>

³ https://gsuite.google.co.uk/intl/en_uk/security/

- Google has produced a public cloud security and compliance Whitepaper detailing the controls protecting G Suite products.⁴
- Google's data security and privacy controls are audited by independent third parties.
 - G Suite for Education (and the data centres that support the service) are SSAE 16 / ISAE 3402 Type II SOC 2-audited and have achieved ISO 27001 certification.⁵⁶
- The University maintains a close working relationship with Google who are on hand to answer security questions.

Controlled Technology

A small number of researchers in the University handle technical information that is covered by UK export law (this is usually, but not limited to, defence related technologies). As the data in G Suite for Education may be held on servers internationally, the University has obtained legal advice on the specific matter of technical information controlled by export law.

- The use of Google mail (Gmail) to send, receive or store emails that contain information controlled by export law would not in itself qualify as exporting data. For example, if both the sender and recipient are in the UK.
- The use of any mail system to send, receive or store emails that contain information controlled by export law to those outside of the UK would qualify as exporting data.
- Data transmitted by email can pass through national boundaries regardless of destination and can also be accidentally forwarded to unintended recipients. Data stored in G Suite for Education could, in theory, be made available to US law enforcement agencies.
- Therefore, although the risk is very low, and as should be the case anyway, careful consideration should always be given as to how controlled technology is transmitted and where it is stored.
- Data controlled by ITAR must not be processed using G Suite for Education applications.

Further Information

Google has a comprehensive information about the security and privacy controls in place on their G Suite for Education web pages: <https://edu.google.com/higher-ed-solutions/>

Google's faq web page answers common questions including features and security: https://gsuite.google.co.uk/intl/en_uk/faq/

If you have a specific question or concern that is not answered by this fact sheet or the Google web pages please contact the University's Information Security team, info-security@sheffield.ac.uk.

⁴ <https://storage.googleapis.com/gfw-touched-accounts-pdfs/google-cloud-security-and-compliance-whitepaper.pdf>

⁵ <https://cloud.google.com/security/compliance/soc-2/>

⁶ <https://cloud.google.com/security/compliance/iso-27001/>