



BLACKBOARD OPEN LMS

Privacy/GDPR API Compliance Code Notice



Description

Blackboard cares about privacy. We believe that privacy is a fundamental right for all individuals. Our clients entrust us with the personal information of their employees and their users, who are often students. We take the obligations that are attached to this information very seriously. We expect the same privacy commitment from our vendors and partners and expect all 3rd party Moodle plugin code to comply with applicable privacy laws and in particular with the EU General Data Protection Regulation (GDPR).

As such, we require all 3rd party plugin vendors that have not yet implemented the necessary GDPR API code changes to submit their updates by May 1, 2019.

We will complete code reviews on all submitted updates and include with our next major release (version 3.6 - planned for June 2019) and/or maintenance pack release. After that time, we will update our list of plugins with a column for GDPR compliance in time for the following major release (version 3.7 - planned for December 2019) and will mark plugins as non-compliant if updates have not been in place or submitted in time. We will also contractually require the implementation of GDPR API code changes for any new code reviews we are conducting.

Moodle core provides a code API required for a Moodle installation to become GDPR-compliant. More about that can be found in the documentation here:

https://docs.moodle.org/dev/Privacy_API.

It is important and expected that plugin vendors take this matter seriously with code that fully satisfies the requirements. Adding the minimum code necessary to pass the Moodle Core `provider_testcase` without actually addressing the requirements of the GDPR regulation is not acceptable.

As the Moodle documentation for the Privacy API (see link above) shows we expect the necessary classes to be added to all plugins. The new privacy code should be tested before submission. We suggest that plugin level test cases be added to confirm this functionality, but this is not strictly required.

Thank you for your attention.