

USA		URL of PRIVACY NOTICE/PRIVACY GUIDANCE	
California Institute of Technology	https://www.caltech.edu/privacy-notice		<p>There has been no changes made since 2018. But, this is the privacy notice for the websites of CalTech. There is a separate page for their compliance with FERPA (look here https://registrar.caltech.edu/records/ferpa/ferpa-students) but that is for how the registrar's office handles student records. I fear this is not going to lead me anywhere.</p> <p>Stanford has a very detailed break down of the data they collect, for what purposes and under which legal grounds. However, this list can contain data of different granularity: e.g., platform usage and interaction describes data shared with tooling used with online and hybrid training.</p> <p>MIT has very high level information about data collected on the website and an overview of data relevant for FERPA. It does provide in some detail guidance to the university community how to go about privacy and data protection in the context of research and education.</p>
Stanford University	https://www.stanford.edu/site/privacy/		
Massachusetts Institute of Technology	https://www.mit.edu/privacy/ https://policies.mit.edu/policies-procedures/110-privacy-and-disclosure-personal-information https://registrar.mit.edu/transcripts-records/records-privacy-		
GERMANY			
LMU Munich	https://www.lmu.de/de/footer/datenschutz/index.html		LMU privacy policy is another league from those of the US websites. They detail what third party data is collected on their website, including google, twitter, instagram, google custom search and pictures that they may publish. It is an amazing document in comparison to some of the stuff in the US (except Stanford).
Technical University of Munich	https://www.datenschutz.tum.de/datenschutz/startseite/ https://www.tum.de/spezielseiten/datenschutz?in2cookieHideOptIn=&chHash=49ce73dcfbe93c645c3c1f5cd673461c		The TUM has a rich privacy policy with references to third parties on the website and no further information about SaaS use. There is a complete environment with further resources and a wiki that can only be addressed through the intranet.
Heidelberg University	https://www.uni-heidelberg-de.translate.goog/datenschutzerklaerung_web.html?_x_tr_sl=de&_x_tr_tl=en&_x_tr_hl=en&_x_tr_pto=sc#_Toc514859354 https://www.uni-heidelberg.de/md/zentral/universitaet/beschaefigte/service/personal/stellenausschreibung/aktuell_datenschutzinfo_personal_29.08.19.pdf	Data protection of employee data.	<p>Gives an overview of the data protection policy but does not list the data that is being collected. Has detailed information on google search getting some data, but nothing about third party services used for education purposes. In the page on Lehre and Zusammenarbeit, we see that they list a number of services that have been assessed by the university. However, this page does not provide information about what data is shared and for what purposes, just that these services comply with data protection.</p>
SWITZERLAND			
ETH Zurich	https://ethz.ch/en/footer/data-protection.html		this is a minimal statement with very little information. I expect that there may be more information in the intranet, but not accessible from outside of the university.
École Polytechnique Fédérale de Lausanne	https://www.epfl.ch/about/presidency/fr/bureau-de-la-presidence/affaires-juridiques/politique-de-lepfl-relative-a-la-protection-des-donnees-personnelles/ https://www.epfl.ch/about/presidency/presidents-team/legal-affairs/epfl-privacy-policy/personal-data-we-collect-about-you-and-for- https://www.epfl.ch/about/presidency/presidents-team/legal-affairs/epfl-privacy-policy/with-whom-we-share-your-personal-data/		the privacy policy seems to be mainly concerned with the website of the university and the student records collected by the university. Third parties are mentioned, but not SaaS providers used within the university. "we may also share your Personal Data with some vendors or subcontractors acting on our behalf for operational or analytical purposes (e.g. IT providers)."
University of Zurich	https://www.dsd.uzh.ch/de/online-collaboration.html https://www.dsd.uzh.ch/dam/jcr:e8615576-6aca-40cb-9b6e-7414ce1370ab/Online-Tools_de.pdf https://www.dsd.uzh.ch/dam/jcr:89140184-7798-4f4b-850b-3a045f9394e/FactSheet_Data_Protection_Principles_January2020.pdf		guidance, that also includes reports and recommendations to the university body and data protection officers. They are also one of the few universities that asked faculty and admin to contact them if they want to use tooling/platforms other than the ones curated by the university.
AUSTRIA			

Universitaet Wien	https://dsba.univie.ac.at/rechte-von-betroffenen/ https://dsba.univie.ac.at/		Uwien has a layered approach, where they describe the rights of the data subjects, the obligations of people processing data and the responsibilities of the DPO. I cannot see the details since they are behind an intranet.
TU Wien	https://www.tuwien.at/en/tu-wien/organisation/central-divisions/data-protection-and-document-management/data-protection-at-tu-wien https://www.tuwien.at/en/tu-wien/organisation/central-divisions/data-protection-and-document-management/data-protection-at-tu-	overview of data protection related resources	TU Wien has a lot of documentation, where it is almost impossible to guess which one might be the relevant one. The data protection guidance with respect to educational data processing: they seem to have an on premise solution, for which the data collected is listed quite transparently. Also, for example, for proctoring, they use Zoom. They do not discuss all the data that Zoom collects, but do mention they have a contract and that they use a "Germany Cloud"
TU Graz	https://www.tuwien.at/index.php?elD=dms&s=4&path=Documents/Da ta%20Protection%20Declaration%20Study%20- %20General%20Information/Data_Protection_Information_Edu.pdf https://www.tuwien.at/index.php?elD=dms&s=4&path=Documents/Da ta%20Protection%20Declaration%20Study%20- %20General%20Information/Data_Protection_Information_Online_Exa https://www.tugraz.at/tu-graz/organisationsstruktur/serviceeinrichtungen-und-stabsstellen/qualitaetsmanagement-evaluation-berichtswesen/datenschutz-an-der-tu-graz/	Policy specific to educational activities	TU Graz sees data protection as part of their institutional strategy. They have quite detailed documents for website and registration data, including a committee for employees and data protection, however, I believe their privacy policies for students and learning platforms is in accessible only through their intranet.
UK			
University of Oxford	https://www.ox.ac.uk/privacy-policy#:~:text=We%20will%20only%20use%20your,it%20for%20that%20new%20purpose.	privacy policy pertaining to the website	University of Oxford is quite comprehensive in the data they collect and highlight the ability to exercise subject access rights. Even then, third parties are not listed and the data collection is described rather high level. Some documents are in intranet, so it is not possible to identify if they also provide detailed information for faculty and staff.
	https://www.ox.ac.uk/legal	terms of use of the website (and third party services like chats)	
	https://compliance.admin.ox.ac.uk/student-privacy-policy#collapse968171	most detailed list of data collected and shared by the university	
University of Cambridge	https://www.cam.ac.uk/about-this-site/privacy-policy	Privacy policy pertaining to the website	Once again, much emphasis on website and student records. There is a lot of emphasis on third party services on the website but very little about SaaS offering in education or admin.
	https://www.information-compliance.admin.cam.ac.uk/data-protection/student-data	Data protection statement for student data. No SaaS mentioned. Subject access rights highlighted.	

https://www.information-compliance.admin.cam.ac.uk/records-management	Management and retention of student records, did not include in document repository.	
https://www.information-compliance.admin.cam.ac.uk/data-protection/guidance/provisions#heading8	Guidance on data protection for the university community, includes differentiated guidance for joint/other data controllers as well as data processors	
https://www.cam.ac.uk/about-this-site/social-media/connect-with-us	Third party websites that the Cambridge website is making use of	
https://www.imperial.ac.uk/admin-services/secretariat/information-governance/data-protection/processing-personal-data/privacy-notice/	Numerous privacy notices that make a distinction between students, alumni, staff, events, research partners and learning platforms.	Imperial College has a rather sophisticated approach that distinguishes between different parties whose data is collected and processed. While there is a document dedicated to SaaS providers for learning purposes, the break down is not specific with respect to what data they collect. They claim these parties have contractual obligations to use this data only for educational purposes, but it is not explained how this is guaranteed.

	https://www.imperial.ac.uk/media/imperial-college/administration-and-support-services/secretariat/public/information-for-staff/Digital-Learning-Platforms-Privacy-Notice_May-2019_v0.4.pdf	<p>Document that lists third parties used for education. The list is however not specific to what each party uses. The statement claims that contractually the third parties are required to only use this data for educational purposes, there is however no information about how this is enabled.</p>	
	https://www.imperial.ac.uk/admin-services/secretariat/information-governance/data-protection/our-policy/	<p>Overall privacy policy which is more a list of principles the university abides by than the specific listing of data collected.</p>	
NL			
Wageningen University Research	https://www.wur.nl/en/Privacy-Cookie-statement.htm https://www.wur.nl/nl/download/Reglement-cameratoezicht-2017-2018.htm https://www.wur.nl/en/show/Policy-document-for-processing-personal-data-WUR.htm	<p>privacy policy for website</p> <p>Policy for cameras on campus</p>	<p>Wageningen has detailed documents that accompany their privacy policy. These are downloadable. Interesting is their documentation of the CCTV camera policy (few universities mention such data, and even if they do, they do not have a separate detailed document.) The detailed privacy policy has a long list of data that they protect, but again, no mention of which third party services get access to this data or how they may process it.</p>
University of Amsterdam	https://www.uva.nl/en/home/disclaimers/privacy.html?cb	<p>Privacy policy regarding all data collected by the university</p>	<p>The information is accessible but rather generic. For example, all learning platforms are covered under a sentence like: "to support education (including online education) and the organisation of examinations (including online examinations);" There is no way to find out about the third parties involved and the specific data that they collect or how the university ensures contractual obligations.</p>
Delft University of Technology	https://www.tudelft.nl/privacy-statement	<p>Privacy policy that is for everything although occasionally only for the website (third party tracking on the website)</p>	<p>This privacy policy is very generic and high level. It goes back and forth between being about all data collected at Delft and the website. The policy says they make contractual agreements to ensure data protection vis a vis third parties, but again these parties are not listed. There are specific guidelines for teachers and it recommends that teachers make use of tooling that is approved by the university. However, a link to the list of tools recommended is broken.</p>

	https://www.tudelft.nl/en/privacy-security/privacy/doelgroepen/staff https://www.tudelft.nl/en/privacy-security/privacy/doelgroepen/researcher https://www.tudelft.nl/en/privacy-security/privacy/doelgroepen/teacher https://teaching-support.tudelft.nl/educational-tooling/	<p>Guidance for staff on how to handle data collection and processing.</p> <p>Guidelines for researchers</p> <p>Guidelines for teachers</p>	
FR			
Paris Sciences et Lettres – PSL Research University Paris	https://www.psl.eu/politique-de-confidentialite	Privacy policy for website and student records	There is practically one mention of third parties. This could be because they are officially not using any, I cannot tell. However, the policy also does not say they collect any data for educational purposes, meaning maybe the policy applies only to the website.
Sorbonne University	https://www.sorbonne-universite.fr/fondation/notre-organisation/politique-de-confidentialite-de-la-fondation https://guideetudiant.sorbonne-universite.fr/politique-de-confidentialite.html https://fc.sorbonne-universite.fr/wp-content/uploads/2021/05/Politique-de-confidentialite-et-de-protection-des-donnees-personnelles.pdf	<p>Privacy policy for website.</p> <p>Privacy policy for an app</p> <p>A pdf of the privacy policy for students</p>	<p>Sorbonnes is the first university that also provides a privacy policy for an app, although the privacy policy basically says nothing. Similarly, the privacy policy document are rather curt and just give basics and nothing about communications being captured or learning platforms.</p>
École Polytechnique	https://www.ensta-paris.fr/fr/politique-de-confidentialite		Ecole Polytechnique is a number of institutions and it took us a moment to find their privacy policy which is rather high level. It covers only the website and promises that there are close to no sharing of data with third parties except a mail service.