



381 East Evelyn Avenue, Mountain View, CA 94041
Telephone: (650) 963-9884

January 4, 2016

Via email only (paulolivier@gmail.com)

Professor Paul-Olivier Dehay

Re: Your email messages to Coursera dated November 24, 2015

Dear Professor Dehay:

Coursera, Inc. is in receipt of four emails from you dated November 24, 2015, purporting to request information allegedly held by Coursera about you pursuant to the U.S.-EU Safe Harbor and U.S.-Swiss Safe Harbor, with the various subject headings: (1) "Access and Notice under US-EU Safe Harbor as Coursera student," (2) "Access and Notice under US-EU Safe Harbor as Coursera instructor," (3) "Access and Notice under US-CH Safe Harbor as Coursera student," and (4) "Access and Notice under US-CH Safe Harbor as Coursera instructor." By this letter, Coursera responds to all four emails from you.

Coursera is not required to respond to requests under the U.S.-EU Safe Harbor on the basis of your Belgian nationality (i.e., emails numbered (1) and (2) above). Two of the above-referenced emails ((1) "Access and Notice under US-EU Safe Harbor as Coursera student" and (2) "Access and Notice under US-EU Safe Harbor as Coursera instructor") appear to suggest that the U.S.-EU Safe Harbor applies to personal information allegedly collected by Coursera about you solely on the basis of your Belgian nationality, and not because that information was actually received from a location within the EU. As far as Coursera is aware, any such personal information within the scope of Coursera's Safe Harbor certification was received by Coursera from an entity in Switzerland, and not from an entity with operations in the EU. Thus, the information you have requested in your emails numbered (1) and (2) above does not fall within the definition of "personal data" under the U.S.-EU Safe Harbor.¹ Accordingly, there is no information responsive to your request under Coursera's certification to the U.S.-EU Safe Harbor contained in the emails numbered (1) and (2) above.

Coursera is not required to respond to requests under the U.S.-EU Safe Harbor or U.S.-Swiss Safe Harbor to the extent they relate to information allegedly received about you in your capacity as a Coursera instructor (i.e., emails numbered (2) and (4) above) The subject headings of two of the above-referenced emails ((2) "Access and Notice under US-EU Safe Harbor as Coursera instructor" and (4) "Access and Notice under US-CH Safe Harbor as Coursera instructor") suggest that each purports to request information allegedly held by


¹ See Safe Harbor Privacy Principles Issued by the U.S. Department of Commerce on July 21, 2000, available at http://build.export.gov/main/safeharbor/eu/eg_main_018475 (last accessed Jan. 4, 2016).

Coursera about you in your capacity as a former Coursera instructor. Coursera's certification to the U.S.-EU Safe Harbor and EU-Swiss Safe Harbor encompasses only "personal information from customers."² Coursera's customers include its learners, but not its instructors. Accordingly, Coursera's certification does not cover the information requested in the emails numbered (2) and (4) above.

Coursera has already provided adequate notice regarding the purposes for which it collects and uses information about its learners, and the types of third parties to which it discloses the information, in its Privacy Policy and Safe Harbor Policy. One of the above-referenced emails ((3) "Access and Notice under US-CH Safe Harbor as Coursera student") contains two numbered requests (requests numbered 2 and 5) for information that purport to seek notice of the purposes for which Coursera collects and uses information about you in your capacity as a Coursera learner. Coursera maintains a written Privacy Policy and Safe Harbor Policy on its website which set forth the purposes for which Coursera collects and uses information about its learners, as well as the types of third parties to which it discloses the information.³ Please refer to these policies for further information about Coursera's practices.

Regarding your requests for information under the "Access" principal that Coursera holds about you in your capacity as a learner in the email numbered (3) above, Coursera previously provided you with information that it holds about you in connection with your prior request of October 2014. Coursera is continuing to look into your latest requests, however, and will respond further to those particular requests next week.

Very truly yours,



Wendy Anna Herby
Associate General Counsel
Coursera, Inc.

² See list entry for "Coursera, Inc." U.S.-Swiss Safe Harbor List, and list entry for "Coursera, Inc.," U.S.-EU Safe Harbor List, available at <http://safeharbor.export.gov/list.aspx> (last accessed Jan. 4, 2016).

³ See Privacy Policy and Safe Harbor Policy, available at <https://www.coursera.org/about/privacy> (last accessed Jan. 4, 2016.)