



Security and Privacy Using Google Apps for Education ("G-Suite") - Montessori Academy of London

Montessori Academy of London ("MA" or "School") has established its own **Google for Education** domain - *montessori.on.ca* - which is available to authorized users only. This means that MA has control over the domain and manages who can log in. This provides the School with its own, online collaboration and communication system. Access to G-Suite is provided through a School-supplied *montessori.on.ca* username and password. **All MA G-Suite access is only permitted through a *montessori.on.ca* account.** One common domain (*montessori.on.ca*) facilitates security, system administration, etc. which allows both staff and students of MA to use the online applications in a secure and safe environment.

Logging in to G-Suite, using a *montessori.on.ca* account, grants the user access to applications and tools that are managed by the School. This online environment does not include advertising and comes with strict controls over content and filtering. As such, these applications are different from available public Google applications.

The School aims at all times to protect the personal information, in its custody, from unauthorized access. MA will take all reasonable means to protect personal information. In keeping with our commitment, the School has extensively reviewed all policy and security measures regarding G-Suite. Based on this research, we are satisfied that G-Suite protects the privacy of all staff and students - [Privacy and Security Information](#).

Types of Data and Rights to Data on G-Suite

Currently, Google Data centers are located all over the world. Any data added, uploaded or created in G-Suite (such as this document) is stored on servers located in Google Data Centers. Even though data is stored on Google servers, the School still retains ownership of its data.

The School is using G-Suite for collaboration between students and teachers by creating and accessing documents, presentations, etc. Such data, which will be stored on Google's servers, also includes user login information (First Name, Last Name, User name), and their login password. All passwords are **encrypted** which means that the School and Google cannot read

them (Google admin within the School are able to reset passwords but cannot see the passwords of any student or staff member).

Details regarding Google security and privacy are as follows:

1. G-Suite is governed and managed by the following security policies which ensure that Google will not inappropriately share or use personal information stored in our systems:
 - [Google Privacy Policy](#)
 - [Privacy and Security Information](#)
2. The [Google Apps for Education \(Online\) Agreement](#) confirms that MA students, faculty, and staff are the *exclusive owners* of their data.
3. Google adheres to applicable certain (U.S.) privacy laws, and the [Google Apps for Education \(Online\) Agreement](#) details their obligations and compliance with FERPA regulations - [Family Educational Rights and Privacy Act.](#)
4. [Google Cloud Platform Security](#) which ensures that their data protection compliance meets *international standards*.
5. All of a user's data is owned by the user and the School and [Google doesn't assume ownership of any user data.](#)
6. Google's position on reliability, privacy, and security – [security and privacy for administrators.](#)
7. [There are no ads in Google Apps for Education \(G-Suite\) core services.](#)
8. Through implemented controls, security measures and policies protect user data, Google systems have obtained a [SAS 70 Type II verification](#) and Google will continue to seek similar verification.

Although the above-mentioned laws and agreements may have no legal standing in Ontario or Canada, the School is of the opinion that they do confirm and demonstrate Google's commitment to the protection of personal information of our users and is reflective of the high standards for security and privacy that are present in G-Suite.

Based on [Google's Privacy Policy](#) regarding the protection of personal information, MA is confident that G-Suite, which is different from public Google or generic accounts, meets our expectations and requirements for security and privacy.

However, even though similar laws exist in Canada, under U.S. law the School cannot guarantee against the possible disclosure of information to a foreign authority (e.g. US Government, National Security Agency, etc.) as a consequence of foreign laws, a criminal investigation, etc.

The School is aware of the potential risk associated with a “secret disclosure” but considers the probability of such an event extremely low.

Based on all information researched and information collected, the School is satisfied to accept this extremely low risk in order to benefit from the educational and collaborative features of G-Suite for our users. Furthermore, many thousands of teachers and students from across the country are currently benefiting from using G-Suite while many more public school boards and private schools are employing Google’s G-Suite services each year. The most recent data states that well over 70 million teachers and students are using G-Suite.

Using G-Suite:

No Advertising in G-Suite

G-Suite is free for educational purposes. G-Suite is also offered “**completely ad-free**” -- this means that School data is not processed or scanned by Google's advertising systems.

*Completely ad-free covers the **core** Google Apps for Education (G-Suite) suite.* At MA these core apps include, but are not limited to: Drive, Docs, Sheets, Slides, Sites, and Calendar. Note: It does not cover other non-core Google Apps that a user may access through their G-Suite account such as YouTube or any other 3rd party app that a user authorizes through their own G-Suite account. As well, there are no ads in Google Search when a user is logged in with a school montessori.on.ca account.

Access to montessori.on.ca Online Information

Specifically-assigned teachers and IT staff have access to user logins and Google administrator controls through the Google Admin Console. Through the Admin Console these specific MA staff can:

- have global access to all G-Suite (staff and student) account settings and controls;
- monitor the entire montessori.on.ca system as it pertains to G-suite;
- view statistics regarding an account, such as information concerning last login or data storage usage;
- reset an account password, suspend or terminate account access (at the direction of the Academic Director), and modify account settings;
- receive account information in order to satisfy applicable law, regulation, legal process or enforceable governmental request;
- delete your account and all data associated with that account;

In very rare circumstances, Google tech support will be granted your account data only when montessori.on.ca domain administrators grant Google employees **explicit permission** to do so

for troubleshooting purposes. During the course of troubleshooting an issue or other investigation, the Google Support team may ask for the creation of a test administrator account, solely to be used to resolve the particular issue at hand and in conjunction with a designated G-Suite Administrator.

Notes:

- Except for situations in which a student is expelled, students can export their files from G-Suite before they leave the School.
- The School will determine when data will be removed/deleted from G-Suite. Under normal circumstances, student accounts and data will be deleted by the end of August following the student's Graduation from the School (the previous June) to allow for any information transfer that the student may choose to do before account deletion.

Google and Confidential Information

As a company, Google has established one of the most secure, robust and resilient communication networks of [*distributed data centers in the world*](#).

From Google:

"...securing and protecting information on these servers is critically important to us -- in fact, Google, Inc. relies upon the ***same network and server infrastructure used by our education customers on Google Apps for Education***. The following statements summarize some of Google's best industry practices for network security and user privacy:

⇒ It's your content, not ours. Your content belongs to your School, or individual users at your School - **Not Google**;

⇒ We don't look at your content. Google employees will only access content that you store on Apps when an administrator from your domain grants Google employees *explicit permission* to do so for troubleshooting – *this is done with an identifying unique PIN which is held by the School administrators*;

⇒ We don't share your content. Google does not share personal information with advertisers or other 3rd parties without your consent;

⇒ We sometimes scan content, but only under circumstances like spam filtering, anti-virus

protection, or malware detection;

⇒ Our systems scan content to make our Apps work better for users, enabling unique functionality like a powerful search in Google Docs. This is completely automated and does not involve humans; For more information, see our detailed:

- [Google Privacy Policy;](#)
- [Technologies and Principles;](#)

The following is from Section 7 of the [Google Apps for Education \(Online\) Agreement under Confidential Information:](#)

- **7.1 Obligations.** *Each party (i.e. MA and Google) will: (a) protect the other party's Confidential Information with the same standard of care it uses to protect its own Confidential Information; and (b) not disclose the Confidential Information, except to stakeholders, employees and agents who need to know it and who have agreed in writing to keep it confidential. Each party (and any stakeholders, employees and agents to whom it has disclosed Confidential Information) may use Confidential Information only to exercise rights and fulfill its obligations under this Agreement, while using reasonable care to protect it. Each party is responsible for any actions of its stakeholders, employees and agents in violation of this Section.*

- **7.2 Exceptions.** *Confidential Information does not include information that: (a) the recipient of the Confidential Information already knew; (b) becomes public through no fault of the recipient; (c) was independently developed by the recipient; or (d) was rightfully given to the recipient by another party.*

- **7.3 Required Disclosure.** *Each party may disclose the other party's Confidential Information when required by law but only after it, if legally permissible: (a) uses commercially reasonable efforts to notify the other party; and (b) gives the other party the chance to challenge the disclosure.*

Safety Online

[Google Safety Center](#) provides many resources made available by Google to students, teachers and parents.

Core Services at MA and Chromebooks

Core Services

MA has disabled some core services offered by Google, most notably Gmail. Only the G-Suite services that lend themselves to the most appropriate and efficient uses within the MA learning environments have been enabled. This restricts access of the core services to mainly Google Docs, Google Slides, Google Sheets, and Google Classroom (Junior High). There is no advertising in these core educational services and School data is not used for advertising purposes in any way. Student data created, collected and stored in these services is strictly used solely for purposes that these services are provided for.

Chrome Sync: By logging in to *any* Chromebook or *any* Chrome browser, using montessori.on.ca credentials, users will have access to their apps, data, bookmarks, etc. This is achieved with a built-in feature called Chrome Sync. It's automatic. This means by using Chrome Sync, users can get the same personal experience no matter where they log in or what device use. Google aggregates data from millions of users of Chrome Sync, only after completely removing personally-identifying information regarding individual users (e.g. name). This process is used to holistically improve core educational services. For example, if a particular web site visited appears to be broken, this web site would be moved lower in any Google search results. This process does not analyze any individual's behaviours and is not connected to any specific person. Furthermore, G-Suite users' Chrome Sync data is not used to target ads to individual users.

Awareness of Terms of Use and Privacy

MA will continually develop strategies and offer resources regarding acceptable, responsible use of technology-related security and privacy. Some of this information will be developed within the School and some will come from outside online sources. Furthermore, staff and students should be aware of who has access to their accounts and information stored on Google (see section: ***Access to montessori.on.ca Online Information*** above).

[Google's Privacy Policy](#) clearly establishes who owns the data, and who has access to the data. Essentially, Google will only access aggregate information, across millions of users, to improve service. [Google Cloud Platform](#) meets rigorous privacy and compliance standards that test for data safety, privacy, and security. Even though these laws and governing regulations may have no legal standing in Ontario or Canada, the School is confident that they do establish Google's commitment to the protection of personal information of our students, teachers, and staff.

Location of Data and Data Servers

In order to reduce the impact should a server be compromised and to ensure a high degree of availability of data, Google has many servers located in data centers across the world. This is to protect against the risk of failure in one of their data centers. Currently, Google does have Data Centers located in Canada, however, School data will primarily be stored in the U.S.

The impact of foreign legislation on security and privacy is a concern whenever data storage is outsourced outside of Canada or to a non-Canadian company. MA recognizes this and will take all reasonable measures to mitigate privacy risks.

The U.S. Patriot Act is an example of such foreign legislation. The Patriot Act does allow American courts to order U.S. companies to provide them with limited information under such circumstances such as a counter-terrorism investigation. The possibility would also exist for such access under Canadian legislation if the data were stored on servers in Canada. However, such orders are extremely rare. Even under such legislation, the ownership of School data stored on Google servers still remains with the School. As per Google's security policies and procedures, MA will be notified if access to the data is requested, except when specifically prohibited by law.