Privacy of crowdsourcing educational platforms in the light of new EU regulation

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Overview of the presentation

- GDPR vs. DDP
- What does GDPR take care of
- Privacy policies of the five most used learning management systems
- Privacy policies of the five most popular crowdsourcing platforms
- What my students think about their data and privacy?
- Conclusion

General Data Protection Regulation (GDPR)

What and why do we need GDPR?

- "Data Protection Regulation ('GDPR'), regulates the processing by an **individual, a company or an organisation** of **personal data** relating to **individuals** in the EU."*

- GDPR harmonizes the national regulations of all the EU countries

- It's main objective is to allow EU individuals to have direct control of their data and the way they are processed

- Furthermore, it strictly regulates the transfer of data outside the EU

- GDPR became enforceable on 28 May 2018

* https://ec.europa.eu/info/law/law-topic/data-protection/reform/what-does-general-data-protection-regulation-gdpr-govern_en

What were GDPR intentions? (1)

- GDPR should also apply for all non-EU companies without any establishment in the EU (including US, which dominates the Internet market)

- Processing of personal data will require providing clear and simple information to concerned individuals as well as obtaining specific and explicit consent by such individuals for the processing of their data (Opt-in), other than in cases in which the data protection regime explicitly allows the processing of personal data.

- The Regulation will make a safe transfer of data outside of the EU (including the procession of data in clouds) easier in the event that the parties involved commit themselves to binding corporate rules

What were GDPR intentions? (2)

- New privacy rights, including data subject's "right of portability" and the "right to be forgotten", will be established in the EU. The "right of portability" will allow a transfer of all data from one provider to another upon request, for example transfer of a social media profile or email, whereas the "right to be forgotten" will allow people to wipe the history clean.

- The processing of data of individuals under the age of 13 will in general require parental consent, which will make it more difficult for companies to conduct business which is aiming at minors.

- All companies will be obligated to notify EU data protection authorities as well as the individuals whose data are concerned by any breaches of data protection regulations or data leaks without undue delay, that is within 24 hours.
A harsh sanction regime will be established in case of breach of the unified EU data protection law allowing data protection authorities to impose penalties of up to 2 % of a company's worldwide turnover in case of severe data protection breaches.

What does GDPR cover?

- 99 articles divided into 10 chapters*:
- Lawful basis for processing
- Responsibility and accountability
- Data protection by design and by default
- Pseudonymisation

- Right of access
- Right to erasure
- Records of processing activities
- Data breaches
- Sanctions

*https://eur-lex.europa.eu/legal-content/EN/TXT/?qid=1528874672298&uri=CELEX%3A32016R0679

EnetCollect's privacy and cookie policy

- Available from http://enetcollect.eurac.edu/privacy-policy/
- Nicely prepared by EURAC
- Reasonably detailed, thus readable ☺

- Is it applicable for the prospective European Network for Combining Language Learning with Crowdsourcing Techniques?
- I am afraid, EnetCollect's privacy policy should be slightly different
- Here are some suggestions how to adjust it to our specific purpose

ATutor: https://atutor.github.io

- Profile Visibility
  - Basic Profile
  - Detailed Profile
  - Activities
  - My Contacts
  - Education
  - Position

- Who sees your profile
  - World Network
  - My Contacts
  - Contacts of Your Contacts
  - Local Network
  - Groups

Blackboard: https://www.blackboard.com/index.html

- Our Data Privacy Program & Approach

- Privacy by Design

- Data Transfers

- What Are Cookies & How Do They Work?

- Blackboard Privacy Shield

For more details, check

https://www.blackboard.com/images/223/Blackboard_GDPR_WhitePaper_tcm223-71351.pdf

Edmodo: https://www.edmodo.com/

- What does this privacy policy cover?
- How is children's personal information treated?
- What information does Edmodo display or collect?
- What does Edmodo use my information for?
- Will Edmodo share any of the personal information or children's personal information it receives?
- Is information about me secure?
- What information can i access?
- What other choices do i have?
- What if I'm in a different country?

Moodle: Moodle.org

- Privacy and personal data

- What is collected?

- How is this information used?

- How long is my data stored?

- Privacy and cookie policies are very detailed and exhaustive

- Moodle has an annex that presents the purpose of processing, categories of personal data and the source of the personal data

- The annex has 104 types of personal data

SAP SuccessFactory: https://www.successfactors.com/en_us.html

- Very similar to EURAC's policy

- Additional elements:
  - SAP SuccessFactors uses the following automated tools that feature a particular opt-out mechanism beyond browser settings:
    - Adobe Analytics
    - Adobe Target
    - Google Analytics
    - Demandbase

- U.S.-SPECIFIC PROVISIONS

- Russia-Specific Provisions

Duolingo: https://www.duolingo.com/

- General
- Information We Collect
- Cookies
- Information Obtained by Third Parties
- Use of information obtained by Duolingo
- Sharing your personal data with third parties
- Data subject rights and data retention

- Third party websites and links
- California privacy rights
- EU-U.S. Privacy Shield And Swiss-U.S. Privacy Shield
- Children under age of digital consent
- Links
- Information security
- Do Not Track
- Contact us

EdX: https://www.edx.org/

- Information that edX collects from you
- Cookies and Tracking Technologies on the edX Site
- How your information is used
- How your information is shared
- How to manage your Personal Information
- Storage & Security
- Privacy Policy updates
- Contact information
- Glossary

FutureLearn: https://www.futurelearn.com/

- About Us
- Use of the Website and Online Courses and Content
- Collection of Information
- Use of Your Information
- Storage of Information
- Legal Basis for Processing Your Information
- Disclosure of Your Information

- Data Retention
- Your Rights
- Children
- Cookies
- Research
- Links to Third Party Websites
- Updating this Privacy Policy
- Contacting FutureLearn

Khan Academy: https://www.khanacademy.org/

- What information do we collect?
- How we use the information we collect
- How we share or transfer data
- Marketing and Sponsored Content
- Third Parties and Online Advertising
- Your choice and options relating to data collection and use
- How to access, update, or delete your personal information

- Our approach to Data Security
- School Users and Student Records
- How does Khan Academy protect Children's privacy?
- International Visitors
- European Union Data Protection
- Links to other sites
- Changes and updates to this Privacy Policy
- Contacting Khan Academy

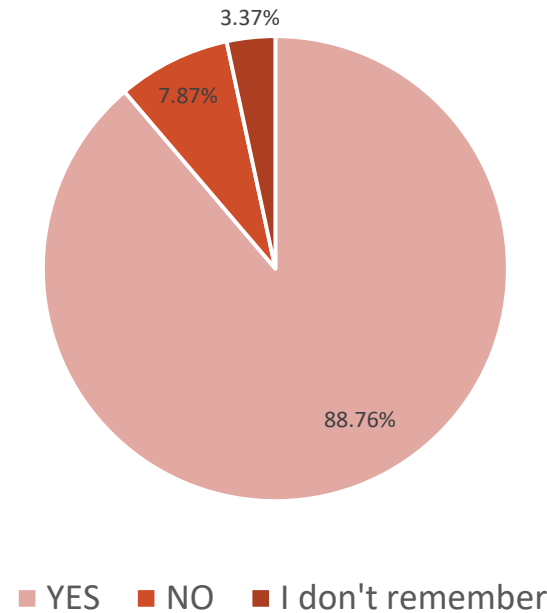# Mechanical Turk: https://www.mturk.com/

- What Personal Information About Customers Does Amazon.com Gather?
- What About Cookies?
- Does Amazon.com Share the Information It Receives?
- How Secure Is Information About Me?
- What About Third-Party Advertisers and Links to Other Websites?
- Which Information Can I Access?
- What Choices Do I Have?
- Are Children Allowed to Use Amazon.com?
- EU-US and Swiss-US Privacy Shield
- Conditions of Use, Notices, and Revisions
- Examples of Information Collected
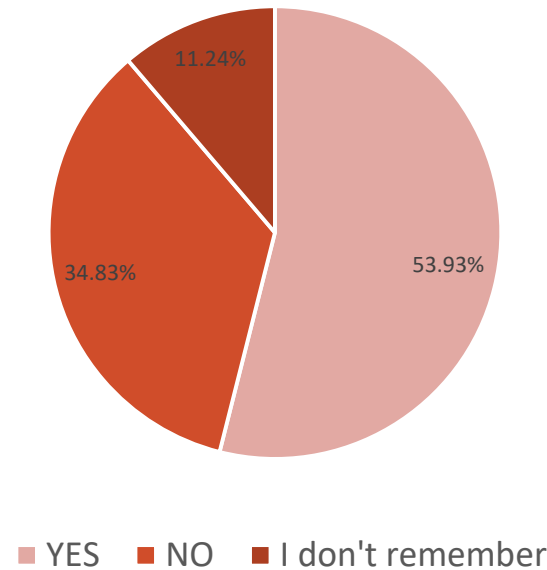
About the feedback

- 89 undergraduate students with at least 90 ECTS

- 30 questions distributed into 6 groups:
  - Students' awareness of privacy legislation
  - HTTP cookies
  - Privacy concerns
  - Privacy of educational portal and LMS
  - Privacy and adherence to rules of law
  - Anonymity of the feedback
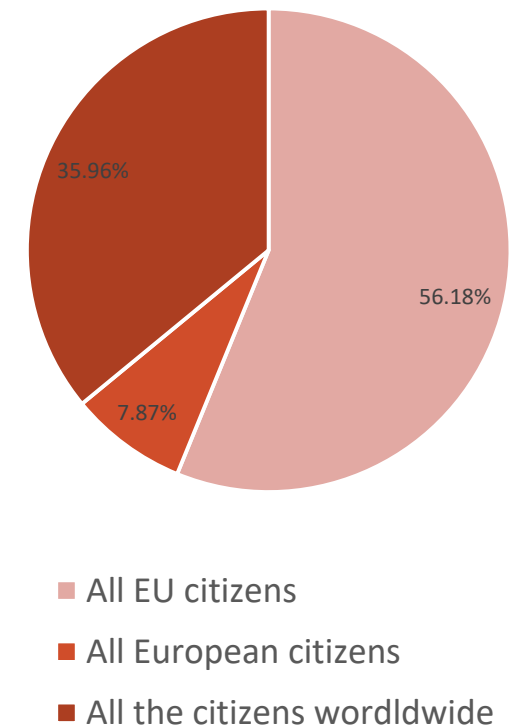
Students' awareness of privacy legislation

Do you know what PDPL is?

3.37%
7.87%
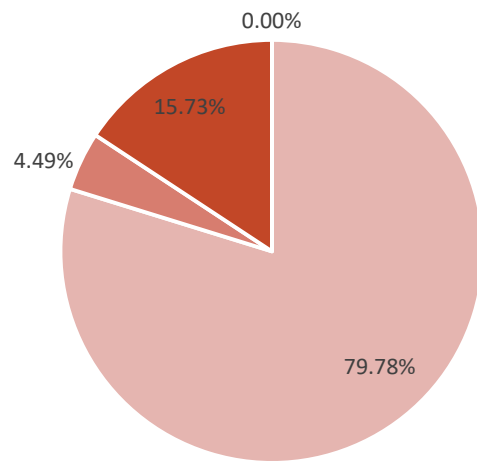88.76%

- YES
- NO
- I don't remember

Do you know what GDPR is?

11.24%
34.83%
53.93%

- YES
- NO
- I don't remember

GDPR is intended for

35.96%
7.87%
56.18%

- All EU citizens
- All European citizens
- All the citizens worldwide

HTTP cookies

Can HTTP cookies be misused to monitor Internet users?
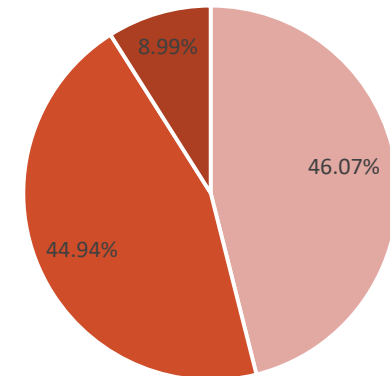
0.00%
15.73%
4.49%
79.78%

■ YES ■ NO ■ I don't know ■ I don't care

How frequently do you remove HTTP cookies?

8.99%
21.35%
69.66%
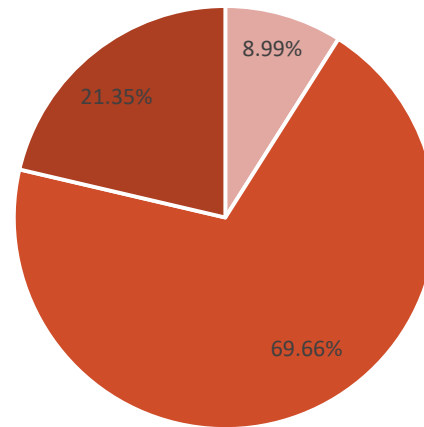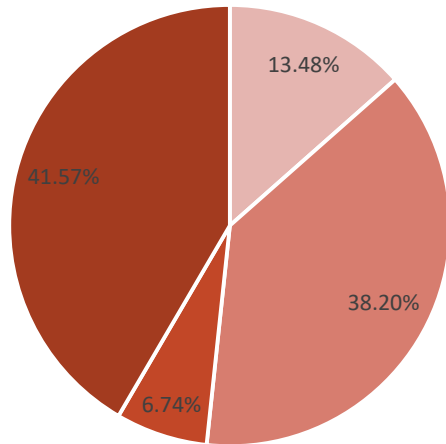
■ Every day ■ From time to time ■ Never

Should you be informed that a site uses HTTP cookies?

8.99%
46.07%
44.94%

■ Yes, it warns me to remove them from my browsing history
■ Yes, although too frequent cookie warnings are annoying
■ No, all sites leave HTTP cookies, the warning means nothing to me

Privacy concerns

Do you read Privacy Policies of the sites you access?

- 13.48%
- 38.20%
- 6.74%
- 41.57%

- Yes, I want to know why are my private data collected and how are they processed
- I read them occassionally, they are all almost identical
- I read them, but I don't trust them
- I never loose my time on reading them

Do you adjust your social networks privacy settings?

- 10.11%
- 14.61%
- 75.28%
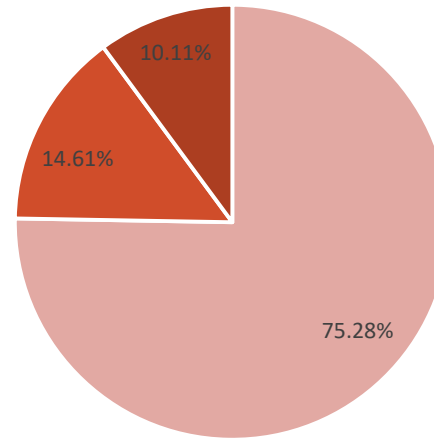
- Yes, all my friends and notices are visible to my friends only
- I share my notices to my friends only
- All my data are shareable and visible to every one

Do you know which of the data you submit are compulsory, and which are not?

- 2.25%
- 21.35%
- 76.40%
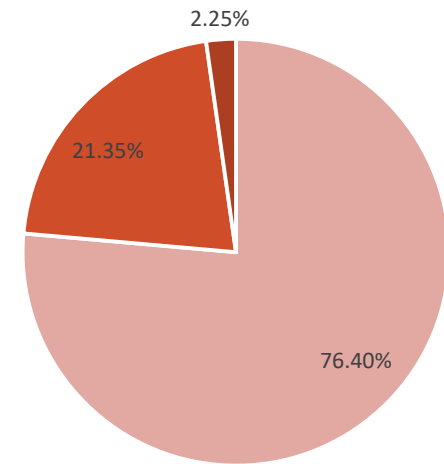
- YES
- I don't know
- I don't care

Privacy of educational portal and LMS (1)

	Don't care (1)	Slightly against (2)	Against (3)	Strongly against (4)	Vigourously against (5)	Completely indifferent (0)	Average
iKnow & Moodle know your name, surname and dosies number. How much does it bother you?	34	15	17	6	2	15	**2.0135**
iKnow and Moodle are synchronized. How much does it bother you?	44	13	15	5	3	9	**1.8750**
iKnow keeps some of your private date (home address, private e-mail, mobile phone). How much does it bother you?	23	22	25	3	10	6	**2.4578**
iKnow keeps records about your security number and your date of birth. How much does it bother you?	17	16	25	8	18	5	**2.9286**

Privacy of educational portal and LMS (2)

	Don't care (1)	Slightly against (2)	Against (3)	Strongly against (4)	Vigourously against (5)	Completely indifferent (0)	Average
iKnow keeps records about your gender and nationality. How much does it bother you?	53	16	9	4	3	4	**1.6824**
iKnow keeps recoreds about all the courses you have enrolled to. How much does it bother you?	51	13	18	1	4	2	**1.7816**
iKnow keeps records about your success at all the exams you have taken. How much does it bother you?	44	15	21	2	5	2	**1.9540**
Your teachers are aware of the results of all their courses you have enrolled to. How much does it bother you?	42	13	17	5	6	6	**2.0361**

Privacy of educational portal and LMS (3)

	Don't care (1)	Slightly against (2)	Against (3)	Strongly against (4)	Vigourously against (5)	Completely indifferent (0)	Average
Student adminsistators are aware of the results of the courses you have enrolled to. How much does it bother you?	38	13	17	6	9	6	**2.2169**
Moodle knows exactly what were your activities during one course. How much does it bother you?	27	19	18	6	13	6	**2.5060**
Moodle knows the IP addess of all your activiteis. How much does it bother you?	21	18	18	9	19	4	**2.8471**
Moodle knows how much time have you spent on all the activities you have undertaken. How much does it bother you?	31	16	15	13	11	3	**2.5000**

Privacy of educational portal and LMS (4)

|	Don't care (1)	Slightly against (2)	Against (3)	Strongly against (4)	Vigouro usly against (5)	Completely indifferent (0)	**Average**
Moodle is aware of all your grades at all the course you have enrolled to. How much does it bother you?	39	14	18	10	5	3	**2.1628**
Moodle knows whether you have seen the questions of the answers you have answered. How much does it bother you?	28	16	19	9	12	5	**2.5357**
Moodle knows when and how many times have you seen the questions of the answers you have answered. How much does it bother you?	31	16	19	7	12	4	**2.4471**
Moodle presents your identity (name, surname, picture) whenever you discuss on a forum. How much does it bother you?	26	9	21	12	18	3	**2.8488**

Privacy and adherence to rules of law

	Yes, completely	I hope	I am not sure	Security problems exist	Average
Do you believe that Moodle takes care of the data you submit?	3	**49**	28	9	2.4831
Do you believe that all your data are secured against security attacks?	4	**47**	35	3	2.4157
Do you believe that all your iKnow data are processed according to law?	12	**55**	20	2	2.1348
Do you believe that Moodle processes all the data according to law?	12	**54**	22	1	2.1348

Anonymity of the feedback

Do you believe that this feedback was anonimous?

YES ■ NO ■ I don't know ■ I don't care
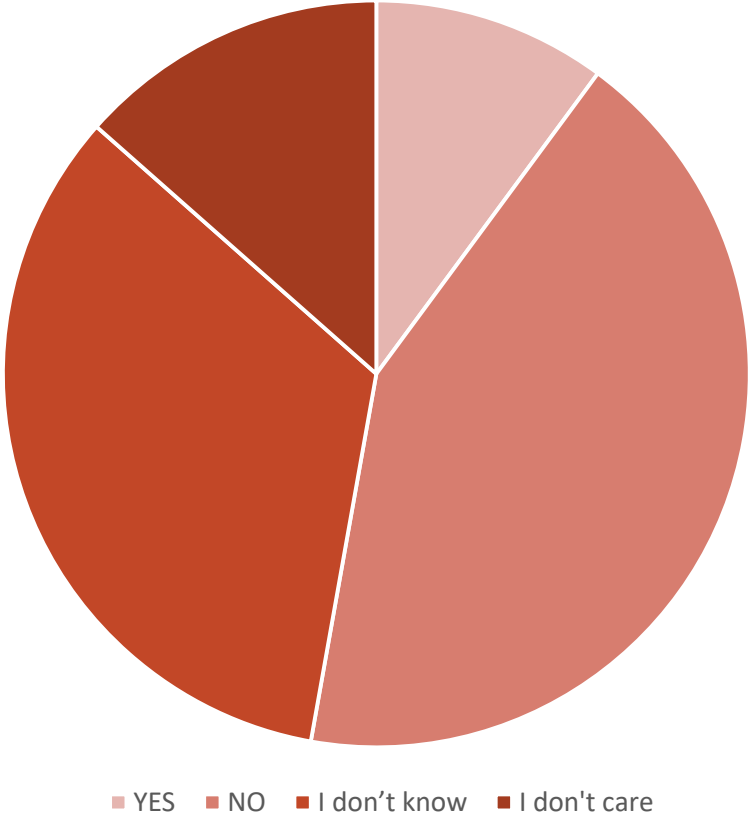
Conclusion

- Privacy protection is a crucial issue of educational systems
- It is even more important when crowdsourcing is intended as a learning technique
- We should examine in details all the privacy policy regulations of the most popular LMS and crowdsourcing platforms
- Then, we should suggest own privacy policy which will be applicable for the proposed EnetCollect's crowdsourcing educational network

Thank you for your attention
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