Privacy overview eduVPN

GÉANT facilitates the eduVPN service. As such, it is responsible for the role of providing coordinative oversight – both technical and organizational – to enable delivery of the service. Part of the aforementioned role is to ensure this General Privacy Overview Statement remains accessible and is updated regularly.

This overview

This General Privacy Overview Statement has been compiled in order to provide maximal transparency into the operations and use cases for eduVPN; we have endeavoured to provide a limitative list of possible uses for the service. By nature, eduVPN is a distributed service. This implies that several independent service delivery actors may be involved in the delivery of any particular use case. By corollary, in such cases, the various privacy policies and/or statements issued by the parties involved may all be applicable. The present *General Privacy Overview Statement* (the document before you) clarifies which parties are involved for every kind of use of the eduVPN service, what role these parties have in that particular service delivery (Controller or Processor, as defined by the General Data Protection Regulation (GDPR)), and where each involved party's privacy policy or statement can be found. If you are interested in the overall framework that describes the legal and GDPR roles in detail, please consult this link (link)

To simplify the act of contacting a party, we have listed the parties involved and/or their direct contact responsible for processing any questions you may have about your privacy (link). Future iterations of this document will contain a version of this augmented with pointers to the privacy statements of parties involved.

The eduVPN service and privacy by design

The goal of eduVPN is to strengthen the security of its users by enabling institutions, students, teachers, employees, and researchers to connect securely to the Internet and/or to their institutional network, wherever they are. eduVPN has been developed with privacy and security in mind from the very beginning of the project.

eduVPN is built upon the principles of data minimalization and purpose limitation. We pledge to never store or view the content of the traffic anywhere on the eduVPN network. The service depends on the eduVPN central server infrastructure connecting the participating eduVPN edge servers. This central infrastructure server does not log any data; as a result, no personal data is processed there. The eduVPN app on your device has been designed according to privacy-by-design principles: the app employs no trackers or telemetric functions. Only high-level statistical data from Microsoft, Google, and Apple is available.

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Ways to use eduVPN

There are different ways to make use of the eduVPN service:

- **EduVPN Secure Internet**

In this mode, eduVPN ensures your computer or smartphone is no longer directly exposed to the open Internet. Instead, eduVPN first encrypts all traffic exiting your device, and sends it all to the eduVPN edge server. This server in turn forwards the traffic to the Internet addresses (e.g., websites) you are trying to connect to. As an added benefit, the website you are connecting to cannot see the IP address of your device. This way your privacy is better protected.

- **eduVPN Institute Access.**

Additionally, the eduVPN server can be connected to your institution's network. When you are using eduVPN in this mode, you obtain direct access to your institution's network. This allows you to access the programs and services you would normally only be able to access from a computer at your institution, but now from the comfort of your home.

Now, let us explore the various methods of utilizing the eduVPN service in more detail.

1. **You are using eduVPN Secure Internet, connecting to your domestic NREN**

Your personal data will be processed by your own NREN, which is responsible for the processing of your data on their own server (Controller). The eduVPN confederation policy signed by your NREN sets the boundaries of the personal data that is processed by your NREN. Your NREN publishes a privacy statement that outlines how your personal data is processed and protected.

2. **You are using eduVPN Secure Internet, obtaining roaming access to a guest NREN (not being your own NREN)**

Your personal data will be processed by the NREN providing the Secure Internet guest service to you. This NREN is responsible for the processing of your data on their own server (Controller). The eduVPN confederation policy sets the boundaries of the personal data that is processed by the guest NREN offering Secure Internet. The guest NREN publishes a privacy statement that outlines how your personal data is processed and protected.

3. **You are using eduVPN Institute Access connecting to a server provided by your home Institution.**

Your personal data will be processed by your home institution, which is responsible for the processing of your data on their own server (Controller). The participating institutions are responsible for their own organizational and technical implementation of eduVPN.
Your institution publishes a privacy statement that outlines how your personal data is processed and protected.

4. **You are using eduVPN Institute Access provided through an NREN server**.

Your personal data will be processed by the NREN and your institution. The NREN provides Institute Access service on the instructions of your institution (Processor). The institution is responsible for the processing (Controller). Your institution publishes a privacy statement that outlines how your personal data is processed and protected.

The eduVPN policy (link)

Organizations interested in participating in the eduVPN service must sign the eduVPN policy. This policy puts forward a set of minimum technical and organizational standards required for the service, putting primary emphasis on prioritizing end-user security and privacy throughout all implementation decisions. This means eduVPN parties are obliged to ask for minimal information only. Parties offering Secure Internet may log user ID in the form of a randomly generated pseudonym, time of client connect, time of client disconnect, and issued VPN IP address. The policy permits logging of users and sessions for a maximum of 30 days unless there is a documented legal obligation to deviate from this policy. After 30 days, all data, except the user ID, must be automatically removed. The eduVPN policy also prescribes that all participating parties must publish a privacy statement describing precisely what is being logged.

Your rights and whom to contact

Towards the end of this overview, we will sum up the rights you have in your roles of user and data subject when it comes to the processing of your personal data. If you wish to exercise these rights, the entity to contact is the Controller –depending on the scenario, this could be your own institution, your domestic NREN, or a guest NREN. A guest NREN is different from your domestic NREN; it is another NREN that is offering the eduVPN server you are using while roaming, e.g., while connecting to another country eduVPN server.

If this policy fails to address an issue you wished to have clarified, or if its explanation remains insufficiently clear to you, please inform us of your concerns through email sent to eduvpn-support@lists.geant.org . The same applies for any privacy questions or concerns you may have relating to the eduVPN service. You will either receive a reply direct from us, or a referral to the authoritative person/organization if necessary.

A note on authentication

Your institution serves as your Identity Provider and, in the majority of cases, it will be connected to the authentication infrastructure of the NREN. The processing of personal data within such an infrastructure is covered by a different privacy policy related to the authentication process. For the Secure Internet service, the eduVPN policy describes the use of a persistent ID that is randomly generated and pseudonymous. By default and under normal operating conditions, the pseudonymous identity used in the infrastructure shall never be mapped to the actual personal identity of the user. Only in those cases where the

NREN is required to do so pursuant to the law, a judicial decision or abuse, shall a mapping of the pseudonymous identifier to the associated user be made.

Your rights

As the data subject, you have certain rights that can be exercised:
- You may request to see your data that a Controller is processing.
- You may ask to amend your data, to complete them, or to remove them if they are incorrect or not (no longer) relevant.
- You may ask to restrict the processing of your data.
- You may request a digital copy of your data that is being processed, and you have the right to transfer these data to a different service provider.

In addition to the rights referred to above, you may also object to processing that takes place on the grounds of legitimate interest. This may be for reasons related to your specific situation.

If you believe that is your personal data is not being handled correctly, you may file a complaint with the Data Protection Authority. There is one in each EU Member State. [Our Members | European Data Protection Board (europa.eu)](https://europa.eu)