



University of California: Learning Data Privacy Principles (DRAFT)

1. **Ownership:** The University of California (UC), its faculty, and students retain ownership of the data and subsequent computational transformations of the data they produce. Individual data owners have the right to determine how their data will be used. The UC acts as stewards of data on behalf of its faculty and students.
2. **Ethical Use:** Learning data collection, use, and computational transformation are governed by pedagogical and instructional concerns, with an aim toward student success through prescriptive, descriptive, or predictive methodologies. As with grades and other sensitive data, uses of learning analytics should be pursued on a “need to know” basis.
3. **Transparency:** Data owners have a right to understand the specific methods and purposes for which their data are collected, used and transformed, including what data are being transmitted to third-party service providers (and their affiliated partners) and the details of how algorithms are applied that shape summaries, particularly outputs and visualizations.
4. **Freedom of Expression:** Faculty and students retain the right to communicate and engage with each other in the learning process without the concern that their data will be mined for unintended or unknown purposes.
5. **Protection:** Stewards, on behalf of data owners, will ensure learning data are secure and protected in alignment with all federal, state, and university regulations regarding secure disposition.
6. **Access and Control:** Data owners have the right to access their data. Given that faculty and students own their learning data and share in its disposition, access to and ultimate authority and control of the data rests with the faculty and student owners, and the data stewards acting on their behalf. Data retention access and control practices will be governed under UC policies and supplier contractual agreements.



University of California: Learning Data Privacy Practices (DRAFT)

1. **Ownership:** Service providers will recognize learning data ownership and access as a right of the faculty and students.
2. **Usage Right:** Through a user's profile setting, service providers will enable users to control the use of their intellectual property. Thus, it will be the user's choice to grant terms such as, "a royalty-free, transferable, perpetual, irrevocable, non-exclusive, worldwide license to reproduce, modify, publish, publicly display, make derivative works."
3. **Opt-in:** Other than those data elements distinctly required for instruction, where appropriate, students will have a choice about the use of learning data collected by faculty and service providers in an "opt in" rather than "opt out" approach.
4. **Interoperable Data:** Service providers will provide learning data to the institution in recognized standard interoperability format(s) to minimize integration costs, support cross-platform and cross-application uses, and promote institutional and academic analysis and research.
5. **Data without Fees:** Service providers will not charge the faculty, students, or other university learning data stewards for the right of access, including the delivery of these data to the University.
6. **Transparency:** Service providers will inform the UC about the learning data they collect and how these data will be used, which in the course of an academic term shall be based on pedagogical concerns and curricular improvement.
7. **Service Provider Security:** All service provider platforms on which student learning data are stored will conform with UC and state mandated security procedures governing the reporting of unexpected incidents and corrections that may occur.
8. **Campus Security:** UC learning data stewards will ensure that all faculty and student data are stored securely in conformance with University data security policy. Learning data stewards will report any learning data security incidents as appropriate to faculty and students, and will provide information about their remedy.