Qualtrics Privacy and Data Security Information

On this page you will find links related to the privacy and data security protocols put in place by Qualtrics LLC for all data collected through the Qualtrics survey platform. Additional protocols put in place by the WRDSB are also included in the summary of the WRDSB privacy and data security review of Qualtrics and in the FAQ.

FAQ

1) Where is data stored?

 Survey responses collected through Qualtrics are stored in an online secure cloud-based database managed by Amazon Web Services hosted at a data centre in Canada.

2) Who has access to personally identifying information?

- a) Only WRDSB research staff have access to personally identifying information collected and stored in the Qualtrics platform. Qualtrics staff will only access personally identifying information if a request is made by a member of the WRDSB Research Department.
- b) The WRDSB has never requested that Qualtrics access personally identifying information and would only do so if a legal or technical reason was identified.

3) How does Qualtrics protect personally identifying information?

- a) Qualtrics uses a range of secure processes to ensure that data collected and stored in Qualtrics can never be accessed by unauthorized users. Their processes include:
 - i) Data access is restricted to authorized users within the platform
 - ii) Data is encrypted while in transit and at rest
 - iii) International privacy and security testing and certification, including HITRUST, International Organization for Standardization (ISO) compliance, penetration tests, and System and Organization Controls 2 compliance
 - iv) The application of software filters and anonymization features to limit or restrict access or use of identifiable information

4) How does Qualtrics use anonymized and aggregated data that is stored in the Qualtrics platform?

- a) Qualtrics anonymizes and aggregates data using a multistep process
 - i) They use automated tools and human oversight to remove any personally identifiable information or replace it with anonymous tags
 - They group data points together (aggregating data) so individual data is combined with other data points so that individualized data is not traceable back to the source
 - iii) They apply human oversight by technical, privacy, and legal employees to address any gaps or discrepancies
- b) Once data has been anonymized, Qualtrics may use data as part of the following analyses:

- (1) product improvement (in particular, product features and functionality, workflows, and user interfaces) and development of new Qualtrics products and services,
- (2) improving resource allocation and support,
- (3) internal demand planning,
- (4) training and developing machine learning algorithms,
- (5) improving product performance, and
- (6) identification of industry trends and developments, creation of indices and anonymous benchmarking.

5) What additional steps has the WRDSB taken to protect the information gathered through Qualtrics?

- a) The WRDSB restricts access to data held within the Qualtrics platform to members of the WRDSB Research Department.
- b) The WRDSB communicates to participants in a Qualtrics survey how the data will be used and who will be able to see which data and in what format.
- c) The WRDSB communicates to all students, staff, and families that participation in all data collection through the Qualtrics platform is voluntary.
- d) The WRDSB carefully considers if personal or sensitive information is needed to support WRDSB programs and/or Ministry requirements. We will not collect data through the Qualtrics platform that is not needed to support accountability and/or decision-making related to WRDSB policies, programs, or initiatives.
- e) The WRDSB staff <u>do not</u> use Qualtrics' built in artificial intelligence (AI) features when conducting any analysis that includes identifiable or personal information of WRDSB students, staff, or families.
- f) The WRDSB removes data from the Qualtrics' cloud services once the platform is no longer needed for collecting, storing, or reporting the data.
- g) The WRDSB minimizes the collection of open ended questions as a means to limit the collection of potentially sensitive or personally identifying information.

Summary Findings of WRDSB Privacy and Data security review of Qualtrics LLC

From January to March 2025, the Privacy and Research Leads at the WRDSB collaborated with their counterparts at the Waterloo Catholic District School Board on a privacy review of the Qualtrics is a tool used to conduct surveys and collect data and is widely implemented throughout both private and public sectors in Ontario and around the world.

Please find below a summary of the key findings of that review and the protocols the WRDSB has put in place to further supplement the policies and practices of Qualtrics LLC.

Data security and privacy summary of Qualtrics:

1. Data security

- a. Qualtrics uses a range of secure processes to ensure that data collected and stored in Qualtrics can never be accessed by unauthorized users. Their processes include:
 - i. Data access is restricted to authorized users within the platform
 - ii. Data is encrypted while in transit and at rest
 - iii. International privacy and security testing and certification, including HITRUST, International Organization for Standardization compliance, penetration tests, and System and Organization Controls 2 compliance
 - iv. Hosts cloud data on secure Amazon Web Services servers based in Canada (both physical and digital security protocols are in place for these data centers)

2. Protection of personal data

- a. Qualtrics defines "Personal Data" as "any information relating to a Data Subject that is protected under Data Protection Law."
- Only authorized Qualtrics users (that is, members of the WRDSB Research Department) have access to personal data that is collected and stored in the Qualtrics platform
- c. Qualtrics applies a range of software filters, encryption, and anonymization features to restrict access to or use of personal data that is collected.

3. Use of artificial intelligence and derivative data

- a. In their General Terms and Conditions Qualtrics describes their use of anonymized and aggregated "Customer Data" as part of their analyses.
- b. Customer data is described by Qualtrics as "any content, materials, data, and information that Authorized Users enter or collect into the production system of the Cloud Service or that Customer derives from its use of and stores in the Cloud Service."
- c. Qualtrics does not use personal data (i.e., data that could be used to identify an individual) as part of their analyses.
- d. Qualtrics anonymizes and aggregates Customer Data (excluding all personal data) for use in their own analyses.
- e. Qualtrics identifies their use of Customer data for the following purposes:

- (1) product improvement (in particular, product features and functionality, workflows, and user interfaces) and development of new Qualtrics products and services,
- (2) improving resource allocation and support,
- (3) internal demand planning,
- (4) training and developing machine learning algorithms,
- (5) improving product performance, and
- (6) identification of industry trends and developments, creation of indices and anonymous benchmarking.

In response to these findings the WRDSB has taken the following steps to ensure that we prioritize the privacy and confidentiality of all the data we collect through Qualtrics:

- a) The WRDSB restricts access to all data held within the Qualtrics platform to members of the WRDSB Research Department.
- b) The WRDSB communicates to participants in a Qualtrics survey how the data will be used and who will be able to see which data and in what format.
- c) The WRDSB communicates to all students, staff, and families that participation in all data collection through the Qualtrics platform is voluntary.
- d) The WRDSB carefully considers if personal or sensitive information is needed to support WRDSB programs and/or Ministry requirements. We will not collect data through the Qualtrics platform that is not needed to support accountability and/or decision-making related to WRDSB policies, programs, or initiatives.
- e) The WRDSB removes data from the Qualtrics' cloud services once the platform is no longer needed for collecting, storing, or reporting the data.
- f) The WRDSB minimizes the collection of open ended questions as a means to limit the collection of potentially sensitive or personally identifying information.

For more details on Qualtrics' data security and privacy practices, please feel welcome to review the general terms and conditions and the privacy and data security documentation shared publicly by Qualtrics.

- Qualtrics General Terms and Conditions
- Qualtrics Privacy Statement
- Qualtrics Data Protection and Privacy
- Qualtrics Commitment to secure and private AI