

 **YouTube**

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Status  
ON for everyone

 **Terms of Service** This service is not covered by the G Suite Agreement.  
If you do not have the requisite authority to bind the customer or End User to these terms, please disable the service

Service status ON for everyone 


**Content settings**   
Restrict YouTube content for your domain.

<b>Setup</b> Signed in users in your organization can only watch restricted and approved videos: <b>ON</b>	<b>Special approvers</b> Verified Google Classroom teachers can approve videos: <b>OFF</b>
---	---

**Permissions**   
Choose which organizational units can approve videos and which have unrestricted access.

**Permissions at this level**  
Can approve videos

Applied at 'Senior Class 2014'

Advanced Settings 

WEB:6212415

## Manage your YouTube settings

*This article is for YouTube settings in G Suite.*

YouTube settings in Google Apps allow you to restrict which YouTube videos are viewable, which videos might show up as recommendations, and which videos are returned in YouTube Search results for signed-in Apps users in your organization. To also apply restrictions to signed-out users, follow the instructions in [Restrict YouTube content on your network](#) to update your network configuration.

Google Apps administrators can apply permission policies for 3 different roles in YouTube settings, configurable by organizational unit:

- **By default with YouTube Restricted Mode enabled**, users in the domain get a restricted YouTube experience.
- **Unrestricted users** are able to browse all of YouTube when signed-in even if you've also set [network-level restrictions](#).
- **Approvers** can approve videos so that signed-in users in their organization can watch them.

What content is available when restricting YouTube on your network?

A large number of videos are available when YouTube is restricted. To add additional content, YouTube settings in Google Apps allow *approvers* to search for and approve additional videos to make them viewable by all users in their organization. See [Approve a YouTube video](#).

We algorithmically restrict content that's available through this setting. No algorithm is perfect. If you see inappropriate content, please [flag](#) it.

Do restrictions also apply to recommendations, related videos, and search?

Yes, all recommended and related videos and videos available in search are also restricted.

What happens if a user on a restricted network tries to watch a video that's not approved for viewing?

If the Google Apps administrator hasn't given unrestricted YouTube access to a user, a message appears, prompting that the video isn't available.

- If a user has unrestricted access and is signed in to their Google Apps account, they can view all videos on YouTube.
- If a user is an approver and is signed in to their Google Apps account, the option to approve the video displays below the video player.
- If a user doesn't have unrestricted access or approval permissions, they can't view or approve a video. They'll need to contact the Google Apps domain administrator to approve the video or be added as a video approver.

See [Add YouTube video approvers](#) and [Give unrestricted YouTube access](#).

WEB:6212415

## Manage your YouTube settings

*This article is for YouTube settings in G Suite.*

YouTube settings in Google Apps allow administrators to restrict which YouTube videos are viewable, which videos might show up as recommendations, and which videos are returned in YouTube Search results for signed-in Apps users in your organization. To also apply restrictions to signed-out users, follow the instructions in [Restrict YouTube content on your network or managed devices](#) to update your network configuration.

You can apply any one of 4 permissions policies in YouTube settings, configurable by each organizational unit:

- **Strict Restricted YouTube access**—Enabled by default only when you choose the option “restrict content for logged-in users in your organization”.
- **Moderate Restricted YouTube access**—Users can only watch restricted and approved videos. This offering is similar to the Restricted Mode setting in the YouTube app and offers a larger corpus of videos than the Strict offering.
- **Unrestricted YouTube access**—Users can browse all of YouTube when signed-in even if you’ve also set [network-level restrictions](#).
- **Can approve videos**—You can designate individuals or organizational units to approve videos so that signed-in users in their organization can watch them.

What content is available when restricting YouTube on your network?

A large number of videos are available when YouTube is restricted. To add additional content, YouTube settings in Google Apps allow *approvers* to search for and approve additional videos to make them viewable by all users in their organization. See [Approve YouTube videos and channels](#).

We algorithmically limit content that's available if you choose to apply either Strict Restricted YouTube access or Moderate Restricted YouTube access to users in your organization. No algorithm is perfect. If you see inappropriate content, please [flag](#) it.

Do restrictions also apply to recommendations, related videos, and search?

Yes, all recommended and related videos and videos available in search are also restricted.

What happens if a user on a restricted network tries to watch a video that's not approved for viewing?

If the Google Apps administrator hasn't given unrestricted YouTube access to a user, a message appears, prompting that the video isn't available.

- If a user has unrestricted access and is signed in to their Google Apps account, they can view all videos on YouTube.
- If a user is an approver and is signed in to their Google Apps account, the option to approve the video displays below the video player.
- If a user doesn't have unrestricted access or approval permissions, they can't view or approve a video. They'll need to contact the Google Apps domain administrator to approve the video or be added as a video approver.

See [Add YouTube video approvers](#) and [Give unrestricted YouTube access](#).



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Mr. Keith Enright  
Chief Privacy Officer  
Google LLC  
345 Spear St.  
San Francisco, CA 94105

24 June 2020

## **Summary of Observations and Recommendations**

Dear Mr. Enright,

We have completed our engagement to perform an examination of Google LLC (“Google”) Management’s assertion related to the processes and controls in place for the Privacy Program for the two years ended April 25, 2020 (the “Reporting Period”) in accordance with Parts III and IV of the Agreement Containing Consent Order File No.: 1023136 (the “Order”), with a service date of October 28, 2011, between Google and the Federal Trade Commission (“FTC”).

### **Background**

The purpose of the engagement was to perform an examination of management’s assertion that the processes and controls in place for the Privacy Program were in conformity with Parts III and IV of the Order. We performed our procedures in accordance with the Attestation Standards of the American Institute of Certified Public Accountants (“AICPA”). We have also prepared this summary to communicate our observations and recommendations to Google management.

Part III of the Order requires Google to “establish and implement, and thereafter maintain, a comprehensive Privacy Program that is reasonably designed to: (1) address privacy risks related to the development and management of new and existing products and services for consumers, and (2) protect the privacy and confidentiality of Covered Information. Such program, the content and implementation of which must be documented in writing, shall contain privacy controls and procedures appropriate to Google’s size and complexity, the nature and scope of Google’s activities, and the sensitivity of the Covered Information.”

Part IV of the Order requires Google to obtain biennial assessments (“Assessments”) of its Privacy Program from a “qualified, objective, independent third-party professional, who uses procedures and standards generally accepted in the profession.” Google retained Ernst & Young LLP (“EY”) to perform the Assessment for the Reporting Period. The Assessment covered all Alphabet subsidiary products subject to this Order. Our examination report was issued to Google on June 24, 2020 under separate cover.

## Restrictions on the use of this report

The observations and recommendations are intended solely for the information and use of Google management. Our report is not intended to be and should not be used by anyone other than the specified parties. EY therefore assumes no responsibility to any user of the summary of observations and recommendations other than Google as specified. Any other persons who choose to rely on our report does so entirely at their own risk.

Our observations and recommendations do not represent a conclusion on the adequacy or effectiveness of any of Google's privacy controls. It is only intended to provide management with information for improving or enhancing controls based on our observations during the course of the examination. Management should consider its business needs, priorities, schedules, and resources when developing its own action plans for addressing the observations and recommendations. It is possible that issues or observations left unaddressed over time could result in additional recommendations or deviations in future assessments.

Our observations, related risks and recommendations based on our procedures are provided in Attachment A – Summary of Observations and Recommendations. Our observations and recommendations do not constitute an audit, examination or review performed in accordance with the relevant professional standards.

We appreciate the cooperation and assistance provided during the course of our work and would be pleased to discuss our observations and recommendations at your convenience. If you have any questions regarding these matters, please contact (b)(6) at (b)(6)@ey.com or (b)(6) (b)(6) at (b)(6)@ey.com.

Very truly yours,

*Ernst + Young LLP*

# Independent Assessor's Transmittal Letter on Google LLC's Privacy Program

For the Period April 26, 2018 to  
April 25, 2020

With Report of Independent Accountants



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Mr. Keith Enright  
Chief Privacy Officer  
Google LLC  
345 Spear St.  
San Francisco, CA 94105

## **Transmittal Letter**

Dear Mr. Enright,

We are issuing the attached Independent Assessor's Report on Google LLC's ("Google's" or "the Company's") Privacy Program ("Report") in connection with our examination to determine whether for the two years ended April 25, 2020 (the "Reporting Period"), in accordance with Parts III and IV of the Agreement Containing Consent Order File No.: 1023136 (the "Order"), with a service date of October 28, 2011, between Google and the Federal Trade Commission ("FTC"):

- The Company established and implemented a comprehensive Privacy Program (the "Subject Matter" or "Privacy Program") based on the seven Google-specific statements ("Criteria") and supporting controls set forth in Attachment A;
- The Company's privacy controls were appropriate to its size and complexity, the nature and scope of its activities, and the sensitivity of Covered Information (as defined in the Order)<sup>1</sup>;
- The Company's privacy controls met or exceeded the protections required by Part III of the Order; and
- The Company's privacy controls were operating with sufficient effectiveness to provide reasonable assurance to protect the privacy of Covered Information and have so operated throughout the Reporting Period.

This letter should be read in conjunction with the Report.

Part III of the Order requires Google to "establish and implement, and thereafter maintain, a comprehensive Privacy Program that is reasonably designed to: (1) address privacy risks related to the development and management of new and existing products and services for consumers, and (2) protect the privacy and confidentiality of Covered Information. Such program, the content and

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<sup>1</sup> The Order defines "Covered Information" as "information that [Google] collects from or about an individual, including, but not limited to, an individual's: (a) first and last name; (b) home or other physical address, including street name and city or town; (c) email address or other online contact information, such as a user identifier or screen name; (d) persistent identifier, such as IP address; (e) telephone number, including home telephone number and mobile telephone number; (f) list of contacts; (g) physical location; or any other information from or about an individual consumer that is combined with (a) through (g) above."



implementation of which must be documented in writing, shall contain privacy controls and procedures appropriate to Google's size and complexity, the nature and scope of Google's activities, and the sensitivity of the Covered Information."

Part IV of the Order requires Google to obtain biennial assessments ("Assessments") of its Privacy Program from a "qualified, objective, independent third-party professional, who uses procedures and standards generally accepted in the profession." Google retained Ernst & Young LLP ("EY") to perform the Assessment for the Reporting Period. The Assessment covered Google LLC and its successors subject to this Order.

### **EY's Privacy Assessment Approach**

Part IV of the Order requires that the assessments be performed by "a qualified, objective, independent third-party professional, who uses procedures and standards generally accepted in the profession." This report was issued by EY under applicable professional standards that meet these requirements.

EY, an American Institute of Certified Public Accountants ("AICPA") member firm, must comply with the public accounting profession's technical and ethical standards, including the AICPA's Code of Professional Conduct. In addition to the Code of Professional Conduct, the AICPA publishes standards, which delineate specific requirements Certified Public Accountants are consistently required to follow in the course of engagements.

One such standard, the Concepts Common to All Attestation Engagements (AT-C Section 105), states that practitioners must meet specific requirements to accept and perform assessments, such as the following:

#### **Assignment of the Engagement Team and the Practitioner's Specialists:**

The engagement partner should be satisfied that:

- a. the engagement team, and any practitioner's external specialists, collectively, have the appropriate competence, including knowledge of the subject matter, and capabilities to:
  - i. perform the engagement in accordance with professional standards and applicable legal and regulatory requirements and
  - ii. enable the issuance of a practitioner's report that is appropriate in the circumstances.

Furthermore, "[t]he responsible party in an attestation engagement must have a reasonable basis for measuring or evaluating the subject matter."

EY complied with all these standards in performing the assessment. Furthermore, all EY personnel directing the examination were sufficiently qualified. All EY personnel directing the examination and preparing the Report had a minimum of three years of experience in the field of privacy and data

protection. Further, several EY personnel involved in conducting the procedures during the Reporting Period were involved with, and directed, the assessment during the previous Reporting Period of April 26, 2016 through April 25, 2018.

### **Independence**

AICPA standards also require EY to maintain independence in the performance of audit and examination engagements. The AICPA standard states, “[a] member in public practice shall be independent in the performance of professional services as required by standards promulgated by bodies designated by Council.” (See AICPA Code of Professional Conduct sec. 1.200 Independence). The standard states that to determine whether an auditor has the requisite independence in the performance of professional services, an AICPA member “should evaluate whether the relationship or circumstances would lead a reasonable and informed third party who is aware of the relevant information to conclude that there is a threat to either the member’s or the firm’s independence, or both, that is not at an acceptable level.”

Independence is comprised of independence of mind and independence in appearance, both of which are required of the AICPA member firm and the auditors engaged in the professional service. Independence of mind requires that the member maintain a state of mind that permits the expression of a conclusion without being affected by influences that compromise professional judgment, thereby allowing an individual to act with integrity and exercise objectivity and skepticism. Independence of appearance is achieved by the avoidance of facts and circumstances that are so significant that a reasonable and informed third party would likely conclude, weighing all the specific facts and circumstances, that a firm’s, or a member of the audit team’s, integrity, objectivity, or professional skepticism has been compromised.

EY is independent in accordance with the AICPA standards required for this engagement.

### **EY Assessment Process Overview**

The procedures performed by EY were designed to:

- Examine Management’s Assertion concerning Google’s compliance with Part III of the Order, stating that Google has maintained the Google Privacy Program (“Subject Matter”) to meet the requirements of the Google FTC Order based on the Criteria and supporting controls
- Determine that the controls were implemented and maintained by Google to address the Criteria
- Determine the operating effectiveness of the controls during the Reporting Period based on the Criteria

EY conducted testing procedures to determine that the controls were implemented, maintained, and operated effectively by Google during the Reporting Period. The nature of EY’s testing was dependent on each control, and EY developed a test procedure based on our understanding of the risk,

complexity, extent of judgment, and other factors. EY used a combination of inquiry, observation, and inspection to test the controls. Refer below for a description of the test procedures utilized by EY:

(b)(4); (b)(3);6(f)

(b)(4); (b)(3);6(f)

## Addendum to Transmittal Letter

### Overview of Company

#### Company overview

Google is a global technology service provider focused on organizing the world's information to make it universally accessible and useful.<sup>2</sup> Google's innovations in web search and advertising have made Google's website one of the most accessed Internet destinations, and its brand among the most recognized in the world. Google maintains one of the world's largest online index of websites and other content and makes this information freely available to anyone with an Internet connection. Google's automated search technology helps people obtain nearly instant access to relevant information from their vast online index. Google is a wholly owned subsidiary of Alphabet Inc ("Alphabet").

See below for a list of just a few of Google's wide-ranging products, along with a sample of Alphabet entities, considered to be in scope for the Privacy Program:<sup>3</sup>

- Search;
- AdWords;
- Google Maps;
- Google Apps, including Gmail, Google Docs, and Google Sheets;
- Blogger;
- Google Chrome;
- Android;
- Google Pay;
- YouTube;
- Waze;
- Google Home;
- Verily; and
- Waymo.

Google became a publicly traded company on August 19, 2004. The Company now has offices in more than 60 countries, maintains more than 180 Internet domains, and provides products and services in over 130 languages to Google users all over the world.<sup>4</sup> Google is headquartered in Mountain View, California and employs more than 115,000 people. Google restructured in 2015 to become a wholly owned subsidiary of Alphabet. Alphabet is a portfolio of companies that includes Google and a variety of other subsidiaries ("Bets").<sup>5</sup> Other Bets include a number of entities such as Sidewalk Labs, Verily,

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<sup>2</sup> Google's Mission Statement can be found at: <https://about.google/>.

<sup>3</sup> A list of Google products can be found at: <https://about.google/products/>.

<sup>4</sup> An overview of Google's presence across the world, along with a description of its core philosophies can be found at: <https://www.google.com/about/philosophy.html>.

<sup>5</sup> An overview of the Company's restructuring can be found at: <https://abc.xyz/>.

and Calico. All of Google's original products and subsidiaries, such as Chrome, G-Suite products, and YouTube are still housed under Google. Google operates the Privacy Program, and the criteria apply to both Google and the Bet entities; however, the approach to management may differ across company and by control.

## **EY's Assessment of Google's Privacy Program**

### **Privacy Program assessment**

(b)(4); (b)(3);6(f)

The following sections describe highlights of each component, which support the overall Privacy Program.

### **Scope and programmatic enhancements**

(b)(4); (b)(3);6(f)

(b)(4); (b)(3):6(f)

**Google's privacy policies**

(b)(4); (b)(3):6(f)

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<sup>6</sup> Google's privacy and security principles can be found at: <https://safety.google/principles/>.

## Manage your privacy

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[Access & download your data](#) ^

[Download your data from Google products & services](#) ^

[Learn about downloading your data](#), or visit the [Takeout Tool](#) 🔗 to download your data from Google products and services.

You can also use our tools to [access and review your data](#) or [delete your data](#) 🔗.

### Submit a data access request

If the info you're looking for is not available via these tools, [submit a data access request](#) and specify:

- The categories of personal info you're seeking;
- The products or services to which the data relates;
- Any approximate dates when you think the data may have been collected by Google.

You'll need to [sign in to your Google Account](#) 🔗 to complete the form.

**Important:** You can also call our toll-free number, 855-548-2777. Our representatives can answer many of your questions and help you fill out the [web-form](#) to ensure we are providing information to the account owner.

[Review your basic account info](#) v

(b)(4); (b)(3);6(f)

<sup>8</sup> Google's public-facing privacy policy from the Reporting Period can be found at: <https://policies.google.com/privacy?hl=en-US>.

GOOGLE PRIVACY POLICY

When you use our services, you're trusting us with your information. We understand this is a big responsibility and work hard to protect your information and put you in control.

This Privacy Policy is meant to help you understand what information we collect, why we collect it, and how you can update, manage, export, and delete your information.

Effective March 31, 2020  
[Archived versions](#)

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We build a range of services that help millions of people daily to explore and interact with the world in new ways. Our services include:

- Google apps, sites, and devices, like Search, YouTube, and Google Home
- Platforms like the Chrome browser and Android operating system
- Products that are integrated into third-party apps and sites, like ads and embedded Google Maps

You can use our services in a variety of ways to manage your privacy. For example, you can sign up for a Google Account if you want to create and manage content like emails and photos, or see more relevant search results. And you can use many Google services when you're signed out or without creating an account at all, like searching on Google or watching YouTube videos. You can also choose to browse the web privately using Chrome in Incognito mode. And across our services, you can adjust your privacy settings to control what we collect and how your information is used.

To help explain things as clearly as possible, we've added examples, explanatory videos, and definitions for [key terms](#). And if you have any questions about this Privacy Policy, you can [contact us](#).

(b)(4); (b)(3):6(f)

## Privacy Program teams


(b)(4); (b)(3):6(f)

**CONFIDENTIAL**






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Welcome, 

Manage your info, privacy, and security to make Google work better for you

### Privacy & personalization


See the data in your Google Account and choose what activity is saved to personalize your Google experience



[Manage your data & personalization](#)

### Security issues found

Protect your account now by resolving these issues




[Secure account](#)

### Account storage

Your account storage is shared across Google services, like Gmail and Photos


36% used – 5.4 GB of 15 GB



[Manage storage](#)


### Take the Privacy Checkup

This step-by-step guide helps you choose the privacy settings that are right for you



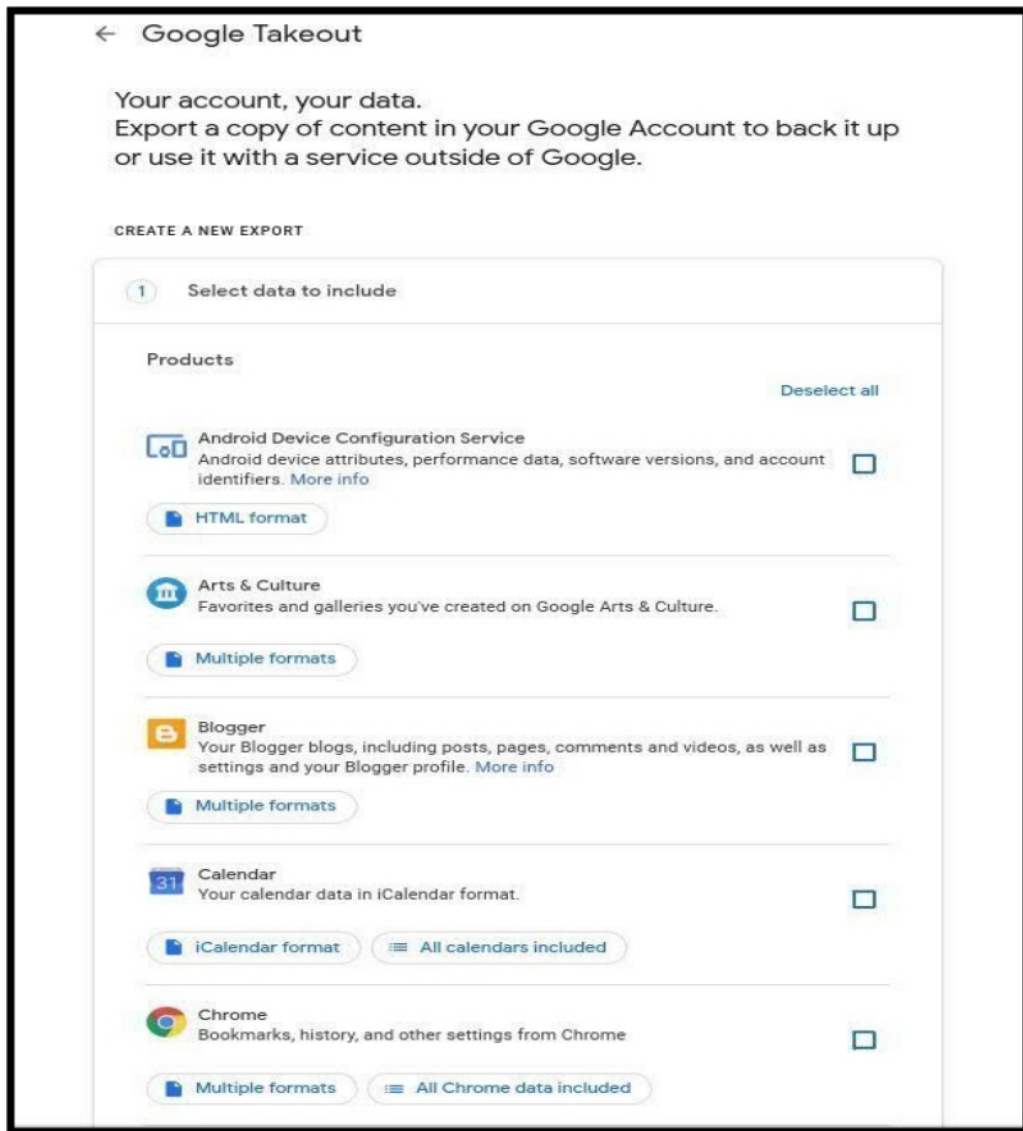
[Get started](#)

Only you can see your settings. You might also want to review your settings for Maps, Search, or whichever Google services you use most. Google keeps your data private, safe, and secure. [Learn more](#)





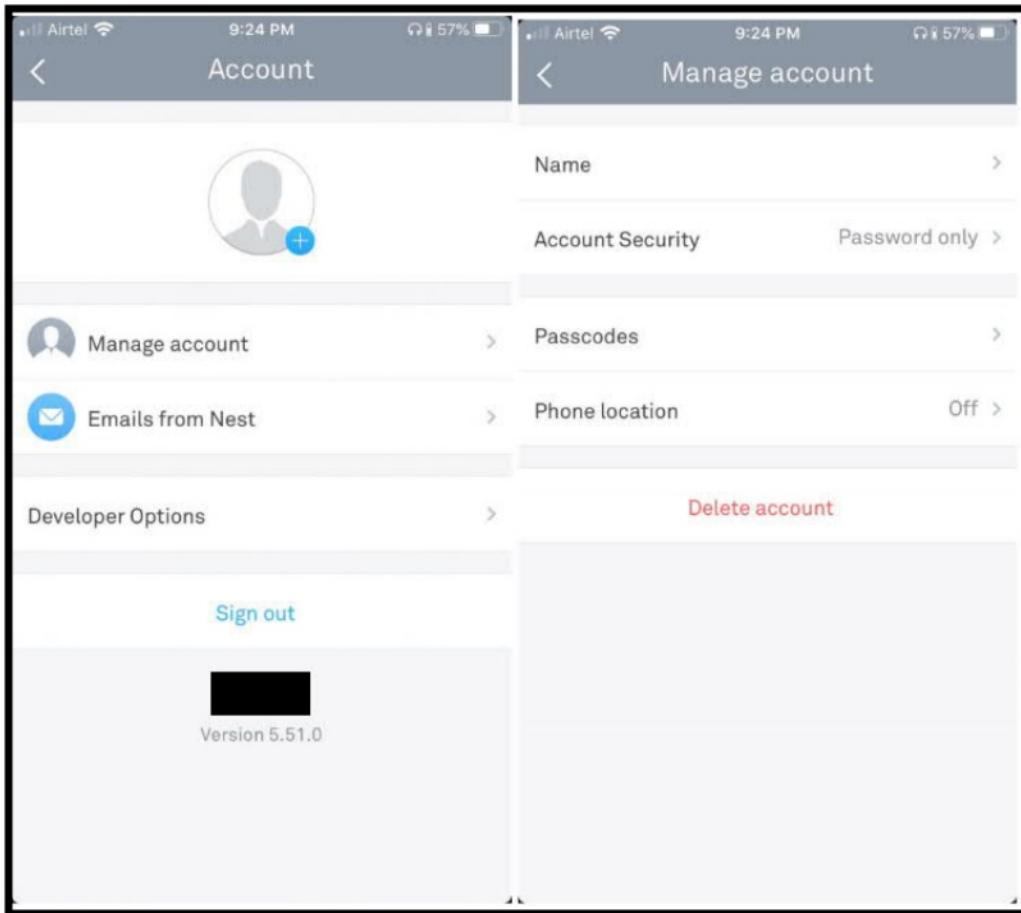
Building a better working world

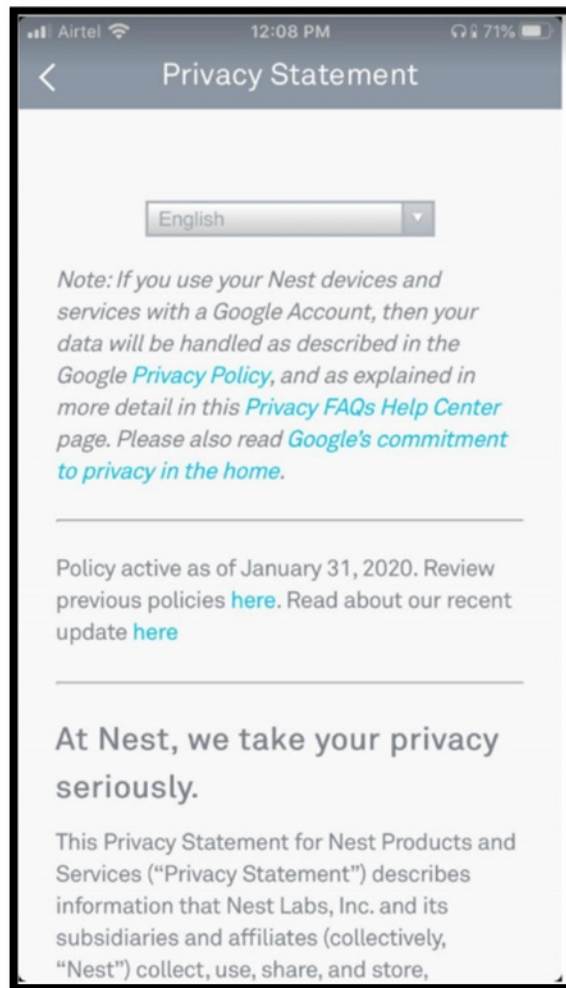


(b)(4); (b)(3)-6(f)



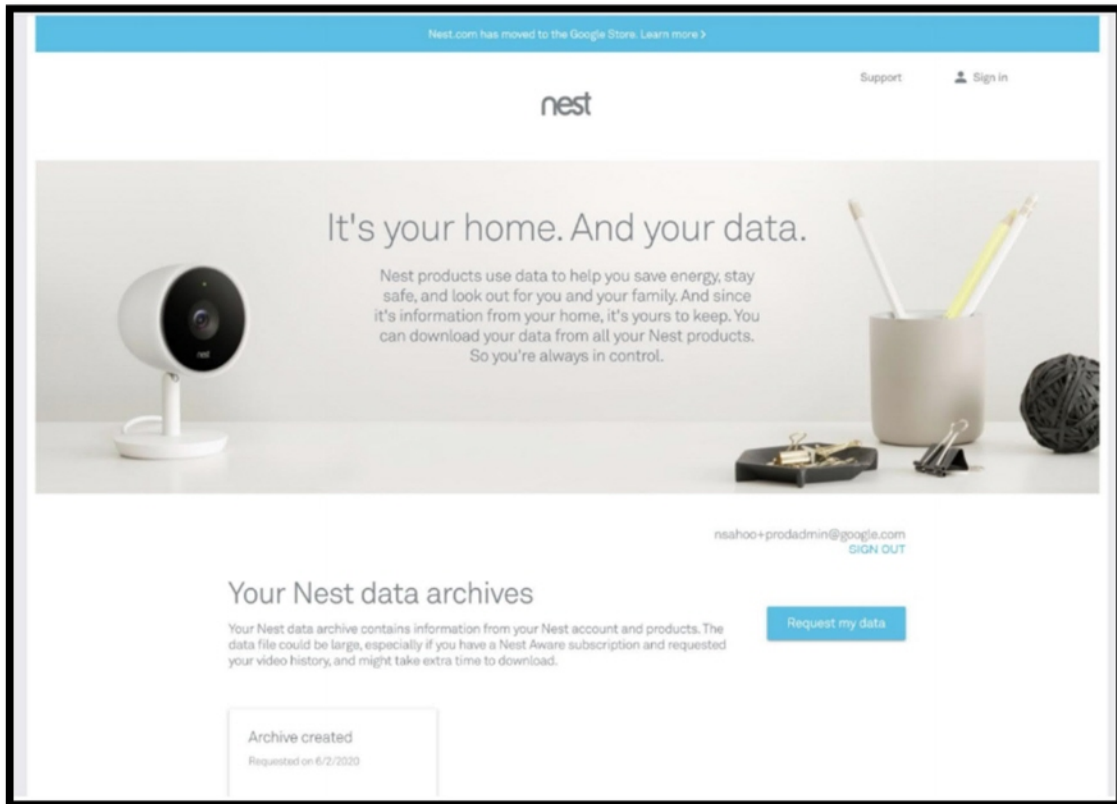
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Building a better  
working world



(b)(4); (b)(3):6(f)

# Independent Assessor's Examination Report on Google LLC's Privacy Program

For the Period April 26, 2018 to April 25,  
2020





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**Independent Assessor's Transmittal Letter on  
Google LLC's Privacy Program**

**For the Period of April 26, 2016 to April 25, 2018**

**With Report of Independent Accountants**

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Mr. Keith Enright  
Director, Privacy Legal  
Google LLC  
345 Spear St.  
San Francisco, CA 94105

Dear Mr. Enright,

We are issuing the attached Independent Assessor's Report on Google LLC's<sup>1</sup> ("Google" or "the Company") Privacy Program ("Report") in connection with our examination to determine whether for the two years ended April 25, 2018 (the "Reporting Period"), in accordance with Parts III and IV of the Agreement Containing Consent Order File No.: 1023136 (the "Order"), with a service date of October 28, 2011, between Google and the Federal Trade Commission ("FTC"):

- The Company established and implemented a comprehensive privacy program (the "Subject Matter" or "Privacy Program") based on the seven Google-specific statements ("Criteria") and supporting controls set forth in Attachment A;
- The Company's privacy controls are appropriate to its size and complexity, the nature and scope of its activities, and the sensitivity of covered information (as defined in the Order)<sup>2</sup>;
- The Company's privacy controls meet or exceed the protections required by Part III of the Order; and
- The Company's privacy controls are operating with sufficient effectiveness to provide reasonable assurance to protect the privacy of covered information and have so operated throughout the Reporting Period.

This letter should be read in conjunction with the Report.

Part III of the Order requires Google to "establish and implement, and thereafter maintain, a comprehensive privacy program that is reasonably designed to: (1) address privacy risks related to the development and management of new and existing products and services for consumers, and (2) protect the privacy and confidentiality of covered information. Such program, the content and implementation of which must be documented in writing, shall contain privacy controls and procedures appropriate to [Google's] size and complexity, the nature and scope of [Google's] activities, and the sensitivity of the covered information."

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<sup>1</sup> Google Inc. became Google LLC during the Reporting Period.

<sup>2</sup> The Order defines "covered information" as "information that [Google] collects from or about an individual, including, but not limited to, an individual's: (a) first and last name; (b) home or other physical address, including street name and city or town; (c) email address or other online contact information, such as a user identifier or screen name; (d) persistent identifier, such as IP address; (e) telephone number, including home telephone number and mobile telephone number; (f) list of contacts; (g) physical location; or any other information from or about an individual consumer that is combined with (a) through (g) above."



Part IV of the Order requires Google to obtain biennial assessments (“Assessments”) of its Privacy Program from a “qualified, objective, independent third-party professional, who uses procedures and standards generally accepted in the profession.” Google retained Ernst & Young (“EY”) to perform the Assessment for the biennial period beginning April 26, 2016 and ending April 25, 2018 (“Reporting Period”). The Assessment covered Google LLC and its affiliates subject to this Order.

## **EY’s Privacy Assessment Approach**

Part IV of the Order requires that the assessments be performed by “a qualified, objective, independent third-party professional, who uses procedures and standards generally accepted in the profession.” This report was issued by EY under applicable professional standards that meet these requirements.

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One such standard, the Concepts Common to All Attestation Engagements (AT-C Section 105), states that practitioners must meet specific requirements to accept and perform assessments, such as the following:

### **Assignment of the Engagement Team and the Practitioner’s Specialists:**

The engagement partner should be satisfied that:

- a. the engagement team, and any practitioner’s external specialists, collectively, must have the appropriate competence, including knowledge of the subject matter, and capabilities to
  - i. perform the engagement in accordance with professional standards and applicable legal and regulatory requirements and
  - ii. enable the issuance of a practitioner’s report that is appropriate in the circumstances.

Furthermore, “[t]he responsible party in an attestation engagement must have a reasonable basis for measuring or evaluating the subject matter.”

In performing this Assessment, EY complied with all these standards. Furthermore, all EY personnel directing the examination were sufficiently qualified. All EY personnel directing the examination and preparing the Report had a minimum of three years’ experience in the field of privacy and data protection.



## Independence

AICPA standards also require EY to maintain independence in the performance of audit and examination engagements. The AICPA standard states, “[a] member in public practice shall be independent in the performance of professional services as required by standards promulgated by bodies designated by Council” (AICPA Code of Professional Conduct sec. 1.200 Independence). The standard states that to determine whether an auditor has the requisite independence in the performance of professional services, an AICPA “member should evaluate whether the relationship or circumstances would lead a reasonable and informed third party who is aware of the relevant information to conclude that there is a threat to either the member’s or the firm’s independence, or both, that is not at an acceptable level.”

Independence is comprised of independence of mind and independence in appearance, both of which are required of the AICPA member firm and the auditors engaged in the professional service. Independence of mind requires that the member maintain a state of mind that permits the expression of a conclusion without being affected by influences that compromise professional judgment, thereby allowing an individual to act with integrity and exercise objectivity and skepticism. Independence of appearance is achieved by the avoidance of facts and circumstances that are so significant that a reasonable and informed third party would likely conclude, weighing all the specific facts and circumstances, that a firm’s, or a member of the audit team’s, integrity, objectivity, or professional skepticism has been compromised.

EY is independent in accordance with the AICPA standards required for this engagement.

## EY Assessment Process Overview

The procedures performed by EY were designed to:

- Examine Management’s Assertion concerning Google’s compliance with Part III of the Order, stating that Google has maintained the Google Privacy Program (“Subject Matter”) to meet the requirements of the Google FTC Order based on the Criteria and supporting controls;
- Examine the design effectiveness of the controls implemented by Google to address the Criteria; and
- Examine the operating effectiveness of the implemented controls during the Reporting Period.

EY performed procedures to evaluate the design and operating effectiveness of the controls implemented and/or maintained by Google during the Reporting Period. The nature of EY’s testing was dependent on each control, and EY developed a test procedure based on our understanding of the risk, complexity, extent of judgment, and other factors. EY used a combination of inquiry, observation, and inspection for testing of the controls. Refer below for a description of the test procedures utilized by EY:

## **Addendum to Transmittal Letter**

### **Overview of Company**

#### **Company overview**

Google is a global technology service provider focused on organizing the world's information to make it universally accessible and useful.<sup>3</sup> This lists just a few of Google's wide-ranging products:

- Search;
- AdWords;
- Gmail;
- Google Maps;
- Google Apps, including Google Docs, Google Sheets, and Google Drive;
- Blogger;
- Google Chrome;
- Android;
- Google Pay;
- YouTube; and
- Google Home.

Google became a publicly traded company on August 18, 2004. The Company now has offices in more than 40 countries and provides products and services in over 130 languages to Google users all over the world. It is headquartered in Mountain View, California and employs more than 75,000 people. Google is a wholly owned subsidiary of Alphabet Inc.

### **EY's Review of Google's Privacy Program**

#### **Privacy Program review**

(b)(4); (b)(3)-6(f)

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<sup>3</sup> Google Mission Statement, <https://www.google.com/about/our-company/>



# Privacy Policy

Last modified: December 18, 2017 ([view archived versions](#)) (The hyperlinked examples are available at the end of this document.)

There are many different ways you can use our services – to search for and share information, to communicate with other people or to create new content. When you share information with us, for example by creating a [Google Account](#), we can make those services even better – to show you **more relevant search results** and ads, to help you **connect with people** or to make **sharing with others quicker and easier**. As you use our services, we want you to be clear how we're using information and the ways in which you can protect your privacy.

Our Privacy Policy explains:

- What information we collect and why we collect it.
- How we use that information.
- The choices we offer, including how to access and update information.

We've tried to keep it as simple as possible, but if you're not familiar with terms like cookies, IP addresses, pixel tags and browsers, then read about these [key terms](#) first. Your privacy matters to Google so whether you are new to Google or a long-time user, please do take the time to get to know our practices – and if you have any questions [contact us](#).

## Privacy Program teams

(b)(4); (b)(3):6(f)



Welcome, [Name]

## Control, protect, and secure your account, all in one place

Your Google Account gives you quick access to settings and tools that let you safeguard your data, protect your privacy, and decide how your information can make Google services work better for you.

<p> <b>Sign-in &amp; security</b> &gt;</p> <p>Control your password and Google Account access.</p> <p>Signing in to Google Device activity &amp; security events Apps with account access</p> <p> <b>Security Checkup</b> Protect your account in just a few minutes by reviewing your security settings and activity. <b>GET STARTED</b></p> <p> <b>Find your phone</b> Whether you forgot where you left it or it was stolen, a few steps may help secure your phone or tablet. <b>GET STARTED</b></p>	<p> <b>Personal info &amp; privacy</b> &gt;</p> <p>Manage your visibility settings and the data we use to personalize your experience.</p> <p>Your personal info Contacts Manage your Google activity Ads Settings Control your content</p> <p> <b>Privacy Checkup</b> Take this quick checkup to review important privacy settings and adjust them to your preference. <b>GET STARTED</b></p> <p> <b>My Activity</b> Discover and control the data that's created when you use Google services. <b>GO TO MY ACTIVITY</b></p>	<p> <b>Account preferences</b> &gt;</p> <p>Adjust account settings, like payment methods, languages, &amp; storage options.</p> <p>Payments Purchases, subscriptions &amp; reservations Language &amp; Input Tools Accessibility Your Google Drive storage Delete your account or services</p>
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We're committed to your privacy and security.

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Product	Details		SELECT NONE
+1s		▼	<input checked="" type="checkbox"/>
Android Device Configuration Service		▼	<input checked="" type="checkbox"/>
Blogger		▼	<input checked="" type="checkbox"/>
Bookmarks		▼	<input checked="" type="checkbox"/>
Calendar	All calendars	▼	<input checked="" type="checkbox"/>
Chrome	All Chrome data types	▼	<input checked="" type="checkbox"/>
Classroom			<input checked="" type="checkbox"/>
Cloud Print			<input checked="" type="checkbox"/>

<sup>6</sup> The Google Takeout webpage can be found at: <https://takeout.google.com/?pli=1>





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**Independent Assessor's Examination Report on Google  
LLC's Privacy Program**

**For the Period of April 26, 2016 to April 25, 2018**

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