XSEDE Data Sharing and Privacy Policy

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# A. Document History

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B. Document Scope

XSEDE, on behalf of the National Science Foundation (NSF), operates a set of central infrastructure services, which serves to federate many Service Provider sites.

This policy pertains to information gathered through the XSEDE central infrastructure services—including but not limited to the XSEDE User Portal (XUP), the XSEDE ticket system, the XSEDE Resource Allocation Service (XRAS)—to Service Provider resource usage reported back to the XSEDE accounting system, and to other data collected by XSEDE in the course of meeting its program objectives.

Service Provider sites and XSEDE partners, such as science gateways, may gather information by means other than the XSEDE infrastructure, and such information does not fall under this policy unless it is shared by partners with XSEDE. XSEDE may also share information with partners (as described in this document), but such information, once shared, no longer falls under this policy.
C. Document Body

C.1. General Statement on Data Sharing and Privacy
The XSEDE program and most XSEDE-allocated resources are associated with public institutions and funded by a federal agency. As such, data collected by XSEDE and Service Providers about the use of XSEDE infrastructure and XSEDE-allocated resources are presumed public and sharable, with some exceptions and with appropriate safeguards for user information. Due to integration of the XSEDE central services with a variety of Service Providers and other partners, users should be aware that the privacy of usage data is limited as a practical matter.

Foremost, XSEDE limits the amount of personally identifiable information that it requires of users. We require enough information to uniquely identify an individual and ensure the security of the infrastructure. Users are further encouraged to provide only publicly available contact information (work affiliation, email address, and phone number) instead of personal contact information. (Note, however, that falsifying user profile information violates XSEDE’s Acceptable Use Policy.) To the extent possible, XSEDE avoids collecting information that could be used for legal or financial harm. We do optionally request, and encourage users to provide, a range of demographic information that helps XSEDE communicate the impact of the infrastructure to NSF and other stakeholders.

XSEDE does not sell user information to third parties. However, information collected by XSEDE may be shared publicly or with authorized third parties for open academic studies about the infrastructure, how it is used, its user community, and the impacts of the federal investment.

The remainder of this document defines and clarifies this general policy statement with respect to key data sets collected within the XSEDE environment.

C.2. Definitions

Personally Identifiable Information (PII): Information that might be used to uniquely identify an individual. The Personally Identifiable Information collected by XSEDE includes name, institutional affiliation, email address, and phone number.

Principal Investigator (PI): An XSEDE user who has received access to XSEDE-allocated resources as the lead on a request submitted and granted through the XSEDE allocations process. A PI may grant access to XSEDE-allocated resources to other users, whose usage will be charged to the PI’s allocation(s).

XSEDE: When used unqualified, this term refers to the common infrastructure operated by the XSEDE Operations group, distinct from the infrastructure provided by XSEDE Service Providers.

Service Providers: Service Providers are organizations independently funded to provide cyberinfrastructure services to the XSEDE community.

XSEDE-Allocated Resources: Resources provided by Service Providers to the XSEDE Community and with access managed via the XSEDE allocations process.

XSEDE Community: The set of authorized users of XSEDE. The community includes users who may directly use an XSEDE-allocated resource, users who may use XSEDE-allocated resources through an XSEDE partner (e.g., through a science gateway interface), and users of any XSEDE central infrastructure service.
**XSEDE Partners:** Organizations that collaborate with XSEDE but are not governed under its policies. Examples include science gateways, peer programs such as the Open Science Grid (OSG), Service Providers, Globus, and the XSEDE Metrics Service.

**Authorized Third Parties:** In the context of this policy, persons or organizations who may be granted access to information that otherwise would not be shared under this policy. Authorization may be granted on legal grounds, such as through Freedom of Information Act (FOIA) requests, or as part of academic research studies approved by an Institutional Review Board (IRB).

### C.3. Information XSEDE Collects

XSEDE collects and stores a wide range of data about users and their use of XSEDE services and XSEDE-allocated resources.

- **User Profiles.** User profiles contain Personally Identifiable Information (e.g., name, institutional affiliation, email address, and phone number) to establish the unique identity of individuals and maintain the ability to communicate with users.
- **Access and Allocation Requests.** XSEDE collects a range of information for purposes of establishing eligibility for and reviewing requests for access to various XSEDE resources.
- **Usage Information.** Information about access to and use of XSEDE services and XSEDE-allocated resources (e.g., system logs, resource accounting data) by individuals from the XSEDE community is recorded in order to measure resource use, improve operations, provide reports to stakeholders, and understand the value of the services and resources.
- **Survey and Evaluation Data.** XSEDE conducts regular surveys of the XSEDE community to assess and improve specific services and evaluate the overall success of the program.

There are different ways of accessing XSEDE services and XSEDE-allocated resources, each of which involve different disclosure of personal information and different data sharing approaches. Details follow for each type of access.

#### C.3.1. User Profiles

Access to most XSEDE services as well as access to XSEDE-allocated resources requires a user to register for an XSEDE user account in the XSEDE User Portal (XUP). Information collected at registration includes name, affiliation(s), title, phone numbers, and email address. After creating an XSEDE user account, users can optionally provide additional profile information, including demographic data, social media handles, and biographical details. Users have the ability to share their profiles with other users via a public profile link on their profile page. By default, name, organization, department, title, and avatar are publically visible. Users must opt-in to permit any optional account and profile information to be made public. Only name, email, affiliation, phone number, and NSF user type are required fields.

**Publications and other citable works.** Linked to user profiles, XSEDE collects references to user-authored publications and other citable works as part of communicating the value of XSEDE services and XSEDE-allocated resources, as well as supporting the allocation review process. XSEDE collects only citation and/or bibliographic information.

#### C.3.2. Access and Allocation Requests

As part of submitting a request for access to XSEDE-allocated resources, the requester must voluntarily submit various information and documents in support of the request. Access to non-allocated resources and services (e.g., training courses) may also require users to provide additional registration information beyond that required to register for an XSEDE user account.
User information collected is mostly a subset of the information collected for an XSEDE user account, and an XUP account is required to submit an allocation request and use other XSEDE-managed services. Users may choose not to supply elements of the requested information, but access to those resources and services may be restricted as a result.

C.3.3. Usage Information for XSEDE Services

Most XSEDE services have logging, monitoring, and/or instrumentation to track individual usage of these resources and services. Data collected by these service features is subject to this policy.

Data from anonymous use of the public XSEDE website and other services. XSEDE maintains a public website and other services, all or part of which allow for anonymous, public access. When one uses such services anonymously, XSEDE collects the information sent by the client (typically a web browser) and through the use of various technologies such as cookies. This information typically includes the user’s Internet address, type of web browser, operating system and, if the user was directed to the XSEDE website from another website, the address of that site.

Data from authenticated access to the XUP and other services. Many parts of the XUP and other XSEDE services, including but not limited to training courses, user forums, XSEDE Resource Allocation Service (XRAS), and XSEDE Single Sign-On Hub, require user authentication. When one uses these and other XSEDE services, XSEDE collects information about the user and logged by the service related to usage. This information typically includes the user’s Internet address, service capacity utilized, time and date of usage and so on.

User help requests. To support XSEDE users in achieving their objectives, XSEDE operates a ticket system for managing and tracking user help requests. XSEDE collects information about the user and their issue, which is logged in the ticket system. This information typically includes the user's XSEDE username or email address, time and date of request, description of the issue, and exchanges between the user and XSEDE or Service Provider support staff.

C.3.4. Usage Information for XSEDE-Allocated Resources

Most XSEDE-allocated resources have logging, monitoring, and accounting features or other instrumentation to track individual usage of these resources. XSEDE collects a subset of these usage data for allocations, accounting, and reporting purposes. Data collected by XSEDE via these service features is subject to this policy.

In the course of conducting allocated projects on XSEDE-allocated resources, users may place research data on those resources, either as part of submitting a computational job or through the use of data storage facilities. Aside from possible Service Provider-reported aggregate accounting or monitoring data about the use of storage, XSEDE does not collect or read users’ research data.

C.3.5. Survey and Evaluation Data

XSEDE conducts a range of surveys to assess the program’s performance, plan for and evaluate the success of XSEDE events and services, gather feedback from the user community, and gather information from XSEDE staff about the working environment. These surveys are regularly analyzed, summarized, and reported on by members of XSEDE’s Strategic Planning and Policy Evaluation (SPP&E) team. The raw response data is governed by Institutional Review Board (IRB) protocols for human subject research and non-anonymized data is not shared. Data collected under IRB protocol are clearly marked as such, and require respondent review and consent of IRB-approved invitation letter prior to participation. Surveys that are conducted outside of the SPP&E team are considered for internal decision making and program planning and are not subject to IRB approval. These data are not shared publicly in any fashion.
C.3.6. **Data from Accessing XSEDE Through Partners**

XSEDE services and XSEDE-allocated resources may be accessed through a number of partners, including Globus services, Science Gateways and peer grids (e.g., OSG). Users of these partner entities entrust certain information to the operators of these services. The protection of information collected by the operators is subject to their data privacy and protection rules and is solely the responsibility of those operators. When a user accesses XSEDE services or XSEDE-allocated resources via a partnering service, XSEDE may obtain personal information or attributes about the user from that entity, but only if that entity has the right to share the user information with XSEDE. Such data reported to XSEDE is subject to this policy.

C.4. **How XSEDE Uses Collected Information**

XSEDE uses the information it collects for the following purposes across the organization:

- To administer and manage XSEDE services and support Service Providers in managing their resources.
- To communicate with users regarding XSEDE services.
- To provide the information and services that users request.
- To provide personalized content when users visit the XSEDE website or services.
- To improve XSEDE websites and services.
- To better market XSEDE products and services to the XSEDE community.
- To understand the value and impact of XSEDE services and XSEDE-allocated resources.
- To produce reports for NSF and other funding or advisory bodies.
- For any other purpose, which we disclose to users in a specific privacy notice.

C.5. **Information XSEDE Shares**

XSEDE shares some of the information it collects as part of demonstrating the stewardship of federal funds and to help assess the impact of the integrated cyberinfrastructure.

C.5.1. **XSEDE User Profile**

Profile information users set on the XSEDE User Portal (XUP)—information beyond that required to create a portal account—is opt-in only. If one chooses to share certain fields in their XUP privacy settings, these may be shared publicly if the user shares his/her public profile link.

C.5.2. **Information about XSEDE Usage**

For accounting and reporting purposes, XSEDE collects information about how its users utilize XSEDE services and XSEDE-allocated resources. Usage information about XSEDE-allocated resources is collected initially by individual Service Providers and may also be stored by those providers.

Users should be aware that the privacy of these data is limited as a practical matter. These data are available to other members of the project to which the utilization is charged and, depending on the specific resource, may also be viewed or inferred by other users of that resource.

XSEDE routinely shares this usage information, typically in aggregate form but potentially unfiltered, with funding agencies and researchers working on their bequest.
C.5.3. **Information about Allocation Awards**
The existence of an award and basic information about the principal investigator (PI) and project (e.g., the size and duration of the award, on which resources the award is made, and the project abstract) are made public.

C.5.4. **Information about Allocation Requests and Reviews**
Information included in allocation requests is treated as private communications between the submitters and the XSEDE staff and committees that evaluate the proposals. This includes information about whether or not a proposal has been submitted for evaluation, identities of reviewers, and any reviewer comments associated with the request.

Data from allocation requests may be utilized by XSEDE staff or authorized third parties to study the allocations process and perform correlation with usage patterns and scientific success/productivity either for purposes of XSEDE or for reports to sponsors. In such cases, results will be anonymized and/or aggregated before being made public.

C.5.5. **Information from a Partner**
If a partner (e.g., gateway operator, Service Provider, PI, or campus champion) releases data to XSEDE, they must specify if it has privacy constraints and thus falls under this policy. All other data received is assumed public and may be used at the discretion of XSEDE.

C.6. **With Whom XSEDE Shares Information**
XSEDE does not sell user information; however, XSEDE does share some information publicly. As a project supported by a federal agency, most usage data about XSEDE services and for XSEDE-allocated resources is generally presumed public, though users can limit the amount of profile information that may be shared publicly.

XSEDE shares identifiable information with XSEDE Service Providers to resolve system issues, perform accounting on XSEDE allocations, and resolve security incidents. XSEDE may also share some identifiable information as part of publicly available usage data describing allocations and use of XSEDE services or XSEDE-allocated resources.

C.6.1. **Information Shared with Service Providers**
XSEDE routinely makes information about its users and their usage available to participating Service Providers for purposes of securing, maintaining, and administering XSEDE-allocated resources. Information shared in this manner will then fall under the privacy policies of the Service Provider sites rather than this policy. While this information is shared without obligation, it is expected these sites will treat such information for operational purposes in a manner generally in alignment with this policy.

C.6.2. **Institutional Review Board Approval**
XSEDE may permit access by a third party to non-anonymized data that is otherwise deemed private or confidential in this policy for research purposes. Such permission shall be contingent on approval from the third party’s Institutional Review Board. In such cases, results will be anonymized and/or aggregated before being made public.

C.6.3. **Legal Requests**
The XSEDE project office is associated with a public institution and funded by a federal agency. Therefore, XSEDE is subject to Freedom of Information Act (FOIA) requests and must respond to these as well as any other legitimate legal and regulatory requests.
C.7. Acceptance of This Policy

One may choose to use or continue to use XSEDE services. Such usage constitutes acceptance of this Data Sharing and Privacy Policy. One may also choose to stop using XSEDE services and/or appeal to XSEDE management.

C.8. Governance

XSEDE will cooperate with partners in audits and investigations in the event of suspected breaches of this policy.

Over time XSEDE may update this privacy policy. Notice of such changes may take the form of an additional notice provided to users at the time XSEDE collects user information, a notice on the XSEDE website, or other more proactive approaches. The form of notice given will depend on the nature and extent of the change, at the discretion of XSEDE management. Regardless of the nature of the change to the policy and form of notification, such changes will apply to any personal information users may have previously provided to XSEDE.