

Technical verification improvement plan

Microsoft

Privacy Company, Floor Terra and Sjoera Nas, 19 August 2020

At the request of SLM Rijk, on 19 August 2020 we have tested compliance with commitments 2b, 4a and 4d. The relevant measures should have been taken on 1 August 2020.

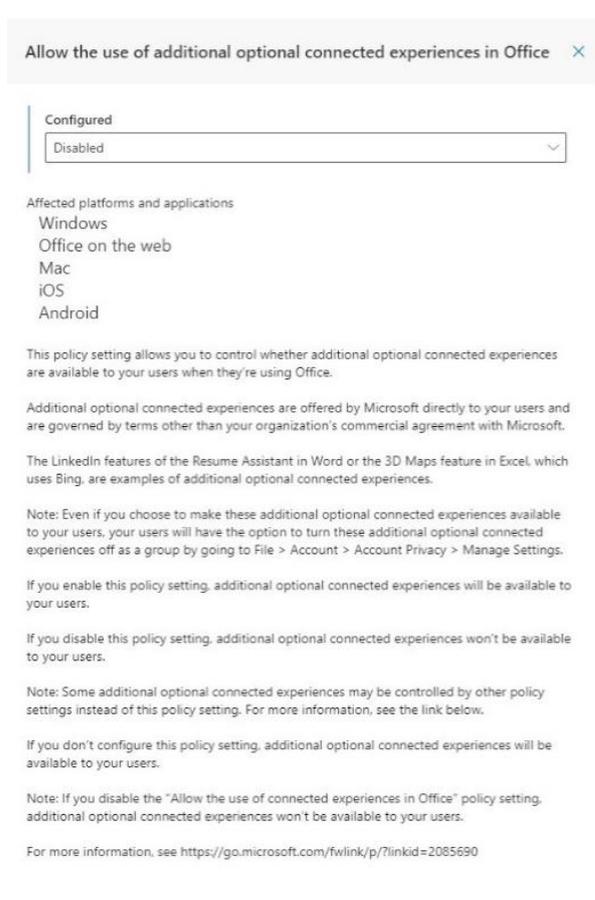
- 2b *Provide further information on the third parties identified in the DPIA report and classification of these parties either as a sub-processor (if Microsoft is a processor) or a Controller Connected Experience, a Non-Microsoft Product or an Add-In (if Microsoft is the controller).*
- 4a *tools which administrators can use to effectively disable the use of the Controller Connected Experiences from anywhere, in all mobile Office apps and in Office for the Web. This tool should ensure that there is a clearer choice for administrators instead of the current three controls for the four different categories. In addition, if an administrator has disabled all Controller Connected Experiences and Microsoft introduces a new Controller Connected Experience, this new Connected Experiences should be switched OFF as a result of the general administrator setting.*
- 4d *telemetry settings for administrators in Office for the Web and the Intune Company Portal app.*

Methodology and findings

1. Privacy Company has created a new test account in its own Microsoft365 Business tenant.
2. Privacy Company applied its regular testing procedure, with test devices and interception with Wireshark and Mitm-proxy, as described more extensively in complete DPIA reports.
3. As admin of the tenant, we have switched off the Controller Connected Experiences.

Finding: We note Microsoft has added, as committed, a **new option**, next to the existing option for Office for the Web, **to turn off the Controller Connected Experiences** for the Excel, OneDrive, Outlook, PowerPoint, Teams and Word mobile apps on iOS and Android.

Figure 1: Additional optional connected experiences disabled



4. We have checked the presence of traffic to third parties in Microsoft Office Online and in the mobile apps on iOS and Android. We started with Word, OneDrive and Outlook and continued with Excel, PowerPoint and Teams.

Findings: we did not find any of the previously mentioned third parties. This means **Adjust** is removed from the OneDrive and Outlook mobile apps. **Cloudflare** no longer appears in the Word mobile app as it is only used in connection with the (disabled) Controller Connected Experiences. **Giphy** is disabled in the mobile and web versions of Teams (without having to use a separate control). **Helpshift** and **Uservoice** no longer appear in the Outlook mobile apps, apparently because they are indeed treated as Controller Connected Experiences, and these are disabled in the test environment. We no longer captured traffic to **Optimizely** from <https://www.microsoft.com/en-us/microsoft-365/onedrive/online-cloud-storage>. We also checked the more prominently displayed link from a Google query for OneDrive: <https://onedrive.live.com/about/en-us/signin/>. Microsoft has apparently removed Optimizely as committed.

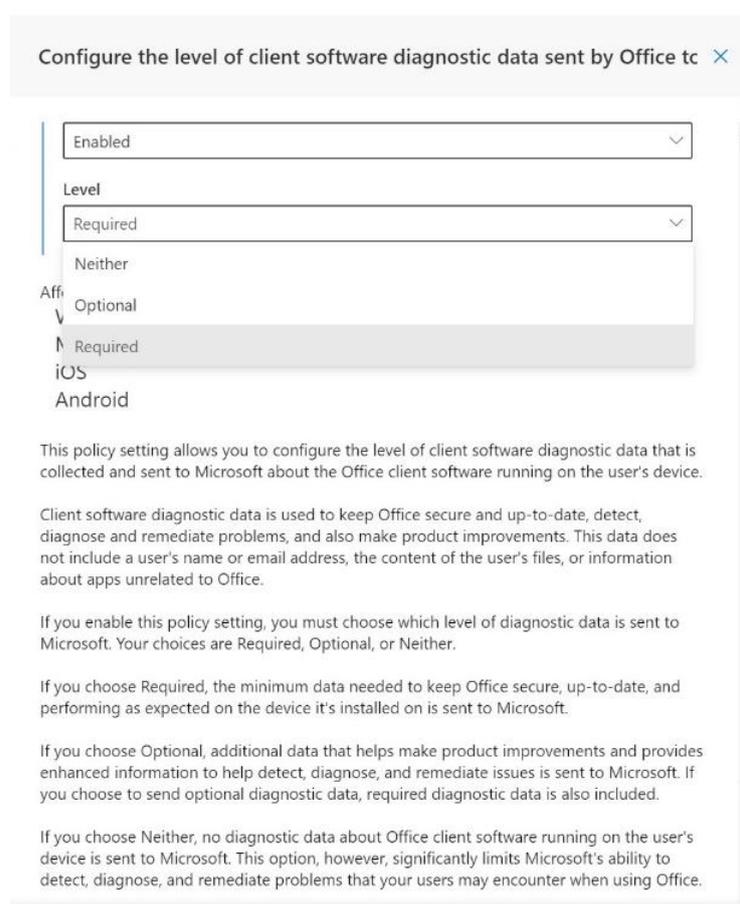
We did observe traffic to **Akamai** in the Outlook and Teams mobile apps en in Word, Excel, PowerPoint and OneDrive for the Web, but according to the improvement plan, Akamai is a subprocessor.

We checked the presence of three new experiences in Outlook for the Web, to verify if they are Controller or Processor Connected Experiences. We did see the option 'Joyful Animations' (Vrolijke animaties), but not the options 'Quick suggestions' or 'Suggested replies'. Apparently these are Controller Connected Experiences, and therefore, disabled.

5. We verified the working of the existing and the new control to minimise telemetry data in respectively Office for the Web en the mobile Office apps.

Findings: There is a new telemetry control to limit the collection by Microsoft of diagnostic data from the Excel, OneDrive, Outlook, PowerPoint, Teams and Word mobile apps on iOS and Android that allows admins to choose between the three levels of Neither, Required and Optional.

Figure 2: Possibility to control telemetry level for the tested mobile Office apps



Privacy company has **not found any content data or filenames** in the telemetry data from the tested mobile Office apps during this test. We only observed pseudonymous identifiers such as User.PrimaryIdentityHash=[xxxxxxx] and User.TenantID.

However, Privacy Company did find user names and email addresses in the telemetry from Onedrive on iOS. See [Figure 3](#) on the next page.

6. Other findings

We have one question for Microsoft, with regard to the availability of the tool 'Expressions' in the Outlook web app. See [Figure 4](#) below. This functionality enables users to add gifs from external sources such as Giphy, through the use of the search engine Bing. We understood from the explanation about the Controller Connected Experiences that all functionality related to Bing is offered by Microsoft as data controller (not as processor). If that is indeed true, should Expressions not be offered as a Controller Connected Experience, and thus, be disabled when an Enterprise customer disables the Controller Connected Experiences?

Figure 4: Presence of Expression in Outlook web app

