**Recommended Settings for Admins**


DPIA Zoom 2024

Version 2
Version after update DPIA Zoom 2024
Version 1
DPIA Zoom 2022

# Index

# Privacy controls for admins

Administrators of Zoom Meetings Education can exercise control over the data processing by Zoom in multiple ways. In the initial DPIA a list was included of missing privacy controls. Some of these options were available for hosts of meetings, but an education or research organisation may want to take central technical measures, at the tenant level, to prevent hosts from violating privacy and security rules, for example for all or specific groups of employees or students.

In response to the initial Data Protection Impact Assessment (DPIA), Zoom clarified that several of these controls were already accessible. Additionally, in certain instances, Zoom's transition to a data processor role for all personal data eliminated the necessity for specific administrative controls. Below, we delve into 23 relevant options, complete with references to Zoom's documentation on how to implement these settings.

## 1. Enable E2EE

Admins can enable end-to-end encryption for all Meetings. This is possible for all clients, except when Zoom is used via the browser. E2EE meetings are limited to 200 participants. Thanks to Zoom's participation to the EU US Data Privacy Framework use of E2EE is no longer required to protect the data against the risks of access by government authorities in third countries, but it can still be a very useful measure to protect confidential and sensitive/special categories of personal data. See Section 7 of the DPIA.

Admins can make E2EE mandatory for all users in their account, by clicking the lock icon, and then clicking *Lock* to confirm the setting.

Because Zoom can no longer see the contents of exchanged communications, the following functionality will no longer work:

- Join the meeting by telephone

- Join before host

- Cloud recording

- Live streaming

- Live transcription

- Breakout Rooms

- Polling

- Zoom Apps[1]

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[1] Zoom, End-to-end (E2EE) encryption for meetings, last updated 28 February 2024, URL: https://support.zoom.us/hc/en-us/articles/360048660871-End-to-end-E2EE-encryption-for-meetings.

With up-to-date end user clients, the functionalities of meeting reactions and 1:1 Private Chats do still work. Admins can use local recording for Meetings.[2]
Enabling end-to-end encryption also disables users from joining Zoom calls through a web browser.

*Figure 1: Meeting disabled on web browser when end-to-end encryption is enabled*
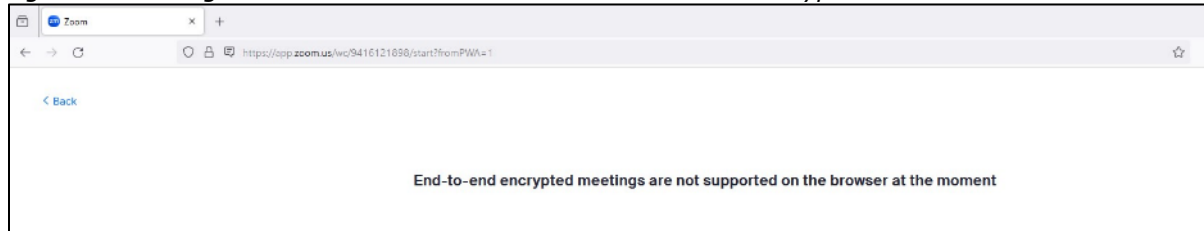


## 2. EU Geolocation

Zoom has completed its EU Cloud offering by the end of 2022. Since, Zoom processes most personal data from EU Education tenants exclusively in Zoom's EU data centres (in Germany and the Netherlands).

Zoom also offers options to hosts select the data centers that will be used to process the Content Data when hosting a meeting or webinar.[3] Dutch school and university admins can disable this functionality, and only allow the data to be processed in Germany (home region for all paid EU accounts) and the Netherlands.

## 3. Public and private in meeting chat

Admins can enable or disable chat for all users in the account or for specific groups in the account.

Admins can also disable private chat, which prevents participants from sending private messages to other participants in the meeting. Participants will still be able to privately message with the host. [4]

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[2] Zoom, Enabling and starting local recordings, last updated 20 November 2023, URL: https://support.zoom.us/hc/en-us/articles/201362473-Enabling-and-starting-local-recordings.
[3] Zoom, Selecting data center regions for meetings/webinars, 10 January 2024, URL: https://support.zoom.com/hc/nl/article?id=zm_kb&sysparm_article=KB0060026
[4] Zoom, Enabling or disabling in-meeting chat, last updated 14 November 2023, URL: https://support.zoom.us/hc/en-us/articles/115004809306-Enabling-or-disabling-in-meeting-chat.

## 4. Controls in permanent Team Chat

Admins have privacy related controls for Team Chat, a feature that allows end users to create permanent chat channels in the Zoom client. These controls include:[5]

- Enable end to end chat encryption
- Allow bots to participate in chats and channels
- Enable Personal channel in Chat window
- Allow users to search for each other
- Allow users to add contacts
- Allow users to chat with others
- Allow users to create channels
- Show users' presence status to external contacts
- Share links to messages and channels in Team Chat
- Schedule a meeting from chat or channel
- The Chat Etiquette Tool allows admins to create policies to prevent unwanted sharing of sensitive information based on defined keywords and text patterns/regular expressions (such as account numbers and social security numbers).
- Allow channel owner and admin(s) to remove messages of other members:

Controls also include those related to retention periods:
- The retention period for messages and files in Zoom's cloud
- The storage of messages on local devices (excluding personal channel messages)
- The storage of edited and deleted message revisions
- The sending of data to a third-party archiving service.

## 5. Enable Advanced chat encryption

Admins can enable Advanced chat encryption. Zoom explains: "When advanced chat encryption is enabled, Content Data at rest is encrypted by keys generated & operated on chat participants' devices."[6]

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[5] Zoom, Configuring Zoom Team Chat admin settings, Last Updated 24 November 2023, URL: https://support.zoom.com/hc/en/article?id=zm_kb&sysparm_article=KB0058688

[6] Zoom, Advanced chat encryption, last updated 28 October 2023, URL: https://support.zoom.us/hc/en-us/articles/207599823.

## 6.  Use of SSO and Vanity URL

Organisations can deploy SSO for employees to subscribe to Zoom, with an organisational subdomain.[7]  Such a Vanity URL[8] creates three privacy controls:

Use email aliases. Zoom explains: "*In most email systems it is possible to create multiple aliases for each user that are routed to the same user inbox. Customers can thus create an alias for each of their users to ensure that they are not easily identifiable by their email address. An admin can choose to only provide these pseudonymous addresses to Zoom.*"
Remove or replace first name and surname. Zoom explains it does not need the full name of the user to provide its services. "*The customer can decide to delete these data from existing accounts, use a generic organisation name (*such as: *University of Amsterdam*, example added by Privacy Company*) and/or not to provide any details for new users. The service will still work, even though the display name may be blank/anonymised. This may make existing waiting room functionality hard, but video waiting rooms would mitigate this.*"[9]
Prevent use of cookies and transfer of IP addresses and device identifiers of end users to the USA when they look up information on Zoom's publicly accessible website. Traffic to an EU Customer's Vanity URL stays within the EU.

## 7.  Prevent participants from saving chats

Chats are automatically saved. Organisations may want to disable this feature and prevent participants from saving chats that may contain personal data, not just from participants, but also remarks about, or data from, other individuals.[10]

## 8.  Create a custom privacy disclaimer

Administrators may create a custom (privacy) disclaimer when users join a meeting or sign-in to their account.[11] The disclaimer has variable settings for frequency and whether it may be seen by users internal or external to the organization.

## 9.  Sharing of data in chats

Admins can set limits to the type and size of files that can be shared in chats:

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[7] Zoom, Quick start guide for SSO, last updated 28 October 2023, URL: https://support.zoom.us/hc/en-us/articles/201363003-Quick-start-guide-for-SSO.
[8] Zoom, Guidelines for Vanity URL requests, last updated 28 October 2023, URL: https://support.zoom.us/hc/en-us/articles/215062646-Guidelines-for-Vanity-URL-Requests.
[9] Zoom reply to part A of the DPIA, 19 March 2021, p. 16.
[10] Zoom, Enabling meeting and webinar auto saving chats, last updated 28 October 2023, URL: https://support.zoom.us/hc/en-us/articles/360060889932-Enabling-auto-saving-chats.
[11] Zoom, Creating a Zoom custom disclaimer, 13 December 2021, URL: https://support.zoom.us/hc/en-us/articles/360051221831.

- Only allow specified file types (optional): Specify the file types that users can send in chat. Zoom desktop client version 5.4.0 or higher is required.

- Maximum file size (optional): Specify the maximum file size (MB) that users can send in chat and in-meeting chat. Zoom desktop client version 5.4.0 or higher is required."[12]

## 10.Do not enable Attendee Feedback

Zoom itself can ask for post-meeting Feedback, through its own surveys. As described in Section 1.7, Zoom has disabled this functionality by default for EU Education customers. [13] Admins can (re-)enable Feedback, but they must be aware that the survey contains an open text field. There is a possibility that end users provide personal data in this text box. That means the organisation shares personal data with Zoom as a data controller.

## 11. Do not enable Giphy in Team Chat

The US based company Giphy enables users to search for illustrations based on keywords, based on its archive of millions of GIFs, stickers, and video clips/animations. If the organisation has enabled advanced chat encryption, use of Giphy is technically impossible. To prevent traffic to Giphy as a third party (Zoom does not have a subprocessor agreement with Giphy) admins should not enable this integration in the Team Chat.[14]

## 12.Mute individual or all participants upon entry

This meeting setting can help manage participants and prevent distractions and interruptions during a meeting (Zoom-bombing).[15]

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[12] Zoom, Enabling file transfer in meetings, URL:
https://support.zoom.com/hc/en/article?id=zm_kb&sysparm_article=KB0058822.

[13] Zoom, Managing the end-of-meeting experience feedback survey, last updated 28 October 2023, URL:
https://support.zoom.us/hc/en-us/articles/115005855266-End-of-meeting-experience-feedback-survey.

[14] Zoom, Enabling or disabling animated GIF images for Team Chat, last updated 28 October 2023, URL:
https://support.zoom.com/hc/en/article?id=zm_kb&sysparm_article=KB0059062 .

[15] Zoom, Muting all participants when they join a meeting, last updated 28 October 2023, URL:
https://support.zoom.us/hc/en-us/articles/360060860512-Muting-all-participants-when-they-join-a-meeting.

## 13. File transafer

To prevent accidental data breaches, file transfer is disabled by default.[16]

## 14. Annotation

Enabling annotation tools allows meeting participants to collaborate, brainstorm, and draw over shared content. This functionality is disabled by default.[17]

## 15.Prohibit the viewing and recording of the 'gallery' during screen sharing

Admins can prohibit viewing and recording of the gallery with participants when a screen is shared, by selecting active speaker view. This means the teacher can see the students, but the students do not see each other, nor are they recorded. This helps guarantee the public character of meetings and recordings.[18]

## 16.Visibility of participants

Admins can allow users to see each other's contact details. The set of controls for contact lists displayed within an organization is described as follows:[19]

- List all account users under 'All Contacts': This will allow all users to see all other users under Company Contacts (displayed in the All Contacts section on the Contacts tab). This option does not show contact groups.

- List all Zoom Rooms under 'All Contacts': This will show all Zoom Rooms under Zoom Rooms (displayed in the All Contacts section on the Contacts tab).

Admins can also determine the visibility of contact groups:

- Visible to anyone, searchable by anyone: All users can see the group in the client and app (displayed in the All Contacts section on the Contacts tab). All users can search for group members.

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[16] Zoom, Sending a file in meetings and webinars, last updated 28 October 2023, URL: https://support.zoom.us/hc/en-us/articles/209605493-Sending-a-file-in-meetings-and-webinars.
[17] Zoom, Enabling or disabling annotation tools for meetings, last updated 23 November 2023, URL: https://support.zoom.us/hc/en-us/articles/4409894568845-Enabling-or-disabling-annotation-tools-for-meetings.
[18] Zoom, Adjusting your video layout during a virtual meeting, last updated 9 November 2023, URL: https://support.zoom.com/hc/en/article?id=zm_kb&sysparm_article=KB0063672.
[19] Zoom, Managing user groups and settings, Last Updated 28 October 2023, URL: https://support.zoom.com/hc/en/article?id=zm_kb&sysparm_article=KB0062584#h_01G371HC1ZPB3RR4P098X60NCN

- Visible to members only, searchable by anyone: Only members can see the group in the client and app (displayed in the All Contacts section on the Contacts tab). All users can search for group members.

- Visible to members only, searchable by members only: Only members can see the group in the client and app (displayed in the All Contacts section on the Contacts tab). Group members are only searchable by other group members.

## 17.Co-hosts

There is a control for co-hosts. The admin can use this to enable hosts to add co-hosts. Co-hosts have the same in-meeting controls as the host.[20]

## 18.Polling

With the control for polling, the admin can add 'Polls' to the meeting controls. This allows hosts to survey the attendees through polls.[21] EU Education customers can integrate survey services from their own subprocessors in Zoom.

## 19.API features and Marketplace apps

An admin has access to a number of API features. Access to the API is turned Off by default. This means the admin has to pre-approve use of all apps in the Marketplace. There is an option for admins to enable API access to all users' chat messages in this account. By default, the admin has to approve all authorisation requests from end-users (See Figure 2 below).

Therefore, as an admin, you will have the option to opt out from receiving any marketing communications.

## 20.Integration of user calendar and contacts

Zoom account administrators can enable users to integrate their calendar and contacts. Zoom supports Google Calendar, Microsoft Exchange and Microsoft Office 365.

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[20] Zoom, Host and co-host controls in a meeting, last updated 9 November 2023, URL: https://support.zoom.us/hc/en-us/articles/201362603.

[21] Zoom, Enabling polling for meetings, last updated 28 November 2023, URL: https://support.zoom.us/hc/en-us/articles/4412324684685.

*Figure 2: Zoom explanation about account permissions for apps[22]*



## 21.Webinar settings: social share, tracking pixels and livestreams

Owners and administrators have the ability to disable third party social share buttons on the registration pages for Zoom webinars. The social share buttons are **on** by default. This enables end users to share the webinar announcement on social media. If the webinar is not open to a general public, administrators should disable these social share buttons.

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[22] See also Zoom, Admin management of the Zoom App Marketplace, last updated 4 January 2024, URL: https://support.Zoom.us/hc/en-us/articles/360032447812-Managing-Zoom-Marketplace.
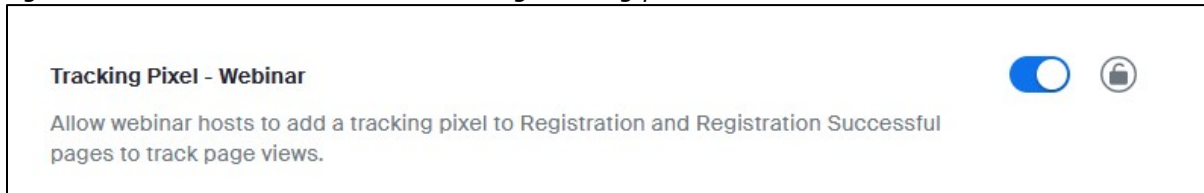
*Figure 3: Webinar Registration settings: social share enabled*



Owners and administrators also have the ability to place tracking pixels on the invitation and confirmation pages of Zoom webinars if they use Zoom's sub processor Twilio to send these mails.[23] These pixels track traffic and engagement from users who reach the page from the emails that invite them to join a webinar.
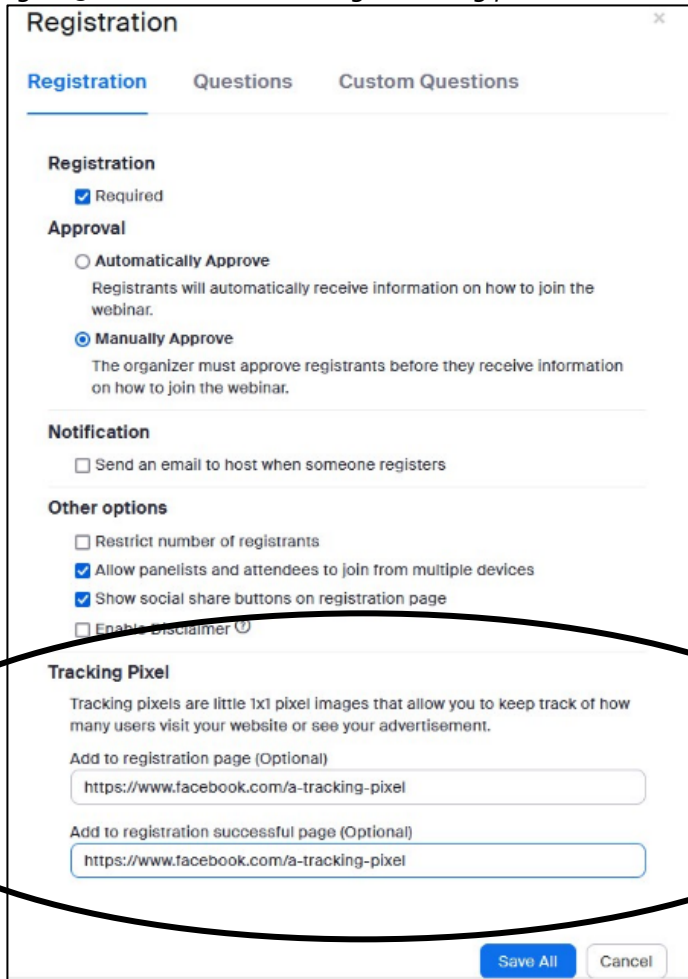
*Figure 4: Administrator control for enabling tracking pixels*



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[23] Zoom, Enabling webinar tracking pixel, last updated 28 October 2023, URL: https://support.zoom.com/hc/en/article?id=zm_kb&sysparm_article=KB0066874.

*Figure 5: Webinar host enabling a tracking pixel*

*Figure 6: Tracking pixel present on a webinar registration page*
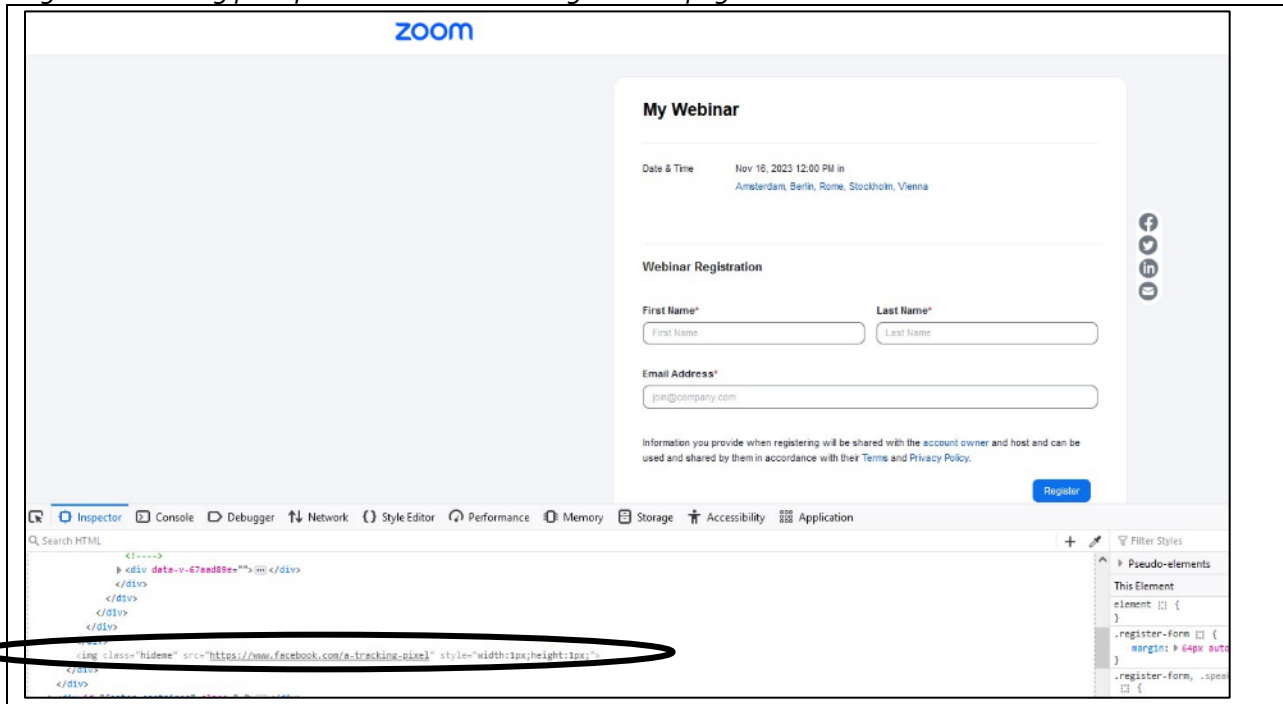


Owner and administrator accounts have the ability to allow or disallow the livestreaming of webinars, and the specific third party livestreaming services used to do so. Livestreaming is enabled by default and the services Facebook, Workplace from Meta, Youtube, and Twitch are enabled. To prevent unauthorised processing by these social media for their own commercial purposes, owners and administrators are advised to disable these third party services.

*Figure 6: Default settings for the livestreaming of webinars*
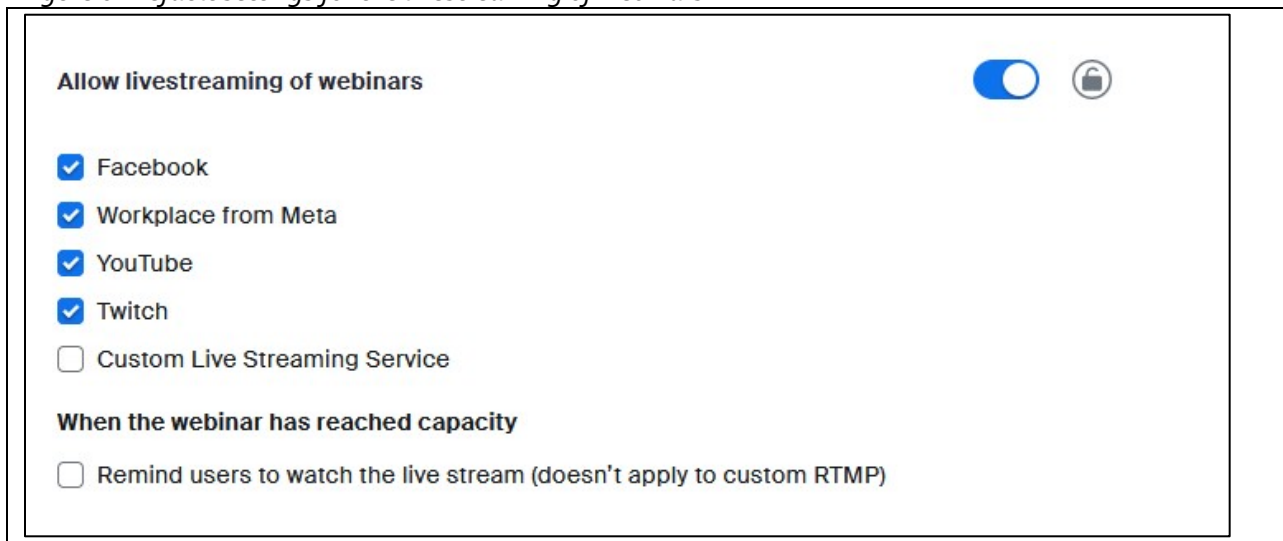
## 22.Third Party Surveys

Owners and administrators have the ability to allow users who create meetings to share surveys with meeting participants.[24] These surveys may be from a third party, such as Google or Survey Monkey. This option is (also) disabled by default. To prevent data leakage to third parties that may process these data for their own commercial purposes, admins should not enable this option. Zoom has confirmed that universities can integrate with their own survey / mailing tool.

*Figure 7: Administrator control for third party surveys*
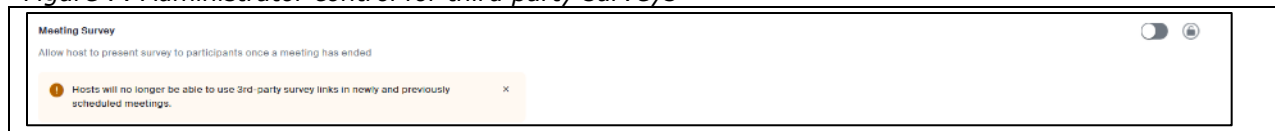


## 23. Zoom AI Companion

Even though Zoom AI Companion was out of scope of the DPIA, and the data processing could not be tested, organisations will have to make a choice about its use. Zoom offers seven features through the integration of AI tools with its services.[25] Include in this list is a feature that has been available prior to the release of AI Companion: Smart Recording. This is the only AI feature currently available for administrators with an EU Education license. Among other things, this feature divides users' cloud recordings of meetings into chapters and provides and highlights of portions of the meeting.[26]

*Figure 8: Owner and Administrator controls for the Zoom AI Companion*



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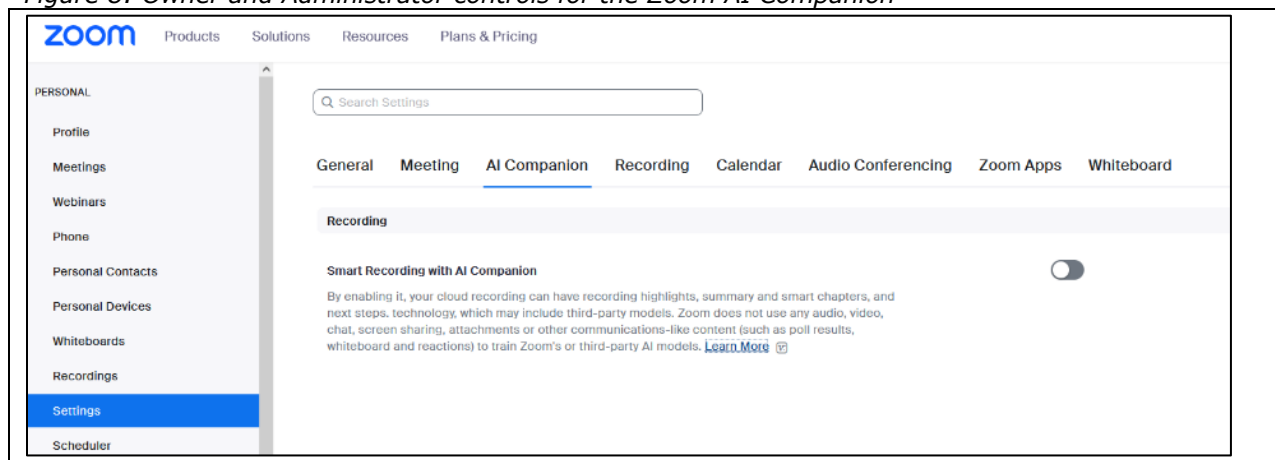
[24] Zoom, Enabling meeting surveys, last updated 12 January 2024, URL:
https://support.zoom.com/hc/en/article?id=zm_kb&sysparm_article=KB0067657.
[25] Zoom, Settings and Configuration for Zoom AI Companion, last viewed 16 November 2023, URL:
https://support.zoom.com/hc/en/category?id=kb_category&kb_category=891c5079c3bdf1104b490e8dc00131da.
[26] Zoom, Using Smart Recording with AI Companion, last updated 28 October 2023, URL:
https://support.zoom.com/hc/en/article?id=zm_kb&sysparm_article=KB0061101.