Information on the processing of personal data for the purposes of administering remote exams/final tests during the Covid-19 pandemic emergency.

EU Regulation 2016/679 "General Data Protection Regulation" (hereinafter "GDPR") establishes the right of every person to the protection of the personal data that concerns them. In accordance with art. 13 of EU Regulation 2016/679, the University of Trento intends to provide both teachers and students (hereinafter "data subjects"), as participants in remote exams/final tests, with the following information.

1. Data Controller
The Data Controller is the University of Trento, via Calepina n. 14, 38122 Trento (TN); email: ateneo@unitn.it; ateneo@pec.unitn.it.

2. Contact details of the Data Protection Officer
The Data Protection Officer, to whom requests for information relating to the data subject’s personal data can be sent, can be contacted at the following email address: rpd@unitn.it.

3. Purpose of data processing and legal basis
In the context of the pandemic and the progress of the vaccination program, art. 1, paragraph 1, of Legislative Decree 111/2021 has established that, with effect from 1.09.2021, priority should be given to carrying out teaching and other curricular activities face-to-face. However, art. 23, paragraph 2 of the Prime Ministerial Decree of 2 March 2021 establishes that students who are unable to participate in teaching and other curricular activities, should have the opportunity to participate remotely in certain activities identified by the individual universities, which must also take into account the specific needs of students with disabilities and specific learning disabilities.

Therefore, DR of 08.31.2021 n. 886 of the University of Trento guarantees students the opportunity to take the tests - including final tests - remotely if they satisfy one of the following criteria: a) physical disability or frailty, supported by appropriate medical certification, b) positive Covid test result and / or quarantine measures, c) in an area which is subject to restrictions and unable to travel, d) administration of the vaccine scheduled for the day of the test, the day immediately preceding or immediately following the test. These conditions must also be demonstrated and communicated well in advance to the Examination Commission.

For this purpose, the University of Trento processes the personal data of the data subjects in the context of carrying out its tasks of public interest (Article 6, paragraph 1, letter e), 3, letter b) and 9, para. 2, lett. g) of the GDPR and art. 2-ter and 2-sexies of Legislative Decree 196/2003 and subsequent amendments) for the sole purpose of guaranteeing the administration of remote exams/final tests in oral, paper and computerized format and only until the end of the Covid-19 pandemic emergency.
4. Categories of data processed
The Moodle Exams platform processes the following personal data:
Teachers: name and surname, photo, university email address or personal email address, tax code, ID and
Ada role, last access to the course, any other courses you are enrolled in, image and voice when associated
with the teaching materials provided by the teacher, any personal data / opinions expressed voluntarily during the event;
Students: name, surname, photo, matriculation number, department, course of study, curricular activities in the
student's academic record, university email address or personal email address, social security number, ID and
Ada role, last access to the course, list of courses in which the student is enrolled, list of Esse3 exams in
which the student is enrolled if the "Verify enrollment in Esse3 exam" function has been activated; only in the case of interventions, also image, voice and any personal data/opinions expressed voluntarily during the intervention.
The Zoom, Google Meet and Lockdown Browser platforms collect the following metadata through their respective desktop applications (PC and MacOs), and / or browser extensions (Firefox, Chrome, Edge) and / or Mobile Apps: IP address, information on device / hardware (e.g. webcam, microphone).
Particular data: health data provided to support the request to participate in the exam / final test remotely.

5. Nature of the provision of data
Providing personal and specific data is an essential requirement for participation in the exams / final tests remotely, and failure to provide such data precludes such participation.

6. Data processing methods
The processing of personal data is carried out using computerized and online methods by personnel authorized to process the data in relation to the tasks and duties assigned, and in compliance with the principles of lawfulness, fairness, transparency, purpose limitation, data minimization, accuracy, integrity and confidentiality (Article 5 of the GDPR), and of data protection by design and protection by default (Article 25 of the GDPR). Specifically, the online exams are carried out in the following ways:
- oral and paper, through the Moodle, Zoom and Google Meet platforms;
- computerized, through the Moodle, Zoom, Google Meet and Lockdown Browser platforms. When Lockdown Browser is used, it is used without the automatic surveillance feature.

7. Categories of recipients and transfer of data to third countries
In addition to the University staff involved processing the personal data for the aforementioned purposes, they will also be disclosed to other subjects who, in the context of providing the services necessary to pursue the
aforementioned purposes, may process the personal data of the data subjects on behalf of the Data Controller. To this end, the managers of the aforementioned platforms have been designated as Data Processors pursuant to art. 28 GDPR. Personal data may be transferred to non-EU countries; if this happens, the transfer will be made on the basis of an adequacy decision pursuant to art. 45 of the GDPR or, in its absence, the standard data protection clauses pursuant to art. 46, 2 par., Lett. c) of the GDPR. In other cases, the data may be disclosed to third parties only for the fulfillment of a legal obligation and / or an order by the judicial authorities.

8. Data storage period
The personal data will be kept for the period necessary to achieve the aforementioned purpose and, in any case, for the time established by current legislation and / or by the University regulations regarding the management and retention of the documentation produced by the University in carrying out its institutional activities.

9. Rights of data subject
At any time the data subject may exercise the rights enshrined in article 15 et seq. of the GDPR towards the Data Controller, using the contact details indicated above, and in particular:

- the right to access their personal data and other information indicated in art. 15 of the GDPR;
- the right to rectify their personal data if inaccurate and / or request integration if incomplete;
- the right to erase their personal data, except in cases where the University is required to keep them pursuant to art. 17, 3 para. of the GDPR;
- the right to limit the processing of their data in the cases indicated in art. 18 of the GDPR;
- the right to object to the processing of the personal data concerning them in cases where this is permitted.

Data subjects may exercise their rights using the relevant form on the "Privacy and protection of personal data" page of the University portal and send it to the contact address of the Data Controller indicated above. Data subjects who believe that the processing of their personal data is in violation of the GDPR, have the right, pursuant to art. 77 of the GDPR, to lodge a complaint with the Supervisory Authority for the protection of personal data or to appeal to the relevant judicial authorities.