

Information regarding the processing of personal data for the purposes of carrying out remote examinations during the period of the epidemiological emergency by Covid-19.

EU Regulation 2016/679 "General Data Protection Regulation" (hereinafter "GDPR") establishes the right of every person to the protection of his/her personal data.

Pursuant to art. 13 of EU Regulation 2016/679, the University of Trento intends to provide its lecturers and students (hereinafter "interested parties") with the following information when conducting remote examinations.

1. Data Controller

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

2. How to contact the Data Protection Officer

The Data Protection Officer to contact for information regarding your personal data is available on rpd@unitn.it.

3. Purpose and legal basis of data processing

Within the regulatory framework established in response to the Coronavirus national emergency, the University processes personal data within the performance of its public interest tasks in order to carry out remote examinations by oral, paper and computerized means for the entire period of suspension of in-classroom teaching activities as a result of the emergency measures for the containment of the epidemiological emergency by Covid-19 (Art. 6, par. 1(e) and par. 3(b) and art. 9, par. 2(g) of GDPR, and art. 2-ter and 2-sexies of Legislative Directive 196/2003 and ss.mm.ii.).

4. Categories of data processed

The Moodle platform processes the following personal data:

Lecturers: first and last name, photo, institutional email address, video image and voice.

Students: first and last name, date of birth, photo, student identification number, course of study, institutional email address; special categories of personal data such as health data (disability, Specific Learning Difficulties - DSA, Special Educational Needs –BES, if requesting special aids and/or adaptations for the exam); video image and voice recorded only when using a system that involves automatic surveillance.

The web conferencing platforms Zoom and Google Meet, used to carry out the exams, collect—

through their respective desktop applications (PC and MacOs), and/or extensions for Browsers (Firefox, Chrome, Edge) and/or Mobile Apps—the following metadata: IP address, device/hardware information (e.g. webcam, microphone). For further information please refer to Zoom's, Google Meet's and Respondus's respective privacy policies.

5. Nature of data provision

The provision of personal data is essential for remotely carrying out the examinations therefore failure to provide it will lead to exclusion from the exam.

6. Personal data processing

The processing of personal data is carried out by computerized and telematic means by personnel authorized to process data in relation to the tasks and duties assigned and in compliance with the principles of lawfulness, correctness, transparency, purpose limitation, data minimization, accuracy, integrity and confidentiality (Art. 5, GDPR) and data protection by default (Art. 25, GDPR). Specifically, the remote examinations are carried out in the following ways:

- oral and paper, through the Moodle, Zoom and Google Meet platforms;
- computerized, through the platforms Moodle, Zoom, Google Meet, Lockdown Browser and Monitor Respondus.

If Lockdown Browser is used with automatic surveillance (carried out with Respondus Monitor), the exam session will be recorded with the sole purpose of guaranteeing the correct execution of the exam session and detecting any illegal behaviour by the student.

7. Categories of recipients and data transfer to third countries

Personal data may be communicated to the University staff involved in the fulfillment of the aforementioned purposes. Personal data will also be communicated to Zoom, Google Meet and/or Respondus, Inc., as Data Processors pursuant to Art. 28 GDPR. In such cases, personal data may be transferred outside the European Union but only within the limits and under the conditions set forth in Article 44 *et seq.* of GDPR, or in the context of a decision of appropriateness by the European Commission and/or in the presence of standard contractual clauses adopted by the European Commission. Outside of these instances, the data may be communicated to third parties only for the fulfilment of a legal obligation and/or a decision of the Judicial Authority.

8. Period of data retention

Personal data will be kept on record for as long as necessary to fulfil the purposes it was collected for and in any case for the time necessary to fulfill legal obligations and in any case for the time established by current legislation and/or the University regulations regarding the management and storage of the documentation produced by the University in the performance of its institutional activity.

9. Rights of data subjects

At any time, interested parties may exercise the rights set forth in Articles 15 *et seq.* of the GDPR with respect to the Owner:

- right to access their personal data and other information indicated in Art. 15 of the GDPR;
- right to rectify their personal data if inaccurate and/or to integrate such if incomplete;
- right to have their personal data deleted (so-called 'right to be forgotten'), except in cases where the University is obliged to keep the data in compliance with a legal obligation or for the performance of its public interest tasks;
- right to restrict the data processing in the cases indicated in Art. 18 of the GDPR;
- right to object to the processing of personal data where this is permitted.

To exercise your rights, you can complete the form on the "Privacy and personal data protection" page of the University portal and send it to the Data Controller.

Data subjects who believe that the processing of their personal data is in violation of the GDPR, have the right under Article 77 of the GDPR to lodge a complaint with the Guarantor Authority for the protection of personal data or to take appropriate legal action.