



Policy on the processing of personal data for the use of Online Education services provided through the Moodle e-learning platform and related tools/services

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

Pursuant to Article 13 of the EU Regulation 2016/679, the University of Trento intends herein to provide its faculty and students (hereinafter "data subject(s)") who use the Online Didactics services 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. Contacting the Data Protection Officer

The Data Protection Officer whom you can contact for information regarding your personal data can be reached at the following email address: rpd@unitn.it.

3. Purpose of data processing and legal basis

The University of Trento processes the personal data of data subjects in the context of the performance of its public interest tasks (Articles 6(1)(e), 3(b) and 9(2)(g) of the GDPR and Articles 2-ter and 2-sexies of Legislative Decree 196/2003 et seq. ii) for the purpose of using the Online Didactics services provided through the e-learning platform Moodle. This platform offers online tools and settings for the purposes of the delivery of didactic activities, the utilization of materials and resources and the interaction between students and teachers, as provided for by the relevant regulations in force (Annex 3 of DM 635/16 and Annex 4 of DM 289/2021).

In particular, the processing of data takes place to meet the following specific purposes:

- delivery of teaching and learning assessment activities through synchronous and asynchronous technologies (in both blended and fully online modes) by teaching and support staff;
- verification of learning progress through the conducting of computerized tests;
- conducting of exams/final examinations at a distance if the students are in one of the conditions provided for by the university authorities;
- allow asynchronous communication between data subjects through the resources available on the Moodle platform, such as forums, system notifications, etc.;



- enable synchronous communication between data subjects via Zoom, Google Meet, and Wooclap platforms;
- enable the uploading and enjoyment of videos through the Kaltura and Vinapse (Daddyvideo) media servers;
- enable the release of open digital badges through My Open Badge platforms;
- enable the creation of mathematical notations through the Mathtype interactive equation editor;
- allow the verification of the students' papers through the Turnitin software for the detection of possible cases of plagiarism and copyright infringement, should the instructor(s) deem it appropriate, according to what is established in the specific privacy policy.

4. Categories of data processed

Lecturers: first and last name, photo, institutional email address (personal email address only for non- UniTrento lecturers), tax code, Ada ID and role, date and time of last access to the course, image and voice when associated with the teaching materials provided by the lecturer, any personal data/opinions voluntarily expressed during the lectures.

Students: first name, last name, photo, student registration number, department, course of study, course activities present in the university transcript, institutional email address (or personal email address for outsiders), social security number, Ada ID and role, date and time of last access to the course, list of courses in which the student is enrolled, list of Esse3 examinations in which the student is enrolled if the "Esse3 Registration Check" feature has been activated; in the case of participation during teaching activities, voice and any image and personal opinions voluntarily expressed during the intervention.

Other personal data such as IP address, device/hardware information (e.g. webcam, microphone) are collected through desktop applications (PC and MacOs), Browser extensions (Firefox, Chrome, Edge) and/or Mobile Apps related to the platforms used from time to time (Zoom, Google Meet, Lockdown Browser, Wooclap, Turnitin).

5. Nature of the provision of data

The provision of personal data is indispensable to take advantage of the Online Didactics services provided through the Moodle e-learning platform and failure to provide such data will render it impossible to use it.

6. Method of processing

The processing of personal data is carried out in a computerized and telematic manner by personnel authorized to process data in relation to the assigned tasks and duties and in accordance with the principles of lawfulness, fairness, transparency, purpose limitation, data minimization, accuracy, integrity and confidentiality (Art. 5 GDPR) and through the principles of data protection by design and data protection by default (Art. 25 GDPR).

7. Categories of recipients and transfer of data to third countries

Personal data will be communicated, in addition to the University staff involved in the pursuit of the above-mentioned purposes, also to other entities, which, as part of the provision of services necessary in pursuit of the above-mentioned purposes, may have to process the personal data of the data subject(s) on behalf of the Data Controller. To this end, the subjects managing the above-mentioned platforms have been designated Data Processors pursuant to Article 28 GDPR. Outside of these cases, data may be disclosed to third parties only for the fulfillment of a legal obligation and/or an order of a judicial authority.

Since the use of Turnitin's antiplagiarism service implies the transfer of personal data to the USA, and considering Turnitin LCC's compliance with the Data Privacy Framework, this transfer is carried out in accordance with the adequacy decision for the EU-US Data Privacy Framework as well as Art. 46, para. 2, letter c) of the GDPR or by subscribing to the standard data protection clauses.

8. Period of data retention

Personal data will be kept for the period necessary to achieve the above-mentioned purpose and in any case retained for the time established by current legislation and/or University regulations regarding the management and preservation of the documentation produced by the University in the performance of its institutional activities.

9. Rights of data subjects

At any time, data subjects may invoke against the Data Controller, at the contacts indicated above, the rights enshrined in Articles 15 et seq. of the GDPR:

- Right of access to one's personal data and other information specified in Article 15 of the GDPR;
- Right to have their personal data corrected if inaccurate and/or supplemented if incomplete;



- Right to deletion of one's personal data except in cases where the University is obliged to retain them under Art. 17, 3 par. of the GDPR;
- Right to restrict the processing in the cases indicated in Article 18 of the GDPR;
- Right to object to the processing of personal data concerning them in cases where this is permitted.

In order to exercise the rights, it is also possible to use the appropriate form found on the [Privacy and Personal Data Protection](#) page of the University portal.

Data subjects who believe that their personal data is being processed in violation of the GDPR have the right under Article 77 of the GDPR to lodge a complaint with the Data Protection Authority or to take appropriate legal action.

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