Information on the processing of personal data for distance lessons covering the period of the COVID-19 epidemic

EU Regulation 2016/679 “General Data Protection Regulation” (“GDPR”) establishes the right of every person to the protection of personal data relating to them. According to Article 13 of EU Regulation 2016/679 the University of Trento is informing its teaching staff and students (“the interested parties”) of the following:

1. Data Controller

The data controller is the University of Trento, via Calessina n. 14, 38122 Trento (TN); email: ateneo@pec.unitn.it; ateneo@unitn.it.

2. Contact details of the Data Protection Official

The contact details of the Data Protection Official to request information about your own personal data and to exercise the rights enshrined in article 15 and ss. of the GDPR are: via Verdi n. 8, 38122 Trento; email: rpd@unitn.it.

3. Purpose of processing and legal basis

In the emergency national regulatory framework drawn up for the Coronavirus epidemic, the university processes personal data to carry out its duties in the public interest in order to guarantee that distance lessons can take place for the whole period of suspension of teaching activities that require attendance in accordance with the urgent measures taken to contain the COVID-19 emergency (art. 6, par. 1, lett. e), 3, lett. b) and 9, par. 2, lett. g) of the GDPR and art. 2-ter and 2-sexies of the D. lgs. 196/2003 e ss.mm.ii.).

4. Categories of processed data

Teaching staff personal data: name and surname, photos, institutional email address, images and voice, any personal information voluntarily given during the lesson.
Student personal data: name and surname, photos, matriculation number, department, course of study, university record booklet, institutional email address; in cases where contributions/chats are made, data also includes personal information given voluntarily, images, voice and/or personal opinions.
The web conferencing platforms Zoom and Google Meet, through the respective desktop applications (PC and MacOs), and/or through browser extensions, (Firefox, Chrome, Edge) and/or through Mobile Apps collect the following meta data: IP address, information on device/hardware (eg. webcam, microphone).
5. The provision of data

The provision of personal data is necessary to attend a lesson and failure to supply personal data means it will be impossible to participate in a lesson.

6. Data processing methods

In compliance with the principles of lawfulness, correctness, transparency, purpose limitation, data minimization, accuracy, integrity and confidentiality (art. 5, par.1 GDPR) and respecting data protection from the beginning of the planning process and predefined protection settings (art. 25 GDPR), distance lessons will be carried out in the following ways:

- synchronously on the Zoom platform with the possibility of registering;
- asynchronously with recorded lessons.

The recoding is done so the lesson can take place at a later date. The teaching staff are responsible for posting recorded lessons on their course Moodle page.

7. Categories of recipients

Lessons will be available to students enrolled on their respective Moodle courses for the entire emergency period. Outside of these instances, personal data can be communicated to third parties only when complying with a legal obligation and/or on the order of the judicial authority.

8. Data retention period

Personal data will be retained for the period necessary to undertake the aforementioned activities and fulfil any legal obligations. Personal data will be retained for the period of time set out by current legislation and/or university regulations regarding the management and retention of documents produced by the University in carrying out its institutional activities.

9. Rights of the data subject

At any time, toward the data controller, the interested parties can exercise the rights enshrined in art. 15 and ss. of the GDPR:

- The right of access to personal data and other information indicated in art. 15 of the GDPR;
- The right to correct personal data when it is incorrect and/or to add to it if it is incomplete;
- The right to delete personal data (the right to be forgotten) except in cases where the university is required to keep it in accordance with a legal obligation or when carrying out its activities in the public interest;
- The right to limit the data processing as set out in art. 18 of the GDPR;
- The right to oppose the processing of personal data when this is allowed.

To exercise these rights it is possible to use the dedicated form which can be found on the page “Privacy e protezione dei dati personali” on the university’s website and send it to the data controller at this email address: rpd@unitn.it.
Interested parties who deem that the processing of their personal data has taken place in violation of the GDPR, have the right according to art. 77 of the GDPR to lodge a complaint with the Data Protection Authority or refer the matter to the appropriate courts.