Information regarding the processing of personal data for the purposes of teaching courses remotely during the period of the Covid-19 epidemiological emergency.

EU Regulation 2016/679 "General Regulation on the protection of personal data" (hereinafter "GDPR") guarantees the right of every person to the protection of personal data concerning them. 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 in the course of teaching and other remote learning activities.

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. Contact details for the Data Protection Officer
The Data Protection Officer can be contacted for information regarding your personal data and for the exercise of your rights under Articles 15 et seq. of the GDPR at the following address: via Verdi n. 8, 38122 Trento; email: rpd@unitn.it.

3. Purpose of data processing and legal basis
Within the national emergency regulatory framework determined by the Coronavirus, the University processes personal data as part of the performance of its public interest tasks in order to ensure the delivery of lectures at a distance for the entire period of suspension of teaching activities "in the presence" determined by the emergency measures on the containment of the epidemiological emergency by Covid-19 (art. 6, par. 1, lett. e), 3, lett. b) and 9, par. 2, lett. g) of GDPR and articles 2-ter and 2-sexies of D. lgs. 196/2003 and ss.mm.ii.).

4. Categories of data processed
The Moodle platform processes the following personal data:
- Teachers: name and surname, photo, institutional email address, video image and voice, any personal data / opinions voluntarily expressed during the lesson;
- Students: name and surname, photo, student identification number, department, course of study, course activity, institutional email address; only in the case of interventions, also image, voice and any personal data/opinions voluntarily expressed during the intervention.

The Zoom and Google Meet web conferencing platforms 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 the privacy policies, respectively, of Zoom and Google Meet.

5. Nature of data provision
The provision of personal data is essential for the performance and participation in distance learning. The sharing of personal image and voice by the student is optional but failure to do so will make it impossible to actively participate in the lessons through interventions.
6. Methods of treatment of personal data
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). In this case, the delivery of the remote lessons can be carried out in the following ways:
- in a synchronous manner, with the possibility of registration;
- in an asynchronous manner, with the recording of the lesson.

The registration of the lesson by the teacher is made for the purpose of subsequent use of the lesson.

The recorded lessons will be made available by the teacher on his or her own course in the Moodle platform for the benefit of the enrolled students.

7. Categories of recipients and transfer of data to third countries
Personal data may be communicated to the University staff involved in meeting the aforementioned purposes of the remote learning process. Personal data will also be communicated to Zoom and Google Meet, 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 Art. 44 et seq. of GDPR, or in the presence 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 cases, 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 for the period necessary to achieve the aforementioned purposes and in any case, for the time necessary to fulfill legal obligations and for the period of 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 the interested parties
At any time, the 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 delete their personal data (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;
- the right to limit the processing in the cases indicated in Art. 18 of the GDPR;
- right to object to the processing of personal data concerning them in cases where this is allowed.
To exercise your rights, you can use the appropriate form on the "Privacy and personal data protection" page of the University portal and send it to the Data Protection Manager at the following email address: rpd@unitn.it.

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.

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