

**Information regarding the processing of personal data for the purposes of carrying out remote lectures 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 concerning the delivery of remote lectures.

**1. Data Controller**

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

**2. How to contact the Data Protection Officer**

For information regarding one's own personal data, the Data Protection Officer can be contacted on [rpd@unitn.it](mailto: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 ensure the delivery of remote lectures 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: 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, study career, institutional email address; only in the case of interventions, also image, voice and any personal data/opinions voluntarily expressed during the intervention.

The web conferencing platforms Zoom and Google Meet 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 and Google Meet’s respective privacy policies.

### **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. Personal data processing**

The processing of personal data is carried out by computerized and ITC 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 delivery of online lectures remotely may be carried out in the following forms:

- synchronous (real-time) online classes, which can be recorded;
- asynchronous classes, with recorded video clips that substitute for lectures.

The recording of the lecture on the part of the lecturer is made for the purpose of further use of said lecture. The recorded lessons will be made available by the lecturer on his or her own course in the Moodle platform for the benefit of the students enrolled.

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

Personal data may be communicated to the University staff involved in the fulfilment of the aforementioned purposes. 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 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 aforementioned purposes 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 Data Controller:

- 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 it 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 their rights, the form on the "Privacy and personal data protection" page of the University portal can be completed and sent it to the Data Controller.

Data subjects who believe that the processing of their personal data is carried out 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.