

**Preliminary remark: the privacy statement below can be customized and must be amended, but no information sections may be deleted.**

### **Privacy Statement Example:**

This privacy statement gives a detailed description of how we process your personal data when you participate in an online assessment with proctoring.

## **1. PURPOSE AND LEGAL GROUND FOR THE PROCESSING OF YOUR PERSONAL DATA**

For the purpose of specific online assessments, Ghent University uses online proctoring, the tool "Proctorio" to be more precise. Proctoring involves processing of personal data: it is used for identity checks and for exam fraud prevention. By means of Proctorio, Ghent University verifies whether or not you have observed the applicable rules, and whether or not you have been using unauthorized sources like e.g. the chat function, internet or e-mail. This is why online proctoring performs an identity check: Ghent University must be able to ascertain itself that you and only you have participated in the assessment.

Online proctoring is part and parcel of the education duties carried out by Ghent University for reasons of public interest. For this purpose, Ghent University has laid down the necessary regulations with Proctorio, which acts as data processor in this context.

The ultimate goal is for you to receive a degree that is at once highly valued and a truthful reflection of your competencies.

## **2. WHO IS RESPONSIBLE FOR DATA PROCESSING AND HOW TO CONTACT US?**

Online proctoring is used by lecturers-in-charge of course units affiliated with Ghent University. Ghent University is responsible for the processing of personal data.

For questions, comments or suggestions about online proctoring, please contact the Education Department's Quality Assurance Office at [onderwijsondersteuning@UGent.be](mailto:onderwijsondersteuning@UGent.be). For further questions about the rights and obligations with regard to privacy, or in case you feel that your personal details have been processed wrongfully or incorrectly by Ghent University or by Proctorio, please contact Ghent University's Data Protection Officer at [privacy@ugent.be](mailto:privacy@ugent.be).

## **3. WHICH PERSONAL DATA IS PROCESSED?**

"Personal data" is data that contains information about an identified or identifiable natural person.

In the context of your participation in an online assessment with online proctoring at Ghent University, the following data will be processed:

- a) your name (first name, initials, last name);
- b) your Ghent University e-mail address;

- c) a picture of your Ghent University student card, or in exceptional circumstances, of your ID-card; a limited number of photos for identification purposes (taken by the student using the computer's/laptop's webcam);
- d) video and audio recordings of the student concerned, and of the table or desk at which s/he is sat during the exam (taken by the student using the computer's/laptop's webcam);
- e) on-screen activities during the exam;
- f) keyboard touches and mouse movements during the exam;
- g) the computer network's IP address to which the computer/laptop is connected;
- h) the webpages and applications you visit during the exam;
- i) your answers to the exam questions;
- j) specific data in connection to the exam (time, date of submission, attempt numbers, a score calculating the likelihood of fraud, annotations added by the lecturer-in-charge, abnormalities, level of fraud suspicion (by means of the colour codes red, orange or yellow).

Online proctoring does not require the processing of any special personal data categories ("sensitive data") that reveal racial or ethnic origin, political views, religious or philosophical beliefs.

#### **4. WHO HAS ACCESS TO YOUR PERSONAL DATA?**

The lecturer-in-charge has access only to the personal data of students taking the exam connected to his/her course unit. In case of suspected exam fraud, the study programme's Examination Board will be notified. Any authorized staff of the lecturer-in-charge (including members of the Examination Board, among others) have access to your personal data on a strict "need-to-know" basis. This means that their right of access is limited to the discharge of their duties in case exam fraud or other irregularities have been established. This right of access therefore only applies to the purposes stated in this privacy statement. The lecturer-in-charge makes sure that your personal data is not passed on to third parties, unless the reasonable use, retention or disclosure of your personal data is necessary (e.g. to comply with prevailing rules and regulations, to detect technical or security issues or to protect the rights, ownership or safety of the online exam).

Proctorio acts as data processor and is responsible for the encrypted data retention. Proctorio has no access to the content of the data. The privacy and security regulations Ghent University has negotiated with Proctorio are also applicable to parties called in by Proctorio.

#### **5. RETENTION PERIOD OF PERSONAL DATA**

Your personal data is being processed during online proctoring and will be retained for an ensuing period of 180 days. The data is encrypted. Only the lecturer-in-charge has access to your personal data. Your data is deleted as soon as the retention period expires.

#### **6. SECURITY OF YOUR PERSONAL DATA**

All data collected during online proctoring is encrypted. This means that nothing leaves your computer until it is encrypted and that it is only decrypted by the lecturer-in-charge. Proctorio takes appropriate technical and organizational measures to protect your personal data against any form of loss or unlawful processing, and to limit access to your data. The data is retained on a secure server within the European Union.

## **7. WHAT ARE YOUR RIGHTS WITH REGARD TO PROCESSING PERSONAL DATA**

When we collect and use your personal data, you enjoy a number of rights that you can exercise as described below. Please note that if you wish to exercise a right, we will ask you for a proof of identity. We do this to avoid a personal data breach, for example, in case an unauthorized person acts on your behalf and exercises a right in your name. Article 21 of the GDPR provides you with the right to object to our processing of your personal data.

Objection is possible in case you feel that based on your particular situation on the ground of which your privacy interests outweigh the purposes described above. In addition, GDPR stipulates other rights you can exercise under certain conditions: the right to obtain a copy, the right to rectification of personal data in case they are factually incorrect, the right to erasure, and the right to restriction of processing. In order to exercise these rights, please contact Ghent University's Data Protection Officer at [privacy@ugent.be](mailto:privacy@ugent.be)

If you repeatedly make the same request and cause obvious inconvenience, we may refuse these successive requests or charge you an administrative fee to cover the costs. We can also refuse or only partially grant you the right to access your personal data, if such access could disproportionately damage the rights and freedoms of others, including those of Ghent University.

If you have a complaint about the processing of your personal data by Ghent University, you can contact Ghent University's Data Protection Officer at [privacy@ugent.be](mailto:privacy@ugent.be). If you are not satisfied with our answer, you can file a complaint with the competent data protection authority, namely the Belgian Data Protection Authority ([contact@apd-gba.be](mailto:contact@apd-gba.be)) and/or the Flemish Supervisory Committee ([contact@toezichtcommissie.be](mailto:contact@toezichtcommissie.be)).

## **8. AMENDMENTS TO THE PRIVACY STATEMENT**

This privacy statement can be amended to continue to comply with the applicable rules and regulations. If the privacy statement is amended, this will be communicated through the usual channels.