



INFORMATION ON PERSONAL DATA PROCESSING RELATING TO WRITTEN EXAMS CARRIED OUT THROUGH MOODLE, SEB, EXAM NET, WEBCONFERENCE, PROCTORING  
(pursuant to art. 13 of EU Regulation 2016/679)

## Introduction

Pursuant to art. 13 of Regulation (EU) 2016/679 ("GDPR") concerning the protection of individuals with regard to the processing of personal data, as well as the free circulation of such data, which repeals Directive 95/46/EC, the University of Milan, as Data Controller, informs students of the processing of personal data concerning them relating to written exams carried out through MOODLE, SEB, EXAM NET, WEBCONFERENCE, PROCTORING.

The University of Milan complies with the current legislation on transparency and the mandatory publication of data and documents.

### 1. Data Controller and Data Protection Officer (DPO)

The data controller is the University of Milan, represented by its pro tempore Rector, Via Festa del Perdono no. 7, 20122 Milan, e-mail [infoprivacy@unimi.it](mailto:infoprivacy@unimi.it).

Pursuant to art. 37 et seqq. of EU Regulation 2016/679, the University has appointed as Data Protection Officer (DPO) Prof. Avv Pierluigi Perri, c/o Department "Cesare Beccaria", Via Festa del Perdono no. 3, 20122 Milan, e-mail [dpo@unimi.it](mailto:dpo@unimi.it).

### 2. Purpose and legal basis

Personal data processed

a) Written exams using Moodle + SEB and, in case the exam is taken from remote,

Webconference

Written exams using Exam.net + SEB and, in case the exam is taken from remote,

Webconference

Written exams on paper and, in case the exam is taken from remote, Webconference

- Data required for the purpose of identifying users when accessing exam platforms (personal and contact data, IP address of your device); access list with connection date, time and period
- Data relating to exam procedures such as, for example, data relating to the hardware and software characteristics of the device used by candidates, data required for identifying the best tools to assist students with disabilities, or specific learning disabilities; audio and video data of the candidate and the environment in which the exam takes place; data relating to the exam (answers given and marks)
- Other data communicated or made available by the user during the exam.



b) Written exams using Moodle + Proctoring

- Data referred to in letter a)
- User data acquired through video and recordings used for exam surveillance purposes

The data is processed exclusively for institutional purposes connected to exams, pursuant to art. 6, paragraph 1, sect. e) of the GDPR.

The provision of data is a necessary requirement to be able to access the exams; failure to provide it implies the impossibility of accessing the requested service

**3. Processing methods**

Data will be collected in compliance with the principles of relevance, completeness and not exceeding the purposes for which the data is processed.

The personal data provided is processed in compliance with the principles of lawfulness, correctness and transparency, provided for by art. 5 of the GDPR, also through IT and digital tools designed to store and manage the data, and, in any case, in such a way as to guarantee security and protect confidentiality.

**4. Categories of subjects to whom the data may be communicated or who may learn about them and any data transfers abroad**

The personal data of users who access the platforms, collected during the performance of the service, may be processed by the examining instructor, the employees and contractors of the University for the management of remote services, IT security, exams and students' career (CTU, ICT, Student Offices, COSP), as authorised persons.

For exams using the Moodle + Proctoring system, the data collected during the offering of the service, with the exception of data belonging to special categories of personal data, may be processed, in the capacity of Authorized person, by the University employees in charge of the management of distance services (CTU and DIRICT), in charge of IT security and related to the structures responsible for the management of profit exams and students' careers, and may be communicated to the platform provider for the mere purpose of keeping records, without the latter having access to them or being able to perform any other processing operation.



It is without prejudice the communication of data requested, in accordance with the law, by the Public Security Authority, by the Judicial Authority or by other public entities for purposes of defence, state security and investigation of crimes, as well as communication to the Judicial Authority in compliance with legal obligations, where there is an alleged offence.

Only for the purpose of technical assistance to the candidates, personal data relating to access made by students, to the exams taken and to the questions in the exam may be processed by external subjects appointed as Data Processors.

The persons in charge of assistance services, with the previous consent of the candidate requesting the service, may remotely access the PC of the interested party for the sole purpose and within the limits strictly necessary for the provision of the assistance requested.

Apart from the aforementioned cases, personal data are not in any way and for any reason communicated or disclosed to third parties.

Personal data is transferred to third countries under adequacy decision or data processors that provide appropriate safeguards.

## **5. Data retention**

Personal data will be kept for the time strictly necessary to ensure exam procedures and grade recording, without prejudice to the possibility of extending this period in cases of serious violations occurring during the examination and only for the time required therefor.

For exams using the Moodle + Proctoring system, the data will be kept for a maximum of 30 days from the date of recording of the images, for inspection purposes then they will be automatically deleted.

Only in the case of detection of any anomalies, the data will be further stored for the time strictly necessary to allow the data subject to provide their remarks. It is forbidden to anyone to disseminate the recordings by any means.

## **6. Rights of the data subject**

Pursuant to arts. 15 to 22 of the GDPR, the data subject may exercise, if the conditions are met, the right to ask the data controller for i) access to their personal data, ii) the rectification or iii) cancellation of the same, iv) data processing restrictions, by contacting the Data Protection Officer, via Festa del Perdono, 7, 20122 Milan - e-mail: [dpo@unimi.it](mailto:dpo@unimi.it).

## **7. Right to object**

Pursuant to art. 21, paragraph 1, of the GDPR, the data subject may object at any time, for reasons connected to his/her particular situation, to the processing of their personal data pursuant to art. 6, paragraph 1, letter e, i.e. when the processing has as its legal basis the performance of a task of public interest, by contacting the following: Data Protection Officer, via Festa del Perdono, 7, 20122 Milan -e-mail: [dpo@unimi.it](mailto:dpo@unimi.it).



## 8. Right to lodge a complaint

Without prejudice to any other administrative or judicial remedy, every data subject shall have the right to lodge a complaint with a supervisory authority, in particular in the Member State of his or her habitual residence, place of work or place of the alleged infringement if the data subject considers that the processing of personal data relating to him or her infringes the GDPR.

## 9. Updates

This Information may change over time. Please check for any updates in the Privacy section of the website <http://www.unimi.it>.

The Rector  
Elio Franzini