

PRIVACY POLICY

EXAMS/LEARNING ASSESSMENT TESTS PROCEDURES



Dear student,

With this policy, Bocconi University (hereinafter referred to as the "University" or "Bocconi") - pursuant to and in accordance with the provisions of art. 13 of European Regulation 2016/679 on the protection of personal data ("GDPR") - wishes to inform you about the processing of your personal data related to the procedures for conducting tests (hereinafter, "exams") adopted by the University.

This policy is drafted on the basis of the principle of transparency and all the elements required by the GDPR. It is divided into individual sections in order to make it quicker, easier, and more understandable to read.

1. DATA CONTROLLER

The Data Controller is Bocconi University, with registered office in Via Roberto Sarfatti, 25, 20100 Milan.

2. PURPOSE OF THE PROCESSING

Your personal data will be processed to ensure the proper conduct of the exam. In addition, your personal data may be processed for the purposes of detecting any illegal or irregular conduct related to the conduct of the exams, exclusively in cases where there are grounds for suspecting behavior that does not comply with the [General University Rules](#) the [Code of Conduct](#) and the [Honor Code](#). This activity is aimed at ensuring the integrity, security, and regularity of the exams and will be carried out with respect to the criteria of proportionality and data minimization.

3. TEST PROCEDURES AND RELATED TYPES OF DATA PROCESSED

The table below illustrates the different methods of conducting exams currently in use at the University; please note that the provision of personal data is necessary for the examination to take place and failure to provide such data will make it impossible to take part.

It is up to the instructor of the relevant course to choose the method deemed appropriate for each exam.



	EXAM TYPE	INFORMATION SYSTEMS USED	DESCRIPTION OF THE PURPOSES/ METHODS OF TESTS PROCEDURES	TYPE OF DATA PROCESSED
IN- PERSON EXAMS	1. Paper-based written or oral exam	None	The test will take place in the presence of an instructor and the other students taking part, in paper form. For identification purposes, you will be asked to show your Bocconi ID card or ID.	first name; last name; student number identity document or Bocconi ID card
	2. Written exam in the classroom on the student's electronic device	Respondus Lockdown Browser; Blackboard Collaborate	The test will take place in the presence of an instructor and the other students taking part in the test, electronically via your electronic device. For identification purposes, you will be asked to show your Bocconi ID card or ID.	first name; surname; student number identity document or Bocconi ID card
		Respondus Lockdown Browser; Blackboard Collaborate University network systems.	Only in the event of suspicions of illegal or irregular conduct may the University carry out targeted checks, even after the end of the exam, on the network traffic generated by students connected to the Bocconi Wi-Fi network during the test. These checks are solely intended to detect the use of and/or access to artificial intelligence tools and/or other unauthorized software and/or websites and/or apps, which are accessed and/or used by the student for the	The processing concerns information ("metadata") and logs relating to the operations performed by students during the tests (hereinafter also referred to as " Traffic Data "). Traffic Data is generated by the network devices and systems used for the proper functioning of the Wi-Fi network of Bocconi. The types of data processed include: logs generated by the Respondus system;



			purpose of altering the outcome of the test.	logs generated by the Blackboard system; MAC address of the device used for access IP address assigned at the time of connection; date, time, and duration of the connection; information about the classroom/floor from which access took place; DNS logs (web domains requested during the connection, without content analysis).
	3. Written exam on paper or on the student's electronic device	Respondus Lockdown Browser; Blackboard Collaborate	To ensure the integrity of the examination, you will be asked to connect to Collaborate from a different device (e.g. smartphone) in order to frame the location where you will take the exam. For identification purposes, you will be asked to show your Bocconi ID card or ID. At the end of the test - only if you take the paper version - you will be asked to show your paper through the webcam, take a photo of your paper and upload it from your PC.	first name; last name; student number; identity document or Bocconi ID card



REMOTE EXAMS *	4. Remote oral exam	Blackboard Collaborate Teams	The test will take place in front of the instructor and in the presence of a witness. You will be asked to show your surroundings. For identification purposes you will be asked to show your Bocconi ID card or ID.	first name; last name; student number identity document or Bocconi ID card
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* Examination method adopted in exceptional cases, subject to assessment of compliance with the regulations in force at the time of adoption of the aforementioned method and subject to specific notification to students.

Please note that the processing in question does not involve automated decision-making processes or profiling activities.

4. THE LEGAL BASIS FOR PROCESSING

The processing of your personal data is necessary for the performance of a task of public interest carried out by the University in accordance with Article 6(1)(e) of the GDPR and Article 2-ter of Italian Legislative Decree no 196/2003.

5. COMMUNICATION OF PERSONAL DATA

Your personal data will be processed exclusively by persons authorized to process them pursuant to Article 29 of the GDPR and by legal and natural persons appointed pursuant to Article 28 of the GDPR as Data Processors, in compliance with the GDPR. In this regard, it should be noted that the University has deemed that *Blackboard*, duly appointed as the data processor, complies with the GDPR and has technical and organizational measures in place to protect the rights and freedoms of students.

Blackboard uses the services of its own data processors (sub-processors) and, in particular, Amazon Web Services (hereinafter also referred to as "AWS"), which provides the data storage service.

It should be noted that AWS servers are located in Frankfurt. It follows that a transfer outside the European Union is not possible for the processing under consideration.

Personal data may be communicated to public bodies or judicial authorities where required by law or to prevent or suppress the commission of a crime.

6. DATA RETENTION PERIOD

The table below illustrates the retention time of your personal data



TYPE OF DATA PROCESSED	RETENTION PERIOD
Processed and personal data contained therein meaning name, surname, student number	5 years
Bocconi ID card or identity document shown for identification purposes in front of the camera	No retention is envisaged
Video recording made with a mobile device	No retention is envisaged
Traffic Data	<p>Traffic Data is stored:</p> <ul style="list-style-type: none"> i) for as long as necessary (and no longer than six months) for the instructor to verify that the exam has not been subject to unauthorized conduct, in order to ensure its suitability, reporting it in accordance with the <i>'Procedure for verifying network traffic in the event of suspected use of artificial intelligence systems or unauthorized software during learning assessment tests'</i>; ii) in the event of disciplinary proceedings being initiated against students, for a further period of 120 days; iii) if the proceedings result in a disciplinary sanction, such data will be retained for a further period of 120 days from the date of notification, as well as for as long as necessary for the purposes of managing any litigation until its conclusion.



7. TERRITORIAL SCOPE OF PROCESSING

Your personal data will be processed by the Data Controller within the European Union. Respondus Inc., based at 8201 164th Ave Northeast Suite 200, PO Box 3247 Redmond, Washington, USA, provides the *LockDown Browser* application to the University, which, in any case, does not process your personal data for the purposes pursued by the University.

However, the Data Controller informs you that in the event that you decide, in a completely autonomous manner and in contravention of the University Guidelines that have already been sent to you, to make use of the "Help center" and "System check" functions, Respondus Inc. will process some of your personal data independently, for its own purposes. This may, therefore, involve a transfer of data outside the EU, specifically to the USA.

For more information about Respondus Inc.'s privacy policy, you may consult it at: <https://web.respondus.com/privacy-policy/>.

In any case, you can always obtain further details from the Data Controller by requesting evidence of the specific guarantees adopted.

8. RIGHTS OF THE DATA SUBJECT

Pursuant to Articles 15 et seq. of the GDPR, you may, at any time, exercise the rights expressly recognized to the data subject and, in particular, obtain:

- confirmation as to whether or not personal data concerning you are being processed and obtain access to the data and the following information (purpose of processing, categories of personal data, recipients and/or categories of recipients to whom the data have been and/or will be disclosed, storage period);
- the rectification of inaccurate personal data concerning you and/or the integration of incomplete personal data, including by providing a supplementary declaration;
- the erasure of personal data, in the cases provided for by the GDPR;
- the restriction of processing in the cases provided for by privacy legislation in force;
- the portability of data concerning you and/or request the direct transmission of your data to another data controller;
- the revocation of the consent given without prejudice to the lawfulness of processing based on the consent given before revocation;
- object at any time for reasons related to your particular situation, to the processing of personal data concerning you in full compliance with current privacy legislation, as well as for marketing and profiling purposes;

You may exercise your rights by contacting the following email address, attaching a copy of your identity document: dpo@unibocconi.it. In any case, you will always have the right to lodge a complaint with the competent supervisory authority (Personal Data Protection Authority), pursuant to Article 77 of the GDPR, if you believe that the processing of your data is contrary to current privacy legislation.

On _____ you declared that you have read and understood the privacy policy

[] I declare that I have read and understood this policy on the processing of my personal data





**Università
Bocconi**
MILANO