Bocconi

PRIVACY POLICY

EXAMINATION PROCEDURES

Dear student,
with the following information notice the Università Commerciale Luigi Bocconi (hereinafter referred to as the "University" or the "Bocconi") - pursuant to and in accordance with the provisions of art. 13 of the 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 examination procedures adopted by the University.

This information notice is drafted on the basis of the principle of transparency and all the elements required by the GDPR and is divided into individual sections in order to make reading quicker and easier.

1. DATA CONTROLLER

The Data Controller is the Università Commerciale Luigi Bocconi, with registered office in via Roberto Sarfatti, 25, 20100 Milan.

2. PURPOSE OF PROCESSING

Your personal data will be processed to ensure the proper conduct of the examination.

3. HOW THE EXAMINATION IS CONDUCTED AND RELATED TYPES OF DATA PROCESSED

The table below illustrates the different examination modes currently in use at the University. It is up to the lecturer of the relevant course to choose the mode deemed appropriate for each examination paper.

	EXAM TYPE	**INFORMATION SYSTEMS USED**	**HOW THE TEST WAS CONDUCTED**	**TYPE OF DATA PROCESSED**
IN-PERSON EXAMINATIONS	1. Paper-based written or oral examination	• None	The test will take place, in the presence of a teacher and the other students taking part, in paper form. For identification purposes, you will be asked to show your *badge* or ID.	• name; • surname; • serial number • identity document or *badge*
	2. Written examination in the classroom	• Respondus Lockdown Browser;	The test will take place, in the presence of a	• name; • surname; • serial

	EXAM TYPE	INFORMATION SYSTEMS USED	HOW THE TEST WAS CONDUCTED	TYPE OF DATA PROCESSED
	on the student's electronic device	• Blackboard Collaborate	teacher and the other students taking part in the test, electronically via your electronic device. For identification purposes, you will be asked to show your *badge* or ID.	number • identity document or *badge*
DISTANCE EXAMINATIONS *	3. Written examination 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 examination. For identification purposes, you will be asked to show your *badge* 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.	• name; • surname; • serial number; • identity document or *badge*
	4. Remote oral examination	• Blackboard Collaborate • Teams	The test will take place in front of the teacher and in the presence of a witness. You will be asked to show your surroundings. For identification purposes you will	• name; • surname; • serial number • identity document or *badge*

	EXAM TYPE	INFORMATION SYSTEMS USED	HOW THE TEST WAS CONDUCTED	TYPE OF DATA PROCESSED
			be asked to show your *badge* or ID.	

* Examination mode adopted in exceptional cases, subject to assessment of compliance with the regulations in force at the time of adoption of the aforementioned mode and after specific notification of students.

4. THE LEGAL BASIS OF THE 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.

5. COMMUNICATION OF PERSONAL DATA

Your personal data will be processed exclusively by persons authorised 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 regulations. In this regard, it should be noted that the University has deemed that *Blackboard*, duly appointed as Data Processor, complies with the GDPR regulations and has technical and organisational 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 “AWS”), which provides the data storage service.

It should be noted in advance that the servers of AWS 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, matriculation number	5 years
Badge or identity document shown for identification purposes in front of the camera	No retention is envisaged

TYPE OF DATA PROCESSED	RETENTION PERIOD
Video shot with the mobile device	No retention is envisaged

7. TERRITORIAL SCOPE OF processing

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

However, the Data Controller hereby 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 centre" 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 and more specifically to the USA.

For more information on the privacy policy of Respondus Inc, you can consult it at https://web.respondus.com/privacy-policy/.

In any case, you can always obtain more details from the 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 granted to you and in particular obtain:

- confirmation as to whether or not personal data concerning you are being processed and to 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 the privacy legislation in force;
- the portability of your data and/or request the direct transmission of your data to another data controller;
- revocation of the consent given, without prejudice to the lawfulness of the 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 using the Privacy Web Form available here (also accessible below via QR code), or by contacting the Data Controller or the DPO at the contact details above, enclosing a copy of your identity document.

Privacy Web Form

In any case, you will always have the right to lodge a complaint with the competent supervisory authority (Garante per la Protezione dei Dati Personali), pursuant to Article 77 of the GDPR, if you believe that the processing of your data is contrary to the privacy legislation in force.

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

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