



## Notification regarding the processing of Personal Data (Proctoring service application)

The American College of Greece (hereinafter “**ACG**”), following the suspension, by means of a Ministerial Decision, of educational activities which are carried out with the physical presence of the participants in order to contain the spread of CoVID-19, and in its effort to ensure that the Deree exams will take place as scheduled and in a manner which safeguards public health and the health of its students, decided to carry out the exams remotely through Blackboard (ACG’s intranet) and the use of the remote proctoring service application called “Proctorio”, which enables students to take the exams remotely from the comfort and safety of their home. In this context, ACG hereby provides you the following information, in accordance with the Regulation (EU) 2016/679 of the European Parliament and of the Council (“General Data Protection Regulation”) and the law 4624/2019, as in effect from time to time (together “**the Personal Data Legislation**”):

The use of the proctoring service application “Proctorio” by ACG entails the processing of students’ personal data, as follows:

- Scanning of the identity card/passport of the student in order to confirm the identity of the student participating in the exams.
- Scanning of the room (if needed) in which the student is taking the exams in order to ensure the absence of books and notes in the area.
- Recording of sound, image, use of the mouse and keyboard depending on the exam settings.
- Recording of any pop-up windows in the computer used by the student to take the exam depending on the exam settings.

The provider of the application has no access whatsoever to the above personal data of the students participating in the exams. Access thereto is limited solely to the instructor of each course, who is only permitted to view the said information and recordings (“view-only” access) and is not allowed to download or save the content of the examination or any other data. In addition, no data residing in the students’ computers is tracked or monitored in any way by neither the provider of the application, ACG nor the course instructor.

The aim of the processing is to enable the participation of students in the Deree exams in a manner which safeguards public health and the health of the students, the identification of the participating students and the conduct of the exams in such a way that ensures the integrity of the procedure.

The legal basis for the processing is the performance of our contract for the provision of educational services by ACG during the period of implementation of the extraordinary measures for the containment of CoVID-19.

ACG will keep and process the above personal data for a maximum period of 1 year and a half after the end of the final exam, following which they will be permanently deleted.



Subject to certain exceptions, conditions and limitations provided by the Personal Data Legislation, participants may exercise their right of access, rectification, restriction of processing, objection, erasure of the above personal data, as well as the right to data portability. In case one of the aforementioned rights is exercised, we shall take any possible measure for the prompt satisfaction of the relevant request, according to the specific provisions and conditions of the Personal Data Legislation, and shall inform the data subject in writing regarding the satisfaction of their request, or for the reasons that prevent the exercise or the satisfaction thereof according to the Personal Data Legislation.

In addition, students have the right to lodge a complaint with the Hellenic Data Protection Authority, in case they consider that the processing of their personal data is in violation of the Personal Data Legislation.

If you have any queries in relation to the protection of your personal data, you can contact the Data Protection Officer of the American College of Greece by using the following contact details:

dpo@acg.edu