

Notification regarding the processing of personal data (Examinations with Online Proctoring)

In light of the mandatory suspension of educational activities which are carried out with the physical presence of participants so as to contain the spread of CoVID-19, the American College of Greece (hereinafter “**ACG**”), may carry out Deree exams remotely, through Blackboard, by using the remote proctoring service application called “Proctorio”, which enables Deree students to take the exams from the comfort and safety of their home.

In this context ACG, in its capacity as Data Controller, hereby describes how your personal data are processed and how your privacy is safeguarded when you take an ACG examination with online proctoring, in accordance with the Regulation (EU) 2016/679 of the European Parliament and of the Council (“General Data Protection Regulation” – “GDPR”) and the law 4624/2019, as in effect from time to time (together “**the Personal Data Legislation**”):

1. Categories of personal data which are subject to processing

If you take a remote examination with online proctoring, ACG will process the following personal data:

- a. full name and acg e-mail address;
- b. image of your ACG student identification card, or, if this is not available, the relevant parts of your Police ID;
- c. picture of you, taken through the webcam of your computer/laptop;
- d. video and audio recordings of you while taking the examination, made via the webcam of your computer/laptop. These recordings are used to analyze whether there are multiple persons in view and whether you have left the room;
- e. on-screen activities (including any pop-up windows, web pages and applications visited), use of the keyboard and mouse movements, only while taking the exam and depending on each exam settings;
- f. the IP address of the computer network (Internet Provider Network) to which your computer/laptop is connected;
- g. your answers to the examination questions.

For the avoidance of doubt, no biometric or other special categories of personal data (within the meaning of Article 9 of GDPR) are being processed. In addition, no data residing in your computer/laptop are tracked or monitored in any way by neither the provider of the online proctoring tool, ACG, the course instructor or any third party.

2. Processing purposes and legal basis of processing

The above personal data are only processed for the following **purposes**:

- a. Authentication: ACG verifies your identity to make sure that you, and only you, have taken the exam;
- b. Safeguarding the academic integrity of the exam procedure: ACG verifies that you have complied with the applicable exam rules and have not used any unauthorized sources, such as chats and the Internet;

c. Time frame control: ACG verifies whether you have completed the examination within the applicable time frame.

The **legal basis** for the processing of the above personal data is the performance of our contract concerning the provision of educational services by ACG during the period of implementation of Covid-19 related government restrictions (the performance of which necessarily includes the carrying out of exams in order to assess students' performance), in combination with the fact that such processing is necessary for the purposes of the legitimate interests pursued by ACG. More specifically, ACG needs to be able to guarantee the quality of education and assessment (by enabling good, reliable and fair examination procedures and preventing identity fraud and academic integrity violations), not to jeopardize the value and lawfulness of the degrees it awards and to avoid unnecessary study delays for students, while at the same time protecting the health of our students and staff. Thus, ACG deems that the processing of the above personal data is necessary for the purposes of the legitimate interests pursued by it, taking also into account the large numbers of students which are required to take exams, and that the students' rights and freedoms are sufficiently protected.

3. Access to personal data and transfer to third parties (outside ACG)

The personal data collected when making a remote examination with online proctoring will only be viewed, after the exams have been concluded, by employees of ACG, who, by virtue of their position, have a role in the processing of your personal data for the above purposes and for whom it is necessary to have access to the personal data in case academic integrity violation is suspected (i.e. the respective course instructors and, where relevant, the members of the ACG academic bodies which are competent to examine appeals on examination results according to ACG academic policies and regulations).

Although an automated system is used by the online proctoring system for purposes of determining the probability of academic integrity violations, students will not be subject to decision-making based solely on automated processing (as described in Article 22, paragraph 1 of the GDPR); The online proctoring system does not decide on whether academic integrity violations have taken place, rather it only delivers data. Therefore, each suspicion of possible academic integrity violation will first be reviewed by the respective course instructor, who will be given access to the material collected through the online proctoring system ("view-only" access with no possibility of downloading or saving it) and prepare a report if s/he considers that a violation has indeed taken place, after which the decision shall be taken by the competent ACG academic bodies. Furthermore, course instructors may choose to proceed to random/sampled checks of the collected material, for purposes of assessing whether academic integrity violations may have occurred.

The personal data collected within the scope of online monitoring (as per Section 1) is stored encrypted on a secure Proctorio server located within the European Union, in accordance with the security measures outlined in Section 5. Proctorio is the company that provides the tool used by ACG for online monitoring.

In any case, your personal data will not be transferred to countries outside the European Union.

4. Retention Period

Your personal data indicated above (including video and audio recordings) will only be stored for three (3) months after the taking of an exam. Thereafter, ACG will only store your answers to the examination questions, as prescribed by the relevant academic policies and regulations.

By way of exception, if there is suspicion of identity fraud or academic integrity violation, the relevant data produced by Proctorio and the accompanying reports prepared by course instructors will be retained for the period necessary to reach a decision on the legitimacy of the result of an

examination according to ACG academic policies and regulations, as in effect from time to time and for the final resolution of the relevant dispute.

5. Security of processing

ACG takes appropriate technical and organizational measures to protect your personal data against unauthorized access, loss and any form of unlawful processing, including by providing access only to authorized ACG individuals as per Section 3.

Furthermore, the online proctoring provider (Proctorio) employs encryption algorithms, using double-encryption, zero-knowledge technology to scramble personal data, both during transfer and in storage, with end-to-end protection of every piece of information that leaves a student's computer/laptop during an exam. This practically means that Proctorio has zero access to the encrypted data stored on the Proctorio server, which, in turn, means that nothing leaves your computer until after it is encrypted and is never unencrypted until it is unlocked by an authorized ACG official. In any case, Proctorio is also required to ensure that personal data is processed carefully, securely and in accordance with GDPR and may not process personal data for its own purposes.

6. Data subjects' rights

Subject to certain exceptions, conditions and limitations provided by the Personal Data Legislation, students 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 to promptly satisfy the relevant request, according to the specific provisions and conditions of the Personal Data Legislation, and shall inform you in writing regarding the satisfaction of your request, or for the reasons that prevent the exercise or the satisfaction thereof according to the Personal Data Legislation. In addition, you have the right to lodge a complaint with the Hellenic Data Protection Authority, in case you 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