

VID Specialized University – Privacy Policy for Inspera Assessment

- students, PhD candidates and former students

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Brief presentation of Inspera Assessment

Inspira Assessment is a digital examination system that is used to hold examinations at universities and university colleges. When you sit a digital examination at VID Specialized University (VID), your personal data will be registered, processed and stored in Inspera Assessment.

In order for you to take a digital examination, some personal data from the Common Student System (FS) is retrieved as well as login data via Feide.

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1. What is a privacy policy?

This privacy policy describes how VID processes your personal data in Inspera Assessment. The purpose of this privacy policy is to inform you of the types of personal data processed, how it is processed, who is responsible for the processing, your rights and whom to contact.

2. What is considered personal data?

Personal data is defined as any data, information and assessment that can be linked to you as an individual. The factor that determines whether data is regarded as personal data is whether it can identify a specific person.

Data which, on its own, cannot be linked to an individual, may constitute personal data when used in combination with other data.

3. The purpose of and legal basis for the processing of personal data in Inspera Assessment

3.1 Purpose

The purpose of processing personal data in Inspera Assessment is to protect your rights as a student or doctoral candidate, and to fulfil VID's duties and obligations under the Act relating to Universities and University Colleges.

The processing of personal data in Inspera Assessment is necessary in order for VID to be able to:

- administer, conduct and mark digital examinations;

- carry out the necessary administration related to your studies and you as a student; and
- document the results of your studies.

3.2 Legal basis

The processing is authorized under sections 3-9, 3-10 and 4-15 of the Act relating to Universities and University Colleges and paragraph 1(c) and (e) of article 6 of the GDPR.

Processing is necessary in order to exercise public authority and to comply with the provisions of the Act relating to Universities and University Colleges. Processing is also necessary for ensuring that VID can best protect your interests as a student.

4. Which types of personal data are processed in Inspira Assessment?

No sensitive personal data about you is stored or processed in Inspira Assessment.

Personal data about you is registered in Inspira Assessment without your express consent. Personal data is retrieved from FS and login data is obtained via Feide.

The following personal data is stored and processed in Inspira: candidate name and number, national identity number, course/subject, language, contact information, attendance, answer papers, marks, requests for explanations of grades and the actual explanations, information related to sitting the examination.

Examination results and explanations of grades that are registered for you in the examination systems by lecturers and examiners are transferred to FS.

5. Automated decision-making

Personal data in Inspira Assessment is not subject to automated decision-making.

6. How long do we store your personal data?

In principle, your personal data in Inspira is stored indefinitely. If VID's contract with Inspira Assessment comes to an end, your personal data will be erased within a reasonable timeframe.

More details on storing personal data are available here: <http://www.inspera.com/gdpr>

7. Disclosure of your personal data to third parties

Disclosure or export of data is defined as any transfer of data other than to its own system/processing or to the data subject or someone who receives data on their behalf. VID may disclose or export data that contains personal data to other systems, i.e. to external data processors, when deemed necessary.

In order for you to sit a digital examination, we send relevant personal data to Inspira Assessment. Inspira AS, which develops and operates Inspira Assessment, will have access to personal data such as your Feide ID, candidate number or name, IP address and other examination data from FS.

Inspira uses Amazon Web Services to store data. In order to check for plagiarism in answer papers, the integrated service Urkund is used (see separate privacy policy).

Your personal data will not be transferred to countries outside the EU/EEA, or to international organizations. Your personal data will only be disclosed to countries where the European Commission considers the data protection legislation to be adequate, or where sufficient guarantees are in place to protect your privacy, such as in the EU-US Privacy Shield.

<https://www.privacyshield.gov/welcome> or https://ec.europa.eu/info/law/law-topic/data-protection/data-transfers-outside-eu/eu-us-privacy-shield_en

8. The security of personal data

VID regularly conducts risk and vulnerability analyses in order to protect your personal data in Inspira Assessment. Various security measures have also been implemented, such as access control to ensure that only employees who require access to your personal data are granted access. All data that is registered in Inspira is logged, and all employees are subject to confidentiality, see section 13 – Duty of Secrecy – in the Public Administration Act.

9. Your rights

Right to information and access

You have the right to receive information about how VID processes your personal data. It is the intention of this privacy policy to contain the information you have the right to receive.

You also have the right to view/access all personal data registered about you at VID and to receive a copy of the personal data held on you if you so wish.

Right to rectification

If we hold incorrect personal data about you, you are entitled to have this data rectified. You are also entitled to have supplementary information added to incomplete personal data held on you. If you believe we have registered incorrect or incomplete personal data about you, please contact us. It is important that you state the reason and, if relevant, document why you believe the personal data is incorrect or incomplete.

Right to restriction of processing

In certain cases, you have the right to request that the processing of your personal data is restricted. Restricting the processing of personal data means that your personal data will still be stored, but that the possibilities for further processing will be limited.

If you believe that your personal data is incorrect or incomplete, or if you have lodged an objection to the processing (read more about this below), you have the right to request a temporary restriction on the processing of your personal data. This means that processing will be restricted until, if relevant, we have rectified your personal data, or until we have been able to assess whether your objection is justified.

In other cases, you may also request a more permanent restriction on the processing of your personal data. In order to be entitled to restrict the processing, the conditions in article 18 of the GDPR must be met. If we receive a request from you to restrict the processing of your personal data, we will assess whether the statutory conditions have been met.

Right to erasure

In certain cases, you have the right to request erasure of your personal data. The right to erasure is not unconditional, and whether you are entitled to have your personal data erased must be assessed in light of relevant legislation on the protection of privacy, i.e. the GDPR.

In certain circumstances, the law allows for us to make exceptions to your right to erasure. For example, we may need to store personal data for the purpose of performing a task in compliance of the Act relating to Universities and University Colleges, or for reasons of public interest, such as archiving, research and statistics. The right to erasure does not apply to digital examinations since the reason for processing will either be to meet a legal obligation, perform a task in the public interest or exercise public authority.

Right to object

You may have the right to submit an objection to the processing on the grounds that you have a specific need to stop the processing. This includes if you have a need for protection or have a secret address, etc. The right to object is not unconditional, and is contingent upon the legal basis for the processing, and whether you have a specific need. The conditions are stipulated in article 21 of the GDPR. If you submit an objection to the processing of your personal data, we will consider whether the conditions for submitting an objection have been met. If we find that you have the right to object to the processing and that your objection is justified, we will discontinue processing, and you will have the right to request erasure of the data. It should be noted that we may under certain circumstances make exceptions from erasure, for example if we have to store your personal data for the purpose of performing a task in compliance of the Act relating to Universities and University Colleges, or for reasons of public interest.

Right to lodge a complaint about the processing

If you believe we have not processed your personal data in a correct and lawful manner, or if you believe that we have failed to protect your rights, you have the right to lodge a complaint about the processing. You can find information about how to contact us in section 10.

If we dismiss your complaint, you can appeal to the Norwegian Data Protection Authority (DPA). The DPA is responsible for ensuring that Norwegian organizations comply with the Personal Data Act and the GDPR in the processing of personal data.

10. Contact information

Data controller

VID is the data controller of personal data in Inspera Assessment, see article 4 (7) of the GDPR.

If you wish to exercise your rights as described in section 9 above, you can contact us at behandlingsansvarligFS@vid.no. We will process your request without undue delay, and within 30 days.

Data protection officer

VID has appointed a data protection officer who is responsible for protecting the personal data interests of students and employees at VID. The data protection officer for administrative processing of personal data at VID can be contacted by e-mail: personvernombud@vid.no (appointed on 1 September 2018).

Service provider

Inspera AS is the supplier of Inspera Assessment. This means that Inspera AS develops, maintains and operates Inspera Assessment. Through this work, a select few staff at Inspera AS have access to personal data registered in Inspera Assessment.

E-mail address for Inspera AS: firmapost@inspera.no