

Up2U Project – Privacy Notice

Description of the up2U project

The Up2U Project <https://up2university.eu/> is a three-year innovation action funded by the European Union's Horizon 2020 research and innovation programme. The Up2U Project intent to bridge the gap between secondary schools and higher education by better integrating formal and informal learning scenarios and adapting both the technology and the methodology that students will most likely be facing in the universities. The main objective of the Up2U project is to bring innovation to schools by piloting teaching and learning technology and methodology that empowers teachers and students to develop digital skills required by the 21st century internet society.

To achieve this objective, the Up2U Project is designing and delivering a Next Generation Digital Learning Environment (NGDLE) that is modular, interoperable, highly customizable and portable. The Pilot School that wishes to participate in the Up2U Project's pilot activities will have the opportunity to bring its teachers and students to the platform and engage with broad teaching and learning activities supported by the platform.

The Up2U pilot platform is accessible at <https://learn.up2university.eu/>

Personal Data will be processed by Up2U project partners as Joint Controllers. This means that all partners are equally responsible for the processing of personal data, including the collection, storage, transferring and also for the implementation of appropriate security measures to protect it.

In order to process your personal data with the standards referred above, we will use EdupersonalID. This is persistent, non-reassigned, privacy-preserving identifier for a user, only shared between an identity provider and the service provider. An identity provider uses the appropriate value of this attribute when communicating with a particular service provider or group of service providers, and does not reveal that value to any other service provider except in limited circumstances.

EdupersonalID was designed to preserve your privacy and inhibit the ability of multiple unrelated services from correlating activities.

The Up2U project is coordinated by GÉANT Association, which for many years has been offering a forum to collaborate, innovate and share knowledge in order to foster developments in technology, infrastructures, and services for the benefit of the research and education worldwide community.

GÉANT is dedicated to safeguarding your personal data that we are processing, developing and applying data protection solutions that are effective, fit for purpose and demonstrate an understanding of, and appreciation for the GDPR. We are committed to ensure ongoing and continued compliance with data protection legislation and guidance provided by the supervisory authorities with regard to our business as a whole and all of our service offerings.

Please consult GÉANT's Privacy Notice for more details: [GÉANT website](#).

Scope of this Privacy Notice

This Privacy Notice sets out the criteria and the conditions under which Up2U project collects, processes, stores and transfers your personal data, how the confidentiality of such information is ensured as well as any law and/or regulation implemented or enacted in accordance with the GDPR (General Data Protection Regulation), and the legislation on the protection of electronic privacy, or any law which modifies, replaces, adopts or codifies any of the above laws, as well as any other applicable national laws on the processing of personal data and privacy, as they may exist under applicable law.

For the purposes of this Privacy Notice, the following terms should be understood:

"data subject" – Natural person whose personal data is being collected, held or processed (see also: "User" definition below);

"data controller" - the natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of personal data; where the purposes and means of such processing are determined by Union or Member State law, the controller or the specific criteria for its nomination may be provided for by Union or Member State law;

"data processor" - a natural or legal person, public authority, agency or other body which processes personal data on behalf of the controller;

"personal data" - any information relating to an identified or identifiable natural person ('data subject'); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person;

"processing" - any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction;

"supervisory authority" - independent public authority which is established by a Member State pursuant to Article 51 Reg. UE 679/2016

"third party" - a natural or legal person, public authority, agency or body other than the data subject, controller, processor and persons who, under the direct authority of the controller or processor, are authorised to process personal data;

Moreover, for the purposes of the present, the following terms shall also apply:

"Website" the website accessible through the domain names -

"User" or "data subject" - the internet user of the "Website", whom the data refer to and whose identity is known or who may be, directly or indirectly, identified.

Why Do We Process Your Personal Data?

Purposes and legal basis

Up2U Project collects and processes your personal data, for the following purposes and legal basis:

- to provide you access and running the Up2U platform;
- for authentication, registration and maintenance of your profile;
- to monitor the use of the platform for security purposes;
- to bring up the activities of piloting teaching and learning technology and methodology that empowers teachers and students to develop digital skills.

Legal basis:

- According to GDPR and with the purpose of collection and processing of your personal data Up2U Project relies on Legitimate Interest, in order to bring up the activities in the interest of the controllers involved in the project funded by the European Union's Horizon 2020 research and innovation programme under Grant Agreement No. 732049 - Up2U.
- For the performance of a Contract (ART. 6 LETT. b): in order to provide you, access to the educational platform
- Consent (art. 6 lett.a and art. 8): where the child is below the age of 16 years such processing shall be lawful only if and to the extent that consent is given or authorised by the holder of parental responsibility over the child¹.

¹ ART. 8 GDPR: the processing of the personal data of a child shall be lawful where the child is at least 13/16 years old depending from Countries. Where the child is below the age of 13/16 years, such processing shall be lawful only if and to the extent that consent is given or authorised by the holder of parental responsibility over

What Personal Data Do We Process?

As part of the Up2U project and in order to provide you, access to the educational platform, we have a legitimate interest in processing the following personal data:

1. Registration and User Profile
 - Role (Student or Teacher);
 - Name or Nickname (or profile name)
 - Email address
 - Date of birth
 - School/Institution and grade
 - Picture or Video

2. For platform maintenance and for security reasons
 - IP Address
 - Access Time – Date
 - EdupersonTargertID
 - Logs data

3. When entering and using the Website
 - IP address
 - Navigation data within the Website through the installation of cookies

When and How we Share Personal Data?

Your personal data, when necessary will be shared with the parties involved in the Up2U Project, the members of the Consortium, that are following the same practices and had implemented the security and data protection requirements to ensure the adequate protection of your personal data.

Personal data should be available to the other Up2U controllers.

Due to the nature of the application being used some data may be visible to other users of the platform.

One of the controllers is based in Switzerland and one in Israel. These partners will process personal data in accordance with the legislation in force in the respective countries, which has been declared adequate and has standards that comply with the regulations in force in the EU
Personal Data Retention

Your personal data will be processed until the end of the Up2U project. Currently, the end of the project is planned at the end of 2019. After this period your personal data will be anonymized and used only for statistical purposes, unless you will renew the consent as the project will follow.

Security

To ensure the security of your personal data, we have in place the following measures:

- Minimisation of personal data we collect;
- Pseudo-anonymised personal data – edupersonTargetID;
- Multi-layers of firewalls to avoid the unauthorised external access;
- Managing, limiting and controlling access to personal data;
- Backup and redundancy;
- Regular testing of the effectiveness of the measures implemented;
- Safety and encrypted communication channels.

Your Rights

According to GDPR (Articles 15 and following) you have the following rights regarding your personal data:

- You have the right to request access to your data;
- You have the right to ask us to rectify information;
- You have the right to object to your data being processed;
- You have the right to data portability;
- You have the right to ask us to erase your personal information SUBMITTING ONE OF THE REASONS SET OUT IN ARTICLE 17;
- You have the right to lodge a complaint with a supervisory authority: Autoriteit Persoonsgegevens <https://autoriteitpersoonsgegevens.nl/en>, about our personal data processing activities if you feel your data is not being managed as described in this Privacy Notice;
- You also have the following rights regarding the data we process through your consent:
 - you have the right to withdraw consent at any time, without affecting the lawfulness of processing based on consent before the withdrawal;

Joint Controllers references:

- (1) GÉANT VERENIGING (Association) - registered with the Chamber of Commerce in Amsterdam with registration number 40535155 with its registered address at Hoekenrode 3, 1102 BR, Amsterdam, The Netherlands, Netherlands (the main establishment of GÉANT in line with GDPR) - and operating in the United Kingdom as a branch located at City House, 126-130 Hills Road, Cambridge CB2 1PQ (hereafter "GÉANT" or "Project Coordinator")
- (2) THE OPEN UNIVERSITY (OU), RC000391, established in WALTON HALL, MILTON KEYNES MK7 6AA, United Kingdom, VAT number GB650748918,
- (3) UNIVERSITA DEGLI STUDI DI ROMA LA SAPIENZA (UROMA), 80209930587, established in Piazzale Aldo Moro 5, ROMA 00185, Italy, VAT number IT02133771002,
- (4) CONSORTIUM GARR (GARR) IT2, CF97284570583, established in VIA DEI TIZII 6, ROMA 00185, Italy, VAT number T07577141000,
- (5) NATIONAL TECHNICAL UNIVERSITY OF ATHENS - NTUA (NTUA), established in HEROON POLYTECHNIQU 9 ZOGRAPHOU CAMPUS, ATHINA 15780, Greece, VAT number EL099793475,
- (6) ETHNIKO DIKTYO EREVNAS TECHNOLOGIAS AE (GRNET) AE, 003057201000, established in LEOFOROS KIFISIAS 7, ATHINA 11523, Greece, VAT number EL094536469,
- (7) UNIVERSIDAD DE VIGO (UVIGO) ES8, N/A, established in LG CAMPUS LAGOAS MARCOSENDE, VIGO PONTEVEDRA 36310, Spain, VAT number ESQ8650002B,
- (8) TELTEK VIDEO RESEARCH SL (TELTEK) SL, PO45703, established in PLAZA MIRALLES SN LOCAL A3B, VIGO PONTEVEDRA 36310, Spain, VAT number ESB27709476,
- (9) INSTITUTO SUPERIOR DE ENGENHARIA DO PORTO (ISEP), -, established in RUA DR. ANTONIO BERNARDINO DE ALMEIDA 431, PORTO 4200-072, Portugal, VAT number PT501540709;
- (10) FUNDACAO PARA A CIENCIA E A TECNOLOGIA (FCT), 503904040, established in AVENIDA D CARLOS I 126, LISBOA 1249-074, Portugal, VAT number PT503904040,
- (11) TEL AVIV UNIVERSITY (TAU), CERTIFICATE 20/11/1969 LAW 1958, established in RAMAT AVIV, TEL AVIV 69978, Israel, VAT number IL589931187,
- (12) MACHBA - INTERUNIVERSITY COMPUTATION CENTER (IUCC), 580154060, established in SOFTWARE ENGINEERING BUILDING TEL AVIV UNIVERSITY, TEL AVIV 69978, Israel,
- (13) KAUNO TECHNOLOGIJOS UNIVERSITETAS (KTU) LT3, 111950581, established in K DONELAICIO 73, KAUNAS 44029, Lithuania, VAT number LT119505811,
- (14) KORMANYZATI INFORMATIKAI FEJLESZTESI UGYNOKSEG (KIFU), established in CSALOGANY 9-11, BUDAPEST 1027, Hungary, VAT number HU15598316

(15) INSTYTUT CHEMII BIOORGANICZNEJ POLSKIEJ AKADEMII NAUK (PSNC), 000849327, established in NOSKOWSKIEGO 12-14, POZNAN 61 704, Poland, VAT number PL7770002062,

(16) OWNCLOUD GMBH (ownCloud), HRB28050, established in LEIPZIGER PLATZ 21, NURNBERG 90491, Germany, VAT number DE279917654,

(17) GESELLSCHAFT FUR WISSENSCHAFTLICHE DATENVERARBEITUNG MBH GOTTINGEN (GWDG) GMBH, HRB598/CF2020601715, established in AM FASSBERG 11, GOTTINGEN 37077, Germany,

(18) EUROPEAN ORGANIZATION FOR NUCLEAR RESEARCH (CERN), N/A, established in ROUTE DE MEYRIN CERN, GENEVA 23 1211, Switzerland, VAT number N/A,

The subject to be referred to as the DATA CONTROLLER is represented by the CONTACT POINT identified by the aforementioned Joint Controller's agreement as follows:

GEANT ASSOCIATION - HOEKENRODE 3 1102 BR AMSTERDAM – ZUIDOOST NETHERLANDS
Tel number: +31 20 530 4488 – Email: GDPR@geant.org

Complaint / Termination:

GEANT is based in the Netherlands and has appointed an internal Data Protection Officer (DPO) for you to contact if you have any questions, complaints or concerns about how your personal data is being handled, the Data Protection Officer, contact details are as follows:

GEANT Association Data Protection Officer
Hoekenrode 3 1102 BR Amsterdam – Zuidoost Netherlands
Tel number: +31 20 530 4488 – Email: GDPR@geant.org

and to complain to the Dutch Supervisory Authority - Autoriteit Persoonsgegevens about our personal data processing activities if you feel your data is not being managed as described in this Privacy Notice:

Dutch Data Protection Authority Autoriteit Persoonsgegevens
<https://autoriteitpersoonsgegevens.nl/en>

Postbus 93374 2509 AJ DEN HAAG. Telephone number: (+31) - (0)70 - 888 85 00.

For the exercise of Your rights: Data Subject Access Request- please use the email to receive this information: GDPR@geant.org

We keep this Privacy Notice under regular review. This Policy was last updated in February 2019.