

Description of the openUp2U platform

The original Up2U platform is a Next Generation Digital Learning Environment (NGDLE) that is modular, interoperable, highly customizable and portable, which was designed and developed under the Up2U Project, which is bridging the gap between secondary schools and higher education (more information about the project: <https://up2university.eu/>). In response to the COVID-19 pandemic situation the Up2U project partners developed an open version to use for all levels of education: **openUp2U platform**. This is a trimmed version with a minimal toolset that will be available during the pandemic of coronavirus without any charge in order to provide in those difficult times a platform allowing for online learning. The **openUp2U platform** is accessible at up2university.eu/open

Scope of this Privacy Notice

This Privacy Notice sets out the criteria and the conditions under which **openUp2U platform** 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).

What Personal Data Do We Process?

In order to provide you with the access to the openUp2U platform, we will be processing the following personal data:

A. Registration and User Profile

- Role;
- Name (or profile name)
- Email address
- Date of birth
- Affiliation
- Picture or Video

B. For platform maintenance and for security reasons

- IP Address
- Access Time – Date
- Attended courses and grades
- EdupersonTargetedID (persistent, non-reassigned, privacy-preserving identifier for a user, only shared between an identity provider and the service provider)
 - Logs data

C. When entering and using the openUp2U platform

- IP address
- Navigation data within the Website through the installation of cookies

Providing the information above is necessary and if you choose not to provide certain information, you may not be able to establish a user account on openUp2U platform.

Data Controller

GÉANT Association registered in the Netherlands is the data controller of your personal data. GÉANT has appointed Data Protection Officer, who can be contacted at: GDPR@geant.org

Why Do We Process Your Personal Data?

OpenUp2U platform collects and processes your personal data, for the following purposes:

- to provide you access the openUp2U platform;
- to operate and improve the platform;
- to create, administer or provide learning content;
- 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;
- to track the usage of the platform (including analytics and to report aggregate usage information, which is not personal data);
- to exercise, enforce and comply with legal rights and obligations (including responding to authorities and investigating, preventing or taking action regarding illegal activities as required by applicable law).

Legal basis

Your personal data will be processed on the basis of:

- if you are 16 or older - your consent;
- if you are under 16 – the consent provided by the holder of parental responsibility over you.

Additionally, we process your personal data on the basis of legitimate interest consisting of providing to the users technical solution enabling them to participate in online learning (based on voluntary decision of each user) as well as administrative and security maintenance of platform what is not overridden by the interests or fundamental rights and freedoms of the user (data subject).

When and How we Share Personal Data?

Your personal data, when necessary will be shared with third parties, that are following the same practices and have implemented the security and data protection requirements to ensure the adequate protection of your personal data.

Due to the nature of the application being used some data (name and email) may be visible to other users of the platform.

Personal Data Retention

Your personal data will be processed until the end of the academic year, at the minimum, or until the end of the COVID-19 pandemic. 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 and pseudonymization of personal data we collect;
- 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

You have the right to: request access to your data; ask us to rectify information; withdraw your/parental consent what is not affecting the lawfulness of the processing based on the consent before its withdrawal. Those rights can be exercised by contacting: GDPR@geant.org;

Additionally, you have the right to lodge a complaint with a supervisory authority: **Autoriteit Persoonsgegevens** <https://autoriteitpersoonsgegevens.nl/en>, Postbus 93374 2509 AJ DEN HAAG. Telephone number: (+31) - (0)70 - 888 85 00.

Privacy notice updates

This privacy notice may be reviewed and updated from time to time – in such case the privacy notice will be labelled as “Revised (date). The last review of this notice was in March 2020.