

INFORMATION NOTICE- MOODLE

This Data Protection Notice outlines how the University of Luxembourg (the University) manages your personal data in relation to the University Moodle platform (https://moodle.uni.lu). The University Moodle platform is operated with the Moodle Learning Management System (LMS), a software which is free and open source and is hosted by the University. Moodle is our course management system and is available for students as well as general staff.

You can find our full Data Protection Policy int the following link: https://wwwen.uni.lu/university/data protection/data protection policy and faq

1. Who is the controller of your personal data

The University of Luxembourg is a public higher education and research establishment, operating under the supervision of the Ministry for higher education.

The University of Luxembourg has its official address at:

MAISON DU SAVOIR 2, avenue de l'Université L- 4365 ESCH-BELVAL

Phone number: Tel.: (+352) 46 66 44 1

Internet address: https://wwwen.uni.lu/university

The University has appointed a DPO: reachable during working hours. Further information is provided on https://www.uni.lu/university/data_protection and an email address is available: dpo@uni.lu

2. What are the purposes

We process your personal data for the following purposes:

- Students: the personal data is processed to provide students with online course materials, a digital learning environment, and a space to hold online discussions with their peers.
- Lecturers: the personal data is processed so that lecturers can provide students with online course materials and a digital learning environment.
- General staff: the personal data is processed to give staff access to the ULearn training catalogue (life-long learning for the University staff), to allow them to register to courses and to provide them with online course materials.

3. Which personal data do we collect

We process various types of personal data which are needed for the management of Moodle LMS, including:



- Name, last name,
- Email address, affiliation (CRC, faculty, interdisciplinary research center), department or office
- Status (e.g., teacher or student or employee),
- Course data (e.g., tasks, participation, enrolment, exam questions, exam answers),
- University credentials (username only),
- Logs (last access to the course, material consulted...)

Some exams and assessments are conducted using the University Moodle. Some exams are graded in the University Moodle. However, the final grades are transcribed later in your electronic student file.

To access to the University Moodle, you will need to use your University's credentials. Users may add further information on their profile page (location, interests, profile picture). It is also possible to add a description in the user profile.

Please keep in mind that we do not require any sensitive personal data (racial or ethnic origin, political opinions, genetic data, biometric data, health data or data concerning your sex life or sexual orientation). We would like to remind you that you should never share sensitive data on the University Moodle platform.

General staff: you will be required to fill in a questionnaire evaluating the course. The responses to these surveys are anonymous.

4. On which legal basis do we process your personal data?

- Students & Lecturers: The legal basis for the processing of personal data is Article 6.1(e), GDPR, the processing is necessary for the performance of a task carried out in the public interest. The University of Luxembourg has a mission established in Article 3 of the Law of 27 June 2018 to provide higher education courses leading to degrees, diplomas, and certificates.
- General staff: The legal basis for the processing of personal data is Article 6.1(f), GDPR, the processing is necessary for the purposes of the legitimate interests pursued by the University. The University has the legitimate interest to provide and manage the training courses of its employees. On the other hand, the employee has an interest in following a course to develop his/her professional skills.

5. Who can access your personal data?

• Students: student data can be viewed by lecturers, student programme administrators and study directors (name, surname and log data of participants). In addition, your peers will be able to see your name in the participants and check your profile.



- Lecturers: students can view your name and surname in the platform, your contributions and check your profile.
- General staff: staff members working in the Human Resources Department of the University
 of Luxembourg, and the University of Luxembourg Competence Centre treating your
 enrolment.

System managers have access to all data in order to administer and manage the Moodle site (e.g., file management, upgrade the site, integrations...).

6. How long do we keep your personal data?

Moodle accounts are retained for as long as your account is active. Your account will be deleted two years after you have last accessed Moodle or longer as the deletion is scheduled once a year.

7. Do we transfer your data outside the European Union?

Your personal data will not be transferred outside the European Union.

8. Security of your personal data

The processing of your personal data is carried out through the Moodle Learning Management System for the purposes mentioned above. The University of Luxembourg implements technical and organisational measures to ensure the security of the personal data in compliance with the GDPR and especially Art. 32 GDPR.

Information and operations are secured by requiring users to login before accessing any information. Passwords must meet complexity requirements and must be reset regularly to prevent any unauthorised access to Moodle. In addition, the University has set up in Moodle user roles for its staff, teachers, and students, which are constantly under review. Each role has specific permissions to access, delete or modify the data.

The University Moodle is backed up in order to prevent any data loss.

9. What are your rights with regard to the processing of your personal data?

You will have the right to access and rectify your personal data. In certain cases (in accordance with the conditions set out by the General Data Protection Regulation (Regulation (EU) 2016/679)), you will also have the right to object to the way in which your data is used, to request that your data be deleted, to ask to restrict certain aspects of the processing of your data and to retrieve your data to forward it to a third party (right to data portability).



If you wish to exercise your rights, you should contact moodle@uni.lu. He/she will liaise with the University of Luxembourg's Data Protection Officer to handle your request. You can also contact the Data Protection Officer by email at dpo@uni.lu or by post at the following address:

UNIVERSITÉ DU LUXEMBOURG Data Protection Officer Maison du Savoir 2, Avenue de l'Université L-4365 Esch-sur-Alzette

10. How can you lodge a complaint?

If you consider that the Processing of Personal Data relating to you infringes the GDPR, you will have the right – without prejudice to any other administrative or judicial remedy – to lodge a complaint with a supervisory authority, in particular in the Member State of your habitual residence, place of work or place of the alleged infringement.

In Luxembourg, the competent authority is the <u>Commission Nationale pour la Protection des</u> <u>Données (CNPD)</u>.