

**DISTANCE TESTING/EXAMINATION
PRIVACY POLICY**

1. Who is responsible for my data?

The entity responsible for treating your data is Ensilis, Educação e Formação, Unipessoal, Lda., the institutional entity of Ensilis Europeia, the Instituto Português de Administração de Marketing of Porto (IPAM Porto) and the Instituto Português de Administração de Marketing de Lisboa (IPAM Lisboa), corporate fiscal entity nº 504 669 788, with its headquarters located in Quinta do Bom Nome, Estrada da Correia, 53, 1500 210 Lisboa, henceforth referred to as “Ensilis”.

Ensilis has formally appointed a Data Protection Officer (herein referred to as “DPO”) with an email account for the reception of emails regarding your data:

direitos.dados@Ensiliseuropeia.pt

2. How is your data collected?

To reply to this question, one must separate your personal data sources and the type of data processed by Ensilis:

a) Sources from which personal data is retrieved:

- i. Data you have supplied in the course of your procedural dealings with Ensilis;
- ii. Treatment of personal data of relevance for the administrative and scientific services supplied by Ensilis;
- iii. Data obtained from third parties if your consent was given.

b) Type of personal data

- i. Identification data;
- ii. Academic data;
- iii. Other personal data that may be recorded during the use of the platform and which reveals aspects of your private life, i.e. images of you and your surroundings, your voice and verbal statements, statements made in conversations in messaging/texting and in forums and documents you share through the platforms;

iv. Sensitive data, i.e. those necessary to adapt the use of the platform to the needs of students with disabilities, as well as health data that are revealed by virtue of audiovisual capture, as well as biometric data to confirm your identity.

3. Third party data

Ensilis does not intend to collect data from third parties. In the course of audiovisual capture, an unwanted collection of the image, sound and statements of other people who are in the same space as you might occur. Should this happen, you must inform the third party of the terms of this policy.

4. Why is your data processed?

At Ensilis, we process your personal data with the following objectives:

a) To carry out the distance assessment of students, for which student knowledge and skills testing procedures will be established as regarded by Ensilis for being the most appropriate to implement. Among others, the following are mere examples of procedures that may be adopted:

- i. Synchronous oral exam;
- ii. Online written test (open- or closed-book);
- iii. Objective test (multiple answer test);
- iv. Academic assignment (essay, critical analysis, document review, action proposal, etc);
- v. Portfolio;
- vi. Report;
- vii. Applied projet, with (individual or group) synchronous oral defense/presentation;
- viii. Resolution of problems / cases;
- ix. Theses and dissertation defense / viva voce.

b) To manage incidents that may arise in the evaluation process and to prevent fraud, always ensuring that the evaluation procedures comply with the Statutes and internal regulations for the assessment of knowledge and the normal functioning of the Ensilis higher education institutions' study cycles / degrees, including those procedures that are carried out in accordance with the Legal Regime of Higher Education Institutions, approved by Law No.

62/2007 of September 10, the Legal Regime of Degrees and Diplomas, approved by Decree-Law No. 74/2006 of March 24, in its current wording;

c) To verify the correct use of online platforms to perform the tests, ensuring that each platform is adapted to the aims of the evaluation and ensuring compliance with data protection regulations;

d) To identify students participating in distance assessment procedures with certainty.

We highlight that the acceptance of this policy is essential for the realization of distance tests/exams and that, if authorization is denied, it will impede Ensilis from ensuring an alternative evaluation methodology in its higher education institutions.

5. What right does Ensilis have to treat your personal data?

Ensilis processes personal data on the following grounds:

a) The compliance with the legal requirements applicable to Ensilis. These obligations are laid down in the legislation regulating higher education or other applicable legislation; And

b) The development and execution of our established relationship, which is defined in the terms of attendance and in the admission forms signed upon registration and/or enrolment.

c) The acceptance of this privacy policy.

6. Who will have knowledge of your personal data?

In pursuance of the above objectives, the personal data processed by Ensilis may legally be communicated to the following recipients:

a) Organisms, services and agents of the State and other public entities;

b) Independant accreditation entities;

c) Owner(s) of the platform(s) deployed to carry out the evaluation procedures, ensuring, whenever possible, the compliance with the principle of data pseudonymization.

Data communications are intended only to ensure the correct development of the contractual relationship, as well as to comply with the legal obligations in force.

7. International data transfer

The use of the different distance assessment platforms may mean that the owners of these platforms or the companies managing them are located outside the European Economic Area.

However, in the case of international data transfers, Articles 45 and 46 of Regulation (EU) 2016/679 provide the appropriate required assurance measures.

8. How long do we keep your data?

Personal data is retained for a minimum period of 5 years after the date of the evaluation procedure, when you have not exercised your right to have your data erased and considering, for each specific case, the applicable legal time limits, the type of data and the purpose of the data processing.

The minimum data required to record evidence of the student's academic path will be stored, and this will constitute the individual student record.

9. What are your rights in relation to our processing of your data?

Ensilis informs you that you have the right to access your personal data at all times and to obtain confirmation of how that data is being processed.

Likewise, you have the right to request the rectification of inaccurate data or, where appropriate, to request its erasure whenever the data are no longer necessary for the pursuit of the purposes for which they were collected.

In certain circumstances, you may also request that the processing of your data be limited.

Similarly, you may object to the processing of your personal data for alternative defined purposes. In this case, Ensilis will cease processing the personal data in question, unless there are legitimate reasons to that effect, or to ensure the exercise or defense of possible claims or to ensure compliance with legal and regulatory determinations in force.

Ensilis is not responsible for any problems caused to the normal execution of academic activities that the said interruption of data processing may lead to.

Finally, you can also request the right to the portability of personal data.

You may exercise your rights by the following means:

a) Letter addressed to Ensilis, Educação e Formação, Unipessoal, Lda., Quinta do Bom Nome, Estrada da Correia, n.º53, 1500 210 Lisboa; or

b) E-mail to direitos.dados@Ensiliseuropeia.pt

In both cases, it is necessary to prove the identity of the person exercising their rights. Ensilis will provide the requested information no later than one month after receipt of the request. This period may be extended by another two months if necessary, taking into account the complexity and number of requests.

The owner of the data may also complain to the National Data Protection Commission (Comissão Nacional de Proteção de Dados - CNPD) or contact our Data Protection Officer (DPO), who will review the complaint within a maximum period of two months.