



Integrity Advocate - Privacy Notice

1 WHY WE USE INTEGRITY ADVOCATE AS AN ASSESSMENT TOOL?

The Integrity Advocate assessment tool enables students to participate in a proctored or supervised online assessment. Integrity Advocate works in tandem with Brightspace to add an ID verification and a non intrusive supervision layer to online assessments.

2 WHAT IS THE LEGAL BASIS FOR PROCESSING PERSONAL DATA?

The legal basis for UCD to process your personal data under the GDPR using Integrity Advocate is 'public task', as participation in assessment is a core requirement of educational programmes in UCD.

3 WHAT INFORMATION IS SHARED WITH INTEGRITY ADVOCATE?

Students: The following minimum, mandatory information is shared with Integrity Advocate in order for you to access your account: 'UCD Connect username', 'UCD email, and 'Full Name'.

In addition you will be required to submit your photograph and photo ID as part of the verification process prior to taking an assessment. During the course of the assessment your video and screen content can be captured.

Staff: The following minimum, mandatory information is shared with Integrity Advocate in order for you to access your account: 'UCD Connect username', 'UCD email and 'Full name'.

4 HOW LONG IS YOUR DATA STORED FOR?

Students: The minimum, mandatory personal data which you share with Integrity Advocate will be retained for no longer than 1 Trimester after you cease to be a student at UCD and your account is terminated. All residual information (user image and flagged frames) not deleted at 24 hours post assessment will be deleted at 24 months unless otherwise indicated.

User photos are deleted after 24 months; images of approved photo identification are deleted within 24 hours of ID confirmation. Any frames/screenshots not used to support a potential violation will be deleted after 24 hours.

Staff: The minimum, mandatory personal data which is shared with Integrity Advocate will be retained until the point that your UCD IT Account becomes disabled.

5 HOW DO WE PROTECT YOUR DATA?

UCD has advanced IT Security measures in place to protect the integrity and confidentiality of the personal data you share with Integrity Advocate. Please ensure you take care to protect the confidentiality of your UCD Connect user log in details including username and password to protect your account through Brightspace.

YOUR DATA PRIVACY RIGHTS

6 RIGHT TO ACCESS

You have a right to make a Subject Access request in relation to the information which UCD and Integrity Advocate are processing as part of your account. Information on submitting a Subject Access Request under the GDPR is available from the [UCD Freedom of information Unit](https://www.ucd.ie/dataprotection/request.htm) at:

<https://www.ucd.ie/dataprotection/request.htm>

- **Right of Access:** You have the right to know what type of personal data UCD holds about you and to obtain a copy of this data.
- **Right of Erasure:** Under certain circumstances, GDPR allows you to have personal data erased. We will assess whether it is possible to implement such a request but please be aware that UCD will need to retain certain information about you in order to carry out our lawful functions
- **Right to Object:** Under certain circumstances, you can object to the processing of your personal data
- **Right to Portability:** Under certain circumstances, you have the right to request that we provide elements of your data in a commonly used, machine-readable format
- **Right to Rectification:** You have the right to have any inaccurate personal data which we hold about you updated or corrected
- **Right to Restriction:** You have the right to block the processing of your personal data in certain circumstances. We will assess whether it is possible to implement such a request
- **Automated Decision-Making:** You have the right to object to automated individual decision-making (i.e. making a decision solely by automated means without any human involvement) and profiling (i.e. automated processing of personal data to evaluate certain things about an individual). UCD does not make any decisions about students using wholly automated means

7 RIGHT TO RECTIFICATION

If you ever identify any inaccurate data which is recorded on your Brightspace / Integrity Advocate account, you have a right to request that your record is updated for accuracy.

8 RIGHT TO LODGE A COMPLAINT

a) UCD IT Services

If you have any concerns in relation to how your personal data is being processed by UCD and Integrity Advocate we would appreciate it if you could contact UCD IT Services as a first port of call to discuss any concerns about the protection of your privacy rights by logging a call via www.ucd.ie/ithelp and selecting "Get Help"

b) UCD Data Protection Officer (DPO)

You also have a right to report any concerns you have in relation to the processing of your personal data under Integrity Advocate to the UCD DPO by emailing gdpr@ucd.ie.

c) Data Protection Commission (DPC)

Finally, you have the right to lodge a complaint with the Supervisory Authority, in Ireland the Data Protection Commission (DPC) if you have serious concerns that your rights as a data subject under the GDPR have been infringed. However, we really wish to help, and would encourage you to contact IT Services with any initial concerns. Details of how to lodge a complaint can be found on the DPC [Website](http://www.dpc.ie).

Version History

Date	Version Control	Approved by
19 March 2021	Version 1.0	IT Services, UCD Registry, Office of the DPO
10 Nov 2021	Version 1.1	T. Mountjoy, UCD IT Services