Privacy Statement Brightspace

November 2022

WUR attaches great importance to the protection of your privacy and strives to make its services available to you in a transparent, personal, and reliable way. Any personal data retrieved via Brightspace is processed in accordance with the privacy regulations.

This statement describes your rights and obligations when it comes to the processing of personal data via Brightspace. The Regulations for the protection of personal data contain general provisions that also apply to your use of Brightspace at WUR. These regulations also apply to the processing of personal data via Brightspace.

What do we do with your personal data

WUR processes several personal details that are retrieved by your use of Brightspace. This includes:

- First name;
- Last name;
- Username;
- Student number;
- Email address;
- Preferences you have set regarding matters such as receiving e-mails;
- Your photograph, if you choose to share one (not required);
- Role at user level;
- Enrolments;
- Login history;
- Feedback from lecturers or fellow students;
- Digitally uploaded/Brightspace-generated messages (incl. discussion forum messages, submitted assignments, quiz results);
- Online status and progress data (incl. content completion summary, objectives completion summary and grades performance summary);
- IP address.

Principles governing the way data is processed

Personal data is handled according to the following principles:

- to fulfil a task in the general interest (Article 6(1e) of the GDPR) for data processing activities that relate to education;
- the legitimate interest of the organization (Article 6(1f) of the GDPR) for data processing activities that relate to network and information security;
- permission (Article 6(1a) of the GDPR).

Purposes of data processing

WUR processes your personal data for the following purposes:

Providing full educational support within Brightspace

Brightspace is there to support the education that is provided at WUR. Student data made available to (guest) employees (lecturers, student assistants) who offer any type of guidance to students, contributes to forming a clear picture of the quality and effectiveness of a student's learning process. Lecturers or student assistants can use this information to adapt their courses or teaching methods in order to provide students with more effective guidance and thus positively influence study behaviour and study results.

Furthermore, the personal data is being processed to promote cooperation among students, inform students about the content of the subjects they are taking, make teaching material available to students and to test knowledge and measure progress.

Providing the best possible user support for Brightspace
Questions may arise amongst users before or while using Brightspace. It is important for employees to whom these questions are directed to have access to the system and relevant data in order to support users optimally. The personal data may therefore be used to improve WUR operations, achieve an appropriate level of information security and improve/update Brightspace.

Any data you provide will solely be used for the abovementioned purposes.

Who has access to your information?

This depends on the user's role and the way the data is processed. For example: a forum post may be visible to all students in a given seminar group. However, very different rules apply to other data, such as final marks. Information may be visible to:

- other students;
- staff members who prepare your courses, set up groups and manage the courses;
- staff members who provide support both to lecturers and to you as a student;
- the course coordinator who is responsible for the course in Brightspace;
- (guest) lecturers who teach the course;
- Teaching assistants who support the lecturers;
- members of the Board of Examiners and members of the Examination Appeals Board;
- WUR staff who conduct research with the aim of improving the level of teaching and the teaching material.

Third parties, data retention periods, legal protection and the data protection officer

The Regulations for the protection of personal data include information on how WUR deals with the involvement of third parties, transferring data to foreign countries, data retention periods, information on your rights with regard to the processing of personal data obtained through using Brightspace and the contact details of our data protection officer.

Security

Processing personal data naturally involves appropriate security measures. This is why this application is secured and why we require the same from our partners. WUR's starting point is the NEN-EN-ISO/IEC 27002:2017. In this way, personal data are optimally secured. Of course, D2L and WUR also monitor whether there is any unlawful traffic or activities.

You can read more about the type of measures and how we ensure a secure application in our security policy.

Third party services and other services

Brightspace uses several third party services and services developed by and hosted within WUR. These services are necessary for a continuous and proper education. These services are for educational purposes such as, but not limited to, detecting plagiarism, viewing lecture recordings and displaying the Student Portal. With each third party, WUR has a data processing agreement.

For more information about the (third party) services and the way they process your personal data, please click on the table of contents of this privacy statement or scroll down.

What rights do I have under the GDPR, and how can I exercise those rights?

If you do not agree with the way your personal information is processed, and if there are specific circumstances which mean that your interest in relation to privacy is more important than the purposes mentioned above, you have the right to appeal. The GDPR also confers additional rights, including the right to inspect, amend or delete your data and to restrict the ways it is handled, which you can exercise under certain conditions. If you would like to exercise these rights, please contact us via: privacy@wur.nl.

How to submit a complaint

If you have a complaint about how WUR has handled your personal data, please contact us via privacy@wur.nl. If you do not agree with the way in which WUR deals with your complaint, you have the option to submit a complaint to the Dutch Data Protection Authority.

Finally

WUR reserves the right to alter the terms and conditions included in this statement without notice. Any alterations will take effect from the moment they are published in Brightspace.

Should you have any questions regarding this privacy statement, please contact us via privacy@wur.nl.

Wageningen University & Research

November 2022

Privacy statement CopyRIGHT tool

November 2022

The CopyRIGHT tool is a tool developed by the IT collaboration organisation SURF to help support instructors in using teaching materials correctly in terms of copyright. Not all articles or (chapters from) books may be put in Brightspace as PDF. The tool analyses all PDFs and classifies them. If a pdf is classified as containing content that may not be used as teaching material in this way, the course coordinator of the relevant course can be contacted. Together with the course coordinator options will be explored how this, or a comparable publication, can be offered to the students. Sometimes the publication can be offered in a different way (via a link for example), there is an (open access) alternative or the library can add this publication to their collection.

The tool is also going to give Wageningen University & Research (WUR) central insight into what types of teaching materials are being used within Brightspace. These insights can help, for example, to adjust the WUR Library collections or to create reports at various non-personal levels within the organization.

With this privacy statement, WUR indicates which personal data is being processed by the CopyRIGHT tool and for what purposes. This privacy statement has been prepared during and is valid for the beta phase of the CopyRIGHT tool.

For information about your rights, contact persons, and what to do when you have a complaint or question, please see the main (Brightspace) privacy above.

What do we do with your personal data

WUR uses and secures your personal data with the greatest diligence. However, for the functioning of the CopyRIGHT tool, some personal data is processed:

- First Name (User, course coordinator and possibly of authors or persons in publications)
- Surname (User, course coordinator and possibly of authors or persons in publications)
- Business email address (User, course coordinator and possibly of authors or persons in publications)
- File name and metadata which may contain personal data
- Access and/or identification details (User)
- Logging data (User)
- Other (personal) data which is contained in the documents which are scanned

Please note that personal data indicated with User will only be processed when the tool is used directly and will not be automatically gathered from Brightspace. In the current phase, only library employees who access the AIP-tool (part of CopyRIGHT) are classified as Users. The personal data of all other possible data subjects could be automatically processed by analysing the teaching materials from Brightspace.

Purposes of data processing

The collected data mentioned above will be used for the following purposes:

- To contact a course coordinator if teaching materials may not be used (in this way) in Brightspace, in which case the name and email address of this person is stored.
- To adequately secure the tool.
- For the adequate functioning of the tool.

Legitimate interest

To process these personal data, WUR relies on the basis of legitimate interest. WUR must fulfil all obligations under the Copyright Act. To achieve this, WUR must analyse and classify all educational materials in Brightspace. WUR has an interest in automating the analysis and classification process because it is impractical to manually check 35,000-50,000 files annually. Full manual checking would inevitably lead to errors and incompleteness. Annually recurring files can also be more easily identified with this tool and automatically ignored or correctly categorised, thus avoiding unnecessary approaches to course coordinators.

Sharing of data

WUR's basic principle is not to share data with others unless necessary for the application to function and/or to offer a service. The data in the CopyRIGHT tool is shared with SURF for the purpose of functioning and/or offering the service. WUR has entered into a processing agreement with SURF for this purpose.

An important exception is the sharing of personal data arising from legislation and regulations. In this case, WUR or SURF must share data with authoritative bodies such as the police. This will always take place under the supervision of a data protection officer.

Data storage & security

Personal data collected during the usage of the tool will be retained for as long as the User makes use of the tool. Only the contact information of the course coordinators will be kept for longer than this time (2 years). Anonymised logs are kept for the purpose of product review and enhancement, and will be kept for no longer than 120 days.

In order to ensure the highest level of data security, WUR maintains as a starting point the NEN-EN-ISO/IEC 27002:2017 norm. Furthermore, WUR will also monitor if there is any irregular activity. Please see our Information Security Policy for more information.