Accounting Technicians Ireland

e-Assessment Data Privacy Policy

Table of Contents

1. Introduction

At ATI we fully understand and embrace the challenges of tomorrow through our updated education offering that addresses the changing requirements of accounting professionals.

Our offering is digitally transformed to provide new ways of engaging with a more diverse cohort of learners through up-to-date content delivered via traditional and flexible learning models. The models strengthen the skills and competencies of students and members through enhanced qualifications geared towards employability, encourage life-wide learning, and provide clear pathways for those who wish to advance.

To this end, Accounting Technicians Ireland has changed the way we deliver our exams to students and has transitioned from paper-based exams to e-assessment, introducing an online platform for all future exams.

The platform gives students the flexibility to take their exams from any suitable location and eliminates the need to travel to a centralised exam venue.

1.1 E-Assessment

- In order to ensure that exams are fair and that all students follow ATI's Rules and Regulations, the E-Assessment incorporates human proctors who supervise each individual student while they take their exam.

- All students must follow the Exam Rules and Regulations provided on our website www.accountingtechniciansireland.ie for the year that they are intending to complete their exam. The Rules and Regs can be located here.

- Students who require reasonable accommodation will also have greater flexibility to sit their exams and will have the option to have e-readers, larger font size and additional time should this be required. Students will not have to sit their exam in a stressful exam environment but from the comfort of their own home.

- Complaints, extenuating circumstances or issues which arise during the exam can be investigated more definitively as there is a record of the whole exam experience.

- Best practice and recommendations for education in Ireland are clearly aligned with the direction of increasing the use of innovative approaches to teaching, learning and assessment. With this in mind, ATI is leading the curve in digitizing the assessment delivery to futureproof its qualification and make it more flexible not only for the student but for employers alike.

- The use of e-assessment allows students to get their results and appropriate feedback in a timely manner.

1.2   Policy Aim

This policy gives guidance as to the data protection practices adopted by ATI in the management of student data in e-assessment delivery.

1.3   ATI's Commitment

Accounting Technicians Ireland will ensure that as a data controller it will meet all the data protection obligations as laid out in the GDPR. The Data Protection policy can be found here and this also extends to the personal data processed on the e-assessment platform.

The Institute has also put in place Data Processing Agreement with its Data processor Eintech related to e-assessment and will carry out periodic audits to ensure that the processing of data is done in accordance with GDPR.

2. Data Processing

2.1 Legal Basis

ATI has identified a number of legitimate interests with regard to the transition to online examinations.

The following factors have also led us to the decision to transition from paper led exams to an e-assessment environment.

Increased security of exam script online. Paper scripts are transported via courier from the exam centre to ATI HQ and the risk of exam scripts being misplaced is mitigated with online exams via cloud technology. There is an increasing number of students each year requiring reasonable accommodation and finding additional rooms in exam venues where space is already at capacity was becoming increasingly difficult each year.

The financial implications of renting additional rooms for the increasing demand of students requesting reasonable accommodation and the logistics of getting the papers, couriers and invigilators to a venue was increasing from year to year. The timetable scheduling of the exams in June, August and October meant that ATI was already competing with other Professional/Education bodies for these venues at the same time.

As a result of the above transition from paper based to e-assessment, ATI will use the Rogo e-assessment platform to allow students to complete their examinations online. In order for ATI to provide these exams, ATI will need to use certain data provided to them by the student at registration and to collect additional data while the student is taking the exam. The data will be held no longer than necessary to carry out the exam processing and in exceptional circumstances investigate issues that may arise.

The Institute has carried out a Legitimate Interest Assessment in order to ensure that the privacy and data protection rights of students are balanced with the requirement to process their data by the Institute. This analysis has led the Institute to conclude that it has a legitimate interest in processing student data in order to provide its examination function

2.2 Data Collected

The following data will be collected in relation to the e-Assessment

- Student Name
- Exam Number
- Email Address
- Contact Phone number
- Video and audio recording of the exam session
- Image of Identification Document
- Flags indicating non-conformance to exam rules

- IP Address from which the exams are taken
- Browser and Operating system of the PC
- Cookies are placed on the student's PC
- Exam Script
- Exam Grade
- Log files containing records of systems access
- Reasonable Accommodation adjustments

As per ATI's Rules and Regulations, information pertaining to a student's identity is collected during the registration process and is updated when a student updates their personal data in Source (CRM).

Images, video recording, non-conformance flags, IP Address, PC detail information and log data is recorded during the exam.

Exam script, grade and any adjustments made to the exam are collected in configuring the exam for students when students are taking the exam and when the exam is marked.

ATI will never disclose sensitive information to third party processors in relation to students who have requested Reasonable Accommodation.

2.3 Purpose of the Collection of the Data

The above stated data in 2.2 is collected to ensure that the exam is conducted fairly where all students have agreed to abide by the ATI Rules and Regulations.

E-Assessment is delivered by the vendor Eintech who provides both the assessment platform (Rogo) and invigilation through its sub-processer Monitor EDU to ensure students' compliance with ATI's Rules and Regulations. ATI has minimized the data collected to that which is required to run a fair examination system.

While proctoring services are delivered by Monitor EDU staff in the US, all data is stored by Eintech in the EU and is accessed remotely.

The sub processor, MonitorEDU, complies with GDPR requirements. The following data is collected in order to confirm the identity of the candidate:

- Student name and exam number
- Student email
- Image of Identification document

The following data is collected to contact students in the event that they get disconnected during the exam:

- Name and email address of student
- Contact phone number

The following data is collected to ensure compliance with our Exam Rules and Regulations:

- Video and Audio recording of the exam session
- Flags indicating non-conformance with the exam rules
- IP Address from which the exams are taken

The following data is collected in order to run the examinations and to ensure that students meet the required standard:

- Exam script
- Exam adjustments arising from reasonable accommodation
- Exam grade
- Exam number

The following data is collected to understand the platforms used by students and to ensure that the e-assessment system continues to meet their evolving technical needs:

- PC browser & operating system
- Cookies are placed on the student's PC

Cookies are used by Rogo to establish a connection with the candidate's device. These are known as authentication cookies. They check that the device is connected to the Rogo website. They perform these checks during the exam, so if connectivity is lost then Rogo is aware and continues to try to re-establish contact. The cookies no longer operate once the exam has ended.

For multiple choice or objective test questions, the assessment system will mark the questions based on whether they have been answered correctly or not. Other examinations are marked by human markers who access exam scripts and mark the

questions according to the marking standard specified by ATI. ATI has evaluated this processing and believes that it does not make any decisions based solely on automatic processing, as envisaged by Article 22 of the GDPR.

2.4 Data Retention

A student's personal data is retained for as long as it is needed to support the education and examination process.

The following data is held on Rogo for 4 months after a student completes their examination with ATI to ensure adequate time for malpractice processes and exams appeals. It will be deleted after 4 months.

- Student name
- Student Email
- Flags indicating non-conformance with exam rules
- IP Address from which the exams are taken
- Access logs to the exam's platform

The following data is held on Rogo and will be deleted 2 months after an exam takes place:

- Image of the identification document

The following data is held on Rogo and will be deleted 2 months after an exam takes place, to ensure adequate time for the malpractice process:

- Video and audio recording of the exam session

The following data is held on Rogo and will be deleted 4 months after the publication date:

- Exam script
- Exam adjustments arising from reasonable accommodation

The following log data is stored on Rogo's servers and is deleted after 4 months.

- Access logs to the Assessment system

The following data is stored on a student's PC and is not deleted, unless by a user:

- Cookies on the student's PC to ensure the effective operation of the exam software.

The retention periods outlined above will normally apply to the examinations process. However, where a breach of the Education Rules & Regulations is suspected, or where a student makes an application under the special circumstance process, then the Institute will retain the data for as long as it takes to complete an investigation and if

necessary, until an appeal completes, including any referral for judicial action. In such circumstances, the Institute will download the student's data to their internal computer systems and remove it from the Rogo system. Once any such examination review process has completed, the Institute will then delete the data from its own systems.

ATI E-Assessment Data Retention Schedule	
Data Retained on Rogo Platform	**Retention Period**
• Student Name • Student Email • Flags indicating non-conformance with exam rules • IP Address from which the exams are taken • Access logs to the exam platform	**4 months**
• Image of the identification document	**2 months**
• Video and audio recording of the exam session	**2 months**
• Exam script • Exam adjustments arising from reasonable accommodation	**4 months**
• Access logs to the Assessment system	**4 months**
• Cookies on the student's PC to ensure the effective operation of the exam software.	**The following data is stored on a student's PC and is not deleted, unless by a user:**

2.5 Data Location

In order to provide the e-assessment service, ATI has partnered with Eintech, the Rogo, platform provider. Eintech is the processor contracted by ATI to meet its data privacy standards and audited annually to ensure these standards are met.

The following information is stored by Rogo in the EU and Ireland:

- Student Name
- Exam Number
- Email Address
- Video and audio recording of the exam session
- Image of Identification Document
- Flags indicating non-conformance to exam rules

- IP Address from which the exams are taken
- Browser and Operating system of the PC
- Cookies are placed on the student's PC
- Exam Script
- Exam Grade
- Log files containing records of systems access
- Reasonable Accommodation adjustments

The processor, Eintech, uses Microsoft's own data centres to host its solutions and is ISO 27001 certified.

Eintech use Twilio (Twilio Inc. Headquarters - San Francisco USA), to provide secure, video and audio streaming services, that enable remote invigilators to view candidates undertaking exams in real-time. Twilio's software is integrated with Rogo and all data is encrypted during transfer and at rest using high level data encryption.

Video and audio are captured separately and streamed to local servers that invigilators access to view candidate activity. For ATI these local servers are located in the Republic of Ireland. The separate video and audio streams are then transferred to Twilio servers based in the USA. Here the separate streams are compiled into one file. The compiled video and audio files can then be transferred back to Rogo servers - based in The Netherlands and Republic of Ireland, or transferred to client servers, for retention. Photographs taken of candidate ID and candidate photos are not part of the data transferred to Twillio. These are kept separate and stored on Rogo's MS Azure servers in the Republic of Ireland and The Netherlands.

Twilio is fully GDPR compliant and ISO 27001 Information Security Standard certified. Twilio also holds Privacy Shield, Cloud Security Alliance and AICPA SOC 2 certification. Twilio has in place Binding Corporate Rules (BCRs) which are binding data protection policies approved by European data protection authorities. BCRs enable multinational businesses, such as Twilio, to make intra-organisational transfers of personal data across borders in compliance with EU data protection law. BCRs function as a code of conduct for Twilio's data protection practices, based on strict principles established by EU data protection authorities.

Twilio's BCRs were approved in May 2018 and demonstrate Twilio group members' commitment to provide adequate protection of personal data throughout the organisation, regardless of the group members' location in the world. Twilio's BCRs enable the transfer of personal data to Twilio group members across borders in compliance with EU data protection law.

2.6 Data Transfer

No data is transferred to third parties other than as described in Section 2.5 above.

Eintech, as data processor, used by ATI in this regard is subject to the ATI's Data Privacy procedures and has signed an agreement to uphold ATI's standards and all applicable legislation in their processing of personal data. Eintech has data processing (sub-processing) agreements with both MonitorEDU and Twilio. Annual audits of processors are completed by ATI in order to ensure compliance with the contracted standards and general data protection requirements.

3.Data Subject Rights

3.1 Summary

Data subjects have the following rights under the GDPR:

- The rights of access to the personal data controlled by ATI.
- The right to correct any inaccuracies in the personal data;
- The right to deletion of personal data or to restriction of the processing of the personal data;
- The right to data portability of the personal data.

Data subjects can contact Accounting Technicians Ireland in relation to the use of their personal data in the processing of their e-assessment examinations:

Telephone: 01 6498100
Email: dp@accountingtechniciansireland.ie
Address: 47/49 Pearse Street, Dublin 2

If you have any query or grievance in respect of the processing of your personal data, you have the right to lodge a complaint to the Data Protection Commission:

Telephone: 1890 252 231
Email: infor@dataprotection.ie
Address: Data Protection Commission, 21 Fitzwilliam Square South, Dublin 2, D02 RD28