

Privacy statement for MOOC

About the privacy statement

What are personal data?

The service in brief

The purpose of personal data processing in the service

Registered personal data, legal grounds and storage time

Automatic case processing

Disclosure of your personal data to third parties

Security in relation to your personal data

Your rights

- Right to information and access

- Right to rectification

- Right to restriction of processing

- Right to erasure

- Right to object

- Right to complain about the processing

Contact

About the privacy statement

This privacy statement describes how the data controller processes your personal data in the service. The purpose of this privacy statement is to inform you about what personal data we process, how it is processed, who is responsible for the processing, what your rights are and who you can contact.

What are personal data?

Personal data are all forms of data, information and assessments that can be linked to you as a person, cf. [the Personal Data Act](#) Section 2 and [the GDPR](#) Article 5(1). The decisive factor as to whether data constitutes personal data is whether it can be linked to a specific person. Data that, on its own, cannot be linked to an individual person may constitute personal data in cases where the data are found together with other data.

The service in brief

MOOC is a service for educational institutions for producing and providing open online courses for course participants. Course participants register in the service as a local user in the service, a user from a social media platform or a user from Feide. Participants register for available courses from the course catalogue. The service provides course participants with functions for following course modules, answering assignments and taking part in surveys, as well as for communicating in groups and through channels. The educational institution can charge a fee for participating in courses or for issuing a course diploma. Issued course diplomas are stored in the service and can be downloaded by the course participant. The service generates statistics for the course administrator on the number of users taking the course, geographic location, degree of completion and other details related to the completion of the course.

The service does not allow processing of sensitive personal data, which is ensured by the educational institution's validation of the course content and by rules related to use of the service.

The purpose of personal data processing in the service

The service registers different types of users and pertaining data for the following purposes:

Types	Description	Purpose of processing
Administrative users	Academic personnel and system administrators.	Administration of online courses and technical services.
End users	Persons with access to online courses	Follow courses and user functions for answering assignments, dialogue between academic personnel and other end users.

Registered personal data, legal grounds and storage time

Personal data related to user accounts in the service requires consent as legal grounds, cf. [the Personal Data Act, and the GDPR](#) Article 6(1)(a).

Registered personal data about authors and contact persons are covered by [the Personal Data Act, and the GDPR](#) Article 6(1)(f) – to perform a task on grounds of legitimate interests.

The service does not allow processing of sensitive personal data. In the cases where the users themselves can write information in the comments field and similar, the user is obliged to meet the requirements and guidelines for the service. Users are not permitted to register sensitive personal data about themselves or others or to use the service for defamatory conduct.

The data controller is entitled to store information for statistical purposes, if this is in the interests of society at large, cf. [the Personal Data Act](#) Section 8 and [the GDPR](#) Article 6(1)(e).

The following personal data are processed in the service:

User data

Type of data	Description	Source
Basic user data	Full name	MOOC, Feide
Contact information	Email address, postal address, phone number.	MOOC, Feide

Gender	User's gender to address users of the service.	MOOC (Canvas)
Title	Professional title shown in the user's profile in the service.	MOOC (Canvas)
Blocking	Users can be blocked from using the service in the event of misuse. Registered with grounds and date.	MOOC
Course status	Registration status and completion status for courses.	MOOC
Assignment submissions and assessments.	Assignments submissions and any assessments these have received. In the form of files with different media formats or text saved directly in the service.	MOOC
Messages and posts in the forum and messaging channels	User's own posts, messages and dialogue with other users of the system.	MOOC
Course diploma	Course diploma for completed courses, can be downloaded by the user.	MOOC

Technical user data

Type of data	Description	Source
System identities	Unique identity for users of the service and integrated systems.	MOOC, Feide
Password	Encrypted. When authentication is performed directly in the service (not via Feide)	MOOC
System roles and affiliation to the organisation	The user is assigned roles in the system in order to provide adapted functionality and access to the service.	MOOC
Session information and cookies	Information related to the user's dialogue with the service. Necessary to adapt functionality in the service and to authenticate users. External analysis service applied when using Canvas, managed by Instructure. User data are anonymised before being analysed.	MOOC, Feide, Google Analytics (when using Canvas)

Log	Log of system use related to the logged-in user and/or their IP address. The purpose of logs is to ensure security and integrity in the system, provide user support and analyse use of the service. The data collected include time of use, information about browsers and hardware, session information and other information that browsers normally provide.	MOOC
-----	---	------

Information about your activity is stored in order to provide user support and to gain an impression of general use of the service.

Personal data is stored until one of the following occurs:

- User consent is withdrawn
- The purpose of the personal data processing has been fulfilled
- The data controller decides to discontinue the service

Logs and backups of the system data are stored for up to one year.

User information (except log) is stored for the lifetime of the resources for users who register content in the service.

Automatic case processing

Personal data related to the system users will not be subject to automated case processing or profiling.

Disclosure of your personal data to third parties

Disclosure or export of data is defined as all disclosure of data aside from to the service's own system/processing or to the data subjects themselves, or to someone who receives data on their behalf.

Personal data linked to users are transferred in the following cases to countries outside the EU/EEA:

- When using Canvas, provided by Instructure Inc, an American company and a member of Privacy Shield.
- When using Canvas, provided by Instructure Inc, Google Analytics is used to analyse traffic. Personal data are anonymised before being analysed. Google Inc is a company registered in the USA, and is a member of Privacy Shield.

When using Canvas and Open edX, provided directly by Unit, data are not transferred outside the EU/EEA. Services provided directly by Unit are run on servers in the EU/EEA.

Your personal data will be disclosed to Unit/BIBSYS, which is the service provider, and to its subcontractors.

Subcontractors	Function
NTNU	Premises for server management for Unit's direct services
Blue Safespring AB	Cloud management and backup for Unit's direct services
UNINETT AS	Delivers Feide, for authentication of users of the services
Instructure Inc	Cloud management of Canvas LMS (full version). See Instructure's data protection policy: https://www.canvaslms.com/policies/privacy .

The subcontractors' staff who need the personal data to perform their work will have adapted access in order to provide user support and any rectification of errors in the service.

Security in relation to your personal data

Personal data processed in the service are secured by several measures. All transfers to and from the service related to user accounts are encrypted. The data processor conducts regular risk and vulnerability analyses and tests the security of the service to ensure your personal data are safe.

The data controller is responsible for procedures that address data protection in connection with the publication of content.

Your rights

Right to information and access

You have a right to receive information about how your personal data are processed in the service. This privacy statement has been produced to provide the information you have a right to receive. You also have a right to see/access your personal data that are

registered in the service, and other personal data that are collected after you have actively logged in. You also have the right to request to receive a copy of your personal data.

A self-service solution in the service where users can see their personal data after logging in allows users to exercise their right of access. If the service does not provide complete information via the self-service solution, users can send a written enquiry to the data controller's user support to acquire access to more detailed information.

Right to rectification

You have a right to have inaccurate personal data about you rectified. You also have a right to have incomplete personal data about you supplemented. If you feel that the service shows inaccurate or incomplete personal data, please contact the data controller, stating the reason why the personal data are inaccurate or incomplete.

Please note that there is a limited possibility of rectifying data that are distributed via open interfaces.

Right to restriction of processing

In certain cases, you may have a right to request restrictions on the processing of your personal data. Restricted processing means that the personal data will still be stored, but that other processing in the service is restricted. To request restricted processing of personal data, the conditions in the Personal Data Act and the GDPR Article 18 must be met. You can request restricted processing

- Pending the data controller rectifying inaccurate or incomplete personal data
- If you have submitted an objection to the processing (see below for more details)
- If the personal data are necessary to establish or defend a legal claim

If restricted processing is granted, the data controller will notify you before the restriction is lifted.

Right to erasure

You have the right to demand that we erase personal data about you. If you would like your personal data to be erased, please contact the data controller. It is important that your request states why you want your personal data erased and if possible, what personal data you wish to be erased.

Please note that legislation provides exemptions from the right to erasure in some cases. This could be cases where we process personal data to fulfil a statutory duty or to address important social interests, such as archiving, research and statistics. Please note that there is a limited possibility of erasing personal data that are distributed via open interfaces.

Right to object

You have a right to object to processing of your personal data on certain conditions defined in the [GDPR](#) Article 21. This applies if:

- Legal grounds for the processing of personal data are based on legitimate interests, reasons of public interest or when exercising public authority
- Processing of personal data entails direct marketing or profiling
- Personal data are processed for scientific or historical research purposes or statistical purposes

The service does not generally satisfy these conditions, with the exception of the processing of author information and in cases where personal data are used for statistical purposes. When personal data are used for statistical purposes, the data are anonymised.

However, please note the following:

- If there is a special need to stop the processing, for example if you have a need of protection, or a confidential address or similar, please contact the data controller.
- When you have consented to the processing of personal data, you have a right to withdraw your consent.

Right to complain about the processing

If you feel that we have not processed personal data in a correct or lawful manner, or if you feel that you have been unable to exercise your rights with us, you have a right to complain about the processing. See our contact details below.

If we do not uphold your complaint, you have the possibility of filing a complaint with the Norwegian Data Protection Authority. The Data Protection Authority is responsible for ensuring that Norwegian enterprises comply with the provisions of the Personal Data Act and the GDPR in their processing of personal data.

Contact

The data controller

The institution is the data controller for personal data in the service and is the primary contact for end users. See [link](#).

The data processor

Unit develops and manages the service on behalf of the data controller and has the role of data processor.

Unit user support's contact details

<http://support.bibsys.no>

Tel. +47 958 24 000

Email: support@bibsys.no