



GDPR data processing agreement

General Data Protection Regulation (EU) 2016/679 of 27 April 2016 (the GDPR)

This privacy notice includes the following information to help you understand clearly how your data is being used:

- The lawful basis for processing your data
- Categories of data processed
- What we do with your personal data

Your rights under the DPA are as follows:

- The right to be informed
- The right of access (see next paragraph)
- The right to rectification
- The right to erasure
- The right to restrict processing
- The right to data portability
- The right to object
- Rights in relation to automated decision making and profiling.

Right of access:

You have the right to submit a Subject Access Request. Submit your request at privacy@ico-cert.org or privacy@bpmspace.com. We will need to obtain proof of your identity before providing you with information we hold about you.

You have the right to submit a complaint to a supervisory authority.

FRT Opt-In / Declaration of consent

Cognitive Services with Face detection and other microservices like App Service, Cosmos DB, BlobStorage and Machine Learning from Microsofts Azure are needed to



use our online exam services TEMS.

In particular, we want to let you know what face detection is and how we use it, and then you can decide whether to opt-in (agree) with your explicit consent or cancel and reschedule an on-premise or people assisted exam.

Lawfulness of processing

Art. 6 (1) a / b GDPR: consent / purchase agreement

How We Use Face Recognition

We are using Face Detection Technology (based on GDPR compliant Microsofts Azure Cognitive Services) to create your unique face detection "template" and use it in the following types of ways:

- **Authentication**
Identify you as the valid and registered student taking the assigned online exam
- **Fraud detection**
Validate and verify that you comply with the exam compliance standards according to our [ICO Examination Regulations \(ER\)](#), [Confidentiality Agreement for Examination Candidates](#) (NDA) and your presence through out the whole online session.
- **Certificate generation with verifiable tokens (GUID)**
Generate your exam certificate. Optionally with a unique and verifiable certificate token without the need of any private data besides your full name, birth date, birth place, country of birth.
- **Certificate Verification / Re-Validation**
- **Re-generating copies of your certificate**

What We Collect

Face recognition is a technology that analyzes photos and videos you're in to calculate a unique cryptographic number, called a "template." Initially we create and use your template to compare it to analyses of the recorded live video/foto stream to recognize if you appear as the valid and assigned student through out the whole exam session.



Further we will store only your full name, birth date, birth place and country of birth. Examination date, results and contact e-mail address, e-mail conversations

Therefore we will generate periodically a picture of you during the exam process. This pictures will not be stored to any cloud service more than 180 days and will be encrypted and archived afterwards.

All non-persistent and persistent processed data is stored securely and encrypted according to highest GDPR / Data Loss Prevention (DLP) standards.

There will be no permanent local data footprint on your device. All data is processed within your web browser tab "session store" and is automatically deleted after your browser tab is closed.

We don't share your data or meta-data with any other third-party.

We'll keep only your personal template (a cryptographic hash code based on meta-data and pictures), your certificate tokens and full name, birth date, birth place, country of birth while your account is active. This is used only for certificate re-validation and re-generating copies of your certificate as needed and only on your mandate or consent.

We will delete your personal template if you cancel your account and wish to delete all of your personal data permanently. After permanent deletion there is no way to revalidate or restore your certificates anymore.

Your personal template is pseudonimized data which is compliant with GDPR standards and is defined as:

"processing personal data in a way that makes it impossible to attribute it to its source without the aid of additional information which can be kept in a secure environment."

All other personal and session data will be pseudonimized within 180 days from finishing your last exam. Only log files (azure services and app logs) will be stored up to 12 months.