

# Privacy Statement 'Perusall'

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The Vrije Universiteit Amsterdam has chosen to support blended education with specific tools that stimulate students to study effectively and attractively and that provide teachers with insight into study behavior and the quality of processing information from study sources (books, articles, messages, videos, etc.).

VU Amsterdam considers privacy important and therefore handles your personal data with care. In this Privacy Statement we describe what happens to your personal data and how your privacy is safeguarded when you work in the Perusall program.

## 1. Who is responsible for processing my personal data?

The Stichting VU (hereinafter referred to as: **VU Amsterdam**) - which maintains the Vrije Universiteit Amsterdam - is responsible for the data processing operations described in this privacy statement. VU Amsterdam has a legal duty to ensure that your personal data is processed in accordance with applicable privacy legislation, including the General Data Protection Regulation (GDPR).

## 2. For what purpose will my personal data be processed and on what legal basis?

We process your personal data on the lawful ground of 'consent' (article 6.1 (a) GDPR) or 'legitimate interest' (article 6.1 (f) GDPR). Legitimate interest means that the processing is necessary to promote a legitimate interest and that your rights and freedoms are sufficiently safeguarded. The legitimate interest concerns the realization of optimal education and exam components.

More specifically, the objectives of the processing are as follows:

- a. Stimulate the development of close-reading skills;
- b. Promote online collaboration and interaction with other students;
- c. Increase student participation and commitment during education;
- d. Supporting teachers to guide students and give feedback on study behavior and the achievement of learning goals (Learning and Teaching);
- e. Supporting teachers to determine the extent to which learning objectives are achieved (Summative assessment).

Personal data will only be used in the following manner:

### *A. Summative assessment (where participation is mandatory; lawful ground 'legitimate interest')*

You may be required to obtain a part of the final grade or conditional admission to a course section by making content contributions in Perusall. You make this contribution in the form of annotations (comments) that you put in the study sources. The teacher will assess the level of quality of your contributions on the basis of the parameters mentioned in question 3, Category B. These are registered by Perusall and the teacher can include them in the assessment in a specific ratio. The parameters mentioned in question 3, Category C, can only be used in Summative assessments if the instructor can explicitly substantiate why the use of these data is necessary in view of the learning objectives of the course, and there is no less privacy-sensitive alternative to test the knowledge and/or skills of the student.

- B. *Learning and Teaching (Formative testing) in which participation is voluntary (lawful ground 'consent') unless the learning objectives are explicitly about promoting study behaviour (lawful ground 'legitimate interest').*

Here, in addition to the parameters for Summative assessment, the following parameters are used as listed in question 3, category C.

A student who, due to his or her specific situation, objects to the use of Perusall for Summative assessment has the right to object at any time. It will be assessed on a case-by-case basis whether this objection can or should be met, for example by making a replacement assignment. Objection can be made in the manner stated in question 10.

Subject to the safeguards set forth in this document, the rights and freedoms of students are adequately guaranteed.

### **3. Which (categories of) personal data are processed?**

If you work in Perusall, VU Amsterdam processes the following personal data:

#### *Category A: General*

- a. name (first and last name);
- b. email address;
- c. the IP address of the computer network to which your computer/laptop is connected (for the proper functioning of the system);

#### *Category B: Summative assessment*

- a. the number of annotations you make;
- b. the quality of the annotations;
- c. the distribution of annotations across study sources;
- d. the time of making the annotations;
- e. the number of positive ratings (upvotes) you received;

#### *Category C: Learning and Teaching*

- f. opening the command;
- g. opening the study sources;
- h. the number of pages of study sources (for PDF sources) you have opened;
- i. the duration with which you opened the study resources;
- j. the length of time you have spent with the study resources (active reading time) by determining whether pages are activated by scrolling or mouse movements.

### **4. Who has access to my personal data?**

The personal data collected when using Perusall will only be viewed by your instructor(s) from VU Amsterdam who created the assignments. In addition, Perusall has access to your data for administrative purposes and to improve its system.

### **5. Will my personal information be shared with third parties?**

The personal data collected within the framework of the purposes (see question 2) are stored on secure servers of the company Perusall LCC and its subcontractors. Perusall LCC is the company that supplies the Perusall tool used by VU Amsterdam.

VU Amsterdam has entered into a processing agreement with Perusall LCC to ensure that your personal data is processed carefully, securely and in accordance with GDPR. This agreement also states that Perusall and its subcontractors (sub-processors) may never process personal data for their own purposes and may only act in accordance with instructions from VU Amsterdam. The only exception is that publishers may use the annotations via the Perusall platform to improve their study resources and may approach you to draw attention to their offer (marketing purpose). Fully anonymized and aggregated data can be used for marketing or research purposes.

In principle, your personal data will not be further shared with other third parties, unless VU Amsterdam is required to do so by law or a court order.

#### **6. Will my personal data be transferred to countries outside the European Union?**

Yes, your personal data will be transferred to the United States.

The VU ensures that transfers to countries outside the EEA only take place if the European Commission has designated the country in question as having an adequate level of protection (Article 45 GDPR) or appropriate safeguards have been put in place (Article 46 GDPR).

#### **7. How long will my personal data be stored?**

We do not retain your personal information longer than necessary to achieve the purposes stated in question 3. For summative assessment purposes, the data will be kept for 3 years or as determined by law or by your faculty.

#### **8. How will my personal data be secured?**

VU Amsterdam takes appropriate technical and organizational measures to protect your personal data against loss and any form of unlawful processing.

#### **9. Who can I contact if I have questions about the processing of my personal data?**

If you have any questions about the way your personal data is processed, please contact [silvester.draaijer@vu.nl](mailto:silvester.draaijer@vu.nl) or 020-5989429.

#### **10. How can I exercise my privacy rights?**

On the basis of the GTC you have - subject to certain conditions - the right to access your personal data processed, the right to correct your personal data if they contain factual inaccuracies, the right to delete your personal data, the right to limit the processing of your personal data and the right to object to the processing of your personal data.

If you wish to exercise these privacy rights, you may notify the VU Data Protection Officer via:

Data Protection Officer VU Amsterdam  
Boelaan 11051081  
HV AMSTERDAM

[functionarisgegevensbescherming@vu.nl](mailto:functionarisgegevensbescherming@vu.nl)

In order to be able to process the application, you will be asked to identify yourself. This way it will be checked if the request is made by the right person. If you are not satisfied with the way in which we handle your personal data, you also have the right to file a complaint with the Personal Data Authority.

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