

## Registrar's Office – Online Exam Procedure - Clarification Text

Within the scope of Distance Education Process, Middle East Technical University Registrar's Office, bearing the title of "Data controller", processes the following personal data within the limitations of identified purposes in accordance with the law no. 6698 on the Protection of Personal Data.

In an official announcement dated 11.05.2020, numbered 75850160-301.01.01-E.30480, the Council of Higher Education notified all universities of the requirement to hold the exams online due to the COVID-19 pandemic constituting a force majeure. Thus, in accordance with the law no. 6698 article 5/2 on the Protection of Personal Data and to maintain a secure and fair environment for the exams to take place, all participants are expected to keep their cameras on during exams.

### Personal Data Processed, Data subject and Data Categories

The personal data processed by our University herein this period and the categories of the data are presented as follows:

<b>Data Collector: Registrar's Office</b>		
<b>Data Subject</b>	<b>Type of Data</b>	<b>Category of Data</b>
Receiving Party	Assignment sheet (electronic), Image, Video Footage	Visual-Audial Recording
Receiving Party	IP Address, E-mail	Communication
Receiving Party	Student Number, Name, Surname	Identification
Receiving Party	System activity logs, time of the activity, e-mail content sent to users on ODTUClass, responses given to online exam questions, forum messages sent/ received during the exam, live online exam footage	Client Operations

### Purpose and Legal Basis of Personal Data Processing

<b>Type of Data</b>	<b>Purpose of Processing</b>	<b>Legal Basis</b>
Assignment sheet (electronic)	To hold live online exams	Article 5.2.ç It is necessary for compliance with a legal obligation to which the data controller is subject.
Image, Video Footage	To hold live online exams	Article 5.2.f Processing of data is necessary for the legitimate interests pursued by the data controller, provided that this processing shall not violate the fundamental rights and freedoms of the data subject.
IP Address, E-mail	To provide security for the operations of the data controller, to hold live online	Article 5.2.ç It is necessary for compliance with a legal obligation to which the data

	exams	controller is subject.
Student Number, Name, Surname	To hold live online exams	Article 5.2.ç It is necessary for compliance with a legal obligation to which the data controller is subject.
System activity logs, time of the activity, e-mail content sent to users on ODTUClass, responses given to online exam questions, forum messages sent/ received during the exam, live online exam footage	To provide security for the operations of the data controller, to hold live online exams	Article 5.2.ç It is necessary for compliance with a legal obligation to which the data controller is subject.

### Transfer of Personal Data

Transfer of personal data in Turkey and abroad during online exams is as follows:

- In Turkey: no transfer of personal data
- Abroad:

Data Transferred	Purpose of Transfer Abroad	Transfer of Data Abroad
Name, Surname, data of live online exam images	To hold live online exams	Blackboard Collaborate, Cisco Webex ( <a href="https://www.webex.com">https://www.webex.com</a> )

### Rights of the Data Subject

Within the scope of the Article 11 of Law no. 6698 on the Protection of Personal Data, each person has the right to request to the data controller about him/her to

- learn whether personal data are processed or not,
- demand for information as to if personal data have been processed,
- learn the purpose of the processing of personal data and whether these personal data are used in compliance with the purpose,
- know the third parties to whom his personal data are transferred in country or abroad,
- request the rectification of the incomplete or inaccurate data, if any, and request the erasure or destruction of personal data under the conditions in accordance with the law no. 6698 on the Protection of Personal Data,
- request reporting of the operations carried out to third parties to whom personal data have been transferred,
- object to the occurrence of a result against the person himself/herself by analyzing the data processed solely through automated systems,
- claim compensation for the damage arising from the unlawful processing of personal data.

## The Method and Legal Basis of Collection of Personal Data

Within the scope of Distance Education Process, Middle East Technical University Registrar's Office collects verbal, written or online personal data using the following methods in accordance with the law no. 6698 on the Protection of Personal Data, articles 5 and 6 on conditions for processing personal data and conditions for processing of special categories of personal data:

Type of Data	Method of Collection	Platform
Assignment sheet (electronic), Image	Semi-Automatic Transfer	<a href="https://odtuclass.metu.edu.tr">https://odtuclass.metu.edu.tr</a>
IP Address, E-mail	Automatic Transfer	METUSIS
Student number, Name, Surname	Automatic Transfer	METUSIS, ODTUPASS
System activity logs, time of the activity, e-mail content sent to users on ODTUClass, responses given to online exam questions, forum messages sent/ received during the exam	Semi-Automatic Transfer	<a href="https://odtuclass.metu.edu.tr">https://odtuclass.metu.edu.tr</a>
Live online session data, exam materials	Semi-Automatic Transfer	<a href="https://odtuclass.metu.edu.tr">https://odtuclass.metu.edu.tr</a> <a href="https://metu.webex.com">https://metu.webex.com</a>

### Requests

In accordance with Article 13, sub-article 1 of the law no. 6698 on the Protection of Personal Data titled "Request to the Data Controller" and the Communiqué on the Principles and Procedures for the Request to the Data Controller dated 10.03.2018 and numbered 30356, all requests regarding personal rights should be submitted to **Orta Doğu Teknik Üniversitesi Üniversiteler Mahallesi, Dumlupınar Bulvarı No:1, 06800 Çankaya/Ankara** or to the Registered Electronic Mail address **odtu@hs01.kep.tr** by filling in the "Data Subject Request Form" on <https://kvkk.metu.edu.tr>

