

INFORMATION NOTICE - BIONET MOODLE

This Data Protection Notice outlines the processing of your personal data in relation to the use of the Moodle platform put in place in the course of the “*Euro-African Biomonitoring Network for the assessment of environmental exposure in population through universities and occupational health services*” project (“**Bionet**”) (<https://bionet.uni.lu> ; <https://bionet.au.dk/>). The Bionet Moodle platform is operated with the Moodle Learning Management System (LMS), a software which is free and open source and is hosted by the University of Luxembourg. Moodle is used as an e-learning platform in the context of the Bionet project, available for all researchers, PhD students and health professionals involved in the project.

The aim of the Bionet project is to build educational capacities of PhD students, researchers and health professionals in the domains of environmental and occupational health as well as in human biomonitoring, in addition to the assessment of the exposures and health risks for workers in the partner African countries through a sentinel system set-up. The partner institutions involved in the development of Bionet are the following: University of Luxembourg and Laboratoire National de Santé du Luxembourg (Luxembourg), Aarhus University (Denmark), KU Leuven (Belgium), Université Moulay Ismail and Université Euro-méditerranéenne de Fez (Morocco), Jimma University and Hawassa University (Ethiopia), Université de Parakou and Université d’Abomey-Calavi (Benin).

University of Luxembourg jointly with the Laboratoire National de Santé du Luxembourg, developed the online training which consists in a massive learning on the fields of interest, from which a large range of PhD students, researchers and health professionals (hereafter “the trainees”) will benefit, both in Europe and Africa. Particularly, the health professionals who completed the online training from the African partner countries, will be able to recruit workers in different occupational settings to conduct a sentinel survey on the occupational exposure assessment to hazardous chemicals, under the supervision of the African universities, partners of the project. Coordinated by KU Leuven in Belgium, this project has the objective to build the capacities in research on environmental health and human biomonitoring and to point out the most preoccupying environmental hazards and exposures in Africa.

1. Who is the controller of your personal data

In the course of Bionet, the project partner institutions (hereafter “we”) act as joint-controllers and have signed a Joint Controllership Agreement in order to define their roles and responsibilities in that regard (management of data subject requests, notification of data breaches, etc.).

2. What are the purposes

We process your personal data for the following purposes:

- **Trainees:** personal data are processed to provide trainees with online course materials, a digital learning environment, a space to hold online discussions with their peers (forums), as well as

to verify completion of the online courses and to be able to draw segmentation of the different beneficiaries of the project's training.

- **Trainers/Teachers:** personal data are processed so that trainers/teachers can provide trainees with online course materials and a digital learning environment.

3. Which personal data do we collect

We process various types of personal data which are needed for the management of Moodle LMS, including:

- First and last name,
- Email address,
- Institution
- Country,
- Job status (e.g., teacher/trainer or trainee),
- Gender (male/female)
- Birth date / or age intervals
- Course data (e.g., tasks, participation, enrolment, exam questions, exam answers),
- Credentials (username),
- Logs (last access to the course, material consulted...)

Some assessments are conducted using the Bionet Moodle allowing for the generation of certificates of achievement, signed on behalf of the BIONET consortium.

To access the Bionet Moodle, users will need to register. During the registration process, users will be asked to provide the following mandatory personal data: first and last name, email address, institution, country, job status, gender (male/female), birth date or age intervals, and to create a password. The data collected will help in segmenting and identifying the profiles of the beneficiaries who completed the training. BIONET training is destined to health professionals, researchers and PhD students. Therefore, it is important to have indicators on age ranges and genders in order to have a clear visibility on the trainees tranches who benefited from the training.

Users may add further information on their profile page (interests, profile picture). It is also possible to add a description in the user profile.

Please keep in mind that we do not require any sensitive personal data (racial or ethnic origin, political opinions, genetic data, biometric data, health data or data concerning your sex life or sexual orientation). We would like to remind you that you should never share sensitive data on the Bionet Moodle platform.

In case you will be required to fill in a survey in order to evaluate the course, the responses to this survey are anonymous.

4. On which legal basis do we process your personal data?

The legal basis for the processing of personal data is Article 6.1(e), GDPR: the processing is necessary for the performance of a task carried out in the public interest.

The objective of this Bionet project is closer cooperation between European (Belgium, Luxembourg, Denmark) and African (Morocco, Benin, Ethiopia) universities by co-building capacities in environmental health for the assessment of environmental exposure in the population through universities and occupational health services. This will be done by promoting international training of PhD students, researchers and health professionals, forming research groups, upgrading infrastructures for health monitoring, and establishing an African surveillance system with occupational physicians and university researchers, which will allow for the collection of statistically representative biomonitoring data on environmental agents and health.

5. Who can access your personal data?

- **Trainees:** Trainee data can be viewed by trainers/teachers and by a restricted number of researchers from the partner universities participating in Bionet (mandatory personal data described in section 3 and details related to the course results). These data will be transferred upon request to the concerned university partners (see further details in section 7.). In addition, your peers will be able to see your name in the participants and check your profile.
- **Trainers/Teachers:** Trainees can view your name and surname in the platform, your contributions and check your profile.

System managers have access to all data in order to administer and manage the Moodle site (e.g., file management, upgrade the site, integrations...).

6. How long do we keep your personal data?

Moodle accounts are retained for as long as your account is active. Your account will be deleted two years after you have last accessed Moodle.

7. Do we transfer your data outside the European Union?

Your personal data will not be transferred outside the European Union, unless you are a trainee from one of the African partner universities of the project. In this case, the mandatory personal data collected during registration process (described in section 3) and the details related to the course results will be shared with the corresponding African partner university in your country on the basis of a valid mechanism, such as Standard Contractual Clauses. Results of the courses related to the trainees from each country will only be transferred to the concerned university partners.

8. Security of your personal data

The processing of your personal data is carried out through the Moodle Learning Management System for the purposes mentioned above. The University of Luxembourg implements technical

and organisational measures to ensure the security of the personal data in compliance with the GDPR and especially Art. 32 GDPR.

Information and operations are secured by requiring users to login before accessing any information. Passwords must meet complexity requirements to prevent any unauthorised access to Moodle. In addition, the University has set up in Moodle user roles for the trainers/teachers and trainees, which are constantly under review. Each role has specific permissions to access, delete or modify the data.

The Bionet Moodle is backed up in order to prevent any data loss.

9. What are your rights with regard to the processing of your personal data?

You will have the right to access and rectify your personal data. In certain cases (in accordance with the conditions set out by the General Data Protection Regulation (Regulation (EU) 2016/679)), you will also have the right to object to the way in which your data is used, to request that your data be deleted, to ask to restrict certain aspects of the processing of your data and to retrieve your data to forward it to a third party (right to data portability).

If you wish to exercise your rights, you should contact the Data Protection Officer of the University of Luxembourg by email at dpo@uni.lu.

10. How can you lodge a complaint?

If you consider that the Processing of Personal Data relating to you infringes the GDPR, you will have the right – without prejudice to any other administrative or judicial remedy – to lodge a complaint with a supervisory authority, in particular in the Member State of your habitual residence, place of work or place of the alleged infringement.

In Luxembourg, the competent authority is the [Commission Nationale pour la Protection des Données \(CNPD\)](#).

11. Contact details of the Bionet partners

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