Supplementary Privacy Notice for Online Examination and Invigilation Activities

Effective 1st September 2026

1. Relationship with the IOB Data Protection Notice

This Supplementary Privacy Notice for Online Examination and Invigilation Activities supplements the IOB Master Data Protection Notice (https://iob.ie/data-protection) and should be read together with it.

The IOB Data Protection Notice contains general information regarding how IOB processes personal data, including information regarding categories of personal data, recipients, international transfers, data security, retention principles, data subject rights and how to contact the Data Protection Officer.

This Notice provides additional information regarding online examinations, online invigilation, identity verification, academic integrity monitoring, assessment technologies and examination-specific retention periods.

Some programmes may involve learners under the age of 18. Where this occurs, IOB will process personal data relating to those learners in accordance with applicable data protection legislation and the protections described in the IOB Data Protection Notice.

2. HOW IS YOUR PERSONAL DATA COLLECTED?

When taking an examination online, your data will be collected by the assessment delivery application, IOB Learn (Educate, enable and empower | IOB LMS MOODLE) and by the online invigilation application (Proctorio: Securing the integrity of online assessments | Proctorio).

We primarily collect personal data directly from you when you register for, access and undertake an online assessment. We may also receive personal data relating to your programme enrolment, examination eligibility, reasonable accommodations and learner records from IOB systems, educational partners, programme administrators and, where applicable, your employer or sponsoring organisation. Certain technical and monitoring information is generated automatically through the operation of the assessment and invigilation systems.

3. WHAT DATA WILL WE COLLECT FROM YOU DURING AN ONLINE EXAMINATION

Personal data is collected to ensure a fair examination system where all IOB students adhere equally to the Student Regulations as amended from time to time. Online examinations are currently delivered by (i) IOB Learn (LMS MOODLE), IOB's in-house Learner Management System and assessments (specifically continuous assessments) which has an integration on IOB Learn (LMS MOODLE), anti-plagiarism software provided by Turnitin; and (ii) Proctorio, who provide an automated online invigilation system to ensure students' compliance with the IOB Student Regulations Information | IOB students | IOB | Exams and Regulations

The following data is collected to allow you (as the test taker/exam candidate) to log into the system and to confirm your identity (**Category A**):

- Your name, membership number,
- Image of a valid identification document bearing your photograph (namely, a valid driving licence, passport or Garda Identification (National Age Card)) ('**ID Document**')
- Video recordings of you (as the test taker/exam candidate) verifying your identity by showing the ID Document

In addition, the following data is collected to ensure that you (as the test taker/exam candidate) follow our Student Regulations (**Category B**):

- Video and audio recordings of you while taking our exams
- Recordings of your on-screen activities during our exams
- Flags indicating suspected non-conformance by you with our Student Regulations
- Your IP Address (last octet removed)
- Your System Information (browser, cpu, ram, internet connection)
- Any URLs viewed by you during our exams

The following data is collected if, during the online examination, you require support for technical difficulties while using Proctorio services (**Category C**):

- Your name and email address
- Your contact phone or mobile number
- Your IP Address (last octet removed)
- Your System Information (browser, cpu, ram, internet connection)

- Content of your email

The following data is collected in order to run the examinations: (**Category D**):

- Your exam answers (as directly entered into IOB Learn (LMS) or files (excel etc.) uploaded as may be required,
- Your exam grades
- Any adjustments of your examinations arising from Reasonable Accommodation (as defined in the Student Regulations). This may include limited health-related information where necessary to implement approved accommodations.
- Your member number

Where special category personal data is processed for Reasonable Accommodation purposes, this will normally be limited to information necessary to assess and implement the accommodation.

Such information will only be accessible to personnel with a legitimate need to know and will not be used for any purpose unrelated to the accommodation request.

4. WHERE DO WE OBTAIN YOUR PERSONAL DATA?

We obtain personal data from:

- You directly when you register for programmes, undertake examinations and interact with examination support services;
- IOB systems, including learner management and assessment systems;
- Educational partners involved in programme delivery or assessment administration;
- Employers or sponsoring organisations where they administer or support participation in an IOB programme;
- Examination and invigilation service providers, including data generated through the operation of those services;
- Information generated during the assessment process, including examination results, invigilation records, investigations and appeals.

5. THE PURPOSE AND LEGAL BASIS FOR PROCESSING YOUR PERSONAL DATA

We will only use your personal data in the following circumstances:

- Where we need to perform the contract, we have entered into with you
- Where it is necessary for our legitimate interests (or those of a third party) and your interest(s) and your fundamental rights do not override those interests

The table below describes the legal basis that applies to our purposes for processing your personal data. Depending on the circumstances, more than one legal basis may apply:

Purpose for processing	**Categories of personal data**	**Legal basis for processing**
Verify your identity as the test taker/exam candidate, to ensure compliance by you with our Student Regulations, for any investigations and appeals and to contact and liaise with you in order to provide assistance during the online exams	A, B, C	Performance of a contract with you, the learner; Necessary for our legitimate interests for running and maintaining our business, performance of our examination function and ensuring compliance with our Regulations Information | IOB students | IOB
To run online examinations and ensure that you (as the test taker/exam candidate) undertake the examinations in accordance with our Student Regulations	D	Performance of a contract with you; Necessary for our legitimate interests for running and maintaining our business, performance of our examination function and ensuring compliance with our Student Regulations

Where examination support arrangements or reasonable accommodations require the processing of health-related information, IOB will process such information only where permitted under data protection law and only to the extent necessary to administer the accommodation and ensure equal access to assessment opportunities.

6. AUTOMATED DECISION-MAKING

Written examinations are marked by human markers who access exam scripts and mark the questions according to the marking standard specified by IOB. The online invigilation system may generate alerts or flags identifying activity that could indicate potential non-conformance with Academic Regulations. All such alerts are reviewed by appropriately authorised Institute personnel and are not used as the sole basis for any academic integrity, disciplinary or assessment decision. Decisions concerning suspected breaches of regulations are subject to human review and oversight. No automated decisions will be made based on these flags.

IOB uses Multiple Choice Questions (MCQs) for some assessments. These questions are marked using automated software against an answer key which is developed by the Examiner. The evaluation methods are regularly reviewed and tested to ensure they remain fair, effective and unbiased. As part of our Quality Assurance (QA), the questions are reviewed by an external examiner for accuracy and fairness. You may ask us not to make decisions about you that are based solely on automated processing.

7. DATA SHARING & INTERNATIONAL TRANSFERS

Further information regarding international transfers is contained in the IOB Data Protection Notice. The following additional information applies specifically to online examination and invigilation services.

We will share your personal data with third party service providers specifically, Turnitin and Proctorio and their approved sub-processors or with other parties where required by law.

Any Categories A and B data recorded by Proctorio during the examination are stored on Microsoft Azure in the EU. Proctorio utilises zero-knowledge encryption, which means they have zero access to the encrypted data on their own servers. Proctorio does not know anything about the data stored in their servers. This unique design allows nothing to leave your computer until after it is encrypted. Data never becomes unencrypted until it is unlocked by an authorised Institute official. It is not just end-to-end encryption; it is a zero-knowledge system.

Any Categories C and D data processed by Turnitin or its third-party providers for software functionality, engineering, security or customer support purposes is stored in the United States of America, Ukraine and India. Where personal data is transferred outside the European Economic Area, appropriate safeguards will be implemented in accordance with applicable data protection law. These safeguards may include the European Commission's Standard Contractual Clauses, adequacy regulations or other transfer mechanisms

recognised under applicable law. Additional information regarding international transfers is available within the IOB Data Protection Notice.

Any Categories C and D data may also be processed by Turnitin in the UK for engineering or customer support purposes which is subject to an adequacy decision by the EU who has deemed that the UK provides adequate protection for the privacy rights of individuals.

Sometimes IOB process and share your information with trusted third parties. For example, we may share information with:

- Service providers (e.g. assessment facilitators, printers, auditors, legal advisors and other professional advisors);
- Educational and funding partners (e.g. UCD, Higher Education Authority (HEA), IFS Skillnet, The Central Bank of Ireland) or professional standards bodies (e.g. EFPA);
- Employers (e.g. details regarding your programme participation, where applicable);
- Other legal and regulatory bodies (e.g. The Central Bank of Ireland);
- Student Code of Conduct and related Academic Integrity Committee processes, relating to your online assessment;
- Information and Communications Technology (ICT) and information security providers.

Our external exam markers and moderators will also have access to exam scripts for marking purposes.

8. DATA SECURITY

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions, and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected data security breach and will notify you and any applicable regulator of a suspected breach where we are legally required to do so.

9. DATA RETENTION

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for. The retention periods below will normally apply to the examination process. However, we may retain your personal data for a longer period in the event of a complaint,

appeal or investigation where a breach of our Student Regulations is suspected or if we reasonably believe there is a prospect of litigation in respect of our relationship with you.

Type of Data	**Retention Period**
Assessment Materials (Continuous assessment and Exam answers)	13 months
Video and audio recordings of you taking our exam Recordings of your on-screen activities during our exams Flags indicating suspected non-conformance by you with our Student Regulations Your IP Address (last octet removed) Your System Information (browser, cpu, ram, internet connection) Any URLs viewed by you during the exams	Whichever is the later, (i) 6 weeks following the date of the examination or (ii) in the case where an investigation into non-conformance with the Student Regulations is initiated, 1 month from the date that an appeal can be filed against the investigation's findings or from the date of the decision of the appeal (whichever is the later)
Images of the ID Document	Whichever is the later, (i) 6 weeks following the date of the examination or (ii) in the case where an investigation into non-conformance with the Student Regulations is initiated, 1

Video recordings of you verifying your identity by showing the ID Document	month from the date that an appeal can be filed against the investigation's findings or from the date of the decision of the appeal (whichever is the later)
Your name, student number, candidate number and exam grades Records of module grades, Assessment sub-committee grids recheck grades, student transcript/results and conferring records etc.	150 years

Once any such examination review process has been completed, subject to the above, the Institute will delete (where applicable) the relevant data from its own systems.

10. YOUR RIGHTS

Your data protection rights are described in full within the IOB Data Protection Notice. Those rights include access, rectification, erasure, restriction, objection and data portability rights, subject to applicable legal limitations.

11. MAKING A COMPLAINT

If you have a complaint about the use of your personal information, please let a member of staff know, giving them the opportunity to correct things as quickly as possible. If you wish to make a complaint you may do so in writing and by email dataprotection@iob.ie. Please be assured that all complaints received will be fully investigated. We ask that you supply as much information as possible to help our staff resolve your complaint quickly.

You may lodge a complaint with the Data Protection Commission. Further information is available at https://www.dataprotection.ie.

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with IOB.

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request for access is clearly unfounded or excessive. Alternatively, we may refuse to comply with the request in such circumstances.

12. CHANGES TO THIS PRIVACY NOTICE

We reserve the right to update this online examination privacy notice at any time and we will provide you with a new privacy notice when we make any substantial updates. We may also notify you in other ways from time to time about the processing of your personal data.

How to exercise your rights

You may execute any of these rights free of charge. You may do so by contacting us:

Phone: + 353 1 6116500 Email: dataprotection@iob.ie

When you contact us to ask about your information, we may ask you to identify yourself. This is to help protect your information. Once we are satisfied that we have effectively verified your identity, we will respond to the majority of requests without undue delay and within a one-month period (i.e. 30 calendar days) of receipt of the request. IOB will action your request to have your personal information corrected within 10 calendar days. These periods may be extended in exceptional circumstances, and we will inform you where the extended period applies to you along with an explanation of the reasons for the extension.