



## ***Privacy statement Learning Analytics***

Learning Analytics (LA) is the measurement, collection, analysis, and reporting of data from students and their environment in order to understand and optimize education and the environment in which education takes place.

Utrecht University (UU) facilitates the use of LA for the general goal of improving the quality of education. For example by giving students more insight into their own learning process, providing better guidance for students, and enabling teachers to improve their course materials. The [LA policy](#) further elaborates for which purposes LA may be used at UU.

UU is responsible for compliance with the GDPR and considers the privacy of students and other involved parties important. How UU handles personal data is written in [the general privacy statement of the UU](#).

This addition to the general privacy statement specifically covers the processing of study and educational data for LA.

### ***How are personal data collected?***

The personal data that forms the input for LA relates to study and education data and is requested directly from students and collected during the study process. By study and education data, we mean all study-related data that can be collected about a student while applying for a program and during the study period, such as grades, submission of assignments, prior education and enrolment in courses. This data is further processed and stored in educational applications that the student interacts with during the study, such as Osiris and BlackBoard. For each LA project, a detailed assessment is made of which data are needed, whether there is a legitimate basis for this, and whether all privacy conditions are met.

### ***For what purposes does the UU process my personal data?***

LA can be used within UU for the four areas listed below. Any initiative for an LA project should fall within one (or more) of these areas. Each area has a specific purpose, as well as a description of which personal data may be collected. This varies per project. A privacy statement is prepared for each LA project, informing students about the processing of personal data that takes place.

**Area 1 Regulation and course activity:** LA can be used to provide students with insight into their activities and progress within a course. It can also provide teachers with insight into student progress within a course. Possible personal data that are processed for this area of LA, are the activities performed in the course environment by the student, such as submission of assignments and accessing and viewing course materials.

**Area 2 Course and curriculum development:** LA can be used to give teachers insight into the use and quality of their course materials, so that they can continue to improve and innovate their teaching practices. In addition, LA can give education directors insight into the quality of courses, curricula, and their development within their program. Possible personal data that are processed include choices of specific courses in the curriculum and grades obtained.

**Area 3 Student competences:** LA can help teachers, tutors, and students understand student competences. In addition, LA can help education directors understand students' study paths. Possible personal data that is processed are grades or assessments on assignments and choices for specific courses in the curriculum.



**Area 4 Predicting study success or dropout:** LA can provide insight into what factors may be related to study success, study dropout and study delay. Possible personal data that are processed are obtained credits, grades, and the binding study advice (BSA). Automated decision-making is only applied with human intervention, meaning that there is always human review or assessment when making predictions and decisions based on data.

## ***What personal data does the UU collect from me for LA?***

Below is an overview of personal data that could potentially be used for LA projects. As indicated earlier, this depends on the purpose of the LA project and the area:

- Pseudonymized student number
- Binding study advice (bsa)
- Year of birth
- Start of academic year
- Grades
- Obtained credits
- Duration for viewing course material
- Graduation year
- Type of previous education (all types of education from secondary education onwards)

## ***What legal basis does the UU use?***

For the application of LA, UU can rely on two different bases, depending on the type of project.

- Implementation projects: The aim of these projects is to make a lasting intervention that improves the quality of education. For this type of project, **the public interest basis** qualifies. UU performs a public task based on the Higher Education and Research Act (WHW).<sup>1</sup> The UU fulfills a broad public task, including providing education. LA's efforts can contribute to improving the quality of education and thus to UU's public task. For each LA project, an assessment is made as to whether the goal falls within the four areas and whether it is likely that the project will lead to an improvement in the quality of education.
- LA research projects: In most cases, research falls within the UU's public task and therefore also under **the public interest basis**. In exceptional cases, the processing of personal data in the context of the research must be based on **individual consent**. The **basis of 'consent'** should not be confused with the ethical obligation to obtain informed consent from the participant in research. Informed consent is required for all research, in accordance with the rules of the ethical review committees.

## ***With whom are the results shared?***

LA projects process personal data of students with the aim of analyzing that data and using the results to improve education. Who gets to see the results of the analyses differs per project. For example, it can be the student himself who gains insight into his own progress, but it can also be teachers, tutors or program directors.

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<sup>1</sup> Article 1.3 sub 1 WHW



## ***How long is personal data retained?***

The retention period for personal data differs per LA project. If it is a research project, the retention period is usually 10 years. For implementation projects, it is often the case that the personal data is only processed at the moment that the visualization of the data has to be shown. In that case, there is no retention period, but rather a process or a data flow. This is specified and assessed per project.

## ***What are my rights under the GDPR?***

The privacy statement on the website of UU provides a complete overview of the rights of data subjects under the General Data Protection Regulation (GDPR):  
[Privacy statement students - Organisation - Utrecht University \(uu.nl\)](#).

Among the other rights, students have the right to request an overview of the personal data processed about them in an LA project. They can also submit a request that these data be amended, no longer processed or deleted as long as UU can still fulfil its legal obligations. Such a request can be made using the following form: [GDPR Request](#).

## ***How does UU secure my personal data?***

UU handles personal data confidentially. UU takes appropriate technical and organizational measures so that your personal data is properly protected.

### Technical measures

In order to optimally protect your personal data against unauthorized access or use, the UU employs appropriate security technology like pseudonymization. We report (attempted) misuse. The UU also takes organizational measures to protect personal data against unauthorized access.

### Organizational measures

Within the organization, the UU has taken a large number of measures to ensure that your data are not only technically secure, but also that the risk of human error and misuse is kept to a minimum.

## **What are my rights under the General Data Protection Regulation (GDPR)?**

The [UU privacy statement](#) provides a complete overview of your rights under the GDPR.

You can submit your GDPR request using [this](#) form.

## ***Where can I find more information?***

Do you have any questions about Learning Analytics after reading this privacy statement? If so, please feel free to contact the Learning Analytics team. To do so, please send a message to [learninganalytics@uu.nl](mailto:learninganalytics@uu.nl).

UU has appointed a Data Protection Officer (DPO). This is an internal advisor and supervisor who may also be of interest to you, namely if you would like information or advice about UU's processing of personal data or if you would like to file a complaint about it. You can contact the DPO at [fg@uu.nl](mailto:fg@uu.nl).



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## ***When was this privacy statement last amended?***

This privacy statement was last amended on 17 July 2024. UU may, where necessary, make changes to this privacy statement.