

Processing Personal Information in Chromebook

When using Chromebook, hereafter the device, students' personal information is processed. The information is necessary so that a user account can be created for students to access the device and the software that comes with it. The device itself is labeled with the student's first name.

What is the purpose of processing and its basis?

The purpose of using the device is to follow the emphases of the Act on Compulsory Schools no. 91/2008 and the [National Curriculum Guide for Compulsory Schools](#) on providing a variety of ways of acquiring knowledge through the use of technology, information technology and museum and research work. The Act on Compulsory Schools and the National Curriculum Guide place special emphasis on the content and organization of studies in specific subjects, and information and technical education is specifically denoted. It is also stated that students should be given equal opportunities to study and have the opportunity to choose a subject and approach in their own studies. That students have a solution that meets their needs and have a solution that facilitates communication with teachers and fellow students if access to school is restricted or school is closed. Furthermore, to enable students to participate in school activities despite illness. Furthermore, that the City of Reykjavík can fulfill its constitutional obligations towards the data subject regarding the right to schooling.

The legitimacy of the processing of personal information is based on a legal obligation that rests on the primary school in accordance with the provisions of the Compulsory School Act and the provisions of the National Curriculum Guide, which is established on the basis of the Compulsory School Act. Furthermore, it is considered that the processing of personal information in this case is necessary in the exercise of the public authority that the City of Reykjavík exercises when choosing ways to provide instruction to primary school students.

The student's primary school and the City of Reykjavík's IT department have access to the necessary personal information for the use, operation and service of the devices.

Other ways of doing homework related to the Chromebook will be offered if parents do not want to accept the terms of use or have students take the devices home.

Objecting to the processing of personal information

You may generally object to this processing of personal information.

If you object to processing, the primary school may not process the personal information further when it comes to the Chromebook unless it can demonstrate important legitimate reasons for the processing that take precedence over yours and your child's interests, rights and freedoms.

What information is processed?

Personal information processed:

- Basic information about the student, name and primary school.
- Basic information about parents when they are asked to accept the terms of use of the devices.
- The device has a camera and microphone, so the device can collect video or audio recordings when the settings are turned on. The camera comes with a slider that closes the camera and should be closed when the camera is not in use. The microphone is generally switched off, but you can switch it off manually by going to the device settings.
- In general, location data is not collected. The location of the device can be traced if it is lost or stolen, otherwise the information is not collected. You can also view which user last logged in to a tablet and from which IP address.
- Online monitoring of the equipment does not occur on behalf of the primary schools or the City of Reykjavík. This means that what websites the students are browsing is not monitored. However, the devices collect event logs as part of the device's security measures which the city's IT department may need to review in the case of a security event.
- Sensitive personal information is not processed in the devices. Parents and teachers are encouraged to make sure that students do not put sensitive personal information on the devices.
- There is no automated decision-making or personalization of the devices.

Where does the information come from?

Information regarding access to the equipment comes from the student's school access which is created by the primary school based on the students' basic information that the school has. The student can put personal information into the device themselves, but teachers will urge students not to put personal information into the device except when necessary for project work in accordance with the terms of use of the devices and education for parents and students. Basic information about parents is obtained from Mentor/Námfús in order to obtain parental acceptance of the terms of use of the devices.

How long is the personal information stored?

It should be noted that part of the data may be subject to obligation of transfer to the Reykjavík City Archives, as the school is considered a party liable for transfer on the basis of Act no. 77/2014 on Public Archives. In other respects, the information will be stored on the device during the student's studies, but will be deleted three months after

the student has completed their studies at the school and returned the computer to the school.

If a device is lost or stolen, the primary school or the City of Reykjavík can lock the device and delete data from the device within a certain time limit for security purposes.

How do we ensure the security of personal information?

The City of Reykjavík and the primary school safeguard the security of personal information through appropriate organizational and technical measures, e.g. access controls. The above processing of personal information has undergone a risk assessment and has been assessed for impact on privacy. Personal information is not shared outside Europe.

Disclosure of personal information to third parties

After the specified time, the City of Reykjavík may need to transfer part of the data to the City Archives.

Other recipients of the information are the processors who set up and operate the systems necessary for the operation of the equipment. This refers to Google, but a processing contract has been signed. Other recipients of personal information may be relevant in the case of specific software solutions/apps that Chromebook may use, but parents will be instructed on all such software usage in due course.

Your rights

Students and parents may have the right to access the personal information that the City of Reykjavík and the primary school work with on the devices. Students and parents may also have the right to object to the processing, have the information corrected, request that it be deleted, that the processing be restricted and/or that you or a third party receive information in a computer-readable form. Further information about these rights can be found in the City of Reykjavík's Privacy Policy which is accessible on the City of Reykjavík's website, see here: <https://reykjavik.is/personuverndarstefna-reykjavikurborgar>

Complaint about processing

Special attention is drawn to the fact that if you are dissatisfied with the City of Reykjavík's handling of your personal information, you can always contact the City of Reykjavík's Data Protection Officer (personuverndarfulltrui@reykjavik.is) or send a message to the Data Protection Authority (www.personuvernd.is).