

RSPH Online Invigilation Services – Privacy Policy

We, RSPH, provide online invigilation as a service via our supplier, BTL Group Limited. If we, RSPH, offer you (as a candidate) a test/examination through the online invigilation platform that BTL provides (powered by ProctorExam) and if you choose to take such test/examination through the platform, you agree that you are being monitored over the Internet through your computer via your webcam and microphone during your exam session. Online invigilation means that you will log on to a test platform through the internet to take your assessment and you will be monitored, sometimes in real time, during your entire assessment session so that your face, voice, desk and workspace will be captured and a recording will be made of these for the purposes of assessment security and the integrity of the assessment process. It is your responsibility to ensure that only you will be recorded during an online invigilation testing session and that no one else will be physically in the room where you are testing and that no one speaks to you during your testing sessions.

If you use the online invigilation service to take assessments, BTL may also collect and record further information about you when you take the exam which is online invigilated, such as your name, email address, captured facial photo, captured ID photo/government issued ID, physical (visible) health data/condition (by virtue of video recording), racial/ethnic origin/religious beliefs (by virtue of video recording), IP address, browser agents, browser and operating system identifiers, screenshots of your PC, your exam setting (home, office etc), all recorded video streams (computer, webcam and mobile), name of the exam you are sitting and other assessment based data that may be collected, including information about browser version, appVersion, appName, product and appCodeName, video frame size, type and library used for encoding, framerate, jitter, packet loss and bandwidth.

The video and audio recordings are standard test procedures for all awarding organisations' online invigilated tests and your video and audio recording will be used for purposes of identity verification, online observation, incident resolution such as fraud prevention, test security and for the integrity of the test and testing process.

All of the same personal data that BTL collect or receive as described above re Surpass applies for all RSPH's online invigilated tests. Prior to the start of your online invigilated test you may be required to take a picture of yourself. The collection of such data is optional, but necessary if you choose to use the online invigilation function. You understand that the audio and video-tapes of your testing sessions, as well as photos, will be supplied in certain circumstances to RSPH, to assist with the management of your test.

BTL will retain your personal data no longer than is necessary for the purposes for which it is processed. The length of time for which BTL retain information may also depend on the specific retention periods set out by RSPH and applicable laws.

When you use the online invigilation service, BTL use a third party service ProctorExam that is hosted in Germany (Frankfurt Region), to process your data on our behalf. As part of the provision of the service by BTL to RSPH, you agree that some or all of the above personal data may be processed outside the UK and EEA. In such circumstances, and if you are based in the UK or EU, we will, as required by GDPR, ensure that your privacy rights are protected by appropriate safeguards.

As part of the online invigilation services you also agree to allow your personal data to be transferred by BTL to RSPH, from whom you seek certification. We require your personal data so that tests can be correctly administered, and certification can be processed, granted and

administered. RSPH will hold recordings of examinations for 6 months. We may keep this data for longer if your examination is subject to a malpractice investigation. The recording will be deleted once the investigation is complete.

For more information about how RSPH⁷ may collect and use your personal data we encourage you to review our full privacy policy [at https://www.rsph.org.uk/privacy-policy](https://www.rsph.org.uk/privacy-policy).