

Use of “SMOWL CM” desktop monitoring software tool without facial recognition, by IE:

Instituto de Empresa, S.L. and IE University (hereinafter, jointly, “IE”), as data controllers, may monitor the screens of the devices used during the exams and knowledge tests, through the Smowltech application, to verify that you have carry out these tests in a loyal manner, complying with the IE Code of Ethics at all times.

During the exam or knowledge test, the following data will be captured through Smowltech:

- The list of running programs.
- Window or tab changes.
- Paste/copy/print commands.
- Open programs.
- Information about peripherals and hardware.
- Logs and alerts.
- Other data such as the IP address, the operating system or the browser you are using.

These data will be kept along with your academic record only if it is found that you have violated the IE Code of Ethics during the period of time that the record is kept. In all other cases, after testing, they will remain duly locked in Smowltech systems for two years. Once both deadlines have passed, the data will be definitively deleted.

The basis of legitimacy for carrying out this processing is the legitimate interest of IE in having the necessary means to verify compliance with the Code of Ethics when electronic devices are used to carry out exams or knowledge tests, not your consent. To monitor the screen, IE has a provider, in this case Smowltech (SMILEY OWL TECH S.L.), which has the appropriate technical and organizational measures to guarantee the security and confidentiality of the data at all times. The data will not be communicated, in any case, to suppliers located outside the European Economic Area.

Additionally, it is possible that other providers may make specific access, as data processors, to this data, in which case the application of appropriate technical and organizational measures is required by IE to guarantee security at all times. We remind you that you can exercise your rights of access, rectification, deletion, opposition, portability, withdrawal of consent and limitation of processing, as appropriate, by contacting IE by sending an email to supportedatos@ie.edu. Likewise, we inform you that you can file a claim with the Spanish Data Protection Agency, at the address indicated at any time, in case of disagreement.

Without prejudice to the above, you can contact the IE Data Protection Officer at dataprivacyoffice@ie.edu