



September 22nd, 2020

Amy,

Thank you for bringing these privacy concerns to our attention. Here, we have included four different documents for public distribution that we hope will quell some of the concerns with the Utah Education Network.

This packet includes:

- How Does Proctorio Process Data
- Privacy and Data Security
- Google and Proctorio Permissions
- User Misconceptions FAQ

Please let us know if you have any other requests, questions or concerns, we're happy to help in any way we can.

Respectfully,

Mike Olsen
Founder & CEO
Proctorio, Inc.

How Does Proctorio Process Data?

01

How is my privacy protected?

Proctorio runs as a browser extension, having limited access to personal devices and can be uninstalled and reinstalled as much as necessary.

02

Who can access my data?

No one at Proctorio can access your exam-related data, only your instructor and authorized individuals at your institution can access this data.

03

Where is this data stored?

Processed data is stored on Proctorio's servers in geographic locations near the institution, in full compliance to local privacy and data security laws.

04

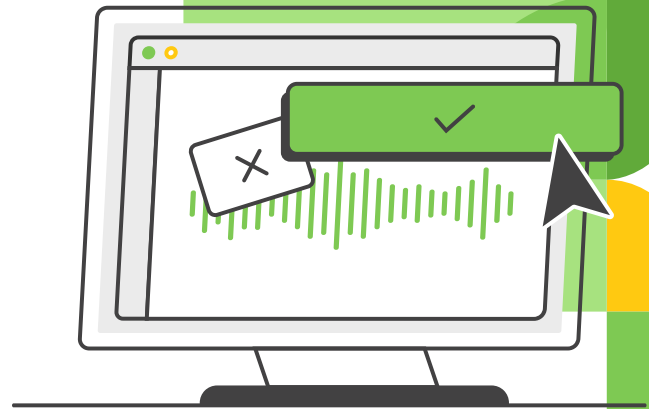
How long is my data stored?

Data is stored 30 days after termination of contract with the partnered institution, unless otherwise specified by the institution.

Test Taker Privacy

Maintaining test taker privacy is at the core of our product, not an afterthought.

That's why **only approved administrators are allowed to access your data** and we never require additional Personally Identifiable Information to enter an exam.



Three Layers are Better Than One

All test taker data is secured and processed through three layers of encryption:

01

The **zero-knowledge layer** is secured using AES-GCM, using encryption keys that are never shared with Proctorio.

02

Transmission into the datacenter is only over TLS 1.2 or 1.3 and, if the client supports it, we use Perfect Forward Secrecy (PFS).

03

Data at rest within the data center is encrypted using AES-256 and is FIPS 140-2 compliant. All data centers are ISO 27001 certified, SOC 2 attested.

Zero-knowledge Encryption

Proctorio utilizes **zero-knowledge encryption**, which means Proctorio has zero access to the encrypted data on its own servers. This unique design ensures that nothing leaves the test taker's computer until it has been encrypted, and data is only decrypted when unlocked by an authorized official. **It's not just end-to-end encryption, it's a zero-knowledge system.**

Please see our third party security audit that verifies our use of these technologies at <https://proctorio.docsend.com/view/mj83bzs62vqrtuky>.

Recognized for Prioritizing Privacy

Proctorio has been recognized by The IKeepSafe Coalition for meeting the highest data security and privacy standards, making Proctorio the first and only remote proctoring software to earn their certifications, which include:

- ✓ Family Education Rights and Privacy Act (FERPA)
- ✓ Children's Online Privacy Protection Act (COPPA)
- ✓ California Student Privacy Certification

Proctorio has proudly signed the Student Privacy Pledge and has been a continuous facilitator in discussions, surrounding the increase and improvement of the security of test taker data and privacy.

Browser Permissions

The following are the browser policy settings and permissions that Proctorio has to use to operate effectively. However, Proctorio does not use all of their settings or permissions to run most of the exams. These permissions are also determined by the setting enabled by the instructor.



Display notifications

We may display a popup notification while you are in the exam in the case that you navigate away from the exam.



Manage your downloads

Downloads will only be prevented during the exam.



Manage your apps, extensions, and themes

We do not manage the themes of your device. But we do manage extensions and applications that may hinder Proctorio from operating properly.



Read and change all your data on the websites you visit

This only occurs during an exam and is a method to ensure that test takers aren't able to infringe academic integrity with the use of third party sites.



Capture content of your screen

This recording setting only runs during the exam and is only visible to exam administrators to review once the exam is submitted. This is used to make sure that no unauthorized online based resources were used during the exam.



Modify data you copy and paste

We don't read/collect the contents in the user's clipboard. Instead, during the exam, we replace the clipboard text with our own to prevent exam content distribution.



Identify and eject storage devices

Storage devices are detected and identified during the exam. But we do not eject storage devices.



Change your privacy-related settings

We may change your privacy settings during the exam so that Proctorio can operate fully. These settings will revert after the exam is completed.



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Proctorio Misconceptions FAQs

For Public Distribution - September, 2020

General

Q: Proctorio is basically malware/spyware, isn't it?

A: No, spyware indicates that the program is secretly stealing information from the owner of the device without the user knowing. Our program makes the user fully aware of what permissions are required to access a Proctorio exam before entering the exam. Our program only runs during an exam as a browser extension, so it runs within a sandbox and is limited in its access to the user's personal computer.

Q: Once I install Proctorio, will it always be running in the background of my computer?

A: No, Proctorio only runs during the exam. Since it is a browser extension, it can be uninstalled immediately after an exam is submitted and reinstalled in time for the next exam.

Q: Why are students forced to download Proctorio?

A: Institutions should be flexible for students who request or require alternate arrangements or modes of assessment, in a way that is in line with their institution policy. It is also important to note that Proctorio runs as a browser extension and can be uninstalled and reinstalled as many times as the test taker chooses.

Q: Does Proctorio use facial recognition?

A: No, we use gaze detection instead, which is an extremely important distinction from a privacy perspective. Facial recognition is the collection and measurement of an individual's unique facial geometry, which is considered biometric data. Gaze detection is only used to see if a test taker is looking away from the screen for an extended period of time, if there are other people present in the test-taking environment, or if the test taker has left the exam for any reason.

Q: Does Proctorio access test takers' personal computer files or data?

A: No, Proctorio is a browser extension and operates within the browser extension sandbox. Therefore, its access to the test takers' personal computer is limited.

Q: Is your product's design to capitalize on instructors' mistrust of students?

A: No, our product's sole purpose is to ensure and protect the integrity and value of an online course or exam.



Q: Why don't you allow bathroom breaks during your exams?

A: Actually, Proctorio encourages instructors to allow bathroom breaks during longer exams. However, it is the instructor's final call on whether or not test takers can leave the exam area and re-enter. Proctorio has no control over this.

Q: It would be preferred if the institution wasn't using an outside company and was using a way of assessment through the school system instead.

A: Unlike some of our competitors, Proctorio integrates directly within the exam administering platform and authenticates the users via Single Sign On, which means that no extra credentials are needed and there is no need to access another third-party site. Proctorio aims to mimic an in-class or testing center experience by only allowing the instructor to review student behavior during exams and make all determinations regarding behavior.

Room Scan Setting

Q: Why is Proctorio forcing me to do a room scan?

A: Proctorio has no default settings. The room scan is an optional setting that your instructor must enable for your exam. They may do this to ensure that no tools are used for the exam outside the camera's field of view (e.g. mobile phone, notepad or textbook). Only your instructor can and will evaluate the room scan.

If you still feel uncomfortable with the room scan, please contact your institution. Most institutions offer an alternative option.

Q: Is the room scan required to do for the whole test?

A: No. If the room scan setting has been chosen by your instructor, you will be prompted to record a room scan at the beginning of the exam and again during the exam if required.

Q: Do I lose exam time during the pre-check process or the initial room scan?

A: No. The exam timer does not start until after the pre-checks are complete.

For room scans, the time continues to run, but your instructor will have set aside a little more time for this. However, you should complete the room scan immediately and return to your exam in order not to lose any additional time.



Behavior

Q: Does Proctorio monitor students' bodies?

A: Proctorio does not monitor students' bodies. The monitoring and recording of test takers' faces is not dictated by the Proctorio software, but by the instructor or the institution. Only they dictate which settings are enabled during an exam and only they have access to the exam recordings and are able to make determinations on academic integrity violations.

Q: How do you decide what behavior counts as “cheating”?

A: Proctorio doesn't determine which behavior is considered cheating. Only the instructor or the institution can dictate what type of behavior is considered as an infringement on the integrity of the exam. Instructors can also review all exam attempts to verify that any flagged behavior was truly infringing on the integrity of the exam.

Q: How do you dictate what “normal” behavior is?

A: The Proctorio software does not dictate what is considered “normal behavior”. Behavior is flagged based on its stark irregularity compared to the behavior found in other exam attempts. After the exam is finished, the instructor is able to review the exam attempt by the given test taker and make the final decision on whether or not the behavior actually infringes on their exam's academic integrity.

Q: What do you do with test takers whose eyes move around a lot?

A: Proctorio does not track eye movements. Instead, instructors can enable settings to ensure test takers are consistently interacting with the exam during their exam attempt.

Q: What if a student looks at the clock to check the time? Or if a student tends to move around a lot? Will they be flagged?

A: Subtle movements, such as the ones mentioned, are not likely to be flagged as the system isn't extremely sensitive in most cases. Even if such actions are flagged, the instructor is able to review the exam attempt and judge whether the given behavior was actually dishonest or not.

Data Security

Q: Will Proctorio ever sell or share test takers' exam-related information?

A: No. Proctorio never sells or shares test takers' exam-related data to third parties.

Q: What happens if there is a data breach?

A: Proctorio encrypts exam-related data in three layers in transit and at rest, so exam-related data never leaves the test taker's computer unencrypted. At rest, exam-related data is stored with zero-knowledge encryption, allowing the data to be inaccessible or completely useless to any individual other than the approved school administrators. This includes employees at Proctorio.

Q: Where is student data being held? On campus?

A: Test taker data is stored in secure geographically-relevant Microsoft Azure data centers close to the institution itself.

Q: What happens to students' data if an institution ends their contract with Proctorio?

A: Proctorio keeps the stored data for 30 days after the end of the contract, unless otherwise specified by the institution. At the end of the 30 days, the data is either transferred to the institution or destroyed.

Q: Can students access the exam data ever?

A: No. The only people that can access and unencrypt the exam-related data are the instructors and approved school administrators. They, themselves, can only access the data within their testing platform and can't download the data at any point.

Q: Where is the data center of Proctorio located?

A: Data is stored in Microsoft Azure data centers that are located geographically near the partnered institution. This included all of our EU based partnerships, in full compliance with GDPR.

Q: Will European data ever be transferred to the U.S.

A: No. All exam-related data collected from institutions in the EU will stay in the European data center at Frankfurt, Germany, in full compliance with GDPR.

Data Collected

Q: Does Proctorio collect biometric information?

A: No, Proctorio does not collect biometric information. Biometrics are physical or behavioral human characteristics that can be used to digitally identify a person and can include facial recognition. Proctorio does store video and audio recordings of test takers, which are not considered biometric data. With zero-knowledge encryption these recordings are rendered useless and inaccessible to anyone other than the exam administrators or approved individuals at the institution. We only keep this information as long as legally required, which, depending on location, is as little as 7 days.

Q: Does Proctorio monitor keystrokes?

A: We do not make use of keystroke fingerprinting. We do track keystroke anomalies, as in if the test taker is pressing keys, to ensure that the test taker is still at the computer and interacting with the exam.

Q: Does Proctorio require students to input biometric information or personally identifiable information to enter an exam?

A: No, Proctorio never requires test takers to upload biometric information or enter additional PII to enter an exam. Instead, test takers simply sign into their LMS to access their exam.

Q: Are the images of scanned test takers' IDs stored?

A: Images of the ID are only stored for the identity verification process. They are collected, submitted to the verifier, and stored with zero-knowledge encryption so that no one but authorized individuals or the instructor can access these images. We only keep this information as long as legally required, which, depending on location, is as little as 7 days.

Exam Environment

Q: I don't want my instructor to see my bedroom. What do I do?

A: We always recommend test takers to take their exams in a place where they won't be distracted or bothered when possible. We also recommend that test takers take their exams in a more neutral setting like the living room or the dining room when possible.

Q: I live with a lot of roommates, will I get flagged for them making noise?

A: We always recommend that test takers explain their living situation to their instructor before the exam. That way the instructor can customize the exam settings to fit their and their students' needs and/ or environment.

Q: What happens if the webcam isn't able to pick up my image?

A: There are multiple reasons that this could be happening. But to fix this, try moving the webcam around, sometimes the angle that it is currently sitting at makes it hard to capture your features. It also may be an issue with the background. When a background is too busy or irregular, it can be hard to detect your features. If possible, you can try moving to a space that has a more plain background.

Q: I wear glasses and the webcam isn't picking up my image?

A: You may be experiencing glare from the reflection with the lenses. To fix this, try adjusting the angle of your head a bit and focus on the screen rather than the webcam. You can also turn down the brightness on your computer.