e-learning FAQ

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Fig. 1: Welcome page
1. What is e-learning?

E-learning (electronic learning) is a modern form of training in which the content is taught with the help of interactive online courses. Decide for yourself when and where you want to train! You receive personal access to the system and can complete the training comfortably and independently in the browser window. It is important to us that you enjoy learning on screen. We therefore attach great importance to the fact that our courses are varied, interactive and easy to understand.

2. What are the advantages of e-learning?

With e-learning courses, you can train entire departments, locations or even your entire workforce in the shortest possible time and with minimum effort. All you have to do is compile a list of participants to be trained. We’ll do the rest! The search for an appointment where everyone involved is available is no longer necessary, and no need to organize a training room.

With e-learning users are not bound to a certain time or location. Each participant simply completes the training when and where it suits him or her. If you are ill, have a customer appointment or are on holiday, you can catch up on the course later.

The training certificates are generated by the system and offered to the participant for download after completion of the training. Personnel or training managers can also view an overview of the training status of the entire group and download it for their files.

![Fig. 2: Overview of learning progress](image-url)
We have created our courses with many interactive elements and tasks. **Merely clicking through the course is impossible.** The participants must actively deal with the contents in order to be able to complete the courses.

![Can you identify personal data?](image)

**Fig. 3: Exercise for data security**

### 3. What are the system requirements?

To be able to use our e-learning module, you need

- a **web-enabled device**, for example a laptop, a desktop PC, a tablet (at least iOS 8 or Android OS 4.1) or a smartphone (at least iOS 8 or Android OS 4.1).

    and

- an **HTML5-enabled Internet browser**, such as Google Chrome (latest version), Firefox (latest version), Internet Explorer (latest version) or Safari (latest version). **Note:** Microsoft Edge may cause problems with the display of our HTML5 content.
4. How much does it cost?

As an existing client of the datenschutz nord group, you can use selected e-learning courses for any number of employees without having to pay any license fees:

- If you have appointed us as your data protection officer, you will receive a flat rate for the current basic course on data protection.
- If you have appointed us as your IT security officer, you will receive a flat rate for the current basic course on IT security.

The actual costs incurred by us for setting up your virtual training room, registering users and processing support requests are usually billed via the existing consulting contingent. Please do not hesitate to contact us if you prefer another form of billing.

If we are not currently providing you data protection officer or IT security officer services, the prices for the use of the training platform are based on the number of registered users and the number of booked courses. The following table shows the price per number of users:

<table>
<thead>
<tr>
<th>NUMBER OF USERS</th>
<th>PRICE PER COURSE</th>
<th>PRICE PER USER</th>
<th>LICENSE</th>
</tr>
</thead>
<tbody>
<tr>
<td>25</td>
<td>540 € (base price)</td>
<td>21,60 €</td>
<td>1 Year</td>
</tr>
<tr>
<td>50</td>
<td>940 €</td>
<td>18,80 €</td>
<td>1 Year</td>
</tr>
<tr>
<td>100</td>
<td>1,440 €</td>
<td>14,40 €</td>
<td>1 Year</td>
</tr>
<tr>
<td>200</td>
<td>2,040 €</td>
<td>10,20 €</td>
<td>1 Year</td>
</tr>
<tr>
<td>500</td>
<td>3,540 €</td>
<td>7,08 €</td>
<td>1 Year</td>
</tr>
<tr>
<td>1000</td>
<td>5,040 €</td>
<td>5,04 €</td>
<td>1 Year</td>
</tr>
<tr>
<td>2000</td>
<td>7,040 €</td>
<td>3,52 €</td>
<td>1 Year</td>
</tr>
</tbody>
</table>

**Note:** All prices do not include sales tax.

We calculate your price individually depending on the exact number of users. If you would like to train more than 2000 users, we will be happy to make you an individual offer. Please send an informal e-mail with the subject “Price inquiry” to elearning@datenschutz-nord.de or call us.

5. Can I test the e-learning modules in advance?

Of course. Register free of charge for our demo virtual training room at https://www.privacy-train.com/login.php?client_id=demo and try out our courses at your leisure. Simply click on "Register new user account" on the registration page.
6. Is it possible to adapt the course content?
Do you need a tailor-made course that takes into account the uniqueness of your company? We will be happy to implement this for you. Contact us and let us know what you need.

7. What’s the procedure?

a) Inform participants
Your first step should be to inform your participants about the planned training course. It is advisable to specify a time frame within which the training is to be completed.

b) Register participants

aa) Registration with lists
The next step is to register the participants. We will be happy to provide you with a sample form for this purpose. As soon as all participants are registered in the system, every user automatically receives a welcome e-mail with personal access data and a link to the virtual training room. The training can now begin. When users log in for the first time, they will be prompted to change their password. The new password must be at least 8 characters long and contain letters and numbers. **Attention:** With the help of the functions “Forgot password?” and “Forgot user name?”, users can use the login page to independently restore their access data if they have forgotten it.

bb) Registration via the Active Directory (SAML)
Alternatively, we can also synchronize the user administration in privacy train with your Active Directory. This eliminates the need for manual user registration. If a user logs on to the domain, he is automatically logged on to privacy train. Since this option causes additional effort, we charge a one-time setup fee. Please do not hesitate to contact us if you want to find out more about using Active Directory.

c) Starting the training
Our courses have been designed in a way that an average user would need about **30 minutes** to complete a training session. You can interrupt the course at any time by closing the browser window or clicking on the “coffee mug” icon in the upper right corner. The system remembers your progress and resumes the course at the point where you interrupted it. In this way, you can conveniently split the course over time.

In order to be able to prove your participation, the passing of the course is logged (green traffic light). However, performance levels for the individual exercises are not documented.

Each user can only view his own learning status (course not started, started or passed). However, it is possible to authorize individuals (so-called coordinators) to view the learning status of the entire group and export it to an Excel file. Please let us know which users should be equipped with these extended authorizations.

If you have technical problems, you can always send a **support request by email** to elearning@datenschutz-nord.de.
8. What about data protection?

Without personal data we cannot set up user accounts for e-learning for you and your colleagues. We require, at a minimum, **first and last name** and an **e-mail address** (several users can be registered with one e-mail address). In the case of multilingual entities, we also collect information as to whether a participant should complete the training in German or English (some trainings are also available in Polish, Czech and Dutch).

As you can see: The project is definitely relevant to data protection law. At the latest, during the data protection basic course you will learn that data processing is only permitted if it is permitted either by law or by consent.

In the case of processing data as part of our e-learning module it can normally be justified as lawful under Art. 6 para. 1 lit. c) GDPR, being in compliance with a legal obligation. In the modern working world, a solid basic knowledge in the areas of data protection and data security is one of the basic requirements of every employee. Training measures in this area are necessary for the implementation of employment relationships, which is why the processing of the employee data required for this is also permissible. **Attention:** Please involve your works council, if applicable!

If you transfer user data to us, the admissibility of that transfer depends on whether you have appointed us as your data protection officer or not:

a) **You have appointed us as your data protection officer**

In this case, the transfer of user data by you to us represents a data transfer. Art. 6 para. 1 lit. f GDPR, legitimate interest, serves as the legal basis.

A so-called commissioned data processing is excluded in this constellation: By law, the data protection officer is responsible for conducting training courses. He is not subject to instructions on how to carrying out this activity. Commissioned data processing must be a strictly instruction-bound activity. This contradiction stands in the way of being considered a commissioned data processing activity.

b) **You have not appointed us as your data protection officer**

In the opinion of the Bavarian Data Protection Supervisory Authority, the transmission of training participant data to an external training organiser for the purpose of conducting training courses **does not normally constitute a case of so-called commissioned data processing** (see page 2 of the FAQ on the delimitation of order processing). We share this view and consider ourselves responsible in terms of data protection law even if you have not appointed us as your data protection officer. The legal situation is therefore identical with the legal situation described under item a).

If - contrary to this view - you nevertheless assume a case of commissioned data processing and would prefer to conclude a contract with us in accordance with Art. 28 GDPR, we are happy to do so. In this case, we will enclose a corresponding supplementary agreement with our license conditions.
9. What about data security?

a) Pseudonymisation of personal data

Personal data is always pseudonymised as far as this is possible according to the intended purpose and does not require any disproportionate effort in relation to the intended protective purpose.

b) Encryption of personal data

Our training platform is encrypted with https. Administrative access to the server system is only possible from our company network.

c) Ensuring confidentiality

   aa) Physical access

   Our e-learning system is operated in a professional computer center in Bremen, which has modern access protection.

   bb) System access

   Administrative access is secured with complex 20-digit passwords consisting of upper- and lower-case letters as well as numbers and special characters.

   User accounts are secured with 8-digit passwords which must contain upper- and lower-case letters and numbers.

   cc) Data access

   Only four employees in our company have administrative access to the system: these are our two system administrators and two employees from the privacy train division.

   Users can only view their own learning status in the system. Coordinators (see point 7 c above) can access the learning status of the entire group.

   dd) Data transfer

   Connections to our e-learning system are https-encrypted.

   ee) Client separation

   We create an independent and separate client for each customer in our system. This ensures that the user data of different customers do not mix.

d) Ensuring integrity (input control)

The input, modification and deletion of user data is logged by the system.
e) Ensuring availability

aa) Availability
We create backups of the data at regular intervals. The servers are located in an air-conditioned room and are equipped with uninterruptible power supplies and up-to-date virus protection.

bb) Order control
Our e-learning-system is hosted by PLUTEX GmbH in a professional computer center in Bremen (Germany). For the sending of system emails we use the service provider Mailjet GmbH. We have Art. 28 GDPR contracts in place with both service providers.

f) Load capacity of the systems
Resistant systems (hardware and software) are used which can withstand the expected stresses with regard to storage, access and line capacities.

g) Review
The technical and organizational measures used are continuously reviewed and, if necessary, adapted to the state of the art.