



LE GOUVERNEMENT  
DU GRAND-DUCHÉ DE LUXEMBOURG  
Ministère de l'Éducation nationale,  
de l'Enfance et de la Jeunesse

**Subject: Tasks focused on student's visual capacities included in the Épreuves Standardisées (ÉpStan) – Information letter concerning personal data protection**

Dear parents,  
Dear guardians,

During the month of November, your child will participate in the *Épreuves Standardisées* (ÉpStan), comprising different tests. The tests aim to assess central competencies, as described in the national school programs, in an objective and reliable way. In so doing, the ÉpStan significantly contribute to quality assurance in the school system.

The ÉpStan also include tasks focused on students' visual capacities. These tasks were integrated within the ÉpStan to identify children who might potentially present functional vision difficulties and that would be eligible for a school screening, which is posteriorly done by the "*Centre pour le Développement des compétences relatives à la Vue*" (CDV), working under the authority of the Ministry of Education, Children and Youth (MENJE). The CDV was established by the law of the 20th of July 2018 in favor of school inclusion. The article 5.1 (b) of the aforementioned law foresees the implementation of a systematic screening of children's functional vision, as part of CDV's institutional mission.

In accordance with the European General Data Protection Regulation (GDPR), collected data is protected via a process of pseudonymization executed by the company iTrust Consulting acting as a "*trusted third party*" (TTP). Your child will receive a numeric code (pseudonym) for each test and iTrust will be in possession of a list allowing to link the numeric code of your child (pseudonym) to their national identification number ("*matricule*").

Once your child has participated in the ÉpStan, these will be analyzed by the *Luxembourg Centre for Educational Testing* (LUCET) of the University of Luxembourg.

If your child's performance in the tasks focused on students' visual capacities is suggestive of difficulties related with functional vision, your child's numerical code (pseudonym) will be transmitted by the Luxembourg Centre of Educational Testing (LUCET) of the University of Luxembourg to the company iTrust consulting. The company iTrust consulting will link your child's numerical code to their national identification number.

Afterwards, the company iTrust consulting will contact the CDV and transmit your child's national identification number, so that they can proceed to the school screening. The goal of this screening is to verify if your child's potential visual difficulties initially identified within ÉpStan can be confirmed.

For the school screening to happen without disturbing school activities, the CDV will contact the Elementary school Direction ("*Direction de l'enseignement fondamental*") and the schooling staff who is responsible for your child, to have access to your contact data and communicate information regarding the screening's process such as, for example, the screening's date.

Neither the CDV nor the LUCET will have access to iTrust consulting company's list which allows to link your child's numerical code (pseudonym) to their national identification number. This ensures that neither the LUCET will have access to the identity of the children who struggled with the visual tasks, nor the CDV will have access to other information pertaining to the students' performance in the ÉpStan. For further information on the ÉpStan pseudonymization process, you can visit the website [www.epstan.lu](http://www.epstan.lu).

The collection, usage, transmission, management and protection of personal data by the CDV and by the LUCET of the University of Luxembourg, in the context of the ÉpStan will be done in compliance with the legal dispositions of the article 6 (e) of the European Regulation EU 2016/679, related with the protection of personal data (GDPR). The data will be processed within the framework of an eventual school screening that is part of the CDV missions foreseen by the law of the 20th of July 2018, in favor of school inclusion (Art. 5.1, b) and within the framework of the research mission of the University as stated in the article 3 of the modified law of 27th of June 2018 which has the organization of the University of Luxembourg as object ("*ayant pour objet l'organisation de l'Université du Luxembourg*"). These missions are of public interest.

The personal data transmitted by the company iTrust to the CDV will be kept by the CDV for the strictly needed duration of 5 years.

**Your rights:**

The legal rules on the protection of personal data, in particular the rights (right of access to data, right of rectification of data, ...) granted to the persons concerned by the processing carried out, are applicable under the relevant conditions and subject to the exceptions and derogations provided.

For questions relating to the processing of this data or in order to assert the exercise of your rights, you may, by justifying your identity and the identity of your minor child (i.e. by attaching a legible and valid copy of your identity document as well as one of your minor child to your request), contact one of the following institutions:

- **Responsible for data treatment:**  
Centre pour le Développement des compétences relatives à la Vue (CDV)  
17A, Route de Longwy  
L-8080 Bertrange, Luxembourg  
E- mail : [info@cc-cdv.lu](mailto:info@cc-cdv.lu) - Tel. : +352 454306-1
- **Data Protection Officer:**  
The Data Protection Officer  
Ministère de l'Éducation nationale, de l'Enfance et de la Jeunesse  
L-2926 Luxembourg  
[dpo@men.lu](mailto:dpo@men.lu)

If you believe, after establishing contact with the aforementioned institutions, that your rights are not respected, you can raise a complaint to the National Commission of Data Protection (*Commission nationale de la protection des données*), located at 15, Boulevard du Jazz, L-4370 Belvaux ([www.cnpd.lu](http://www.cnpd.lu)).

