Instructions for use of the form on data collection according to the CoronaVO

1. <u>Basic information</u>

According to the ordinance of the state government on infection protection measures against the spread of the virus SARS-CoV-2 (Corona Ordinance - CoronaVO), the University of Freiburg is obligated to collect and store certain personal data of attendees, especially visitors, users or participants, for the purpose of providing information to the public health department or the local police authority according to §§ 16, 25 Infection Protection Act (IfSG). There is no need to collect this data again if it is already available. Upon request, the data shall be transmitted to the competent authority.

The Corona Ordinance is supplemented with regard to data processing in areas with study operations by the Ordinance of the Ministry of Science on infection protection measures against the spread of the SARS-CoV-2 virus in the area of responsibility of the Ministry of Science (Corona Ordinance on Study Operations - CoronaVO Studienbetrieb).

According to the CoronaVO, the following data must be collected:

- First and last name
- Address

- Date, time period on-site
- Telephone number, if available

The telephone number has proven to be an essential data point for contact tracing.

The University of Freiburg are forced to exclude persons who refuse to provide their data in whole or in part from visiting or using its facilities or from participating in events.

If persons present provide contact data according to the CoronaVO, they must provide accurate information. An infringement may constitute a breach of order and be subject to a fine.

The purpose of data processing is for effective contact tracing to break chains of infection by public health authorities and thus to protect all members and affiliates of the University and the wider community.

Please help to collect and securely process the required data. We can support you with the following information.

2. <u>Necessity and jurisdiction</u>

At a large, decentrally organized university such as the University of Freiburg, a central collection or further processing of contact data is not possible, therefore the processing of the required data is decentralized by the respective responsible offices.

Depending on the occasion and/or the type of event/meeting/use, the heads of the respective institutions, the responsible organizers/hosts of the respective event/meeting or other gathering as well as the responsible teaching staff (responsible persons) are responsible and accountable. They must ensure that the required data is collected, stored and deleted/destroyed in accordance with data protection regulations.

The obligation to process data pursuant to the CoronaVO or Corona Regulation Study Operations exists in particular in the case of

- Offers for extracurricular, vocational and academic education,

- attendance events and other attendance formats of the study operation, in particular teaching, examination and admission events,

- Use of libraries as well as other academic facilities or operating facilities,

- Use of exercise, study, PC and work rooms,

- catering and supply facilities with visitor and customer traffic,

- student administrative offices as well as in advisory and administrative facilities with visitor and customer traffic.

The collection of contact data (address and telephone number, if available) from University employees can be waived if this data is already available. In this respect, employees must independently ensure that the University has up-to-date contact data and that attendance can be traced in terms of time/location if necessary.

The collection of contact data may not be necessary in individual cases, for example, if the meetings are internal staff meetings within their own organizational unit (e.g. department) or if minutes are kept of the meeting with information on the place, date, time and names of those present. However, even in this case it may be necessary to collect the current availability data of those present, unless it can be ensured that this data is already available. In case of doubt, data collection should take place in accordance with the CoronaVO.

In the case of an event series, e.g. as part of a course or module, there is an obligation to process data for each individual event date. Here, too, the accessibility data of the attendees does not have to be collected again if it is already available.

This is the case, for example, if the students/doctoral candidates/guest lecturers have stored their current contact data in the student administration program HIS-inOne for the purpose of tracking possible chains of infection. If the data has not been stored for this purpose, it should be noted that HISinOne does not require telephone numbers to be stored and therefore cannot be relied upon. In addition, the first and last names **of the participants as well as the date and period of attendance** must be recorded for each event date ([EXA 612 attendance lists CoronaVO](#)). A detailed description of the procedure via HISinOne can be found in the wiki of the Campus Management department under "[Contact data according CoronaVO for on-site events, on-site examinations, on-site study credits](#)."

3. Use of forms, storage, deletion

In order to collect the required data, the form "Data collection according to Corona-VO" is provided in addition to the procedure via HISinOne (study operation). This consists of two parts and is available on the university's "Corona page" under "Studies and Teaching - Fact Sheets and Applications."

The survey form (page 1) is to be filled out by the attendees per person for each event and given to the person in charge. Page 2 contains information on data protection. This information is generally for the data subjects and does not need to be retained. However, the data protection information should always be displayed on site.

In principle, the forms should be kept in printed form by the persons responsible. If possible, they should pre-fill in the details of the event/meeting/date and, if applicable, seat number. The forms are to be handed out to those present on site and the completed survey forms are to be collected again. In the case of regular events/occasions, those responsible should, if possible, ensure that those present print out the form in advance, fill it in and bring it with them to the event.

Those responsible must ensure that all those present complete the survey form and return it to him or her. In doing so, it must be ensured that the information on the event/date and, if applicable, the seat number is recorded correctly. There is no obligation to check the correctness of the contact details of those present. Nor is there any obligation for the persons concerned to identify themselves. However, if it is evident from the information provided that obviously incorrect or incomplete information has been provided, this must be questioned.

The completed survey forms must be kept for a period of four weeks. It must be ensured that unauthorized third parties do not gain access to the data. For this purpose, the survey forms must be stored separately for each event in a locked storage unit (e.g. filing cabinet) in a locked room. The storage must be organized in such a way that the sheets/data are available at all times for any necessary transmission to the health department.

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▬ After the retention period has expired, the data must be deleted or the survey forms must be destroyed ("shredded") in accordance with data protection requirements. You can find information about it on the intranet under "Service A-Z - Aktenvernichtung."

The organization of data protection-compliant storage and destruction of the forms is also the responsibility of the respective data controller.

If you have any questions regarding data processing, please contact Datenschutz@uni-freiburg.de or the university's data protection officer.

Thank you very much for your support!

The instructions for use will be updated as necessary. The current version can be found on the University's "Corona page" under "Study and Teaching - Fact Sheets and Applications".