# universität freiburg

## Information according to Art. 13/14 General Data Protection Regulation (GDPR)

Enrolment, studies, doctorate at the University of Freiburg (UFR)

The protection of your personal data is a key concern for UFR and we want you to be fully informed about the processing of your personal data. We process your personal data (hereinafter referred to as "data") in accordance with the legal requirements and do so in a transparent manner. The following information explains what data is processed, for what purposes and on what legal basis. You will also receive information about contact persons and your rights.

In accordance with Section 60 and Section 38 (5) of the Baden-Württemberg Higher Education Act (Landeshochschulgesetz - LHG), enrolment as a student (matriculation) in a degree program or a combination of partial degree programs provided for in examination regulations and, under certain conditions, in preparatory studies or for the purpose of a research stay or on the basis of acceptance as a doctoral candidate.

In the event of a successful application, the personal data from your application required for the commencement and completion of your studies/doctorate and the associated tasks and legal obligations of the UFR will be transferred and processed as part of the enrolment process. Further data will be collected or generated during enrolment and in the course of your studies/doctorate.

The processing of your data is necessary for the purpose of your enrolment and to carry out your studies/doctorate at the UFR. In addition, we process your data on a voluntary basis in individual cases.

#### 1. Person responsible in the sense of data protection law

#### **University of Freiburg**

Friedrichstraße 39, 79098 Freiburg + 49 (0)761/203-0 info@uni-freiburg.de

#### 2. Data Protection Officer

## **University of Freiburg**

The Data Protection Officer Friedrichstraße 39, 79098 Freiburg datenschutzbeauftragter@uni-freiburg.de

#### 3. Description of the processing activity and purposes of the data processing

Your data will be collected and processed to fulfill the legal tasks of the UFR, in particular in the area of studies and teaching, insofar as this is necessary to carry out your studies or your doctorate. In individual cases, data is processed on the basis of your consent.

This includes the following processing activities and purposes in particular:

- 1. creation of data records, in particular in the University's Campus Management System,
- 2. creation and use of accounts (e.g. UniAccount),
- 3. processing of notifications and applications (e.g. for enrolment, change of degree program or subject or change of degree program combination, exchange of study places, deferral, waiver or refund of tuition fees, leave of absence),
- 4. creation and administration of a student ID card (UniCard),
- 5. creation of enrolment certificates.
- 6. collection of fees in the context of enrolment and re-registration (e.g. semester fees, tuition fees),
- 7. organization of studies (e.g. registration and implementation of courses, lectures, seminars, excursions, internships),

- 8. examination administration (e.g. organization, implementation, administration and communication of results, preparation and transmission of attendance and performance records and certificates),
- 9. use of university services, systems and facilities (e.g. lending of media, use of IT systems, in particular student administration systems (e.g. campus management system), e-learning systems, video conferencing systems),
- 10. information about university dates, requirements, events and offers,
- 11. conducting and participating in elections, in particular compiling electoral registers,
- 12. internal university communication,
- 13. student counseling,
- 14. awarding and implementing scholarships,
- 15. implementation of quality assurance measures and evaluations,
- 16. implementation of student exchange programs and mobility measures,
- 17. registration for and participation in events of the Center for Key Qualifications (ZfS),
- 18. registration for and participation in language courses of the Language Teaching Institute (SLI), Studium generale and general university sports,
- 19. registration for and participation in events of the Freiburg Graduate Center (GraCe) of the Freiburg Research Services (FRS) of the University of Freiburg,
- 20. participation in the self-administration.

# Further processing purposes

- 1. communication, press and public relations,
- 2. competitions and prize competitions,
- 3. supervisory and control powers (e.g. auditing, internal audit, data protection officer),
- 4. statistical evaluations, organizational analyses,
- 5. archiving purposes,
- 6. fulfillment of legal documentation/reporting/notification obligations.

#### 4. Legal basis for data processing

- 1. art. 6 para. 1 subpara. 1 lit. e in conjunction with para. 3 subpara. 1 lit. b GDPR in conjunction with the relevant provisions of the LHG, in particular §§ 2, 5 para. 4 and para. 5, 6, 12, 9, 10, 10a, 28, 29 to 39, 42 para. 2, 43, 58 to 63 LHG in conjunction with the relevant statutes of the UFR, in particular
- a. the statutes of the University of Freiburg on the obligation to provide data,
- b. the statutes of the School of Education "FACE", a joint institution of the University of Freiburg, the Freiburg University of Education and the Freiburg University of Music in conjunction with the statutes of the Freiburg University of Education on the obligation to provide personal data and on the processing of personal data to fulfil the tasks of the university, if applicable in conjunction withthe University Data Protection Statues<sup>1</sup>,
- 2. the statutes of the Freiburg Research and Teaching Center for Music (FZM), a joint institution of the Albert-Ludwigs-Universität Freiburg and the Freiburg University of Music in conjunction with the statutes of the Freiburg University of Music on the obligation to provide personal data and on the processing of personal data for the fulfilment of the university's tasks, if applicable in conjunction with the University Data Protection Statues<sup>2</sup> the
- 3. the statutes of the University of Freiburg on internal quality assurance and quality development for studies and teaching.
- 4. the admission and enrolment regulations of the University of Freiburg
- 5. the study and examination regulations of the UFR

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<sup>&</sup>lt;sup>1</sup> In case of enrolment at the Freiburg University of Education

<sup>&</sup>lt;sup>2</sup> In case of enrolment at the Freiburg University of Music

- 6. the statutes of the University of Freiburg on supplementary regulations for admission statutes, study and examination regulations, doctoral regulations and habilitation regulations,
- 7. the doctoral degree regulations of the UFR,
- 8. Statutes on the implementation of disciplinary measures pursuant to Section 62a LHG at the University of Freiburg,
- 9. the administrative and usage regulations of the UFR facilities,
- 10. the election regulations of the University of Freiburg,
- 11. art. 6 para. 1 subpara. 1 lit. c in conjunction with para. 3 subpara. 1 lit. b GDPR in conjunction with the relevant provisions of the law on statistics for higher education and for vocational academies,
- 12. art. 6 para. 1 subpara. 1 lit. c i.V.m. para. 3 subpara. 1 lit. b GDPR in conjunction with § Section 199a (7) Social Code (SGB) Fifth Book (V) Statutory Health Insurance,
- 13. art. 6 para. 1 sentence 1 lit. c GDPR in conjunction with para. 3 sentence 1 lit. b in conjunction with. § Section 6 (1) and (2) of the Act on the Promotion of Electronic Administration in the State of Baden-Württemberg (E-Government Act Baden-Württemberg EGovG BW i.V.m. Section 3.1.2 VwV E-Akte.
- 14. art. 6 para. 1 subpara. 1 lit. c in conjunction with para. 3 subpara. 1 lit. b GDPR in conjunction with the relevant provisions of the Act on the Maintenance and Use of Archival Records (Landesarchivgesetz LArchG),
- 15. other legal requirements, insofar as these contain a legal obligation to process data or stipulate that data processing is necessary to fulfill the tasks of the University,
- 16. art. 6 para. 1 subpara. 1 lit. a, art. 7 GDPR, insofar as you have given us your (explicit) consent to process your personal data in individual cases. If you provide voluntary or optional information to the University, we generally assume that you give us your (explicit) consent to process this data and process the data on this basis,
- 17. art. 6 para. 1 subpara. 1 lit. e in conjunction with. para. 3 subpara. 1 lit. b GDPR in conjunction with § Section 4 of the State Data Protection Act.

#### 5. Voluntary information, consent and revocation instructions

If you have given us your consent to process your data (voluntary information), you have the right to withdraw your consent at any time, without affecting the lawfulness of processing based on consent before its withdrawal. You can also withdraw your consent for the processing of individual data. In the event of revocation, the data concerned may no longer be processed in the future and must be deleted immediately, unless the processing is permitted on another legal basis.

In the event that you do not give your consent, do not provide any information or revoke your consent, you will not suffer any disadvantages.

In the case of printed works, consent can no longer be revoked once the print order has been placed. Further use of the printed works produced is permitted until the time of revocation. In the event of a new edition, the data concerned will not appear again in the printed product in question.

If consent is not revoked, it is valid for an unlimited period of time.

### 6. Storage duration or criteria for determining the duration

Your data will only be processed or stored for as long as is necessary for the above-mentioned purposes. Unless longer storage or retention is necessary for the assertion, exercise or defense of legal claims or is required by law.

The duration of the processing of your personal data processed by the UFR is generally based on § 12 para. 8 LHG.

According to this, certain data must be stored for a period of 50 years at the request of graduates in order to be able to issue replacement documents for them if necessary. All other data must be deleted immediately after disenrolment. Exceptions apply if an examination procedure has not yet been completed. In addition, the provisions of the State Archiving Act on the obligation to provide

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records and other legal or statutory documentation and retention obligations, in particular in accordance with the University's study and examination regulations, remain unaffected.

According to § 13 para. 2 in conjunction with §§ 4 and 2 LArchG, all documents of the university that are no longer required for the fulfillment of its tasks must be offered to the university archive for transfer. The archive decides, in consultation with the offering body, on the acceptance of documents of historical value and processes the accepted documents in accordance with archiving regulations. Documents that have no lasting value are to be destroyed if there is no reason to assume that the destruction would impair the interests of the person concerned that are worthy of protection.

According to the regulations in the study and examination regulations of the UFR for the Bachelor of Science (B.Sc.), Bachelor of Arts (B.A.), Polyvalent Two-Major Bachelor's Degree Program, Master of Science (M.Sc.), Master of Arts (M.A.), Master of Education for the Teaching Qualification Gymnasium, Master's Degree Program Teaching Qualification Gymnasium - dual, the complete examination files are kept for at least five years. The basic file, which consists of copies of the degree certificate, the transcript of records, the transcript of records and the diploma supplement, is stored indefinitely; it may be stored in electronic form.

According to Art. 6 para. 1 sentence 1 lit. c GDPR i.V.m. para. 3 subpara. 1 lit. b GDPR in conjunction with Section 6 para. 1 and 2 EGovG BW in conjunction with Section 3.1.2 VwG. Section 3.1.2 VwV E-Akte, the data and documents stored in the electronic student file will be stored for five years after disenrolment and, unless there are specific further legal or statutory documentation and retention obligations, will then be offered to the University Archive for transfer.

In addition, the University of Freiburg may store and use certain personal data to maintain contact with its graduates in accordance with § 12 para. 1 sentence 2 LHG, unless they object ("alumni work"). For this purpose, the UFR uses an e-mail address provided at the time of enrolment or during the course of study.

According to § 5 para. 4 sentence 1 LHG, the UFR may store and use the contact details and external progress data of its former applicants who have been granted admission, its former members and relatives and its former doctoral students, insofar and as long as this is necessary for surveys for the realization of the legally prescribed purposes within the framework of quality management and evaluations and the persons concerned do not object. For these purposes, the UFR uses an e-mail address provided at the time of enrolment or during the course of studies. Participation in surveys of current and former students for the purposes of evaluation and quality management is voluntary. In addition to the LHG, the legal basis for this is the University of Freiburg's statutes on internal quality assurance and quality development in the area of teaching and learning, as amended.

For the purposes of financial accounting and in the area of the University Treasury, personal data can be deleted after the statutory retention periods have expired, which result in particular from the Baden-Württemberg State Budget Code (LHO), the German Commercial Code (HGB) and the German Fiscal Code (AO). According to these regulations, the retention periods are up to 10 years; according to the LHO, they are generally 6 years for receipts and 10 years for accounting, cash and organizational documents.

To ensure that students can still access selected services (e.g. retrieve exam results) after disenrolment, the accounts and the personal data required for this are not deleted immediately upon disenrolment. As a former student, you still have what is known as an "estudent account". In the event of disenrolment, you will still have access for a further 60 days. After that, data processing will be gradually restricted. In the course of this, the account is marked as "to be deleted" after 8 months and the data concerned is deleted from connected systems. After 18 months, the university account will be anonymized in the central account management system so that it can no longer be assigned to the former user. It should also be noted that backup versions of central storage systems are usually kept for up to 90 days. Any data stored therein is then finally deleted after 90 days at the latest.

If data processing is based on your consent, the data will generally be processed for the respective purposes until you withdraw your consent.

## 7. Categories of recipients

Recipients to whom the data required for the respective processing purpose is disclosed, e.g. by transmission or granting access, are the following bodies/institutions:

- 1. internal recipients are those bodies or employees who require the data for their activities in the course of fulfilling their duties, in particular:
- a) Student administration (e.g. Service Center Studies, Campus Management),
- b) University Computer Center,
- c) University Library,
- d) faculties/institutes/professorships/teaching staff,
- e) Deans of Studies and Examination and Doctoral Offices,
- f) Committees and appointments,
- g) International Office,
- h) Communication and Marketing,
- i) Department 2 Finance (Financial Accounting/University Treasury),
- j) Department 5 Legal Affairs,
- k) Security, Environment and Sustainability Unit,
- I) Evaluation Service and Quality Management,
- m) Doctoral student conventions,
- n) Structured doctoral programs such as Research Training Groups,
- o) Freiburg Graduate Center (GraCe),
- p) School of Education FACE,
- q) Freiburg Centre for Music Research and Teaching
- r) University College Freiburg,
- s) University Archive,
- t) if necessary other central and decentralized institutions of the University.
- 2. external recipients:
- a) Constituted student body (e.g. in connection with elections),
- b) External lecturers and honorary lecturers,
- c) Ministries and regional councils responsible for higher education,
- d) Statutory health insurance companies,
- e) Offices for education funding,
- f) Federal Statistical Office and the Statistical Offices of the State of BW,
- g) Freiburg University Medical Center,
- h) Cooperating universities (e.g. in connection with Eucor and EPICUR),
- i) Freiburg University of Education<sup>3</sup>,
- i) Freiburg University of Music<sup>4</sup>,
- k) Parties involved and supporting bodies in the defense of claims and legal proceedings, courts,
- I) Processors such as service providers, external companies providing and maintaining IT services and other universities within the scope of technical cooperation.
- 3. Other recipients only come into question in the event that we are legally obliged to disclose or transfer data.

## 8. Your rights as a data subject

- 1. You have the right to receive information from the University of Freiburg about the data processed about you and/or to have incorrectly stored data corrected.
- 2. Under certain conditions, you also have the right to erasure or restriction of processing and to data portability.
- 3. If you have given us your consent to process your data, you also have the right to withdraw your

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<sup>&</sup>lt;sup>3</sup> See supplement to section 7 Recipient categories

<sup>&</sup>lt;sup>4</sup> Currently only when registering for course 06LE28FZM-MH-Glarean-Account in the HISinOne campus management system. See supplement to section 7 Recipient categories.

- consent at any time, without affecting the lawfulness of processing based on consent before its withdrawal. You can also withdraw your consent for the processing of individual data. In the event that you do not give or withdraw your consent, you will not suffer any disadvantages.
- 4. You have the right to lodge a complaint with a supervisory authority if you believe that the processing of personal data concerning you is in breach of the law. Such a supervisory authority is, for example, the State Commissioner for Data Protection and Freedom of Information Baden-Württemberg, e-mail poststelle@lfdi.bwl.de (https://www.baden-wuerttemberg.datenschutz.de/).
- 5. If you wish to assert data subject rights against the University of Freiburg, please contact datenschutz@uni-freiburg.de.

# 9. Information on the objection pursuant to Art. 21 (1) GDPR

You have the right to object, on grounds relating to your particular situation, at any time to processing of personal data concerning you which is based on Art. 6 para. 1 subpara. 1 lit. e and lit. f GDPR.

# 10. Supplementary notes

Please note our general data protection information in the footer of our website at https://www.uni-freiburg.de/datenschutzerklaerung

As a precaution, we would like to point out that data transmission over the Internet (e.g. when communicating by email) may be subject to security vulnerabilities. Complete protection of data against access by third parties cannot be guaranteed. We therefore recommend that you encrypt emails with sensitive content. Alternatively, you can also contact us by post.

Supplement to Section 7 Recipient categories	
A. School of Education FACE	
Recipient	Pädagogische Hochschule Freiburg Kunzenweg 21, 79117 Freiburg datenschutz@ph-freiburg.de  Hochschule für Musik Freiburg Mendelssohn-Bartholdy-Platz 1, 79102 Freiburg kontakt@mh-freiburg.de
Description	As part of the School of Education FACE, the UFR cooperates with the Freiburg University of Education (PH) and the Freiburg University of Music (HfM). Students of the polyvalent two-major Bachelor's degree programs with the option of a teaching degree, the Master of Education degree program and the Master's degree programme in teaching at secondary schools (dual) are also enrolled at the PH or the HfM (double enrolment), insofar as this is necessary for the admission and completion of their studies.  For this purpose, the necessary data of the students concerned will be transmitted to the partner university. The partner university processes the transferred data on its own responsibility.  If students are primarily enrolled at a partner university, the partner university will transfer the necessary data of the students concerned to the UFR so that they can also be enrolled at the UFR.
Affected	<ul> <li>Students of the polyvalent two-major Bachelor's degree programs with the option of a teaching degree,</li> <li>Students of the Master of Education program</li> <li>Students of the Master's degree programme in teaching at secondary schools (dual)</li> </ul>
Puropse	Enrolment, implementation of the study program

Legal basis	Art. 6(1)(e) in conjunction with Art. 3(3) GDPR in conjunction with Sections 2, 6(4), 12(1) sentence 1, (3), (6) and (11) sentence 2, 58 to 60 LHG in conjunction with the statutes of the Albert Ludwig University on the obligation to provide data in conjunction with the statutes of the School of Education 'FACE', in conjunction with the Higher Education Data Protection Statutes of the PH and the Data Protection Statutes of the HfM, as well as other relevant statutes of the partner universities, in particular admission and selection statutes and study and examination regulations.
Types of personal data	
Reference data	<ul><li>Identifier of the reporting university,</li><li>Reference semester.</li></ul>
Personal data	<ul> <li>Name (surname, first names, maiden name if applicable),</li> <li>date of birth, place of birth,</li> <li>sex,</li> <li>first and, if applicable, other nationalities.</li> </ul>
Contact details	<ul><li>Address for correspondence (street, city, state),</li><li>E-mail address.</li></ul>
Study data	<ul> <li>Unique identification number at the UFR (matriculation number or equivalent ID),</li> <li>Unique identification number at the PH (matriculation number or equivalent ID),</li> <li>Type of enrolment,</li> <li>Degree program and desired degree,</li> <li>semester of study,</li> <li>in case of disenrolment: date and reason for disenrolment.</li> </ul>
Application data	<ul> <li>University entrance qualification: Type, year, place of issue.</li> <li>Matriculation</li> <li>First enrolment (semester, year, name and location of the university),</li> <li>First enrolment at a university in Germany (semester and year),</li> <li>Completed semesters (number): University semesters, semesters on leave.</li> </ul>
Cleanup data	Reason for deletion: e.g. disenrolment, change of subject or degree program, deletion due to cancellation of enrolment.
B. Freiburger Forschungs- und Lehrzentrum Musik (FZM)	
Recipient	Hochschule für Musik Freiburg (HfM)
	Mendelssohn-Bartholdy-Platz 1, 79102 Freiburg
	kontakt@mh-freiburg.de
Additional information	Students and doctoral candidates studying musicology at the UFR, as well as members of the FZM, can obtain a guest account ( <u>Glarean account</u> ) at the HfM. Requests can be made via HISinOne, event 'Request MH Glarean account for university students', 06LE28FZM-MH-Glarean-Account. Data protection information regarding this process can be found <a href="https://example.com/here">here</a> .