

# Data Processing Information for Users of the Career and Alumni Portal of HTW Berlin (Data Privacy Policy)



The protection of your data is important to us. In view of this and in order to comply with all of our statutory disclosure and information duties, we inform you in the following about how we, Hochschule für Technik und Wirtschaft Berlin, Treskowallee 8, 10318 Berlin, process your data and what rights you are entitled to with regard to this data processing.

The career and alumni portal of HTW Berlin was developed by IntraWorlds GmbH, Erika-Mann-Str. 7, 80636 Munich, and is operated by IntraWorlds GmbH on our behalf. We therefore explain to you below what data we collect through IntraWorlds GmbH and how this data is processed by us/IntraWorlds GmbH. The obligations of IntraWorlds GmbH towards us and with regard to data privacy are expressly defined in a processing agreement.

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## **1. Subject Matter of Data Privacy**

The subject matter of data privacy is personal data. Personal data is defined as individual items of information relating to the personal or factual circumstances of a specific natural person and as all information relating to an identified or identifiable person in accordance with Art. 4 of the EU General Data Protection Regulation (GDPR).

This includes contact data such as names, addresses, email addresses or telephone numbers. It also encompasses content data which is typically used for the alumni work of a university and in the context of career advisory or job application services, for example CVs and other proof of qualifications. Content data furthermore includes user comments or posts created within a platform. Of course, personal also includes user data such as IP addresses, logIn data or when access is made to specific pages or content.

## **2. Scope and Purpose of Data Processing**

In the following we inform you about the scope of data collection and storage as well as about the use of such data (hereinafter referred to as “Data Processing”, as defined in Art. 4 (7) GDPR) and about the purpose of data collection when you use the career and alumni portal of HTW Berlin.

We first of all explain the specific data processing that is carried out within the scope of the career and alumni portal of HTW Berlin and then explain other forms of data processing in connection with the use of the portal.

### **2.1. Data Processing for the Alumni and Career Service Work of HTW Berlin in Connection with the Career and Alumni Portal of HTW Berlin**

As your university/former university, we use the career and alumni portal as a central point of contact via which we would like to communicate and exchange information with you regarding your personal and professional further education and development, news about the university, opportunities for exchange and networking with (other) alumni and university funding opportunities.

We will keep you up to date on what is happening at HTW Berlin, inform you about career opportunities, further training, scholarships and mentoring programmes. We will also offer you the chance to participate in events, funding programmes or further training. Approximately 2 to 3 years after your graduation, we ask you to give us your feedback by looking back on your studies at HTW Berlin.

#### **2.1.1. Data Processing when you use the Career and Alumni Portal**

If you also actively use the career and alumni portal in order to inform yourself about vacant positions, workshops/events or what is currently going on at HTW Berlin or in order to interact about these topics, for example by commenting on articles, posting content yourself or declaring your participation in events, we process the following data from you which can be typically generated as part of your interactive use of our platform:

- Content data such as
  - The profile visible on the platform filled out by you, including articles written by you or comments about content such as articles, videos, event or workshop announcements
  - Articles created and uploaded by you, photographs, videos
  - Participation messages regarding events or workshops
  - Group memberships
  - Evaluations of content or comments
  - Contact requests and connections
  - Survey participation
  - Messages between users (they cannot be viewed by administrators, i.e. employees of HTW Berlin)
  - Messages to our employees
  - Registration for newsletters

- General other usage data such as
  - o IP addresses
  - o LogIn data
  - o Access to certain content/pages such as articles, documents, events, forums, images, surveys, jobs, videos, etc.
  - o Opening newsletters or clicking on newsletter content

We process such data in accordance with Art. 6 (1 b) GDPR. This personal data is created when you use the platform. We have to process this data in order to offer you the services of our platform and in order to enable such services.

Please also read the information we provide about the processing of IP addresses.

In addition, you of course have the right to object to this data processing, for more information please read section 5.

#### **2.1.2. Storage Period of Data within the Scope of the Alumni Work of HTW Berlin**

After you leave the university, we save your personal data (here exclusively name(s), first names(s), title, private email address, HTW email address, student ID number, date of birth) and study programme data (here exclusively the start and end date of your studies and study programme) for a period of six years (based on the end of the semester on 31.3. or 30.9.). If you do not actively use the platform, we will only use this data record within the scope of the career and alumni portal for the purposes of verifying who you are when you sign in to the career and alumni portal in for the first time.

If you actively use the platform as a graduate, we process your personal data as described in section 2.1.1., i.e. such data that is generated by actively using the platform, for up to 6 years after your last interaction with our platform (in each case based on the end of the semester on 31.3. or 30.9.). Interaction is deemed as logging in to the platform login or any other reaction to communication initiated via the platform (e.g. expression of interest in cooperation with HTW Berlin / event registration by email to alumni@htw-berlin.de or telephone). The reason for this relatively long storage period is that contact and communication with you as a (future) graduate is structured on a long-term basis. We want to keep in contact with you in the long term and to be able to communicate and provide you with information in the long term. We take into consideration that as a graduate you follow the development of your former university, HTW Berlin, and want to have access to possibilities for exchange.

In addition, you of course have the right to object to this data processing at any time, for further information please read section 5.

Before deleting your data, we will inform you in advance that your data is going to be deleted.

## **2.2. Other Data Processing Information**

### **2.2.1. IP Addresses**

Without Internet protocol addresses, “IP addresses” for short, the Internet – explained in very simple terms – would not work. An IP address is an address in computer networks via which web servers and/or individual end devices are able to be addressed and reached. Without IP addresses, the web server and end devices cannot communicate – and therefore cannot display anything. When you want to use the portal, the web server on which the career and alumni portal of HTW Berlin is hosted is therefore pinged with a data request from you. To provide you with data, the web server has to know your IP address. As a result, the web server has to save your IP address at the time the data request is received. In addition, the web server receives information about which web page or file has been accessed and which browser and operating system was used to do this. This information is called a log file.

IntraWorlds GmbH saves your IP address in log files for seven days for reasons of security and network integrity. This enables attacks such as brute force and denial of service to be better recognised and more quickly prevented.

## **3. Data Processing for Specific Purposes, Disclosure of Data**

We observe the principle of using data only for specific purposes. All of the aforementioned data is only processed by us for the already listed purposes and for those purposes listed in the following.

For the alumni work of individual study programmes, on request we disclose lists that contain your name(s), first name(s) and email address only to professors and exclusively in connection with specific activities. In connection with the graduate survey conducted every 2 to 3 years, we disclose a list containing your name(s), first name(s) and email address, study programme and data of graduation to the person(s) responsible for the evaluation of HTW Berlin.

Personal data will not be disclosed to third parties outside of the scope described here without your express permission. Disclosure to state institutions and authorities that are entitled to receive such information shall only be carried out within the scope of the statutory disclosure requirements or if we are obliged to provide information as a result of a court decision.

## **4. Period of Data Processing**

We are obliged to comply with the principles of data limitation and data minimisation. We have already informed you in the above about the period of data processing.

**5. Rights of Data Subjects (including the right to obtain information, the right to withdraw consent, the right to object, the right to request the erasure of personal data, the right to contact the data protection officer)**

Independent of the foregoing, you can object to the use of your data at any time and withdraw any given consent to the use of your data at any time.

If you withdraw your consent to data processing or object to the use of your data, this does not affect the lawfulness of the data processing prior to the time of withdrawal.

You can also ask us to rectify, block or erase personal data we have collected and saved at any time. We expressly inform you that statutory requirements can require us to continue to save data, in which case the data can only be blocked.

Furthermore, we have to inform you that from 25.05.2018 you also have the right to data portability as defined in Art. 20 GDPR and the right to lodge a complaint with the competent supervisory authority as defined in Art. 77 GDPR.

If you exercise your rights directly in respect of IntraWorlds GmbH, the latter is obliged to immediately inform HTW Berlin, and vice-versa, to enable your request to be fulfilled as quickly as possible.

The contact details of our Data Protection Officer are as follows:

Prof. Dr. Horst Theel

Email: [horst.theel@htw-berlin.de](mailto:horst.theel@htw-berlin.de)

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