

## Privacy policy for applicants and students of the University for Continuing Education Krems (Danube University Krems)

In accordance with the General Data Protection Regulation (GDPR), we inform you about the processing of your personal (p) data you provide us with as applicant and subsequently as an admitted student. The privacy policy on our [website](#) contains all information about data collected from your computer when visiting our website.

### Controller according to Art. 4 Z 7 GDPR

University for Continuing Education Krems (Danube University Krems)  
Dr.-Karl-Dorrek-Straße 30  
3500 Krems an der Donau (in the following briefly "we" or "us")

### Contact

Mag. Mag.(FH) Katharina Ranjan  
[datenschutz@donau-uni.ac.at](mailto:datenschutz@donau-uni.ac.at) or +43 2732 893-2229

## Applicant for studies

By filling in the (online) application form you enter your *name, gender, contact details, date and place of birth, nationality, and the sector-specific personal identifier (bPK)* as master data and upload a *copy of a valid ID document* to our server. We receive further p data from the *curriculum vitae (Europass)* including proof of *general university entrance qualification (higher education entrance qualification), tertiary education, professional experience and further education* you provide.

The provision of p data is a prerequisite for processing your application for admission and subsequently for admission to studies (conclusion of a continuing education contract).

Your p data is processed in order to check the admission requirements (according to the curriculum of the respective course of study), by the responsible course managers, the Service Center for Students (SCS) and other administrative units (accounting) and in order to contact you. Your p master data is also recorded automatically in our student administration program (UWKonline)

and our Customer Relationship Management (CRM) system and to inform you in our legitimate interest about our offers and events.

For statutory statistical purposes (§ 9 Abs 6 Education Documentation Act) we also collect p information about the educational careers of your parents.

**Legal basis:** Art. 6 (1) lit b, c, e, f GDPR<sup>1</sup> in conjunction with § 70 UG<sup>2</sup>

You can also voluntarily provide us with a photo for your student ID card – as part of your application – and consent to the processing of p data for marketing purposes by providing your *marital status, professional and management experience, current activities, etc.*

**Legal basis:** Art. 6 (1) lit a GDPR<sup>3</sup>

**Recipients:** In connection with your admission to studies, a defined selection of your p data is transmitted to the data network of the Austrian universities at the Bundesrechenzentrum GmbH (BRZ) for the possible creation of a matriculation number, in accordance with the "Universitäts- & Hochschulstatistik- & Bildungsdokumentationsverordnung" (UHSBV/ University & Higher Education Statistics & Education Documentation Ordinance).

Information may be transferred additionally to our university cooperation partners and, in the case of foreign applicants, to the Österreichische Austauschdienst GmbH (OeAD), embassies and district administration offices within the framework of a mobility program for purposes of residence law.

In order to carry out recording procedures in non-presence, p data can also be transmitted via IT service providers (e. g. video conferencing system) on an appropriate contractual basis. In case of such an event a transfer to third countries or international organizations occurs in accordance with Art. 49 (1) lit b GDPR<sup>4</sup>.

**Storage period:** In case your application is rejected or non utilization of your place at university, the p data you provide will be deleted at the earliest after 2 semesters, if implemented into the study administration management at the latest after seven years.

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<sup>1</sup> **GDPR:** data processing on the basis of (b) pre-contractual measures at the request of the person concerned, (c) to fulfil a legal obligation imposed on us or (e) to perform a task assigned to us in the public interest (f) to safeguard our legitimate interests.

<sup>2</sup> **Universities Act 2002 (UG).**

<sup>3</sup> You may revoke your consent at any time, without this affecting the legality of the processing carried out until the revocation.

<sup>4</sup> The transfer is necessary for the performance of a contract between the data subject or for the implementation of pre-contractual measures at the request of the data subject.

## First-year students and students

### General information

After receiving the mandatory course fee and admission to the study course, an earlier *p matriculation number* will be reactivated or a new *matriculation number* will be created as mentioned above. We process them additionally to the *p data* collected in the application to administer your study course.

At the start of your studies, we assign you an *e-mail account* from Microsoft Outlook including common functions such as calendar and task management. The storage space of this *p university e-mail address* is available on our servers and in Microsoft 365, and it is used to process all applications under study law especially when you invoke your right to electronic communication.<sup>5</sup>

Your *p master data* is also processed during the creation of your personal student ID and parking card for using the parking garage and will be forwarded to the garage owner. In addition, your student ID card gives you access to the (electronic) services of the University Library, the digital databases offered for teaching and research purposes<sup>6</sup> and the loan system, in the context of which your *p master data* may also be processed in the dunning process.

In our legitimate interest you will also receive newsletters sent via e-mail, other study related mailings and information on university events, and we might contact you for research purposes.

**Legal basis:** Art. 6 (1) lit b, c, e, f GDPR in conjunction with UG<sup>7</sup>

**Recipients:** According to the UHSBV (University & Higher Education Statistics & Education Documentation Ordinance) your data is regularly transmitted during your studies to the data network of the universities at the Austrian Federal Computing Center. Furthermore, it is transmitted as part of the overall student record to Statistics Austria, the Austrian student body (Österreichische Hochschülerschaft) and the Ministry of Education, Science and Research for planning, control, supervisory and statistical purposes.

In order to organize a personalized course of study for you, your *p data* might as well be transmitted included in a list compiling course participants to contractually obliged external lecturers before the courses start.

Depending on the university course/study program you attend or your application for the participation in a mobility program, your *p data* (in extracts) may also be transferred to our cooperation partners, educational institutions within the framework of jointly established studies, to public and private

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<sup>5</sup> See § 1a E-Government Act (from 1.1.2020)

<sup>6</sup> Selected databases can independently collect and process your name and e-mail address for the provision of their services on the basis of corresponding framework agreements with us.

<sup>7</sup> Tasks of the universities, study law, information of the public

project partners and sponsors. For an overview of these third parties please contact the person responsible for your university course/study program or our data protection officer.

If you complete your studies by handing in an academic thesis (Master thesis) or dissertation which is assessed positive, the papers will be forwarded to the Austrian Library Network – including your p data – and, in the case of dissertations, additionally to the Austrian National Library (§ 86 UG).

If needed a transfer to third countries or international organizations occurs in accordance with Art. 49 (1) lit b or c GDPR.

**Storage period:** After completing your studies the *sector-specific personal identifier (bPK)* is deleted after two years at the latest. The p examination data is stored for 80 years (§53 UG), *examination records* and *assessment documents (in particular expert opinions, correction of written examinations and examination papers)* (§79 or 84 UG) for min. 6 months from the end of the examination<sup>8</sup> and *mobility applications* for 10 years (cf. §2g FOG) from the date of application.

Apart from this, your p (master) data is stored until the end of the statutory retention periods, e.g. according to the Austrian Commercial Code (UGB)<sup>9</sup>, contractually agreed periods within the scope of grants, the end of any foreseeable or pending legal disputes, other prescribed retention periods<sup>10</sup> and any objection to the receipt of information material and/or newsletters.

## Digital teaching and learning

In accordance with our legal mandate to implement new forms of teaching and learning, in particular distance learning, our courses are supported, among other things, by digital teaching, communication and administration platforms (learning management systems), fixed and mobile video transmission systems for live and/or on-demand streaming in lecture halls and seminar rooms, videoconferencing, digital whiteboards/collaboration tools, and other applications specified in the data protection section of the UWK website (<https://www.donau-uni.ac.at/de/universitaet/datenschutz.html#studienbewerber>), as well as additional program-specific applications<sup>11</sup>

In order to enable your participation in learning management systems, e.g. Canvas, your *name* and *contact data (e-mail)* are processed mandatorily. Failing to do so will stand in the way of fulfilling the continuing education contract with us.

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<sup>8</sup> Excluded from this are exams held via Moodle, see the storage regulations in the "Digital Teaching and Learning" section below.

<sup>9</sup> Company Code

<sup>10</sup> Decree of the Ministry of Social Affairs of May 24<sup>th</sup>, 2018, concerning the storage of training documents for health professionals

<sup>11</sup> Please also note the additional application-specific data protection declarations stored in the respective systems.

When you use our learning management system, Canvas, a session cookie (canvas\_session) is set. This cookie is necessary to manage your login and ensure the platform functions properly. The cookie is automatically deleted when you close your browser or log out.

For system security, for the maintenance of the network infrastructure by our system administrators, and for technical support for users, access to the Canvas platform is logged (log files). All other information you provide to create your personal profile is voluntary and can be changed or deleted by you at any time.

The transmission of content (exams—including, where applicable, photo records, blog posts, assignments, etc.) for the purposes of teaching and research is carried out in accordance with the instructions of the respective instructor and/or for the purpose of exchange with other course participants. To the extent that you upload works, personal data, or other protected materials belonging to third parties, you are personally responsible for complying with the applicable terms of use and framework conditions.

Moodle's integrated interfaces link necessary and useful systems for the study process, allowing them to collect and process your *name* and *e-mail address* for the provision of their services based on corresponding contracts with us. These are: "Turnitin" for the plagiarism check of written (final) papers, "EvaSys" for the evaluation of courses, "Pearson" to offer you ebooks in the context of distance learning and other services that are continuously updated<sup>12</sup>.

When attending courses with live and/or on-demand streaming and via video conferencing, your *picture/video* and *sound data* can be streamed or recorded in our legitimate interest and will be processed via our digital teaching, communication and administration platforms (e. g. Canvas, planet e-stream) or our media server. This data is available to other course participants, our scientific and administrative staff, including any third parties commissioned for digital processing, contractually obligated lecturers, as well as for reporting in extracts to the general public.

As far as the premises permit, an area can be set up in which the course attendance is also possible without your person being recorded. During video conferences, participants can join without turning on their camera. With regard to any picture/video and/or sound data created, you are not entitled to any financial compensation.

**Legal basis:** Art. 6 (1) lit b, c, e, f GDPR in conjunction with UG

**Recipients:** In order to carry out digitized courses, your *p* data will also be processed by IT service providers on a contractual basis and

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<sup>12</sup> See the list at: <https://www.donau-uni.ac.at/de/universitaet/datenschutz.html#studienbewerber> or contact the course instructor for additional course-specific information.

transmitted to them for storage. Our digital channels (website, social media pages, YouTube, media servers) might also publish excerpts from on-demand streams.

If a transfer to third countries or international organizations occurs it is pursuant to Art. 49 (1) lit c GDPR, or to our contract processors based on an adequacy decision of the EU Commission pursuant to Art. 45 (1) GDPR, or based on standard contractual clauses pursuant to Art. 46 (5) GDPR including any necessary additional measures.

**Storage period:** Live streams created during courses are only available at the time of the course. We store on-demand streams until fulfilled purpose. The profile set up on our digital teaching, communication and administration platform Moodle (incl. forums and learning materials) including the associated p data is currently available to you without limit in terms of lifelong learning due to the strongly varying study length of the students. You can delete the p data you have added voluntarily at any time. Moodle log files are automatically deleted after 6 months. Photo logs from online exams are also automatically deleted 6 months after the exam. Please find more information regarding the duration of the course-specific applications in the included specific privacy notices (terms of use).

## Admission tests for the Master's program in Psychotherapy

Based on a cooperation between the University of Vienna and the University for Continuing Education Krems (UWK) for the implementation of the admission procedure in accordance with § 71c of the Universities Act for the Master's program in Psychotherapy, personal data is processed in accordance with the GDPR. This includes, in particular, name, date of birth, the UWK identification number, and test-related identification features in the form of individual barcodes. The test documents are personalized for this purpose. Printing and personalization are carried out using external printing services within the scope of order processing. The provision of personal data is required for participation in the admission procedure; without the provision of data, participation in the admission tests is not possible.

After the test has been conducted, the final personal data of those participants who were actually present at the test will be transmitted to the service provider Coping (COPING OG, Psychologische Diagnostik & Personalentwicklung, Nußdorfer Straße 3, 3133 Traismauer, Austria) within 24 hours.

Coping acts exclusively as a processor in accordance with Art. 28 GDPR and processes personal data only on the documented instructions of the University of Vienna and the UWK.

Coping scans the data from the answer sheets and performs digital data entry. This is followed by a test analysis, in which the quality of the test items, the test sections, and the entire test instrument are checked and the test is evaluated in accordance with the specifications of the University of Vienna and the UWK. The test results are provided in digital form, in the form of an overall ranking as an Excel file and a results report (PDF).

After the examination, the tests are digitized and fully evaluated, including quality control, transfer of attendance data, and statistical evaluation in accordance with the specifications of the University of Vienna and the UWK. The statistical evaluation routines and algorithms used for

this purpose are shared by the University of Vienna and the University of Krems. The physical originals of the answer sheets are returned to the UWK. At the request of the participants, the original answer sheets, including the results reports, can be viewed in person at the UWK by prior appointment, but no later than three months after the test results have been announced.

To process participation and test fees, Stripe Technology Company Ltd. is used as a payment service provider. In this context, the personal data required for payment processing (name, payment information, transaction data) is transmitted to Stripe Technology Company Ltd. and processed there. Processing is carried out exclusively for the purpose of payment handling.

**Purpose of processing:** Personal data is processed for the purpose of organizing, conducting, analyzing, evaluating, and documenting admission tests, as well as providing the test results within the framework of the admission tests for the master's program in psychotherapy. In addition, personal data is processed for the purpose of payment transactions.

**Legal basis:** Art. 6 (1) lit c, e GDPR in conjunction with the tasks of universities, study law, and public information. Data processing by Stripe Technology Company Ltd. is carried out on the basis of Art. 6 (1) lit. b GDPR (performance of a contract or pre-contractual measures).

**Recipients:** Processing is carried out by Coping (COPING OG, Psychological Diagnostics & Personnel Development, Nußdorfer Straße 3, 3133 Traismauer, Austria) within the framework of order processing in accordance with Art. 28 GDPR. Processing by Stripe Technology Company Ltd. (One Wilton Park, Wilton Place, Dublin 2 D02 FX04, Ireland) is carried out within the framework of order processing in accordance with Art. 28 GDPR.

**Storage period:** The personal data processed in the context of the admission tests for the Master's program in Psychotherapy, including the overall rankings and test results, will be stored for a period of up to three years after completion of the respective admission procedure. The storage period is based on the need to ensure the proper execution and traceability of the admission procedure. Storage beyond this period will only take place if there are legal retention or documentation obligations or if the data is necessary for the assertion, exercise, or defense of legal claims.

## Your rights

To exercise your rights to information, rectification, deletion, data transmission, restriction of processing or revocation of consent or objection to the processing of your p data, please contact the above mentioned data protection officer.

If you have any complaints, please contact the Austrian Data Protection Authority (<https://www.data-protection-authority.gv.at/>).