

# Information on the processing of personal data within the framework of the HHU Companion App

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Heinrich Heine University Düsseldorf (hereinafter HHU) provides these data protection notes in order to fulfil its duty to supply information on the processing of personal data stated above pursuant to Arts. 13 and 14 of the General Data Protection Regulation (GDPR).

You can find further information in the HHU privacy statement (German only) (<https://www.hhu.de/datenschutzerklaerung>).

Please refer to the definitions in Art. 4 GDPR with regard to the terms “personal data”, “processing”, “controller”, “third party”, etc. used here.

In this privacy statement, the controller stated under point 1 provides information on the collection, processing and use of your personal data in the course of using the **HHU Companion App** (“app”).

**HHU Companion App** – a tool for creating a community of international students at HHU. The purpose of this digital community is to support students.

**plazz AG** – the contractor who provides the community app for use by HHU students. You can find the data privacy policy of the contractor at the following link: [Data privacy policy of plazz AG | developer of the Mobile Event App](#)

The target user group for this app largely comprises international students. Use by non-international students is not planned. In addition to the group of students involved, the personal data of lecturers and event organisers are also processed (see point 2.3 e). These data are described in detail in the following privacy statement.

If you have questions or feedback about the app, please contact us at the following e-mail address:

[companion-support@hhu.de](mailto:companion-support@hhu.de).

## 1. Contact details

The controller for the processing is HHU, a corporate body under public law (*Körperschaft des Öffentlichen Rechts*) supported by the State of North Rhine-Westphalia (NRW). It is represented by the President, Professor Dr Anja Steinbeck.

### Contact details of the controller

Heinrich Heine University Düsseldorf

Universitätsstr. 1  
40225 Düsseldorf  
Germany

Tel.: +49 211 81-10000

<https://www.hhu.de>

### **Contact for the processing**

Dr Stephan Hollensteiner  
International Office  
Heinrich Heine University Düsseldorf  
Universitätsstr. 1, Bldg. 21.02  
40225 Düsseldorf  
Germany

Tel.: +49 211 81-14107

E-mail: [international-office@hhu.de](mailto:international-office@hhu.de).

### **Contact details of the Data Protection Officer**

You can contact the official HHU Data Protection Officer by post at the address of the controller stated above or via the following means:

E-mail: [datenschutz@hhu.de](mailto:datenschutz@hhu.de)

Tel.: +49 211 81-13060

<https://www.hhu.de/en/about-hhu/organisation-and-bodies/central-university-administration/staff-units/data-protection-unit>

## **2. Information on the personal data processed and the purposes of the processing**

### **1. Information on the personal data processed:**

Within the framework of app usage, the following personal data are collected and processed. You can find information on the associated purposes in section 2.3.

a) All users:

1. The IP address is transferred; this is necessary for technical reasons
2. All entered profile data (user name\*/e-mail address\*/title/first name\*/last name\*/subject\*/intended degree/profile image/link to personal XING/LinkedIn user profile)
3. Chat messages – chat records are stored at the service provider, plazz AG, and on the end devices of users
4. Posts, comments and photos in forums
5. Title/first name/last name of the event organiser/lecturer

6. Contact data of the event organiser/lecturer
7. Favoured events
8. Push token – a push token will be transferred from the mobile end device when the user activates the receipt of push messages in the profile settings
9. “You search”/“You offer” tags for matching with mentors

Mandatory entries are marked with “\*”. It is not possible to register in the app and create a personal account without these entries.

b) App analysis by MATOMO, see below for description:

1. Two bytes of the IP address of the accessing system
2. The app pages/functions accessed
3. The saved actions
4. The time spent in the app
5. Number of app visits

## **2. The data from section 2.1 are processed for the following purposes:**

(1) Registration in the app:

If you wish to use the app, you must register with your e-mail address and a password you have chosen yourself, select a user name and enter your first/last name and subject. You can manage, edit or delete all your entries in the secure profile settings.

(2) Provision of interaction opportunities within the digital community:

- Chat function
- Forum
- Events
- Buddy/mentor matching

For detailed descriptions, please see Section 2.3.

The data are collected directly from you.

We collect and process your personal data in order to offer you all functions of the companion app. The data of all users are stored on servers. In addition, the data arising from use of the chat and events functions are also stored on the end devices of users. Heinrich Heine University has no access to chat records, etc.

The generated data are only utilised for services used within the app.

## **3. Description of the services**

### **a. Creation and use of a user account**

**Purpose:** If you wish to use the app, you need a user account. If you already have a user account, you can log in with your access data. If you do not already have a user account, you can create one in the app by registering.

As a registered user, your personal profile can be accessed by other users. In general, your full name and profile image are visible to others.

### **Categories of personal data:**

The following data are processed in the creation of a user account:

- Title (optional)
- First name/last name\*
- User name\*
- E-mail\*
- Password\*
- Subject\*
- Intended degree (optional)
- Link to personal XING/LinkedIn user profile (optional)
- Profile image (optional)

(\* mandatory entries)

**Data subjects:** Registered users.

### **b. Chat function**

**Purpose:** You can activate/deactivate the chat in the settings of your user account. You can contact and exchange information with other community members – both international students and International Office employees – via the chat function. Your message will be sent to your chat partner and stored at the service provider and on both end devices (sender and recipient). In the chat, your full name, profile image and a link to your user profile will be displayed to the chat partner.

**Categories of personal data:** Transfer of the IP address to enable chat responses to be sent to the end devices of users and your profile to be displayed to other users. The following categories of personal data are processed:

- Title/first name/last name
- Profile image
- Messages

**Data subjects:** Registered users.

### **c. Forum**

**Purpose:** Users also have the option of posting their questions and comments in forums. Every app user can see these posts, like them and comment on them.

**Categories of personal data:** The following categories of personal data are processed:

- Title/first name/last name
- User name
- Profile image

- Personal photo and/or text posts and comments
- Responses to posts and comments

All posts, comments, profile images and photos made available via the app are subject to copyright protection.

**Data subjects:** Registered users.

#### d. Events

**Purpose:** You can view dates and events scheduled by the International Office under Events. Users can “favour” events and save them in the companion app. These data are stored at the service provider and on your end device.

You can also access the detailed view of a programme item (event) by clicking on it. You have the option of receiving a push notification to remind you about the event 5, 15, 30 or 60 minutes before it starts.

**Categories of personal data:** Title/first name/last name and contact details of the event organiser/lecturer.

The information about favoured events will be linked with the user profile.

**Data subjects:** Registered users, lecturers/event organisers.

#### e. Receipt of push notifications

**Purpose:** The app offers the option of receiving push notifications for individual areas (news posts, events). You can configure this function and activate/deactivate the notifications via the settings of your smartphone or tablet.

**Categories of personal data:** A push token will be transferred from the mobile end device and stored on the server, enabling the system to send push notifications to that device.

**Data subjects:** Registered users.

#### f. Buddy/mentor matching (contact mediation)

**Purpose:** This feature helps users find relevant contacts more quickly. You can select any number of tags (properties) under “You search”/“You offer” and the app will present you with an overview of the best matches. Users must explicitly activate this function via matching on the profile page in the app by selecting the tags. You can end the matchmaking for your profile by deselecting the tags again. Communication between users is not moderated at all and employees of the International Office at HHU have no access to the communication.

**Categories of personal data:** The tags enable users to find each other and start a conversation. Information from purpose 2.2.d (chat function) is also processed within the framework of matchmaking.

**Data subjects:** Registered users.

## **g. Matomo analytics**

**Purpose:** In this app we use the open source software tool Matomo to analyse app usage. Analysing the data collected enables us to compile information about the use of the individual components of our app. This in turn helps us improve the app and its usability on an ongoing basis.

When individual pages within the app are accessed, the following data are stored:

- (1) The app pages/functions accessed
- (2) The saved actions
- (3) The time spent in the app
- (4) Number of app visits

You have the right to object to the collection and storage of your data for this analysis at any time with effect for the future. You can do this by changing the setting “Do you want to share your usage data?” under “Privacy” in your profile.

**Categories of personal data:** Transfer of the fingerprint of the device to enable analysis of the usage data by the analysis tool.

**Data subjects:** Registered users.

## **3. Legal basis for the processing purposes**

Your personal data are processed on the basis of the provisions of the GDPR, the State Data Protection Act and further applicable laws. The processing shall only be carried out for the purposes stated under Section 2.

The legal basis for the collection of the personal data is Art. 6 (1) e. GDPR. The processing occurs within the framework of the performance of tasks by the University pursuant to Art. 3 (6) of the Higher Education Act of North Rhine-Westphalia (*Hochschulgesetz NRW*).

## **4. Transfer of personal data**

With the exception of plazz AG, the company which provides the app, your personal data processed by HHU for the purposes stated under Section 2.3 are not transferred to third parties. However, we must point out that the IT departments or a service provider may gain access to the personal data stated under Section 2.2 within the framework of servicing and maintenance work.

Insofar as service providers are granted access to personal data, this shall occur on the basis of a contract pursuant to Art. 28 GDPR.

## **5. Duration of processing/data erasure**

HHU shall store your personal data only for as long as is necessary to fulfil the purposes pursuant to Section 2.3, contractual obligations or statutory obligations.

The log files shall be erased 90 days after fulfilment of the contractual obligations between HHU and plazz AG.

If your app account is inactive for a period of 6 months, the personal data shall be erased. Advance e-mail notification of the closure of the account and erasure of your personal data shall be provided.

You can also close your account yourself at any time by deleting your user account via the profile settings and then deleting the app.

## 6. Your rights as the data subject

As the data subject, you may assert the rights granted to you under the GDPR at any time:

- The right to information about whether your personal data are processed and, if so, which data (Art. 15 GDPR). The restrictions set out in Art. 12 of the Data Protection Act of the State of North Rhine-Westphalia (*Datenschutzgesetz NRW – DSG NRW*) shall apply
- The right to demand rectification or completion of the data concerning you (Art. 16 GDPR)
- The right to erasure of the data concerning you pursuant to Art. 17. GDPR. The restrictions set out in Art. 10 DSG NRW shall apply
- The right to demand restriction of the data processing pursuant to Art. 18 GDPR
- The right to object to any future processing of the data concerning you pursuant to Art. 21 GDPR
- The right to withdraw consent at any time. This shall not affect the lawfulness of processing based on consent before its withdrawal (Art. 7 (3) GDPR)

In addition to these rights, you also have the right to lodge a complaint with a supervisory authority (Art. 77 GDPR). The supervisory authority responsible for HHU is the

State Commissioner for Data Protection and Freedom of Information for the State of North Rhine-Westphalia

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40213 Düsseldorf  
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We would however be grateful if you could contact our Data Protection Officer before lodging a complaint with the supervisory authority. We will do our best to solve the issue.

## 7. Validity of the data protection notes

We reserve the right to amend these data protection notes where necessary to ensure compliance with amendments to relevant laws or regulations, or to better meet your needs. The latest version of these data protection notes as published by HHU shall apply.