

Dear visitors, users and legal guardians,

This data protection notice provides information on the processing of personal data that is automatically collected by HPI from every visitor to the website at <https://hpi-schul-cloud.de/> (A). It further provides information on the processing of data that is collected on behalf of participating schools when they use HPI School Cloud (B).

HPI School Cloud creates the technical foundation for teachers and students to use modern digital teaching and learning content in every subject. Further information on the project is available at: <https://hpi.de/open-campus/hpi-initiativen/hpi-schul-cloud.html>.

Personal data is information that relates to an identified or identifiable person. This primarily includes information that allows conclusions to be drawn about someone's identity, for example, their name, telephone number, address or e-mail address. Statistical data that is collected, e.g. during a visit to the website, and that cannot be linked to a person does not fall under the term personal data.

A. Data processing by HPI when accessing the website

Each time someone visits the website <https://hpi-schul-cloud.de>, access data is automatically transmitted by the browser to enable access to the website. The access data includes, in particular, the IP address of the requesting device, the date and time of the request, the address of the website that is accessed and the requesting website as well as information about the browser used and the operating system. The processing of this access data is necessary to enable access to the website and to guarantee the permanent operability and security of HPI systems. This access data is stored for 14 days and archived after subsequent anonymisation.

The website also uses its own cookies, i.e. small files that are stored on visitors' devices and contain information for exchange with HPI's systems. Most browsers are set to accept cookies by default. However, visitors can adjust their browser settings so that cookies are rejected or only stored with prior consent. Without cookies, however, it may not be possible for all offers and functions of the website to function properly. The cookies used on the website are used in particular for login authentication, load balancing and to note that information placed on the website has been displayed so that it does not have to be presented again during a subsequent visit to the website. In this way, we wish to enable a more comfortable and individual use of the website.

When **non-registered visitors** access the website, the Hasso Plattner Institute (HPI), Prof.-Dr.-Helmert-Str. 2–3, 14482 Potsdam, datenschutz-fragen@hpi-schul-cloud.de is responsible for the aforementioned processing operations. For all questions regarding data protection, the HPI data protection officer can be contacted at datenschutzbeauftragter@hpi-schul-cloud.de (the legal basis for the processing is the aforementioned legitimate interests of HPI).

In the case of **registered users**, the aforementioned data processing takes place under the data protection responsibility of the schools that commission HPI as a technical service provider, as described below.

B. Data processing by schools as data controllers when using HPI School Cloud

When using HPI School Cloud, the contact person and responsible party for the processing of personal data in accordance with the EU General Data Protection Regulation (GDPR) is the school management of the respective school you attend/your child attends.

If you have any questions about data protection in connection with the use of HPI School Cloud by the school, you can also contact the school's data protection officer at any time. He/she can be reached at the e-mail address given in the list (keyword: "Attn. data protection officer").

German International School
E-mail: datenschutz@ds-doha.de

CONSENT TO DATA PROCESSING IN HPI SCHOOL CLOUD

We collect data principally on the basis of your consent.

With this in mind, HPI School Cloud implements a consent concept. We would like to point out that without your consent to use HPI School Cloud (Data Protection Policy/Ordinance of Use), teaching is not possible during a phase of online instruction and no platform is available to your child for digital projects. In principle, there is no obligation to use HPI School Cloud. You can revoke your consent at any time. A revocation does not affect the lawfulness of the processing carried out on the basis of the consent until the revocation. In the event of revocation, we will immediately delete the personal data stored on the basis of the consent, unless there is a legal reason to retain it or you still wish to access the stored data beforehand.

For students under the age of 18, consent must be given by a parent with legal guardianship. After reaching the age of 18, the student will be asked to give his or her own consent.

REGISTRATION AND COLLECTION OF PERSONAL DATA

Registration is principally provided in electronic form on the website: <https://hpi-schul-cloud.de/>.

The collection of personal data is limited to a necessary minimum. The following information is required for registration with HPI School Cloud:

- First and last name
- E-mail address
- Class
- Date of birth

This information is stored so that users can access HPI School Cloud using their email address and the password they have chosen themselves.

USE OF HPI SCHOOL CLOUD

In addition, the following data is collected when using HPI School Cloud:

- User name, user ID and role
- Information on the consent of the user or the legal guardian
- School data (school ID, name, address, state)
- Course data (course identifier, course group, description, dates, deadlines)
- Files uploaded by users to the “My Files” area.
(content data and metadata, e.g. file name, file path, file size and time stamp)
- Task data (task identifier, comments; processing status in %; team members)
- Support requests (subject, message)
- Usage data/log files (shortened IP addresses, clicks, timestamps), to the extent necessary for the software development
- Content and metadata exchanged via the chat and web conferencing function.

PROCESSING PURPOSES

The processing of data in HPI School Cloud takes place in order to enable the use of HPI School Cloud as a learning platform, i.e. the provision of learning software as a web platform including the creation of interfaces to school portals, web-based services and content.

Specifically, the data is processed for the following purposes:

- Provision of a cloud-based learning platform which users can log in to from various devices
- Retrieval of suitable learning content via the so-called Learning Store
- Creation of a virtual classroom through which learning content is delivered, assignments are managed and the other purposes of HPI School Cloud are combined
- Calendar and reminder function
- Data file management
- Provision of collaboration tools (chat function, web conference, teamwork within the school as well as with other schools and/or external experts)
- Presentation of learning progress
- Supporting students in the use of interactive materials provided by teachers
- Processing support requests
- Software development based on anonymised usage data (to avoid risks for users and to improve the functionalities of the Cloud)
- Management of any consent requested from parents and users
- Provision of collaboration tools (chat function, teamwork within the school as well as with other schools and/or external experts).

HPI School Cloud is used to communicate and manage learning content and to support the educational mission of schools. HPI School Cloud is expressly **not** intended for the internal management of student data for other purposes. In particular, HPI School Cloud does not include any functions for recording grades, evaluating students or monitoring attendance. HPI School Cloud is also not a digital class attendance register.

CHAT AND WEB CONFERENCE FUNCTION OF HPI SCHOOL CLOUD

Within a team, a chat can be added in addition to file exchange, group appointments and group news. This makes it possible to send team-wide messages, provided that the school's administrator has enabled the use of the chat function.

As part of HPI School Cloud, a chat is integrated that allows team-wide messages within the "Teams" function. The open source software "[Rocketchat](https://rocket.chat/)"¹ is used for this purpose, which is individually adapted by HPI and is operated and administered by HPI itself.

In addition, there is the possibility of using web conferences for the transmission of video and audio content within the "Teams and Courses" activity area. The web conference can be started by the owners, administrators and instructors in the "Teams" area and by the teachers in the "Courses" area. The open source software "[BigBlueButton](https://bigbluebutton.org/)"² is integrated for web conferences, and also operated and administered by HPI itself.

Within the framework of HPI School Cloud, the existing chat based on the "Rocketchat" software will soon be replaced by a new chat. This will allow messages to be sent to the group of people in the respective activity area within "Teams, Courses and Classes". Permissions for either teachers alone or also students to write in these conversations is always determined by the owner of the respective activity area. Conversations can be initiated with users of one's own school who do not belong to the same activity area, provided that the school has activated this. Participation in such a conversation always requires an invitation from the initiator of the conversation and the acceptance of the invitation by the invited persons. The open source software "[Matrix Chat](https://matrix.org/docs/spec/)"³ is used for this purpose, which is individually adapted by HPI and is operated and administered by HPI itself.

The data processed within the framework of the chat and the web conference function are not passed on to third parties. There is also an encrypted network connection between the application operated by HPI and the client of the end device (SSL encryption).

HELP DESK

The help function of HPI School Cloud (symbolised by the question mark) provides you with the option of contacting the school administrators appointed by the school via a contact form. In the predefined fields, you can describe the problem, the current situation and the target situation, and choose one of several predefined categories. In addition, a user ID is transmitted so that an allocation to your account is possible. The school administrators will also be shown the first and last name stored in your user account, but no other personal data. The school administrators will try to solve the problem or forward this to HPI administrators, who will also only be shown the aforementioned data. The answer to your support request will be sent by the system to the e-mail address stored in the user account.

The data collected when using the contact form will be automatically deleted after your request has been fully processed, unless your request is still required for the fulfilment of contractual or legal obligations (see section "Storage period").

¹ <https://rocket.chat/>

² <https://bigbluebutton.org/>

³ <https://matrix.org/docs/spec/>

DISCLOSURE OF PERSONAL DATA/RECIPIENTS

The personal data generated when using HPI School Cloud is processed exclusively within the European Union.

The collected data is transferred to HPI as the schools' service provider. HPI is bound by a contract in accordance with Art. 28 of the GDPR and article 28 of the Qatar Law No. 13/2016, On Data Protection to process data on behalf of the participating schools in accordance with instructions. If data is passed on to other service providers, they may only use the data to fulfil their tasks. The service providers are carefully selected and commissioned so that there is no breach of data protection. They are contractually bound to instructions, have suitable technical and organisational measures to protect the rights of the data subjects and are regularly inspected. An up-to-date [list of subcontractors](#)⁴ is always available online.

Subcontractors for outsourcing the data

For technical or organisational reasons, HPI reserves the right to subcontract hosting services. The following subcontractors are currently used for hosting:

- dataport AöR, Altenholzer Straße 10-14, 24161 Altenholz, Germany, ("dataport")
dataport can use other subcontractors to ensure smooth hosting. In addition, HPI currently uses the following providers, for example, for the storage of uploaded user data, backups or for the Learning Store:
- STRATO AG, Pascalstraße 10, 10587 Berlin, Germany
- Hetzner Online GmbH, Industriestr. 25, 91710 Gunzenhausen, Germany

Learning Store: External learning content through content providers

For the use of interactive content from external providers (e.g. textbook publishers), pseudonyms are sometimes used. These are only used to record learning progress (e.g. user 123456 has completed task X). The content providers, on the other hand, do not receive any directly personal data (e.g. names, contact details, etc.) and therefore cannot draw any direct conclusions about the actual users of HPI School Cloud. The data on the use of digital offerings (e.g. test questions) can be analysed anonymously by the content providers and used to improve their content and products. The following content providers currently receive pseudonymised usage-related data from HPI on the basis of cooperation agreements:

- Bettermarks GmbH, Skalitzer Str. 85, 10997 Berlin, Germany, ("Bettermarks")
- neXenio GmbH (Nexboard), Charlottenstr. 59, 10117 Berlin, Germany, ("neXenio")

Disclosure due to legal obligation

Beyond the cases described above, your school and HPI will not pass on any personal data to third parties unless the disclosure is made in fulfilment of a legal obligation (e.g. as part of a criminal investigation), as determined in article 19 of Qatar Law No. 13/2016, On Data Protection.

⁴ <https://s3.hidrive.strato.com/schul-cloud-hpi/default/Dokumente/Empfaenger.pdf>

STORAGE DURATION

In principle, personal data is only stored in HPI School Cloud for as long as is necessary to fulfil the purposes for which the data was collected. After that, the data is deleted immediately, unless the data is still required due to legal storage obligations.

HPI will only correct, delete or restrict the processing of the data which is subject to the contract following documented instructions from the respective responsible school. The deletion of data in response to a request by the data subject shall also only take place in consultation with the schools that are responsible. During the term of the contractual agreements between the respective school and HPI, users also have the option of accessing and deleting the files and folders they have stored in HPI School Cloud at any time. The deletion of student accounts is possible by the school administrators.

In its order processing contract, HPI commits to the schools to keep the data for 90 days after the end of the order processing contract with the schools so that the users of HPI School Cloud can download their data. After the expiry of the 90-day storage period, HPI will block all user accounts of the client and delete or return all personal data within a further 90 days, provided that the deletion of this data does not conflict with any statutory storage obligations of the processor or other legal grounds. The data protection-compliant deletion shall be documented and confirmed to the data controller upon request.

YOUR RIGHTS

Registered users of HPI School Cloud should contact the relevant school to exercise their rights. The contact addresses of the participating schools can be found in the following [list of contact addresses⁵](#). Otherwise, visitors to the website should direct their enquiries to Hasso Plattner Institute using the contact details given at the beginning of this document. This also applies if you would like to receive copies of guarantees proving an adequate level of data protection.

You have the right to receive information about the processing of your personal data at any time. If data is incorrect or no longer up to date, you have the right to have this data corrected. You can also demand the deletion of your data. Please inform us well in advance. If deletion is exceptionally not possible due to legal regulations, the data will be blocked so that it is only available for this legal purpose. You can also have the processing of your personal data restricted if, for example, the accuracy of the data is in doubt. You also have the right to data portability, i.e. that you receive a digital copy of the personal data provided by you upon request.

You have the right to revoke consent once given at any time. As a consequence, the data processing, which was based on this consent, will no longer be continued in the future. The revocation of consent does not affect the lawfulness of the processing carried out on the basis of the consent until the revocation.

Insofar as your data is processed for the protection of legitimate interests or for the performance of a task carried out in the public interest or in the exercise of official authority, you have the right to object to the processing of your data at any time on grounds arising from your particular situation.

Finally, you have the right to lodge a complaint with the competent data protection supervisory authority. You can exercise this right at a supervisory authority in the member state of your place of residence, your

⁵ <https://s3.hidrive.strato.com/schul-cloud-hpi/default/Dokumente/Kontaktadressen.pdf>

place of work or the place of the alleged infringement.

DATA SECURITY

HPI maintains up-to-date technical and organisational measures to ensure data security, in particular to protect personal data from risks during data transmission and from third parties gaining knowledge. These measures are adapted to the current state of the art. Data entered on the website is transmitted in encrypted form (Transport Layer Security). A description of the other technical and organisational measures for HPI School Cloud can be found in our [TOMs](#)⁶.

CHANGES TO THIS DATA PROTECTION NOTICE

Occasionally, this data protection notice will be updated, for example, if the functionalities in HPI School Cloud change or if the legal or regulatory requirements change.

⁶ <https://s3.hidrive.strato.com/schul-cloud-hpi/default/Dokumente/TOMs.pdf>