

-- Please note that in principle the German version applies and that the translation is only offered as a service for better understanding. --

Privacy Policy for the FH SWF App

1. Controller

a) Controller for data processing within the FH SWF App

(Functions: student ID, semester ticket, cafeteria menu, calendar, mail, library card, grades, links, and e-learning Moodle) as well as for the login barrier:

Fachhochschule Südwestfalen
Baarstraße 6
58636 Iserlohn

The data-processing unit is:

Dezernat 8
Baarstraße 6
58636 Iserlohn
digi.help@fh-swf.de

b) Responsibility of UniNow GmbH

Responsible for the modules Support Chat, Career Portal, and the areas of product and usage analysis as well as error and performance monitoring:

UniNow GmbH
Dorotheenstraße 10
39104 Magdeburg
+49 391 5054670
info@uninow.de

Contact for data protection:

datenschutz@uninow.de

2. Type and Purpose of Data Processing

The South Westphalia University of Applied Sciences aims to digitalize the student ID, semester certificate, library card, and semester ticket. For this purpose, the campus app of UniNow GmbH has been implemented as a white-label version under the name "FH SWF".

This app allows students to access their student ID, library card, and the *Deutschlandsemesterticket* (ticket function) through a central application. It also allows the borrowing of library media and supports organizing everyday student life by retrieving information from university websites.

When activating or using the ID function, personal data is collected, stored, linked to the user account, regularly validated, and made available for retrieval within the app to enable the use of university and third-party services.

Login credentials are stored locally on the device after the first login. We recommend activating the PIN lock in the app settings, which ensures encrypted storage of login credentials and all personal data.

The app does not require location access for normal use. In the Career section, when searching for nearby job offers, users may optionally allow location access. Smartphone settings allow granting permission once or always when the app is used.

The FH SWF app may display or link to content/services of third parties (e.g., embedded websites, news, links, external apps such as navigation apps). For these services, only the terms of use and privacy policies of the respective providers apply. The South Westphalia University of Applied Sciences has no influence over this.

For statistical purposes (e.g., monthly number of active users), module accesses and interactions are counted using a randomly generated device ID. These statistics are not linked to personal data. Analytics data is processed internally by UniNow and not shared with third parties.

In the app settings, users may optionally create an additional UniNow account (UniNow is the app provider). This account allows synchronization between multiple devices. If synchronization is not needed, account registration can be skipped.

3. Categories of Personal Data, Data Subjects, and Storage Duration

The data listed is retrieved and processed by UniNow GmbH from a server of the university.

Upon each use of the FH SWF app, UniNow GmbH automatically collects the following data from the student's device:

1. Browser type and version
2. Operating system and version
3. IP address (anonymized and shortened in logfiles)
4. Date and time of access

The temporary processing of the IP address is necessary to display the content on the device. The anonymized storage in logfiles ensures the functioning of the app, optimization, and IT security. No storage takes place beyond what is necessary.

When activating the ID function, the following university data is retrieved and displayed in the app:

- First name
- Last name
- Validity period of the ID/ticket
- Email address*
- Photo hash (photo is stored only locally on the device)
- Student ID number
- Date of birth
- Role ("Student")*
- Library card number
- schacPersonalUniqueCode*

These data are transmitted via API/database (hosted by the university) to UniNow and displayed for the student after login via Shibboleth.

Data marked with an asterisk (*) are stored in the UniNow account system.

Backups made by UniNow are stored for a maximum of 30 days and deleted automatically afterward. Backup tapes are released for overwriting after this period.

No additional copies of the data are created without the knowledge of the university, except for backups required for secure data processing or where mandated by law.

4. Legal Basis of Data Processing

Use of the app is voluntary. The ID function is an optional feature.

Processing of personal data is based on the student's explicit consent pursuant to Art. 6(1)(a) and Art. 7 GDPR. Consent may be withdrawn at any time with future effect. Previous processing remains lawful.

5. Recipients of Personal Data

Recipient: UniNow GmbH, acting as a data processor under Art. 28 GDPR.

Data processing takes place exclusively within EU/EEA countries.
No data transfer to third countries occurs.

6. Rights of Data Subjects

You may exercise the following rights at any time with the data-processing authority:

- Withdraw consent (fully or partially) with future effect
- Request access to your stored personal data
- Rectify incorrect or incomplete data
- Request deletion or restriction of processing
- Object to processing
- Data portability (your data will be provided in a structured, commonly used, machine-readable format)

No automated decision-making or profiling according to Art. 22 GDPR takes place.

Questions or complaints may be directed to:

Data Protection Officer

Fachhochschule Südwestfalen
Baarstraße 6
58636 Iserlohn
datenschutzbeauftragter@fh-swf.de

Alternatively, you may contact the responsible supervisory authority:
Landesbeauftragte für Datenschutz und Informationsfreiheit Nordrhein-Westfalen
(Website: ldi.nrw.de)