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## Data Protection Information: TUWEL

Data protection and ensuring it are important concerns at TU Wien. Personal data are processed in strict compliance with the principles and requirements set forth in the GDPR<sup>1</sup> and the Austrian Data Protection Act, DSGVO<sup>2</sup>. TU Wien only processes those data required for the purposes intended and at all times endeavours to guarantee the security and accuracy of the data.

### Controller:

Rectorate of TU Wien

Karlsplatz 13

1040 Vienna

### Data protection officer:

Mag. Christina Thirsfeld

TU Wien, Karlsplatz 13/018, 1040 Vienna

[datenschutz@tuwien.ac.at](mailto:datenschutz@tuwien.ac.at)

### Contact:

Dr.techn. Gergely Rakoczi

Gußhausstraße 28, 1040 Vienna

[support@tuwel.tuwien.ac.at](mailto:support@tuwel.tuwien.ac.at)

### Purpose of data processing

TUWEL (acronym for "TU Wien E-Learning") is the central learning platform at TU Wien and is based on the open source software Moodle. The platform allows teaching staff, employees and students, as well as visitors to and partners of TU Wien, to create and edit online courses together. TUWEL supplements the TISS information system with online course management functionalities for electronically supported courses. Teaching staff and students at TU Wien can supplement their courses with online resources, countless useful activities, submission tools, forums, calendars, feedback cycles, integrated communication tools, etc. To check their authorisation to view, use or edit content on the platform, all users have to log in to the platform using their personal access data. User master data must be stored so that learning elements created in the platform can be assigned to these users for ongoing further processing.

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<sup>1</sup> General Data Protection Regulation

<sup>2</sup> Data Protection Act (DSG)



## Legal basis for data processing

This use of personal data is based on Article 6 par 1 (e) (performance of a task in the public interest) GDPR in conjunction with § 3 of the 2002 University Act

## Category of recipients of the personal data

For all users (apart from the accounts of visitors to and partners of TU Wien), TUWEL retrieves and synchronises the following personal data from the TISS information system, whenever a user logs in:

- First name
- Surname
- Matriculation number
- E-mail address
- Gender
- Avatar
- Role (course administrator, student, tutor)

## Additional personal data saved in TUWEL:

- User name within TUWEL
- Date and time the course was last accessed
- Date, time and type of access to the activities and study materials of courses on which the user is enrolled
- Course enrolment (date, role in the course, enrolment type, association with faculty/institute)
- Assessments received and/or awarded for the user's registered courses
- Data on learning activities and study materials (file submissions, test attempts, assessments, date, feedback, access, attendance, group allocations, number of attempts, appointments, Wiki entries, completion data)
- Communication data (written and read forum posts, announcements, list of contacts, chat messages, polls, comments)
- Information (name, date, time and comment) when a data request has been made for processing personal data
- Information (name, date, time) regarding acceptance of TU Wien user rules
- Personal profile fields, if completed voluntarily by users: city, country, avatar, personal interests, website, ICQ, Skype, AIM, Yahoo, MSN, institution, service department, phone number, mobile number, address, XMPP IM, blog posts



## Recording log files and cookies

Every time you visit TUWEL, it automatically records data and information from the computer system of the calling computer. The following data is collected and noted:

- Date and time of access
- The user's full name
- If applicable, the name of the user affected (e.g. a member of teaching staff accesses a student's assessment)
- Event context (e.g. course or core system)
- Component (e.g. TUWEL activity, TUWEL study materials, etc.)
- Technical event name
- Description for the technical event name
- Origin (web or cli)
- IP address of the computer making the request

Log files contain the above data so that an association can be made with a user or a learning context. The legal basis for storing data and log files is Article 6 par 1 (f) GDPR. The data is stored in log files to ensure the functionality of the learning platform. The data is also used to keep track of learning progress on online courses. The data is not evaluated for marketing purposes in this context. Only TUWEL administrators have access to log files.

We also use "cookies". Cookies are small text files sent by our web server to the user's browser during a visit to our webpages, and stored on the computer for later retrieval. Cookies contain a characteristic string of characters that enables the browser to be uniquely identified the next time the learning platform is accessed. We only use "session cookies" (also known as temporary cookies), that is, those that are only stored temporarily, for as long as you are using one of our webpages. The following cookies are set:

- Session cookies (ID)
- JavaScript cookies
- Matomo/Piwik cookies for statistical analysis

The collected usage data – apart from those cookies used to store data in connection with an active login – does not allow any conclusions to be drawn about the user. None of this anonymously collected usage data is merged with personal data, and it will all be deleted immediately after the end of the statistical evaluation. Once the session concludes, all cookies are deleted as soon as the user ends the browser session. On our webpages, we also use cookies that make it possible to analyse the browsing habits of users. The legal basis for processing personal data using cookies is Article 6 par 1 (f) GDPR. The legal basis for processing personal data using cookies required for technical reasons is Article 6 par 1 (f) GDPR. The cookies are used in particular to determine frequency of use and the number of users of our learning platform, to continue to be able to identify the computer being used when visiting our website and switching from one of our sites to another, and to establish when the visit is over. This tells us which areas of our websites our users have visited, as well as which other websites.

The purpose of using technically necessary cookies is to make it easier for users to utilise the websites. Some of the functions of our website cannot be provided without using cookies. For these functions, it must also be possible to recognise the browser after the user has switched websites.

In TUWEL, it is possible to use the collaborative online editor "Etherpad". This is an open source solution that is both stored and hosted solely on the TU Wien servers. When using Etherpad, the name of the author, the exchange of chat messages between authors, the text content added by the authors in Etherpad and a session cookie are stored (for a period of 2 hours).



## Performance monitoring and profiling

To ensure system performance and further optimization of TUWEL, the performance monitoring and profiling service from Tideways (<https://tideways.com/>) is used. For this purpose, anonymized data about the performance of the TUWEL application is collected. In addition, contact data of TU Wien employees who use the Tideways tool for performance monitoring and profiling are transferred to Tideways for contract processing and support requests.

## Uploading learning materials

Documents can be uploaded to TUWEL for learning purposes (e.g. study materials). If using the MS OneDrive connection to do this, documents must only be uploaded via your TU Wien account.

## Precautionary measures used to protect data stored with us

To ensure that the processed personal data is protected against manipulation, loss or misuse, extensive technical and organisational measures are taken and regularly reviewed and adapted to reflect advances in technology.

Almost all personal user data is stored and processed within the learning platform. Selected online courses require data to be passed to third parties for learning and teaching purposes. This is activated by the teaching staff. Data is disclosed to:

- Möbius Assessment, MapleSoft (disclosure: e-mail address and internal login name for user identification, as well as assessments for completing learning assignments)  
Purpose: maths learning assignments
- Zoom, Zoom Video Communications (disclosure: e-mail address and internal login name for user identification)  
Purpose: communication via web meetings during online courses

Teaching staff can use the "Brickfield Accessibility Starter Toolkit", which is integrated into Moodle, to check accessibility. No personal data is disclosed here.

## Category of recipients of personal data

TUWEL assists teaching in the context of the objectives of TU Wien. It is therefore necessary, and in keeping with the meaning and purpose of the platform, for users to be able to recognise one another within online courses so that they can interact during the learning process. TUWEL therefore has a list of participants in every online course and makes use of integrated role management to control access to course documents and course information using different roles that are defined system-wide (course manager, tutor with/without editing rights, course creator, visitor, etc.).

## Your rights in connection with personal data

As data subject of such data processing, you have the following rights in relation to TU Wien:

- the right to information
- the right to rectification
- the right to erasure
- the right to restriction of processing of your data
- the right to data portability





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Moreover, as data subject you have the right to complain to the data protection authority about any allegedly inadmissible data processing or about any failure on our part to fulfil our obligations under the GDPR.

31<sup>st</sup> march 2022

