

Information about Data Processing and Data Transfer

A.

The entity responsible for the described data processing is:

University of St.Gallen
Dufourstrasse 50
CH-9000 St.Gallen
Mrs. Yvonne Klein
+41 71 224 21 11
innoteach@unisg.ch

in connection with the mandatory use of the electronic cloud-based entity CANVAS

B.

The information of natural persons is mandatory under the Data Protection Act of the Canton of St.Gallen and occurs due to the obligatory usage requirement of electronic entities for natural persons. The data processing results from the university's obligation to ensure the fulfillment of the university-legislated mandate. The justification for this form of data processing is your voluntary enrollment or your voluntary signing of an employment contract, thus implying consent. The use of CANVAS is based on official approval. This information comprises three [3] pages.

C.1. DPO Contact Information / Data Protection Information Office

Switzerland: datenschutz@unisg.ch
EU: RA Frank Diem fdiem@diempartner.de

C.2. Legal Basis for Data Processing

University Act (UG), [sGS 217.1](#)
Personnel Act (PersG), [sGS 143.1](#)

C.3. Type of Collection and Data

Personal data are initially fed into CANVAS by HSG's own systems namely UniT/ Profile Manager/ Info Sheet Application and partially supplemented by information you enter to Canvas yourself. The data is classified as both non-sensitive and sensitive.

Mandatory:

First Name (incl. Any additional first names)	Last Name
User-ID	Language
University	Browser Language
IP-Address	Country

A course info sheet is mandatorily created by the lecturer but does not represent personal data. The PDF generated from the Info Sheet Application (HSG's own tool) is made available on Canvas.

Mandatory (if decided by the University [Lecturers]):

Discussion Comments / Discussions Submitted Content	Assessment Results
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Optional (User decision):

Gender	E-Mail (private)	Notifications
Mobile Number	Social Media Accounts	Picture

Optional (User decision if the University provides for this [Lecturers]):

User videos / Audios

The product CANVAS you are using is sourced from a supplier (third party):

Instructure Global Ltd
Rivington House, 82 Great Eastern St
London, EC2A 3JF
- United Kingdom -

The supplier is contractually bound as a data processor through a data processing agreement (DPA). All data is thus accessible to HSG and the data processor. There is a transfer of your data by the data processor to third parties (independent legal entities or subsidiaries) as sub-data processors for the purpose of providing support services.

A. Area: Service Infrastructure, Logging, Hosting and Networks for Content Delivery

Amazon Web Services Amazon CloudFront Splunk, Inc.

B. Area: Service

Khoros, LLC Looker (google: Google Cloud) Blue (Evaluation Tool)
Respondus

C. Area: Support

CloudApp (JING) Citrix Systems, Inc. Salesforce. com, Inc.
Sharpen Technologies, Inc Momentive, Inc. (GetFeedback by Momentive.ai)

D. Area: Customer Support, Account Management, Implementation, Technology, Security and Professional Services

Instructure, Inc. Instructure Global Limited Instructure Hungary Kft

C.4. Purpose of Processing Personal Data

The purpose of data processing of students, lecturers, specific employees is primarily to enable the completion of university education, the conduct of test series in the entity and community courses, and to determine usage behavior in CANVAS (using Looker) specifically:

«New Analytics» for authorized lecturers / teaching assistants / program directors / executive education / P&P / account administrators

The evaluation is always only on the course level to:

- Determine students' learning progress
- Develop further learning offers
- Recommend learning materials
- Identify learning difficulties
- Identify tools not effectively used

«Admin Analytics» for account administrators

The evaluation is on the account level to:

- Determine students' learning progress
- Develop further learning offers
- Recommend learning materials
- Identify learning difficulties
- Identify tools not effectively used
- Make statements about usage across multiple courses/ semesters
- Ensure compliance rules

C.5. Countries and Locations Where Data is Stored

Service Area

EU (Ireland and/or Germany)

Area: Customer Support for HSG Administrators at the Supplier

USA

C.6. Duration of Storage

Your stored data as well as anonymous data are generally kept indefinitely. Please note the options according to section C.7. Personal clear data in connection with support services are stored for 48 hours and then automatically anonymized. Personal data at Google (subprocessor Looker) are deleted after 24 hours.

C.7. Information on the Rights of Affected Persons

You can assert your rights with a message to: innoteach@unisg.ch

- Right to information
- Right to correction or amendment
- Right to data portability
- Objection

Complete "deletion" can only be requested after deregistration/ leaving HSG. If this right and the right to "restriction of processing" are exercised before this time, an implementation obstacle arises. Note the options according to section C.8.

C.8. Right to Complain to Authorities

Data Protection Authority Canton St.Gallen
Government Building
9001 St.Gallen
+41 58 229 14 14
datenschutz@sg.ch

C.9. Automated Decision Making and Profiling

No personal data is collected or centrally merged for the purpose of behavior control or prediction profiling. Automated decision-making does not take place.

C.10. Cookies and Web Tracking

When using Canvas, no web tracking takes place. When using Canvas, Infrastructure sets cookies which are necessary for technical operation or functionality.

C.11. Additional Information

This is a translation of document TIL-ANL-100001, version 1.0. Only the German version is legally binding; Art. 147 of the University Statutes applies (US; [sGS 217.15](#)).