

Information sheet on data protection in accordance with Articles 13 and 14 of the General Data Protection Regulation (GDPR)

Data protection information concerning the processing of your data in connection with contact tracing for COVID-19 infections

We, Osnabrück Student Services, use the luca system to record contact information of our guests to the dining halls and cafeterias for the purpose of complying with our documentation requirements and supporting contact tracing for COVID-19 infections.

This information sheet informs you about the data that we, the controller, record or provide when transmitting contact data via the luca system; how we save and process your personal data; and your rights as a data subject in respect of your personal data.

Who is responsible for data processing and who can you contact for further information?

Within the meaning of data protection legislation, responsibility lies with the
Studentenwerk Osnabrück
(Osnabrück Student Services)
Institution under public law
Ritterstraße 10
49074 Osnabrück
Germany

Email: info@sw-os.de
Phone: +49 541 331070

You will find more information about us on our website, particularly in the Legal Notice:
<https://www.studentenwerk-osnabrueck.de/de/impressum.html>

You can contact our Data Protection Officer at
Osnabrück Student Services
FAO Data Protection Officer
Ritterstraße 10, 49074 Osnabrück, Germany
Email: datenschutz@sw-os.de
Phone: +49 541 33107 24

Collection of personal data

For the purpose of complying with our documentation requirements and supporting contact tracing for COVID-19 infections, we collect your personal data when you check in to our location.

Personal data is any information relating to an identified or identifiable natural person.

This check-in and the associated transfer of your personal data to us is done through the luca service in one of the following ways:

- Use of the luca app
- Use of the luca web app
- Use of the luca badge
- Use of the digital luca contact form

Check-in via the app can be done by either you scanning our QR code or by us scanning your QR code. If you choose to scan our QR code, you will need to switch on the camera of your device. However, only the shot of the QR code is saved. No other new data is collected. If you register with us via the contact form in the browser, the contact data described below will be newly collected.

Type of processed data

We may process the following data concerning you, which is necessary to enable tracing of infection chains.

- **Contact data:** Last name, first name, address, phone number and email address.
- **Guest stay data:** Name or title of the establishment and event you visited, the date of your visit, the start and end of your visit, the address and geo-coordinates of the place you visited.
- **Additional input data:** Other information you submit via input fields in the luca app, such as your table seat number.
- **Functional data:** Data assignment IDs, keys and QR codes.
- **Temporary usage data:** Data that may occur temporarily when using the luca app, i.e. IP address, IP location, type and version of the browser used and installed browser plug-ins, information on the mobile network used, time zone settings, operating system and platform.

Purpose of processing and legal basis

As a result of the COVID-19 restrictions, we are required to collect your contact data and the times of your visit so that the health authorities can trace people's contacts in cases of new infections. If we have received data from you, we will only process it for this purpose.

The following overview describes the purposes for which we process your personal data, and the legal basis for doing so:

No.	Processing and purpose	Legal basis
(1)	Collection of your contact data, the dates of your visit, input data and functional data when visiting our premises and events in order to comply with statutory requirements.	Point (c) of Article 6(1) GDPR: On the basis of compliance with legal obligations
(2)	Determination of your visit by means of check-in and check-out. These functions can be supported by using the camera and GPS functions on your mobile phone, if you choose to do so voluntarily. Only the information about the time when you check in with us or leave the radius of our location is retained.	Point (a) of Article 6(1) GDPR: Consent Consent by switching on the GPS or camera function, possibly after prompting in the app. You may withdraw your consent for the future at any time by switching off your camera or GPS function (see also the section on your data protection rights)
(3)	Encrypted storage and further processing of your contact data, input data and functional data within the IT infrastructure of culture4life GmbH.	Point (c) of Article 6(1) GDPR: On the basis of compliance with legal obligations
(4)	Transfer of your contact data, guest stay data, input data and functional data to the health authorities.	Point (c) of Article 6(1) GDPR: On the basis of compliance with legal obligations

Recipients of personal data

The luca system is operated by culture4life GmbH. Its subcontractors are providers of software maintenance and operating services (currently neXenio GmbH) and providers of IT infrastructure services (currently Deutsche Telekom AG and Bundesdruckerei Gruppe GmbH). A data processing agreement exists between the controller and culture4life GmbH. The aforementioned recipients and subcontractors cannot use your personal data in any other way than to comply with documentation obligations and to help us with contact tracing. In addition, we may share your personal data with the health authorities at their request for the purpose of track and trace.

Transfer to third countries

Data will not be transferred to any third countries or international organisations.

Duration of retention of personal data

We retain your personal data for a period of four weeks. Your personal data will be deleted after four weeks.

Your data protection rights (access, rectification, erasure, blocking, objection and data portability)

With regard to the processing of your personal data, you have the following rights under the GDPR:

- The right to obtain confirmation as to whether or not your personal data is being processed, and, where that is the case, access to the personal data and certain relevant information. Such information includes the purposes of the processing, the categories of personal data concerned, and the recipients or categories of recipient to whom the personal data has been or will be disclosed (Article 15 GDPR). Please note that the rights and freedoms of other individuals may limit your right of access. When the luca system is used, user data is stored in encrypted form, so that user secrets in unencrypted form only remain in the possession of the person using them. For this reason, we are usually unable to track whether a specific person's personal data is processed in the luca system. Please note that all data is erased from the luca system at regular intervals. All luca app users can view all types of processing of the collected and encrypted data in their own history and contact data.
- The right to obtain the rectification of personal data concerning you if it is inaccurate or incomplete (Article 16 GDPR).
- The right, under certain conditions, to have your personal data erased without undue delay (so-called "right to be forgotten"; Article 17 GDPR). When using the luca app, personal data is secured using encryption techniques based on keys that are kept exclusively by

the luca app on your device. Without these keys, we are unable to assign the aforementioned data to your person and are therefore unable to erase it. However, this data is automatically erased from our system after 14 days and from the luca system on an annual basis. In addition, we erase your data as soon as you uninstall the luca app using the delete function and once any legally binding retention periods have expired. If we have retained data about you that we are able to attribute to you or that is not based on the information you have filed within the luca app, we will erase this data in accordance with your request.

- The right, under certain conditions, to have the processing of your personal data restricted (Article 18 GDPR).
- The right, in certain situations, to object to processing of your personal data, provided that processing is based on the legitimate interests pursued by us or by a third party in accordance with point (f) of Article 6(1) GDPR or your personal data is processed for direct marketing purposes (Article 21 GDPR).
- The right to withdraw your consent given to us regarding the processing of your personal data at any time. Such withdrawal of consent will not affect the lawfulness of processing based on consent before its withdrawal. Please note that in the event of the withdrawal of consent, the encrypted data cannot be attributed to you due to encryption and cannot therefore be excluded from processing until it is automatically erased.

Please note that we do not in principle process your personal data in the form of plain data, but in encrypted form; in certain cases, we will therefore not be able to comply with any such request you make for us to grant the aforementioned rights.

For information, and for requests to erase or rectify your data, please contact us at any time by sending an email to datenschutz@sw-os.de

You also have the right to complain to a competent data protection supervisory authority, such as the Data Protection Commissioner for Lower Saxony, Prinzenstraße 5, 30159 Hannover, Germany, phone: +49 511 120 4500, email: poststelle@lfd.niedersachsen.de

Last amended: 1 October 2021