

Privacy Information for the Feedback Procedure

This privacy information explains how personal data is processed as part of the feedback procedure in accordance with Art. 13 of the General Data Protection Regulation (GDPR).

1. Controller within the meaning of the GDPR

The controller responsible for the processing of personal data as part of the feedback procedure is:

University of Liechtenstein

Fürst-Franz-Josef-Strasse

9490 Vaduz

Liechtenstein

Email: info@uni.li

If you have any questions about the feedback procedure, you can contact Andreas Wolfrum at andreas.wolfrum@uni.li.

You can contact the University's Data Protection Officer at datenschutz@uni.li.

2. Purpose of the feedback procedure

The feedback procedure enables students in particular to submit feedback, comments, suggestions and proposals for improvement to the University.

The processing of feedback submissions serves in particular to:

- obtain feedback on existing processes, structures and services;
- identify potential for improvement;
- respond appropriately to comments and concerns;
- further improve the quality of processes and services; and
- identify recurring or structural issues and consider appropriate improvement measures.

At the same time, the feedback procedure is intended to provide a protected environment in which critical or sensitive feedback can be submitted without concern about inappropriate influence or disadvantage.

Three options are available for this purpose:

a) Feedback via the web form with consent to disclosure

When submitting feedback digitally, your name and email address are collected. You can consent to your complete feedback, including your identity and any personal data contained in the feedback, being disclosed to the persons or units within the University responsible for handling your concern.

b) Confidential feedback via the web form

Your name and email address are also collected when you choose this option. However, this information and your complete feedback are generally accessible only to the Feedback Team and are not disclosed to other persons or units within the University. Information derived from the feedback may be disclosed in anonymised or summarised form, provided that it does not allow you to be identified.

c) Anonymous feedback in paper form

You can submit feedback in paper form via the designated feedback box without providing any identification or contact details. In this case, it is generally not possible to provide an individual response or ask follow-up questions.

3. What personal data is processed?

When feedback is submitted digitally via the feedback form, the following personal data is collected:

- name;
- email address;
- content of the feedback;
- any documents you may submit; and
- other personal data contained in the feedback or in any attached documents.

Providing your name and email address is neither a statutory nor a contractual requirement. However, it is a prerequisite for using the digital feedback form. The web form cannot be submitted without this information. Alternatively, feedback can be submitted anonymously in paper form.

Please provide personal data relating to other persons only to the extent necessary for your concern.

4. Anonymous submission of feedback

Anonymous feedback can only be submitted in paper form via the designated feedback box. The digital feedback form is not intended for anonymous submissions; your name and email address are mandatory fields.

If you wish to submit feedback anonymously in paper form, you should not provide any information or attach any documents from which your identity could be inferred directly or indirectly.

Even if you do not provide your name in a paper submission, your identity may in some circumstances be inferred from the content of your feedback or from the circumstances described. Anonymity therefore cannot be guaranteed in every case.

No individual response can be provided in the case of an anonymous submission. As a general rule, it is also not possible to ask follow-up questions to clarify the matter.

5. Confidentiality and independence of the Feedback Team

The Feedback Team has a particular position of trust and a protective role within the feedback procedure.

For every digital submission, the Feedback Team is aware of the identity and contact details of the person submitting the feedback because providing a name and email address is mandatory. Regular access to this information and to complete feedback submissions is restricted to members of the Feedback Team.

Members of the Feedback Team are required to treat information that becomes known to them in the course of their activities as confidential.

If you do not consent to disclosure, your identity, contact details and complete feedback will generally not be disclosed to other persons or units within the University.

Where necessary for the operation, maintenance or troubleshooting of the technical systems used, appropriately authorised IT staff may have access to the data. Such access is limited to what is necessary and is subject to confidentiality requirements.

This does not affect statutory disclosure obligations or other cases in which disclosure is required on the basis of a legal provision.

6. Processing and internal disclosure of feedback

a) Feedback via the web form with consent to disclosure

Your name and email address are collected with every digital submission.

If you expressly consent to disclosure, the Feedback Team may disclose your complete feedback, including your identity and any personal data contained in the feedback, to those persons or organisational units within the University that are responsible for handling your concern.

Consent to disclosure is voluntary. Refusing consent does not adversely affect your ability to use the digital feedback form.

You may withdraw your consent to disclosure at any time with effect for the future.

b) Confidential feedback via the web form

If you submit feedback digitally without consenting to disclosure, the complete submission generally remains within the Feedback Team's protected area of access.

Information derived from feedback submissions may, however, be further processed within the organisation in anonymised or aggregated form. This may include, in particular:

- summarised findings from several feedback submissions;
- statistical analyses;
- anonymised descriptions of circumstances;

- general suggestions for improvement; and
- information concerning structural or organisational issues.

When such information is disclosed, care is taken to ensure that the person who submitted the feedback cannot be identified.

c) Anonymous feedback in paper form

As a general rule, anonymous feedback submitted in paper form cannot be attributed to a specific person.

The content of the feedback may nevertheless be evaluated and processed to the extent necessary to fulfil the purposes of the feedback procedure.

7. Legal basis for processing

The Feedback Team processes personal data on the basis of Art. 6(1)(e) GDPR in conjunction with Art. 5a and Art. 38 of the Liechtenstein Higher Education Act (Hochschulgesetz, HSG) and Art. 5 of the Statutes of the University of Liechtenstein. The processing serves in particular to facilitate the participation of members of the University and to perform the University's statutory duties relating to quality assurance and continuous quality development.

Where you expressly consent to the disclosure of your complete feedback, your identity and any personal data contained in the feedback to the persons or organisational units within the University responsible for handling your concern, such disclosure is based on Art. 6(1)(a) GDPR.

Where, in an individual case, there is a statutory obligation to process or disclose personal data, the processing is based on Art. 6(1)(c) GDPR in conjunction with the relevant statutory obligation.

8. Processing of special categories of personal data

Due to the free-text nature of the feedback field, your feedback may also contain special categories of personal data within the meaning of Art. 9 GDPR. These include, for example, information concerning health, racial or ethnic origin, religious or philosophical beliefs, or sexual orientation.

Please provide such information only if it is necessary for handling your concern.

Special categories of personal data are processed only where there is a legal basis for doing so under Art. 9(2) GDPR.

9. Recipients and categories of recipients

The recipients of personal data depend on the type of feedback submission you have chosen.

For every digital submission, the Feedback Team initially has access to your name, email address and complete feedback submission.

If you consent to disclosure, your complete feedback, your identity and any personal data contained in the feedback may be disclosed to those persons or organisational units within the University that are responsible for handling your concern.

If you do not consent to disclosure, your identity, contact details and complete feedback generally remain with the Feedback Team. Other persons or organisational units receive only anonymised, summarised or otherwise non-identifiable information.

Where necessary for the operation, maintenance or troubleshooting of the technical systems used, appropriately authorised IT staff may be granted access.

For anonymous feedback submitted in paper form, no identification or contact details are collected. Where personal data can nevertheless be derived from the content of the feedback, the principles set out above apply accordingly.

10. Storage period and deletion

Personal feedback submissions are generally deleted one year after receipt.

The one-year storage period is intended to enable feedback submissions to be processed, traced and evaluated over the course of an academic year. In particular, this makes it possible to identify recurring or structural issues and take them into account when further developing services, processes and activities.

Data is retained for longer only where this is required by a statutory retention obligation or where a specific matter must continue to be processed beyond this period for legal or factual reasons.

Where content continues to be required for statistical analyses or quality development after the storage period has expired, it may be further used in anonymised form. It must then no longer be possible to attribute the information to a specific person.

11. Technical and organisational measures

The University implements appropriate technical and organisational measures to protect personal data processed as part of the feedback procedure against unauthorised access, loss or other unlawful processing.

These measures include in particular:

- restricting access rights according to the need-to-know principle;
- restricting regular access to complete feedback submissions to the Feedback Team;

- requiring members of the Feedback Team to maintain confidentiality;
- protecting electronic systems and user accounts against unauthorised access;
- securely storing feedback submitted in paper form; and
- establishing procedures for the deletion or destruction of feedback submissions.

The technical and organisational measures are reviewed regularly and adjusted where necessary.

12. Rights of data subjects

Subject to the applicable statutory requirements, data subjects have the following rights in particular:

- **the right of access** pursuant to Art. 15 GDPR;
- **the right to rectification** pursuant to Art. 16 GDPR;
- **the right to erasure** pursuant to Art. 17 GDPR;
- **the right to restriction of processing** pursuant to Art. 18 GDPR; and
- **the right to withdraw consent** where processing is based on consent.
- The applicable statutory requirements and restrictions must be taken into account when exercising these rights.

Right to lodge a complaint with a supervisory authority: Pursuant to Art. 77 GDPR, data subjects have the right to lodge a complaint with a data protection supervisory authority (Data Protection Authority, Kirchstrasse 8, 9490 Vaduz) if they consider that the processing of their personal data infringes the GDPR.

Right to object: Where the processing of your personal data is based on Art. 6(1)(e) GDPR, you have the right pursuant to Art. 21 GDPR to object to the processing at any time on grounds relating to your particular situation.

In the case of an anonymous feedback submission, the data subject generally cannot be identified. In such cases, data subject rights can only be exercised to the extent that the person concerned can be identified on the basis of the information available.

13. Withdrawal of consent

Where the disclosure of your feedback is based on your consent pursuant to Art. 6(1)(a) GDPR, you may withdraw your consent at any time with effect for the future.

The lawfulness of any disclosure and processing carried out on the basis of your consent before its withdrawal remains unaffected.

14. Automated decision-making and profiling

No automated decision-making, including profiling within the meaning of Art. 22 GDPR, takes place as part of the feedback procedure.

15. Updates to this privacy information

This privacy information may be amended if, for example, the feedback procedure, the technical systems used, the purposes of processing or the applicable legal framework change.

The current version of this privacy information applies.

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