

Data Protection Information

for the Moodle Learning Platform CD Skills / Celiac facts

This Data Protection Information is provided by Child Health Service gGmbH ("**CHS gGmbH**", "**we**", "**us**").

This Data Protection Information informs you about how CHS gGmbH processes your data when you use the CHS gGmbH website and when you register for educational offerings provided by CHS gGmbH. In particular, this Data Protection Information covers data processing in the context of your participation in the e-learning modules of the Child and Family Health Academy ("ChiFHA") operated by CHS gGmbH ("**learning platform**"). It does not apply to websites that are controlled by third parties and are not affiliated with CHS gGmbH, even if they are linked on the CHS gGmbH website ("**Third Party Websites**"). Please read the privacy policies of the third-party websites, as CHS gGmbH is not responsible for and has no control over their content or privacy practices.

Our educational offerings are available to interested users worldwide. Please note that the data protection laws of some countries may contain specific or differing rules for processing your personal data. We have summarized these country-specific rules in supplementary sections at the end of this Data Protection Information. These sections only apply to you if we process your personal data under the laws of the respective country. Please contact us if you need further information about how we process your data in accordance with the laws of the country from which you access our services.

A. General Section

This section provides general information about data processing, regardless of the country from which you access our services.

§ 1 Controller

Child Health Service gGmbH
Hermann-Schmid-Str. 10
80336 Munich, Germany
ChiFHA@kindergesundheit.de

§ 2 Data Protection Officer

Giulia Roggenkamp
Hermann-Schmid-Str. 10
80336 Munich, Germany
Roggenkamp@Kindergesundheit.de

§ 3 Supervisory Authority for Data Protection

Landesamt für Datenschutzaufsicht / Bavarian State Office for Data Protection Supervision
Promenade 18
91522 Ansbach, Germany
P.O. Box 1349
91504 Ansbach
Tel.: 0981/180093-0
Fax: 0981/180093-800

poststelle@lda.bayern.de,
<https://www.lda.bayern.de>

§ 4 Data Collection

If you have reached the age of 16, you can register on our learning platform.

If you subscribe to our newsletter, we collect:

- E-mail address

Furthermore, we collect your personal data through cookies when you visit our website. Please refer to § 9 of this Data Protection Information for more information.

§ 5 Purpose of data processing

We collect and process your data in order to provide and operate the e-learning modules mentioned above. Additionally, we process your personal data to continuously improve the technical operation of the system and to inform you about our services through our newsletter.

§ 6 Data sharing

We share your data with the following entities:

- **Leibniz Supercomputing Centre of the Bavarian Academy of Sciences ("LRZ")**: We store your data in the learning platform database, hosted on servers operated by Leibniz Supercomputing Centre of the Bavarian Academy of Sciences and Humanitie ("LRZ").
- **LMU Munich**
- External companies that are administrators, ITML (Innovation applied, Greece)

§ 7 Data protection

We handle your personal data confidentially in accordance with data protection laws and our applicable internal policies and procedures. We take commercially reasonable steps to ensure that your personal data is securely stored and protected from loss, unauthorized access or misuse. We will notify you of any data security incidents involving your personal data in accordance with applicable data protection laws.

§ 8 Data retention

The length of time we retain your personal data depends on the nature of our relationship with you. In general, we retain your personal data only for as long as necessary to fulfil the purposes for which it was collected (as outlined above), and as required to comply with legal retention obligations or other legal requirements (e.g. data protection laws).

In particular, we process your course participation data until the respective course is deleted. Test results, learning units, assignments, and data relating to course completion and overall assessment are retained for the duration of legal retention periods. Your profile and associated activity data will be deleted no later than three years after your last activity.

§ 9 Cookies

We use tracking technologies such as cookies to ensure smooth use of our website and to better understand visitor behaviour.

- **Strictly necessary cookies:** Required for correct display of website content and essential functionality.
- **Functional cookies (Moodle cookies):** We use functional cookies that improve the use of our website. For example, session cookies allow the learning platform to recognize you across multiple page views without requiring re-authentication. Other cookies store the status or hidden elements to improve functionality. These cookies are set upon your first visit to the learning platform and remain active until you log out of the learning platform or close your browser. This behaviour may be overridden by changing your local browser settings.
- **Performance/analytics cookies:** We use performance cookies to improve our website service by analysing how you access, navigate, and interact with our site.
- **Marketing cookies:** We use marketing cookies to customize our website to your needs. These cookies analyse your long-term behaviour across sessions. We use our own/own and third-party marketing cookies.

Cookies that are technically necessary for website operation are processed based on our legitimate interest. Whether you can opt out of or must consent to functional, performance, or marketing cookies depends on the laws of the country from which you access our website.

In many cases, you can manage tracking technologies through your browser settings. Please ensure that your browser reflects whether you wish to be notified about or accept tracking technologies (such as cookies) where this is possible. Detailed browser features and instructions are usually available in your browser's user manual or help section.

List of all Cookies:

Cookie Name	Category	Purpose	Retention Period	Cookie Type
Matomo Analytics (_SESSID)	Analytics	To recognise returning visitors and track sessions	Session	First-party cookie
MoodleSession	Essential Cookie	Maintain the logged-in session	Session	First-party cookie, Session cookie

§ 10 Use of the website analysis tool Matomo (formerly PIWIK)

We use the open-source software tool Matomo (formerly PIWIK) on some of our web pages to analyse user behaviour. Your data is processed exclusively in anonymized form. The software sets a cookie on your device. When individual pages - including subpages - of our website are accessed, the following data is stored in anonymized form:

- two bytes of the IP address of the accessing system (user's system);
- the accessed web page;
- the web page from which the user accessed the requested page (referrer)
- the subpages accessed from the requested website
- the time spent on the website;
- the frequency of access;

- Information about the operating system, browser type, and screen resolution.

The software operates exclusively on the servers of LMU/KUM. The data is stored only on these servers. It is not passed on to third parties.

For more information on Matomo, please visit <https://matomo.org/docs/privacy/> (external link). You can deactivate the use of Matomo by adjusting your browser settings.

You may choose whether a unique web analytics cookie may be stored in your browser to enable the website operator to collect and analyse various non-personal statistical data. The use of the analytics cookie aims to continuously improve the quality of the website, its content, and its user-friendliness. Web analytics cookies help us understand how the website is used and thus optimize our offering.

If you choose to opt out, please uncheck the checkbox at the bottom of the page to store the Matomo opt-out cookie in your browser.

§ 11 Changes to this Data Protection Information

Please check this Data Protection Information regularly, as we may update it periodically in accordance with legal data protection developments.

It is important that the personal data we hold about you is accurate and up to date. Please inform us if your personal data changes during your relationship with us.

§ 12 Conflicts with other language versions

In the event of any discrepancies or contradictions between the German version and other language versions of this Data Protection Information, the German version shall prevail.

§ 13 Contact and complaints

We take all complaints regarding our use of personal data seriously. If you have questions, comments, requests, or complaints about this Data Protection Information or our use of personal data, please contact: Roggenkamp@kindergesundheit.de

Any personal data we receive in the context of a complaint will be processed solely for the purpose of handling the complaint and reviewing the level of service we provide.

Part B Supplementary Information

§ 1 EU, UK and Cayman Islands

This section applies to you only if we process your personal data in accordance with the EU General Data Protection Regulation (“**GDPR**”) and the GDPR as incorporated into UK law by the Data Protection Act 2018 (**together “EU-UK GDPR”**), or the Cayman Island Data Protection Law, 2017 (“**DPL**”). Cookie provisions apply to you only if you access our services from a country that has implemented the e-Privacy Directive.

§ 1.1 Legal bases

When we process your personal data for the purposes mentioned above (see § 5 of the General Section), we rely on the following legal bases:

- **Provision and delivery of the e-learning modules:** Your consent (where required); our user agreement for the use of the e-learning module or platform; our Terms and Conditions for the Moodle Learning Platform, legitimate interest in delivering our services;
- **Newsletter:** your consent;
- **technical improvement of system operation/security:** our legitimate interest in maintaining our IT systems, our network and security.

§ 1.2 International data transfers

Your personal data may be transferred to countries outside the EEA, the United Kingdom or the Cayman Islands, for example, to countries where we operate or use service providers, including the United States and other countries that may not have the same level of data protection as those under EEA, UK, or Cayman Islands law. When we do so, we will comply with the applicable requirements under EU and UK data protection laws and/or the GDPR.

§ 1.3 Your rights

Under certain legal conditions, you may request access to your personal data, its rectification, deletion, or restriction of processing. You may also object to the processing or request data portability under the EU-UK GDPR. Additionally, you may have the right to request a copy of the personal data we hold about you. If your request is unfounded or excessive, we reserve the right to reject it or charge an administrative fee.

For any of the above requests, we may require additional proof of identity to verify your identity and protect your data from unauthorised access. We will carefully consider your request and may discuss with you how best to fulfil it.

PLEASE NOTE: UNDER THE EU-UK GDPR, YOU HAVE THE RIGHT TO OBJECT TO THE USE OF YOUR PERSONAL DATA FOR DIRECT MARKETING PURPOSES.

If you have given us your consent to the processing of your personal data, you may withdraw it at any time with future effect. This means that the withdrawal does not affect the lawfulness of processing based on consent before its withdrawal. If you withdraw your consent, we may only continue processing your data if another legal basis exists.

Following deletion, restriction, or withdrawal, continued use of the learning platform, access to stored learning content, and participation in available activities and features can no longer be guaranteed.

§. 1.4 Profiling

We do not conduct any automated decision-making or profiling within the meaning of the GDPR. Tests are analysed automatically and anonymously. The test questions for each individual course are manually compiled by humans. Below we describe which personal data is processed. Other personal data may only be collected and processed on the platform if there is a corresponding legal basis in accordance with the legal requirements.

§ 1.5 Complaints

If you have concerns about how we handle your personal data or wish to submit a complaint about our handling of your personal data, please contact us so we can investigate the matter.. You may also lodge a complaint with your country's competent data protection authority. For example in Germany, you can contact the Bavarian State Commissioner for Data Protection via the website (see § 3 of the General Section).

§ 1.6 Cookies

We only use functional, performance, and marketing cookies after you have consented, if you are accessing our website from the EU or the United Kingdom. You may withdraw your consent at any time with future effect via your web browser settings. Most browsers are set by default to accept all cookies. However, you can configure your web browser to display cookie information before storing, or to reject cookies altogether.

§ 2 China

This section applies to you only if we process your personal data under the Personal Information Protection Law of the People's Republic of China ("PIPL").

§ 2.1 Legal bases

When we process your personal data for the purposes mentioned above (see § 5 of the General Section), we rely on the following legal bases:

- **Provision and delivery of e-learning modules:** Our contract to provide e-learning services, our terms and conditions for the Moodle Learning Platform, your consent;
- **Newsletter:** Your consent;
- **Technical improvement of system operation/security:** your consent to maintain our IT systems, networks and IT security.

§ 2.2 International data transfers

We generally do not transfer personal data from China to other countries. If we do transfer your data outside of China, we will comply with the applicable PIPL requirements and implement appropriate safeguards to ensure the security and integrity of your data. In particular, we rely the data transfer on the China Standard Contractual Clauses and your explicit consent.

§ 2.3 Your rights

Under the PIPL, you may request access to or copies of your personal data, rectification, deletion, restriction of processing, or deletion of your account. You have also the right to request a copy of the personal data we hold about you. We may request additional proof of identity to verify your identity and protect your personal data from unauthorised access. We will carefully review your request and may discuss with you how best to fulfil it. If you have given consent to data processing, you may

withdraw this consent at any time with future effect. This does not affect the lawfulness of the processing based on consent before withdrawal.

We may only continue processing your data if a different legal basis exists.

§ 2.4 Complaints

You may lodge a complaint with the competent data protection authority - the Cyberspace Administration of China (CAC), 11 Chegongzhuang Street, Xicheng, Beijing.

§ 3 Indonesien

This section applies to you only if we process your personal data under Indonesia's Personal Data Protection Law ("**PDPL**").

§ 3.1 Legal Bases

When we process your personal data for the purposes mentioned above (see § 5 of the General part), we rely on the following legal bases:

- **Provision and delivery of e-learning modules:** Your consent (where required); our user agreement for using the e-Learning module or platform; our Terms and Conditions for the Moodle Learning Platform, legitimate interest in delivering our services.
- **Newsletter:** your consent;
- **Technical improvement of system operation/security:** our legitimate interest in maintaining our IT systems, network and security.

§ 3.2 Your rights

Under certain legal conditions, you may request access to your personal data, its rectification, deletion, or restriction of processing. You may also object to processing if the conditions under PDPL are met.

For each of the above requests, we may require additional proof of identity to verify your identity and protect your data from unauthorised access. We will review your request carefully and may consult with you on the best way to fulfil it.

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