

# Data Privacy Information for Student and Employee Mobility Project

**Only the German contractual text is legally binding, the translation is for informational purposes only.**

## **Data Privacy Information according to Art. 13 EU General Data Protection Regulation (GDPR) for participation in the research project "Student Mobility"**

SRH Hochschulen GmbH and motiontag GmbH each process, as independent controllers, the personal data listed under section 2 in the "Student Mobility" project. To gain detailed insights into mobility patterns of students and employees and to develop strategies for sustainable mobility and optimization of transport connections based on these insights, the mobility survey is conducted by motiontag GmbH.

motiontag GmbH provides a smartphone application (hereinafter "App") for download, through which participants can voluntarily make their movements and mobility behavior in everyday life traceable. The personal GPS and smartphone data are processed by motiontag within this project and subsequently made available to SRH Hochschulen GmbH in the form of trip chains for further processing.

To make the survey results comparable with other transport surveys and mobility studies and to understand the reasons for using certain modes of transport, SRH Hochschulen GmbH will collect socio-demographic data and attitude characteristics. The collection of this information is conducted through an in-app survey. Participation in the survey is voluntary.

**Participation in this project is completely voluntary. There are no negative consequences for non-participation or withdrawal from participation. The data will be analyzed anonymously, and no individual evaluation of personal profiles will be conducted.**

By completing the registration in the motiontag App for the "Student Mobility" project, you agree to the processing of your data as described for the above-mentioned project.

## **1. Name and Contact Details of the Controller and Data Protection Officer**

### **Responsible Institutions for Data Processing**

**SRH Hochschulen GmbH**  
SRH University of Applied Sciences Heidelberg  
Campus Berlin

School of Technology and Architecture TEAC  
in the Master of Engineering and Sustainable Technology Management program  
Focus on Mobility and Automotive Industry

**Postal Address:**

SRH Hochschulen GmbH  
Campus Berlin  
Sonnentallee 221  
12059 Berlin

**Central Data Protection Department:**

Administrative  
Headquarters SRH  
Hochschulen GmbH Ludwig-  
Guttmann-Straße 6  
69123 Heidelberg  
By email: [datenschutz.hshd@srh.de](mailto:datenschutz.hshd@srh.de)

**Data Protection Officer:**

frankenDSB DatenschutzManufaktur GmbH  
Jörg Flierenbaum  
Unterer Steinberg 11  
97453 Schonungen  
By email: [datenschutzbeauftragter-srh@frankendsb.de](mailto:datenschutzbeauftragter-srh@frankendsb.de)

## **Technical Partner for Data Collection**

**Development and Provision of App, Recording of Mobility Data:**

motiontag GmbH  
Rudolf-Breitscheid-Straße 162  
14482 Potsdam

For more information on the processing of your data by motiontag, please  
visit: <https://api.motion-tag.de/de/privacy>

## **2. Collection and Storage of Personal Data and the Nature and Purpose of Their Use**

### **2.1 Type of Personal Data**

#### **When Using the App**

Your movement data is recorded using the App. This data serves to conduct mobility analyses to derive traffic-related metrics such as modal split, commuting behavior of students and employees, route preferences, and transport mode choice. Additionally, trip purposes are determined based on cross-day stay patterns and spatial analyses are performed. Particular emphasis is placed on the investigation of student and employee mobility flows to the university and alternative transport routes.

**These analyses are conducted exclusively on a group basis and anonymously for scientific purposes.** No individual profiles are created or evaluated. The results will be published in academic journals or presented at conferences. The findings serve to optimize transport connections for students and employees, support sustainable mobility planning in the student and employee context, and develop recommendations for university administration to improve campus accessibility.

As soon as you start recording in the App, data points are collected that contain spatial coordinates, timestamps, and movement states. We have developed algorithms that interpret this data in terms of trip stages with various modes of transport and associated attributes such as duration and distance. When using the App over multiple days, multi-day movement profiles are created.

**Even though the movement profiles are collected pseudonymously, conclusions about place of residence and study location and thus about individual persons can be drawn from recurring stay locations. Even if no identification of participants is undertaken, the collected movement profiles constitute personal data. Accordingly, they are treated as highly sensitive.**

Both the App for the iOS and Android operating systems transmit the following information from your mobile device to motiontag GmbH: the mobile phone model, the version of the respective operating system, the App version.

Additionally, the following data are collected by motiontag GmbH in the App:

1. **Primary identification data:** Email address for contact and potentially for project participation
2. **Login information for App login:** Email address
3. **Time of localization**
4. **Geo-coordinates and accuracy** (determined by GPS chip)
5. **Acceleration values** (determined via sensors in the mobile phone)
6. **Gyroscope sensor values** (determined via sensors in the mobile phone)
7. **Barometer air pressure data** (determined via sensors in the mobile phone)
8. **Magnetometer** (determined via sensors in the mobile phone)
9. **Movement activity from operating system**
10. **Recognition certainty (confidence)** of movement activity

All other information such as the transport mode used or the trip purpose is generated

based on algorithms using this input data and by comparison with geodata (so-called geomatching).

## **When Using In-App Survey**

1. Email address
2. Students: Study program and semester
3. Employees: Department
4. Gender
5. Age groups
6. Place of residence (postal code area or city district)
7. Distance to place of study/work (campus)
8. Availability of modes of transport (e.g., car, bicycle, public transport ticket, semester ticket)
9. Reasons for choosing certain modes of transport (e.g., time savings, costs, comfort, environmental aspects)
10. Attitudes toward sustainable mobility
11. Willingness to use alternative modes of transport
12. Type of housing (e.g., dormitory, shared apartment, alone, with parents)

## **2.2 Use of Data and Their Purpose**

Your data will be processed exclusively for the following purposes:

1. Scientific analysis of mobility patterns of students and employees
2. Identification of typical student commuting routes and transport mode choice to campus
3. Analysis of main traffic flows of students and employees and traffic volume during lecture times
4. Categorization of different student and employee mobility types and preferences by groups
5. Development of data-driven strategies to promote sustainable student and employee mobility
6. Support for measures to improve campus accessibility
7. Optimization of sustainable mobility for students and employees of the university
8. Scientific publications and conference contributions on student and employee mobility
9. Provision of anonymized insights for university administration and potentially transport providers to improve public transport services for students and

employees

10. Understanding the reasons for using certain modes of transport to derive targeted mobility offers for students and employees

**Your data will not be processed for any purposes other than those mentioned above. No individual evaluation of persons will take place. No performance, behavior, or attendance controls will be conducted. The results serve exclusively scientific and planning purposes at the group level and have no influence whatsoever on your studies, grades, or academic performance.**

## 2.3 Legal Basis for Processing

The legal basis for the processing of your personal data is your voluntary consent according to **Art. 6(1)(a) GDPR** in conjunction with **Art. 9(2)(a) GDPR** (for special categories of personal data, insofar as movement profiles may allow conclusions about stays at locations such as religious institutions, medical facilities, or political events).

## 2.4 Right of Withdrawal

Participation is completely voluntary and has no influence on your studies or employment relationship. You can withdraw your consent at any time with effect for the future without suffering any disadvantages. A withdrawal or non-participation has no effect on your academic performance, grades, or student status or your employment relationship.

## 2.5 Storage Duration of Personal Data

The personal data will be **completely deleted no later than 6 months after project completion**. The exact project duration will be communicated to participants at project start.

Anonymized evaluations and analysis results at group level may be stored beyond this period for scientific purposes, as they no longer contain any personal reference.

## 3. Transfer of Data to Third Parties

We only transfer your personal data to third parties if there is a legal obligation for the transfer according to **Art. 6(1)(c) GDPR**.

**Anonymized and aggregated analysis results** at group level may be made available to university administration and potentially to cooperation partners in the field of transport planning, without this constituting a transfer of personal data.

The raw data (movement profiles with personal reference) will **not** be transferred to third parties.

## 4. Data Protection Impact Assessment

## (DPIA)

Due to the processing of location and movement data that enables profiling, a Data Protection Impact Assessment was conducted according to **Art. 35 GDPR**. This concluded that through pseudonymization, exclusively group-based evaluation, time-limited storage, and voluntary participation, the risks to the rights and freedoms of participants are minimized.

A Data Protection Officer has been appointed and was involved in conducting the DPIA.

## 5. Your Rights Regarding Data Processing

### Data Subject Rights

You have the right:

1. according to **Art. 15 GDPR** to request information about your personal data processed by us
2. according to **Art. 16 GDPR** to request immediate correction of incorrect or completion of your personal data stored with us
3. according to **Art. 17 GDPR** to object to further processing of your data and to request deletion of your personal data stored with us
4. according to **Art. 18 GDPR** to request restriction of processing of your personal data
5. according to **Art. 20 GDPR** to receive your personal data that you have provided to us in a structured, commonly used, and machine-readable format (right to data portability) or to request transmission to another controller
6. according to **Art. 7(3) GDPR** to withdraw your consent given to us at any time. This has the consequence that we may no longer continue the data processing based on this consent for the future. **A withdrawal has no negative consequences for you.**
7. according to **Art. 77 GDPR** to file a complaint with a supervisory authority

## 6. Right to Object

If your personal data are processed on the basis of legitimate interests according to **Art. 6(1)(f) GDPR**, you have the right, according to **Art. 21 GDPR**, to object to the processing of your personal data, insofar as there are grounds for this arising from your particular situation.

## 7. Data Security

The transmission of data collected by the App is carried out exclusively using secure encryption methods. The data are stored encrypted on the server. The server location is in Germany.

motiontag GmbH and SRH Hochschulen GmbH have implemented comprehensive technical and organizational measures to protect your data in order to prevent data loss, manipulation, or unauthorized access.

## 8. Complaints Office

For questions about data protection or to exercise your data subject rights, please contact:

**SRH Hochschulen GmbH**

Ludwig-Guttman-Straße 6

69123 Heidelberg

By email: [datenschutz.hshd@srh.de](mailto:datenschutz.hshd@srh.de) or [datenschutzbeauftragter-srh@frankendsb.de](mailto:datenschutzbeauftragter-srh@frankendsb.de) (Data Protection Officer)

You can also contact the technical partner of SRH Hochschulen GmbH:

**motiontag GmbH**

Rudolf-Breitscheid-Straße 162

14482 Potsdam

By email: [info@motiontag.com](mailto:info@motiontag.com)

You also have the right to file a complaint with a supervisory authority, particularly in the member state of your habitual residence or place of work or in which the alleged infringement occurred.

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**Status: March 2026**