



## Data Protection Information for Austrian DataLAB and Services - Mock-up

Data protection and how to ensure it are important concerns at TU Wien. The processing of personal data occurs under strict observance of the principles and requirements set forth in GDPR<sup>1</sup> and the Austrian Data Protection Act DSG<sup>2</sup>. TU Wien only processes such data as are required to achieve the purposes sought after, and endeavours at all times to ensure the security and correctness of the data.

The ADLS (Austrian DataLAB and Services) project is an initiative sponsored by the Austrian Government to promote collaborative approaches between eight different universities in the fields of data science and high-performance computing (HPC). Here the explicit focus lies on increasing the user-friendliness, reducing the learning curve and thus saving time for researchers, teachers and students when using compute resources. The project deals with expansion and integration of digital services (application programmes facilitating processing and analysis of various types of data) as well as preparing models for future digital services and platforms, based on existing infrastructure. Access to these services is to be provided via graphical user interfaces and interactive platforms.

Our objective is to orient developments within the ADLS Project to the needs of scientists at the participating universities. In order to meet this objective, we for one thing wish to make the ADLS Project known as early as possible to scientists and, for another, to engage in permanent exchange with them in order to better understand their requirements. However, it is important that our resources are concentrate on the requirements needed by as broad an expanse of scientists as possible.

The page <http://mockup.adls-sbx.org/> was created by the core team in node.js (<https://nodejs.org/>) and reflects potential parts of the ADLS Project. The related code/images/... are located at the gitLab of TU Wien <https://gitlab.tuwien.ac.at/ADLS/surveys/wireframe-static>. The mock-up page cannot be located by search engines.

### The purpose of the mock-up:

The mock-up is meant to provide the core team and in extension all participants in ADLS with a better overview of which services are actually requested and would be used by potential users. As a consequence of the findings, we can concentrate on the most pressing features and advance them. Additionally, this can also be used to explain why necessary cuts in the scope of the project are made.

In order to achieve these objectives, we make use of two strategies:

1. Direct feedback by means of a comment function and the possibility of contacting the ADLS team directly (Slack, email).
2. Tracking in order to record user behaviour.

These two methods are not linked to each other, with the exception of some demographic questions. The latter are saved like comments (allocation of a set of responses by means of a time stamp) and used when tracking in order to make statements like “20% of PhD students would like a Wiki.”

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<sup>1</sup> General Data Protection Regulation

<sup>2</sup> Datenschutzgesetz



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As to 1): In the mock-up comments can be entered as free text. Such comments are stored separately by page and can be seen by all users. When being entered, the text is only checked for things that could “damage” the page itself. The core team (and TU Wien subscription manager) can read these comments and also delete specific ones or all of them. The comments are saved as text without any additional information. In that way, feedback can be obtained directly by users and the latter may also voice preferences and suggestions.

As to 2): Tracking makes it possible to follow an anonymous user on the page. That is: a record is made in which sequence subsidiary pages are visited. In addition, which elements are liked/disliked. In this way linked statements like the following can be generated:

- 10% of the users leave the page after five minutes
- PostDocs are more interested in deployment
- Almost nobody likes our jokes in the invented discussion forums of the applications
- “Bring your own licence” is not understood.
- ...

## **Controller:**

Rectorate of TU Wien  
Karlsplatz 13  
1040 Vienna

## **Data protection officer:**

Mag. Christina Thirsfeld  
Technische Universität Wien  
Karlsplatz13/018, 1040Vienna  
datenschutz@tuwien.ac.at

## **Content:**

Dr. Peter Kandolf  
[Peter.Kandolf@uibk.ac.at](mailto:Peter.Kandolf@uibk.ac.at)

## **Purpose of data processing**

The data quoted are collected for the purpose of conducting a survey on the performance structure of the platform or services planned for the Austrian DataLAB and Services Project. The purpose of the survey is to obtain a clear definition and prioritisation by users in order to optimally deploy the available resources. The data serve exclusively the purpose of picking up basic usage issues and work procedures. The demographic data serves to find out groups and trends and differences between them.

## **What personal data do we process?**

### **Runtime environment:**

The mock-up is automatically generated from the code (pipeline in AzureDevOps) and is hosted as an [Azure Serverless App](#). The corresponding code is located in the gitLab of TU Wien and the pipeline for the deployment in Azure DevOps. The related data storage for the comment function is integrated as



[file share](#) and is encrypted and can only be retrieved from the connected Azure subscription. Comments are saved by line and separately for each page as ASCII/UTFx text. The comments are displayed on the page in ongoing operation (only with the open comment function) and can thus be read by all visitors to the page. Should, with regular review of comments, anything unusual emerge that is not suitable or otherwise does not correspond to the “code of conduct,” it is deleted.

The page is protected by a firewall in the form of an interposed [Azure front door](#). It is used to protect the page against attacks and to restrict access to Austria. In order to make this functionality possible, the IP address is used and thus appears in the firewall’s log. The logs are encrypted (the encryption is done upon automatic generation of the resource, with the key not being entered externally) and does not contain any entries older than two days. Earlier or quicker deletion is possible. On the basis of the firewall logs, **no** evaluations are carried out in connection with the study. It only has the purpose of providing the page with basic protection.

### **Analytics:**

The analytics included in the mock-up, and used for the survey to track user behaviour on the page is, done by Google Analytics. The highest level of Anonymization is configured (IP masking).

*Quote: When a customer of Analytics requests IP address anonymization, Analytics anonymizes the address as soon as technically feasible. The IP anonymization feature in Analytics sets the last octet of IPv4 user IP addresses and the last 80 bits of IPv6 addresses to zeros in memory shortly after being sent to Google Analytics. The full IP address is never written to disk in this case. [...]*

Accordingly, the entire IP is never saved, but only an anonymized version of it. For our analysis, we have no access to this masked IP but to an abstract identifier that provides no inference about the IP. Only the data actively indicated on our part are collected. In order to use Google Analytics, a visitor must actively give its consent. Should this be the case, on the page with specific operations, an event is triggered by JavaScript and sent by means of the application’s tracking ID and the data defined on our part to Google Analytics.

### **What data are picked up, where are they processed and for how long do they remain there?**

We distinguish between two types of data, the personal data and the general data of the survey. None of the data picked up here are compared with data outside of the mock-up or expanded with them. Nor are the data passed on to third parties. Extracted results from the analysis are used in reports to the universities and to the ministry as well as the research clusters in order to justify further procedures and promote interest.

### **Personal data:**

The only item of personal data processed in the mock-up is the IP of a visitor.

Azure: The IP is used by the firewall in order to make the functional capability of the firewall possible. The IP is saved in an encrypted log for a maximum of two days.

Analytics: As described above, the IP is immediately anonymized and is not saved.

### **General data:**

Here is the list of general data picked up in the course of the survey. We distinguish between where the data is picked up and processed and how long the data is stored.



### **Demographic questions:**

These are saved on Azure as comments with a time stamp. Since each question is saved separately, the time stamp is used to identify a set. Otherwise, nothing is linked to it.

They are included with all events sent on to Analytics, so that it is possible to answer questions like: "To what page do PhD students go first?"

Storage is up until the end of the survey and evaluation in Azure and in Analytics.

Processing:

In Analytics, in order to answer questions.

The text data are saved and analysed on the PCs of the core team members (e.g. total count, how many of them are PhDs and how many have "good IT skills...")

### **Comments:**

Are stored on Azure, separately for every page of the mock-up.

By line for every entry clicked.

The only thing saved is what has also been entered by visitors, no additional items of information.

May be seen by all visitors to the particular pages.

Are saved up to the end of the survey and its analysis in Azure.

Processing:

The text files are saved for reading and evaluation on the PCs of the core team members.

Analytics (optional, if the visitor's consent is given): Here the demographic questions are always included for each event.

Behaviour on the page (sequence, length of stay, transitions, repeat visits, etc.)

Like/dislike pressed on the page.

Rough geographical data (from the masked IP) → How many visitors to the page come from Vienna, Innsbruck, Graz?

### **Please note:**

The visit to the mock-up is voluntary and the various methods of feedback can also be activated or used separately.

### **Legal basis for data processing:**

TU Wien processes your personal data on the basis of Article 6, par 1 (a) GDPR due to your voluntarily participating in the survey and using the mock-up.

### **Categories of recipients of personal data:**

Personal data processed in connection with the survey or the mock-up is on principle not passed on to third parties. The providers of hosting service for the mock-up, firewall as well as user analysis are



provided with knowledge of the above cited data if such is provided for in connection with the particular contract processing agreements.

- The mock-up - in other words the page (is not given and does not save any personal data) → Microsoft Azure
- Firewall - protection against the mock-up (IP is saved in encrypted form for a maximum of two days) → Microsoft Azure
- Tracking / Analytics - the highest level of anonymization (voluntary and the IP is masked) → Google Analytics

Access authorisation for the data lies exclusively with the project employees of the Austrian DataLAB and Services Project. The authorised administrators of TU.IT additionally have access.

#### **Retention period:**

The firewall data are saved for two days. The remaining data (without any personal data) are saved until the end of the survey and its analysis but in no case beyond the end of the project.

Data processing outside of the European Union:

The operators of the hosting service and the user analysis deployed at TU Wien is headquartered in the United States. Nonetheless, the hosting of the mock-up is in “Western Europe.”

#### **Your rights in connection with personal data:**

As a subject of this data processing, you have the following rights in relation to TU Wien:

- the right to information;
- the right to rectification;
- the right to erasure;
- the right to restriction of processing of your data;
- the right to data portability;
- the right to object

Furthermore, as a subject you have the right to complain to the data protection authority about any allegedly improper data processing or any failure to meet any obligations under GDPR.

#### **Competent regulatory authority:**

The competent regulatory authority is the Austrian Data Protection Authority (DSB), Barichgasse 40-42, 1030 Vienna, telephone: + 43 1 152-0, email: [dsb@dsb.gv.at](mailto:dsb@dsb.gv.at)

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