

Data Processing Regulations of HSG Alumni

These Data Processing Regulations on the basis of Art. 19 of the Statutes shall enter into force pursuant to the resolution of the General Meeting of 15 November 2021.

1. Principles

In order to conduct its activities as the alumni organisation of the University of St.Gallen, HSG Alumni processes data of its members.

These Regulations shall create transparency concerning the principles of data processing and regulate the use and disclosure of member data and further personal data of non-members to any third parties.

HSG Alumni and its affiliated organisations shall take the protection of personal data seriously and comply with the applicable data protection regulations, particularly the Swiss Federal Act on Data Protection (FADP) and, inasmuch as it is applicable, the European General Data Protection Regulation (GDPR).

2. Processing of member data

Member data are gathered and processed in the member profile.
(List in Appendix A)

2.1 Member portal

Besides the publicly accessible part of the website, www.hsgalumni.ch provides members with a member portal that can be accessed by logging in. In this password-protected area, members can process their own data that are accessible to other members and define the degree of accessibility. In the member portal, members can also access information, for instance about invoices, membership information and registrations for events. Also, members are able to administer their community membership and communication settings in the portal.

2.2 Members

The following member data of the University of St.Gallen are stored by HSG Alumni: surname, first name, date of birth, correspondence language, gender, matriculation number, enrolment, degree courses, diplomas, degrees obtained from and years spent at the University of St.Gallen, address, private e-mail address and SWITCH edu-ID. Any further data can be input into the HSG Alumni portal voluntarily by members and be administered and also deleted there.

Members' personal and contact data shall be processed by HSG Alumni on the basis of the Statutes. Members shall not be entitled to object to such data processing owing to the association's obligation to process member data. Such member data shall be stored by HSG Alumni for a minimum of ten years after the expiry of membership but shall not be actively processed and shall be designated as inactive.

However, the minimal contact data shall continue to serve to document members' degrees. Such data may be disclosed to the University of St.Gallen for the purpose of research into former students or for purposes of documentation.

2.3 Rights of the persons concerned

You shall have the following rights in relations with us regarding your own personal data which you have voluntarily made available to us:

- right to information,
- right to correction or deletion,
- right to limitation of processing,
- right to object to processing.

Provided that data processing is based on your consent, you shall be able to revoke it at any time for the future without adducing any reasons, such revocation to be made by adapting the settings in the HSG Alumni portal.

Queries for information have to be addressed to datenschutz@hsgalumni.ch. To enable us to process your queries about the exercise of your rights, it may be necessary for you to identify yourself to ensure that we will be able to identify you unequivocally.

In a case of suspected data protection violation, there is the possibility in Switzerland of lodging a complaint with the Federal Data Protection and Information Commissioner. If the GDPR is applicable, there is a right of appeal to the competent data protection supervisory authority.

2.4 Communication with members

Communication with members shall be conducted by post, telephone, e-mail or other electronic means of communication. For this purpose, members shall make available up-to-date address information such as e-mail addresses, postal addresses and telephone numbers and shall keep them updated.

It shall not be possible for members to object to the delivery of information concerning the association by e-mail.

3. Disclosure of member data

HSG Alumni may make member data accessible to its members as address or contact directories for the purpose of the mutual establishment of contact and business promotion.

The Executive Board shall determine the use of member data.

Members may adapt their privacy settings in their profiles in the online portal. An opt-out possibility shall provide them with the option of concealing individual data or all the data from other members.

Member data shall only be disclosed for commercial purposes after prior notification of and consent by the member concerned.

4. Data exchange with the University of St.Gallen

HSG Alumni exchanges its member data with the University of St.Gallen. The following information may be exchanged for the following purposes:

- all the profile information recorded by a member in the online portal,
- a member's current status and history of membership or affiliation,
- information of a member's activities in the HSG Alumni community.

For this purpose, the Executive Board shall draw up a data processing agreement with the University of St.Gallen.

The minimal contact data shall continue to be stored after membership of HSG Alumni and serve to document members' degrees. Such data may be disclosed to the University of St.Gallen for the purpose of research into former students or for purposes of documentation. Former members may continue to be contacted by HSG Alumni on behalf of the University of St.Gallen. The legal basis for the data storage and contact processing is the performance mandate of the University of St.Gallen. To complement such data, HSG Alumni records publicly known career data of former students from non-members, inasmuch as they have not objected to such data being processed. The legal basis for such processing is constituted by the overriding legitimate interest of HSG Alumni in such processing for the acquisition of members and the support of the HSG community. The person concerned may demand that such additionally recorded data be deleted at any time.

The minimal contact data contain the following data:

- surname,
- first name,
- date of birth,
- correspondence language,
- gender,
- matriculation number,
- enrolment,
- degree courses,
- diplomas,
- degrees obtained from the years spent at the University of St.Gallen,
- address,
- private e-mail address,
- SWITCH edu-ID,
- history of memberships and affiliations,
- data on the basis of the member's activities in connection with her/his membership up to now.

5. Disclosure of data to third parties

Decisions regarding the disclosure of data to any third parties shall be the responsibility of the Executive Board. Data may solely be disclosed for the pursuit of ideational purposes. Any disclosure of data for commercial reasons shall be contingent on the consent granted by the person concerned and can be administered in the HSG Alumni portal.

Data shall be disclosed to the following in accordance with many years of practice:

- service providers which take on digital or physical distribution activities on behalf of HSG Alumni;
- providers of social media services for the implementation of the social media strategy;
- service providers for address validation (no sales of addresses to any third parties);
- HSG Alumni Services GmbH for the business transaction of HSG Alumni;
- HSG Foundation for the acquisition of donors;
- University of St. Gallen, Executive School, for the promotion of events and executive education.

6. Processing of further personal data

HSG Alumni processes contact data of opinion leaders from trade and industry, public administration, politics, the media and educational institutions. Such data are used for invitations and the communication of information.

The legal basis for the temporary storage of the data is constituted by the overriding legitimate interest pursuant to Art. 13 FADP and, if and inasmuch as it is applicable, Art. 6(1)(f) GDPR.

These private individuals may object to the storage and use of their data and demand that the data be deleted.

7. Events

7.1 Members' data

In the case of registration for and participation in events, HSG Alumni may demand further data from members and store these in the members' profiles. Such data may be used for marketing purposes.

7.2 Non-members' data

Information received from participants by means of their registration is stored and used for the conduct of the event. HSG Alumni and possible co-organisers shall undertake to comply with the applicable data protection provisions.

HSG Alumni may purchase contact data from third parties (address brokers) and use these for marketing purposes for the postal delivery of information about events. After the event, the contact data for the dispatch of the invitations shall be deleted by HSG Alumni. The legal basis for such data processing is constituted by the overriding interest pursuant to Art. 13(1) of the Federal Act on Data Protection (FADP) and Art. 31(1) nFADP or, inasmuch as it is applicable, Art. 6(1)(f) of the EU-GDPR. Any person concerned may object to such data processing for the purpose of direct advertising at any time.

Participants shall take cognisance of the fact that on the basis of their participation and on the basis of HSG Alumni's overriding legitimate interest, HSG Alumni uses the data thus gathered for advertising purposes of its own. Thus participants will receive a reminder by e-mail or by post prior to the event and sometimes an event documentation after the event. Also, participants receive information about the next event by e-mail or by post.

If participants expressly do not wish to receive the above, they may notify the organiser of this in writing at any time, such objection to become effective as from the receipt of such notification.

7.3 Image rights

Participants shall be notified that images of and/or statements made by them may be recorded and take cognisance of the fact that on the basis of HSG Alumni's overriding legitimate interest, HSG Alumni may use such material for its own online presence or other advertising purposes. Such material may also be published on HSG Alumni's social media profiles. Participants shall relinquish the copyright to visual and audio material required for this purpose to HSG Alumni. Any images or video clips that show participants in a discriminating manner shall be excluded from such use.

Participants may object to the relinquishment of copyright to visual and audio material to HSG Alumni at any time, such objection to become effective as from the receipt of such notification.

8. Website and online media

In addition, the terms of use and the data protection declaration of the website shall be applicable.

9. Final provisions

Furthermore, the data protection declaration of HSG Alumni shall be applicable.

New members shall be notified of these Regulations. They shall be published on the website.

Please note: this translation is provided for information purposes only and has no legal force.

Appendix A

Data fields in the HSG Alumni profile

Compulsory fields (cannot be processed by members)

- First name
- Middle name
- Surname
- Date of birth
- Gender
- Matriculation number
- SWITCH edu-ID
- Enrolment
- Degree courses
- Diplomas
- Degrees obtained from the years spent at the University of St.Gallen

Optional fields (can be processed by members in the member portal at any time)

- Personal information
- Profile image
- Private and business contact information
- Correspondence language
- Professional experience
- Education/training outside the University of St.Gallen
- Extracurricular commitments
- Memberships
- Knowledge and competencies
- Various interests
- Social networks
- Data protection settings
- Documents