

WU Executive Academy Website Privacy Policy

This privacy policy informs you about the personal data that is collected when you visit the WU Executive Academy website or access the content provided under the domain "executiveacademy.at", and how WU Executive Academy handles this data. It also informs about the rights to which the persons concerned are entitled under data protection law.

A use of the internet pages of the WU Executive Academy is basically possible without any indication of personal data. By means of this privacy policy, we would like to inform the public about the nature, scope and purpose of the personal data we collect, use and process. Furthermore, this privacy policy informs affected persons about their rights.

Content

- 1. the name and address of the controller..... 2
- 2. contact details of the data protection officer 2
- 3. data collected during visits to the website 2
- 4. subscription to our newsletter 3
- 5 How to contact us via the website 3
- 6. routine deletion and blocking of personal data, storage periods 3
- 7. rights of the data subject 4
- 8. regulations for participants in university courses, short programs, lectures and other events at the WU Executive Academy..... 4
- 9. cookies, pixel tags, plug-ins and integration of external content on the website 5
 - 9.1 Cookies 5
 - 9.2 Web analysis..... 6
 - 9.2.1. Google Analytics 6
 - 9.2.3 ClickDimensions..... 7
 - 9.3 Analysis for advertising purposes 7
 - 9.3.1 Analysis for advertising purposes 7
 - 9.3.2 Facebook website Custom Audience 8
 - 9.4 Integration of third-party services and content (plug-ins)..... 9
 - 9.4.1 YouTube and Google Maps 9
 - Google LLC is certified under the Privacy Shield Agreement (<https://www.privacyshield.gov/>) and is therefore considered to provide an adequate level of data protection. You can find Google's privacy policy at <https://policies.google.com/privacy> 9
 - 9.4.3 Vimeo 9

9.4.4 Facebook	10
9.4.5 Twitter	10
9.4.6. instagram.....	10
9.4.4 LinkedIn	11
9.4.5. Xing.....	11
10. references to external websites (external links)	11

1. Name and address of the controller

WU Executive Academy
 Welthandelsplatz 1
 Building EA
 1020 Vienna
 Austria

Phone: +431313365167
 Email: executiveacademy(at)wu.ac.at
 Website: executiveacademy.at

2. Contact details of the data protection officer

You can contact our data protection officer at: [datenschutzbeauftragter\(at\)wu.ac.at](mailto:datenschutzbeauftragter(at)wu.ac.at)

For general data protection inquiries please contact: datenschutz(at)wu.ac.at

Further information can be found on the web at <https://www.wu.ac.at/datenschutz/>.

3. data collected during visits to the website

When you access the WU Executive Academy website, as is customary for other websites, data is collected that is automatically transmitted when you use the website. This data is logged in server log files. This data includes the following:

- IP address from which access was made
- Date and time of access
- Call method (e.g. GET)
 - URL invoked
- Access protocol (e.g. HTTP/1.1)
- HTTP response code
- File size
- Previously visited URL (referrer URL)
- Operating system and browser type (user agent)

The log files are stored for a period of two weeks. WU Executive Academy uses this information to create anonymized usage statistics and to ensure the proper operation and monitoring of the website's performance. Processing is based on the legitimate interests of the WU Executive Academy.

4. Subscription to our newsletter

The WU Executive Academy website offers users the opportunity to subscribe to the WU Executive Academy newsletter. The input mask used for this purpose determines which personal data is transferred to the data controller when ordering the newsletter.

With your separate consent, which you can revoke at any time, or if there is a predominant legitimate interest on our part, we will process personal data about you (name, address, contact details,) for our own advertising and marketing purposes in order to send you regular information about courses, seminars, events and other information from the WU Executive Academy [and WU] that might be of interest to you, as long as you have not revoked your consent or objected to processing for advertising purposes.

The legal basis for the processing is, if you have given us your separate consent, Art 6 para. 1 lit a DSGVO, and otherwise our justified interest in advertising our range of services in accordance with Art 6 para. 1 lit f DSGVO.

If you do not wish to receive the newsletter any longer, please let us know. You can unsubscribe from our newsletter at any time (e.g. simply via the unsubscribe link within a newsletter).

Our newsletters are sent via the e-mail marketing software Clickdimensions. For this purpose, the contact data (name, title, e-mail address) are forwarded to the operator of Clickdimensions, as the processor of the order, who saves and processes these data for the newsletter dispatch. You can find more information about the collected data and data protection by Clickdimensions at:

<https://clickdimensions.com/about/privacy-policy/>

In the course of using the newsletter, data on the time of delivery and opening of e-mails, click behaviour, IP addresses and e-mail programs used are collected. We use this data to make our newsletter as user-friendly and intuitive as possible and to find out the most interesting topics for our customers. This personal data is processed on the basis of our legitimate interests (Art 6 para. 1 lit f DSGVO).

5 How to contact us via the website

If a data subject contacts the WU Executive Academy by e-mail or via a contact form, the personal data transmitted by the data subject will be stored for the purpose of processing or contacting the data subject. This personal data is not passed on to third parties.

6. Routine deletion and blocking of personal data, storage periods

The WU Executive Academy processes and stores personal data only for as long as necessary to achieve the purposes stated in this Privacy Policy for which it is processed, unless legal retention

obligations require longer storage. After the respective purpose has ceased to exist or these periods have expired, the personal data will be routinely blocked or deleted in accordance with legal requirements.

7. Rights of the data subject

In accordance with the statutory data protection provisions, in particular Articles 15 to 21 of the EU Basic Data Protection Regulation (DSGVO), data subjects have the right at all times to

- Information on the personal data processed about them,
- Correction of incorrect data and completion of incomplete data,
- Deletion of their data, whereby the right to deletion may be restricted in the cases specified by law, in particular by legal retention obligations to which WU is subject, by the right to freedom of expression, archiving purposes in the public interest or scientific research purposes.
- Restriction of processing,
- Publication of the data they provide in a structured, common and machine-readable format (right to data transferability),
- opposition to the processing of personal data concerning them for reasons arising from their particular situation. This is provided that the processing is carried out for the performance of a task carried out in the public interest or in the exercise of official authority or on the basis of a balancing of interests. In the event of an objection, WU will no longer process the personal data unless WU can demonstrate compelling reasons for processing that are worthy of protection and outweigh the interests, rights and freedoms of the data subject, or unless the processing serves to assert, exercise or defend legal claims.
- Opposition to the processing of personal data concerning them for the purpose of direct marketing. In case of an objection to direct mail, WU will no longer process the data of the data subject for these purposes.

Corresponding inquiries can be directed to the office indicated in the "Contact" section.

Data subjects also have the right to submit a complaint to the supervisory authority about an alleged violation of their rights or of WU's data protection obligations. In Austria, this is the responsibility of the data protection authority, Wickenburggasse 8, 1080 Vienna.

8. Regulations for participants in university courses, short programs, lectures and other events at the WU Executive Academy

The participant acknowledges that the personal data collected in the course of the initiation and execution of the program or event will be processed automatically by the WU Executive Academy for

the purpose of contractual fulfillment and for the fulfillment of the legally assigned tasks of a university.

For the administration of the program or event, participants' personal data will be passed on to lecturers, WU staff members responsible for the organization of the program (Studies and Examination Office, study law), as well as those cooperation partners of the WU Executive Academy who are involved in the program or event booked.

The legal basis for the processing is in particular Article 6 paragraph 1 letter b DSGVO (fulfillment of contract) and, in particular in the case of university courses as defined in Article 56 of the University Act 2002 (UG), also Article 6 paragraph 1 letter c DSGVO (legal obligation), Article 6 paragraph 1 letter e DSGVO (performance of a task in the public interest), Article 9 paragraph 2 letter j DSGVO, Article 89 DSGVO (scientific research purposes), the UG, the Research Organization Act (FOG), and the WU statutes. In addition, certain personal data within the scope of application of the UG must also be transferred by the WU Executive Academy to the "Datenverbund der Universitäten und der Pädagogischen Hochschulen" (Data Network of Universities and Universities of Teacher Education) due to legal requirements.

In some programs, the WU Executive Academy provides its participants with an online learning platform, which is designed to facilitate and promote internal communication between participants. Participants are therefore aware that name, e-mail and other personal data will be passed on to other participants.

Under the University Act, the universities are responsible in particular for the continuing education of university graduates (section 3(5) UG) and for maintaining contacts with graduates (section 3(10) UG). In order to fulfill these tasks, WU uses graduates' data to inform them about the services offered by WU Alumni Services. The legal basis is Art 6 (1) lit e DSGVO (performance of public duties).

For evaluation and quality assurance purposes, the relevant accreditation bodies (e.g. EFMD, FIBAA, AMBA, AACSB) as well as supervisory authorities of the WU Executive Academy may also have access to the personal data of participants. The legal basis for this are legal obligations under Art 6 para. 1 lit c DSGVO (including Art 14 UG; Art 18 ff Hochschul-Qualitätssicherungsgesetz) as well as important public interests under Art 89 DSGVO, Art 9 para. 2 lit j DSGVO in conjunction with Art 2e FOG.

Furthermore, WU Executive Academy allows participants to send information about WU Executive Academy offerings by mail or e-mail, even after completion of a program or event, as long as participants do not object to the use of their data for direct marketing purposes.

All personal information provided by participants will be treated confidentially by the WU Executive Academy and will only be used in the manner and for the purposes described above.

9. Cookies, pixel tags, plug-ins and integration of external content on the website

9.1 Cookies

The WU Executive Academy website uses so-called cookies. These are small data units that are stored on the visitor's terminal device when he or she visits the WU website. This allows the website

to remember certain entries and settings (e.g. login, language selection, font size and other display preferences) for a certain period of time as long as the cookie is stored.

The WU Website uses cookies in particular to adapt the presentation of the Website to the respective end device and to make the use of the Website as convenient as possible for the visitor. Cookies are also used for analytical purposes to optimize the WU Executive Academy's systems and improve the quality of the website. Processing is based on the legitimate interests of the WU Executive Academy.

Stored cookies can be deleted at any time via the settings of the web browser. Furthermore, cookies can be generally deactivated via the respective browser settings, although in some cases this may limit the use of the WU website. Do-Not-Track requirements are respected by WU.

9.2 Web analysis

The statistical evaluation of the accesses to our website is carried out on the basis of our legitimate interest in accordance with Art 6 Paragraph 1 lit f DSGVO.

9.2.1. Google Analytics

WU Executive Academy uses the Google Analytics component (with anonymization function) on this website. Google Analytics is a web analysis service. Web analysis is the collection, collection and evaluation of data on the behavior of visitors to websites. Among other things, a web analysis service collects data about which website a person concerned came to a website from (so-called referrers), which sub-pages of the website were accessed or how often and for how long a subpage was viewed. The operating company of the Google Analytics component is Google Inc, 1600 Amphitheatre Pkwy, Mountain View, CA 94043-1351, USA. Google participates in the EU-US Privacy Shield (see <https://www.privacyshield.gov>) An appropriate level of data protection is therefore guaranteed for the transfer of data to Google servers in the USA.

We would like to point out that the code "gat._anonymizeIp();" has been added to our website Google Analytics. By means of this addition, the IP address of the Internet connection of the person concerned is shortened and made anonymous by Google if the access to our website is from a member state of the European Union or from another state that is a party to the Agreement on the European Economic Area.

Google Analytics sets a cookie on the end device of the person concerned. What cookies are has already been explained above. By setting the cookie, Google is enabled to analyse the use of our website. Each time one of the individual pages of this website, which is operated by us and on which a Google Analytics component has been integrated, is called up, the Internet browser on the end device of the person concerned is automatically prompted by the respective Google Analytics component to transmit data to Google for the purpose of online analysis. The collected information about your use of this website is transferred to a Google server in the USA and stored there. Google will use this information for the purpose of evaluating your use of the website, compiling reports on website activity for us as website operators and providing other services relating to website activity and internet usage.

Google may also transfer this information to third parties where required to do so by law, or where such third parties process the information on Google's behalf. The personal data of the users will be deleted after 26 months.]

You can prevent the setting of cookies by our website, as described above, at any time by means of a corresponding setting in the Internet browser used and thus object to the setting of cookies. Such a setting of the Internet browser used would also prevent Google from setting a cookie on the end device of the person concerned. In addition, a cookie already set by Google Analytics can be deleted at any time via the Internet browser or other software programs.

Furthermore, the data subject has the opportunity to object to and prevent the collection of data generated by Google Analytics and relating to the use of this website and the processing of this data by Google. For this purpose, the person concerned must download and install a browser add-on under the link tools.google.com. As long as this add-on is installed, no data and information about visits to websites will be transmitted to Google.

Further information and Google's applicable privacy policy can be found at <https://www.google.de/intl/de/policies/privacy/> and <http://www.google.com/analytics/terms/de.html> Google Analytics is explained in more detail at this link https://www.google.com/intl/de_de/analytics/.

9.2.3 ClickDimensions

The WU Executive Academy website uses the marketing automation solution ClickDimensions. It allows us to track the activity of our visitors on our websites. The provider is ClickDimensions LLC, 5901 Peachtree Dunwoody Rd, Suite B500, Atlanta, Georgia 30328, USA. ClickDimensions participates in the EU-US Privacy Shield (see

<https://www.privacyshield.gov/participant?id=a2zt0000000TNmmAAG&status=Active>). An appropriate level of data protection is therefore guaranteed for the transfer of data to ClickDimensions. ClickDimensions uses its own HTML browser cookies. This means that visitors to our site can easily set their own browsers to reject cookies and can easily remove cookies placed by us or others. ClickDimensions never stores information in the LSO area of your computer, i.e. we never use so-called 'Flash cookies' (Local Shared Objects, or LSO for short).

- ClickDimensions never uses visitor identification techniques in which information you provide is exchanged with other websites.

Click [here to](#) read the ClickDimensions web tracking and privacy report.

9.3 Analysis for advertising purposes

The evaluation of visits to our website for advertising purposes is carried out on the basis of our legitimate interest in accordance with Art 6 Paragraph 1 lit f DSGVO.

You may also control the use of cookies used for usage-based online advertising through the Network Advertising Initiative (NAI) website at <http://optout.networkadvertising.org/>, the Digital Advertising Alliance ("DAA") website at <http://www.aboutads.info/choices> and the European website of the European Interactive Digital Advertising Alliance (EDAA) <http://www.youronlinechoices.com/at/>.

9.3.1 Analysis for advertising purposes

We use the online marketing tool Google "AdWords" of Google Inc., USA, to place ads in the Google advertising network (e.g., in search results, in videos, on web pages, etc.). Google AdWords allows us

to display ads for and within our online services in a more targeted manner in order to show users only ads that potentially match their interests. For example, if a user is shown ads for products that he or she is interested in on other websites, this is called "remarketing". For these purposes, when you visit our website and other websites on which the Google advertising network is active, Google will execute code directly by Google and incorporate so-called (re)marketing tags (invisible graphics or code, also known as "web beacons") into the website. With their help, an individual cookie, i.e. a small file, is stored on the user's device (instead of cookies, comparable technologies can also be used). This file records which websites the user has visited, what content he is interested in and which offers the user has clicked on, as well as technical information on the browser and operating system, referring websites, visiting time and other information on the use of the online offer.

Furthermore we receive an individual "conversion cookie". The information obtained with the help of the cookie is used by Google to compile conversion statistics for us. However, we only learn the anonymous total number of users who clicked on our ad and were redirected to a page with a conversion tracking tag. We do not receive any information that personally identifies users.

User data is processed pseudonymously within the Google advertising network. This means that Google does not store and process e.g. the name or e-mail address of the user, but processes the relevant data cookie-related within pseudonymous user profiles. I.e. from Google's point of view, the ads are not managed and displayed for a specifically identified person, but for the cookie holder, regardless of who that cookie holder is. This does not apply if a user has expressly permitted Google to process the data without this pseudonymisation. The information collected about users is transmitted to Google and stored on Google's servers in the USA.

Further information on the use of data by Google, setting and objection options, you can find in the privacy policy of Google (<https://policies.google.com/technologies/ads>) and in the settings for the display of advertising by Google (<https://adssettings.google.com/authenticated>).

9.3.2 Facebook website Custom Audience

Our website uses the retargeting technology "Website Custom Audience" of the social network Facebook, which is operated by Facebook Inc, USA, or in Europe by Facebook Ireland Ltd, Ireland ("Facebook"). Facebook Inc. is certified under the EU-US Privacy Shield Agreement and thus guarantees compliance with an appropriate level of data protection.

The use of Website Custom Audience enables us to show our website visitors, who have already been interested in our website and are Facebook members, advertising and offers relevant to you on Facebook via the Facebook Ad Network.

For this purpose, so-called Facebook retargeting pixels are integrated on our website, which enable Facebook to record you as a visitor to our website using a pseudonym and to use the data as the basis for our Facebook ads on Facebook. According to Facebook, the data collected via the retargeting pixel is not linked to the user data stored on Facebook.

The processing of data by Facebook is carried out within the framework of Facebook's data policy. You can find more information on data protection by Facebook and your options for setting this at <https://www.facebook.com/about/privacy> . You can object to the use of Facebook website custom audiences for the future via <https://www.facebook.com/settings/?tab=ads> and <http://www.youronlinechoices.com/de/prferenzmanagement/> .

9.4 Integration of third-party services and content (plug-ins)

Within our website, we use content or service offers from third parties on the basis of our legitimate interests (namely our interest in the analysis, optimization and economic operation of our website in the sense of Art. 6 para. 1 lit f DSGVO) in order to integrate their content and services, such as videos and maps or social media buttons (PAGE SHARE / Follow us) (hereinafter also referred to as "Plug-Ins").

This usually requires the third party providers of such content and services to be aware of the IP address of users, as without the IP address they would not be able to send the content to their browsers. The IP address is therefore required to display this content. Third party providers may also use so-called pixel tags (invisible graphics, also known as "web beacons") for statistical or marketing purposes. The "pixel tags" can be used to evaluate information such as visitor traffic on the pages of this website. The pseudonymous information may also be stored in cookies on the user's device and may contain technical information about the browser and operating system, referring websites, visiting time and other details about the use of our online offer, as well as being linked to such information from other sources.

If the visitor to our website is simultaneously logged in to third-party applications, the respective third-party provider can assign the visit to our website to the visitor. When users interact with the plug-ins, the corresponding information from your device is transmitted directly to the third-party provider and stored there. If a user is a member of an application of the respective third party and does not want the respective third party to collect data about him/her from his/her visit to our website and link it to his/her membership data stored by the third party, he/she must log out of the respective third party application and delete his/her cookies before visiting our website.

We integrate plug-ins from the following third party providers:

9.4.1 YouTube and Google Maps

Our website uses plugins of the "YouTube" platform and the "Google Maps" service of the provider Google LLC, 1600 Amphitheatre Parkway, Mountain View, CA 94043, USA.

When you visit one of our sites equipped with a YouTube plugin, a connection to the YouTube servers is established. This tells the YouTube server which of our pages you have visited. If you are logged in to your YouTube account, you allow YouTube to assign your surfing behavior directly to your personal profile. You can prevent this by logging out of your YouTube account.

We integrate the maps from "Google Maps". When using Google Maps, Google also collects, processes and uses data on the use of the map functions by visitors to the website. The processed data may include, in particular, IP addresses and location data of the users, which, however, are not collected without their consent (usually in the context of the settings of their mobile devices). The data may be processed in the USA.

Google LLC is certified under the Privacy Shield Agreement

(<https://www.privacyshield.gov/>) and is therefore considered to provide an adequate level of data protection. The Google privacy policy can be found at

<https://policies.google.com/privacy>.

9.4.3. Vimeo

Our website uses plugins from the video portal Vimeo of Vimeo, LLC, 555 West 18th Street, New York, New York 10011, USA. Each time you access a page with one or more Vimeo video clips, a direct

connection is established between your browser and a Vimeo server in the USA. Information about your visit and your IP address is stored. In conjunction with the Vimeo plug-ins (e.g. by clicking the start button), this information is also transmitted to Vimeo and stored there.

If you have a Vimeo user account and do not want Vimeo to collect information about you through this website and link it to your member information stored at Vimeo, you must log out before visiting this website.

The Vimeo Privacy Policy, which provides additional information about Vimeo's collection and use of your information, can be found at <https://vimeo.com/privacy>

In addition, Vimeo calls up the tracker Google Analytics via an iFrame, in which the video is retrieved. This is Vimeo's own tracking, which we do not have access to.

9.4.4 Facebook

We use buttons on the social network facebook.com, which is operated by Facebook Ireland Ltd, 4 Grand Canal Square, Grand Canal Harbour, Dublin 2, Ireland ("Facebook").

Facebook is certified under the Privacy Shield Agreement and thus offers a guarantee to comply with European data protection law (<https://www.privacyshield.gov/participant?id=a2zt0000000GnywAAC&status=Active>).

The purpose and scope of the data collection and the further processing and use of the data by Facebook, as well as the relevant rights and setting options to protect the privacy of users, can be found in the Facebook privacy policy: <https://www.facebook.com/about/privacy/>.

Further settings and objections to the use of data for advertising purposes are possible within the Facebook profile settings: <https://www.facebook.com/settings?tab=ads> .

9.4.5 Twitter

Within our online offer, functions and contents of the service Twitter, offered by Twitter Inc., 1355 Market Street, Suite 900, San Francisco, CA 94103, USA, can be integrated. This may include, for example, content such as images, videos or text and buttons with which users can share content from this online service within Twitter.

If the users are members of the platform Twitter, Twitter can allocate the call of the above mentioned contents and functions to the user's profiles there. Twitter is certified under the Privacy Shield Agreement and thus offers a guarantee to comply with European data protection law (<https://www.privacyshield.gov/participant?id=a2zt0000000TORzAAO&status=Active>). Privacy policy: <https://twitter.com/de/privacy>, Opt-Out: <https://twitter.com/personalization>.

9.4.6. Instagram

Within our online offer, functions and contents of the service Instagram, offered by Instagram Inc, 1601 Willow Road, Menlo Park, CA, 94025, USA, can be integrated. This may include, for example, content such as images, videos or text and buttons that allow users to share content from this online offering within Instagram. If the users are members of the Instagram platform, Instagram may assign the access to the above-mentioned content and functions to the user profiles there. Privacy policy of Instagram: <http://instagram.com/about/legal/privacy/>. Instagram Inc.

Instagram is part of Facebook Ireland Ltd, 4 Grand Canal Square, Grand Canal Harbour, Dublin 2
Facebook is certified under the Privacy Shield Agreement, which guarantees that it complies with European data protection law
(<https://www.privacyshield.gov/participant?id=a2zt0000000GnywAAC&status=Active>).

9.4.4 LinkedIn

Within our online offer, functions and contents of the service LinkedIn, offered by LinkedIn Ireland Unlimited Company Wilton Place, Dublin 2, Ireland, can be integrated. This may include, for example, content such as images, videos or text and buttons that allow users to share content from this site within LinkedIn. If users are members of the LinkedIn platform, LinkedIn may assign the access to the above-mentioned content and functions to the user profiles there. LinkedIn's privacy policy: <https://www.linkedin.com/legal/privacy-policy>. LinkedIn is certified under the Privacy Shield Agreement and thus offers a guarantee of compliance with European data protection law (<https://www.privacyshield.gov/participant?id=a2zt0000000L0UZAA0&status=Active>). Privacy policy: <https://www.linkedin.com/legal/privacy-policy>, Opt-Out: <https://www.linkedin.com/psettings/guest-controls/retargeting-opt-out>.

9.4.5. Xing

Within our online offering, functions and content of the Xing service, offered by XING AG, Dammtorstraße 29-32, 20354 Hamburg, Germany, can be integrated. This may include, for example, content such as images, videos or texts and buttons with which users can share content from this online offering within Xing. If the users are members of the Xing platform, Xing can assign the access to the above-mentioned contents and functions to the user profiles there. Privacy policy of Xing: <https://privacy.xing.com/de/datenschutzerklaerung>.

10. references to external websites (external links)

The websites offered by the WU Executive Academy may contain links to external websites, i.e. third-party websites. However, WU has no influence on their content or the data protection standards of such linked sites. WU Executive Academy is therefore not liable for external links.