

Information on the processing of your personal data

Care and transparency form the basis of a relationship of trust with our students and applicants. We therefore explain how we process your data and how you can exercise your rights under the General Data Protection Regulation (GDPR). The personal data we process and the purposes for which we process it depend on the relevant contractual relationship and the programme for which you apply.

1. Who is responsible for data processing?

The responsibility lies with:

Frankfurt School of Finance & Management gGmbH
Adickesallee 32-34
60322 Frankfurt am Main
Represented by the President Prof. Dr. Nils Stieglitz

2. How do you contact the Data Protection Officer?

You can contact our Data Protection Officer at:

intersoft consulting services AG
Beim Strohause 17
20097 Hamburg
Germany

Or by email:

datenschutzbeauftragter@fs.de

3. Which of your personal data do we use?

If you have an enquiry, have us prepare an offer or sign a contract with us, we process your personal data. In addition, we process your personal data to fulfil legal obligations, to safeguard a legitimate interest or with your consent.

Depending on the legal basis, the following categories of personal data are involved:

Standard information

- Basic information (first name, surname, address, nationality, date of birth)
- Contact details (telephone, mobile phone, e-mail address)
- Qualification (cover letter, curriculum vitae)

- (Work) references and certificates (performance data, assessment data etc.)
- Account information, especially registration and logins

Contract data

- Standard contract information in particular contract number, term, period of notice, type of contract
- Billing data/sales data
- Payment data/account information

Voluntary data

- Video or image recording
- Testimonials (with picture and name)

Data processed when using AI systems

- prompts, uploaded files and other content where these contain personal data
- outputs generated by AI systems where these contain personal data
- account, usage and technical metadata, for example user ID, time and duration of use and log data

4. What are the sources of the data?

We process personal data that we receive from you during the recruiting, admissions and enrolment process and throughout your studies.

We also receive personal data from the following sources:

- Employer of the applicant/student
- Graduate Management Admissions Council (GMAC)
- Educational Testing Service (ETS)
- Study portals
- Trade Fairs
- Publicly available sources (social media channels, websites)
- Other affiliate companies
- web tracking tools, for example Google Analytics and Hotjar
- IB Organization
- College Board
- IELTS
- Pearson

5. Use of AI systems

To support the processes described in this notice, we may use our own AI systems and third-party AI services. This may include preparing, structuring, summarising, translating, analysing and quality-checking information and supporting communication, teaching, study organisation, administration and other existing processes. The legal basis is generally our legitimate interest in efficient processes and the use of modern technology (Art. 6(1)(f) GDPR). Where AI use is necessary to take steps before entering into or to perform the student contract, it is based on Art. 6(1)(b) GDPR. Depending on the case, Art. 6(1)(c) GDPR or your consent under Art. 6(1)(a) GDPR may also apply.

Personal data is processed in AI systems only to the extent necessary for the relevant purpose. Inputs are limited to what is needed. Where possible, we use anonymised, pseudonymised, shortened or generalised information. Special categories of personal data are processed only where this is exceptionally necessary.

The data processed may include prompts, uploaded files, personal data contained in them, technical usage and account data and the generated outputs. As a rule, personal data is not used to train AI models. Any use that departs from this principle takes place only following a separate data protection assessment, on an applicable legal basis and after the data subjects have been informed in advance. Where AI providers act as processors, they may not use inputs and outputs to train their generally available AI models.

AI systems support our employees and lecturers and may be used in particular for analysis and preparation. Where AI outputs concern personal aspects, they are independently reviewed by an authorised person with appropriate expertise. Decisions with legal or similarly significant effects, in particular decisions on admission, scholarships, examinations or academic performance, are not made solely by automated means. Profiling with such effects does not take place. AI-supported use in connection with academic performance takes place only where the study and examination regulations applicable to the relevant programme and the internal policies provide for it and specify the purpose and required procedural safeguards. Where an AI-assisted assessment takes place, it is independently reviewed and remains the responsibility of the competent teaching staff; existing review and academic appeal procedures remain unaffected.

6. For what purposes and on what legal basis do we process your data?

We process your personal data in particular in accordance with the General Data Protection Regulation (GDPR), the German Federal Data Protection Act (BDSG) and all other applicable laws, including the Hessian Higher Education Act.

6.1 To take steps before entering into and to perform the student contract (Art. 6(1)(b) GDPR)

In order to implement the student contract for all academic programmes of the Frankfurt School of Finance & Management (Bachelor of Arts, Bachelor of Science, Master and MBA programmes)

we collect personal data from you. We process this data during the course of contract preparation and creation, e.g. when creating your electronic student file or for accounting purposes.

More specifically, personal data is processed as follows:

- Creating an applicant file on the drive and in the internal databases (Campus Learning Management and Full Fabric)
- Implementation of the application procedure/assessment centre/test procedure
- Implementation of the application procedure for awarding scholarships
- Creating a student file on the drive
- Creating a student account in the internal databases (Campus Learning Management, Full Fabric and Canvas)
- Sending the contract documents and contract-relevant materials (study materials) via Campus Link or by post
- Timetable and event planning
- Issuing a student card
- Contact from the Study Advisory for organisational purposes by e-mail and telephone (e.g. study organisation, participation in competitions, feedback meetings)
- issuing certificates for public institutions (e.g. health insurance companies, German pension insurance) and employers
- registration and deregistration with health insurance providers via the digital notification system
- creation of rankings and recording of award recipients, including for academic ceremonies
- Implementation of the semester abroad planning
- Implementation of the examination procedure (written and oral)
- Recording of grades in the internal databases and creation of the Transcripts of Record (TOR)
- recording student activities and creating the Extracurricular Transcript of Records
- processing applications for leave of absence and reasonable accommodation
- Issue of diplomas and certificates
- Accounts payable and accounts receivable
- CV screening via JobTeaser
- creating participant profiles containing professional background information for lecturers
- AI-supported processing where this is necessary to take steps before entering into or to perform the student contract and the processes listed above
- Use and deployment of AI systems

6.2 On the basis of consent granted by you (Art. 6 para. 1 lit. a) GDPR)

If you have given us your consent to the collection, processing or transmission of certain personal data, then this consent forms the legal basis for the processing of this data.

In the following cases, we will process your personal data on the basis of the consent you have given us:

- sending of an e-mail newsletter
- personalised newsletter tracking
- Sending of advertising e-mails with information on products, services and events of the Frankfurt School of Finance & Management gGmbH
- Creation of customer profiles for marketing purposes
- Creation of a yearbook
- Participation in the cross-programme mentoring programmes
- Publication of a testimonial (name and picture)
- Publication of picture and video recordings
- Answering requests from verification agencies
- Participation in the KODE coaching process in the MBA programmes
- Usage of Career Services (jobteaser)
- transfer of data to ranking services, such as the Financial Times
- participation in events organised by Frankfurt School of Finance & Management gGmbH
- Use and deployment of AI systems

6.3 To fulfil legal obligations (Art. 6 para. 1 lit c) GDPR)

As a university we are subject to various legal obligations. Processing of personal data may be necessary to fulfil these obligations.

In the following cases we process your personal data to fulfil a legal obligation:

- Control and reporting obligations to the Hessian Ministry of Science and Art and the State Statistical Office (Hessian Higher Education Act)
- Prevention/defence of criminal acts
- compliance with tax-law obligations
- AI-supported processing where this is necessary to comply with a legal obligation

6.4 Based on legitimate interest (Art. 6 para. 1 lit f) GDPR)

In certain cases, we process your data to protect our legitimate interests or those of third parties.

- Central customer data management within our corporate group
- Measures for building and facility safety
- Video surveillance to ensure adherence to house rules
- Ensuring IT security and IT operation
- evaluations (e.g. customer satisfaction surveys)
- Classification according to AACSB guidelines and its reporting documentation
- Audits and accreditations
- processing your request for a place in a student residence
- contacting you in connection with rankings
- providing the semester ticket
- nominating you for a semester-abroad place at a partner university
- AI-supported processing to make existing processes more efficient, in particular to prepare, structure, summarise, translate, analyse and quality-check information and to use modern technology

7. To whom will your data be passed on?

To fulfil our contractual and legal obligations, your personal data will be disclosed to various public or internal bodies, as well as external service providers.

Companies in the corporate group:

The Frankfurt School of Finance & Management network of companies maintains a central customer administration, to which employees of all companies have access, in order to be able to offer you all services of our company from one source. The companies in the corporate group are:

- Efiport GmbH
- Frankfurt School Solutions GmbH
- Frankfurt School Financial Services GmbH

External service providers:

We work together with selected external service providers to fulfil our contractual and legal obligations. Specifically, these are:

- IT service providers, for example maintenance and hosting providers and Microsoft
- providers of AI systems and related IT services, in particular OpenAI for ChatGPT EDU and Microsoft where the relevant services are used
- Service provider for a customer relationship management system
- Service provider for file and data destruction
- Print service provider
- Telecommunications service provider
- Payment service provider
- Advice and consulting
- Service provider for marketing or sales
- Web hosting service provider
- Lettershops
- Auditors
- External lecturers and examiners
- Collection service provider
- operators of student residences
- external coaches
- Cooperation partners

We offer some programmes with cooperation partners from the private sector (e.g. auditing firms) and other universities. Career Service also works together with selected companies.

Public authorities:

In addition, we may be required to transfer your personal data to other recipients, such as public authorities in order to comply with statutory notification requirements.

- State Statistical Office of Hessen

- Hessian Ministry of Economics and Art
- Tax authorities
- Health insurance companies
- Social insurance agency

8. Is your data transferred to countries outside the European Union (third countries)?

When we use individual service providers, personal data may be transferred to countries outside the European Union and the European Economic Area (EEA), or may be accessed from such countries. This applies in particular where a service provider or one of its subprocessors is established there.

Such a transfer takes place only where the requirements of Arts. 44 et seq. GDPR are met, in particular on the basis of an adequacy decision by the European Commission or appropriate safeguards under Art. 46 GDPR, such as EU Standard Contractual Clauses and, where necessary, supplementary safeguards. Under the contractually agreed settings for ChatGPT EDU, chat content is stored on servers in the EU; access from third countries cannot, however, be ruled out completely.

9. How long will my data be stored?

We store your personal data as long as it is necessary to fulfil our legal and contractual obligations.

If storage of the data is no longer necessary for the fulfilment of contractual or legal obligations, your data will be deleted, unless further processing is necessary for the following purposes:

- Fulfilment of commercial and tax law obligations to retain data. Retention periods from the German Commercial Code (HGB) or the German Fiscal Code (AO) must be noted. The retention periods are up to 10 years.
- Retention of documents on study periods, examination documents and reports on examination results. The retention periods are up to 60 years (Hessian Higher Education Act in conjunction with the Hessian Registration Ordinance)).
- Preservation of evidence within the framework of the statutory limitation regulations. According to the statutes of limitation of the German Civil Code (BGB), these periods of limitation can in some cases be up to 30 years; the regular period of limitation is three years.
- when AI systems are used, prompts, uploaded files, generated outputs and technical metadata are retained only for as long as necessary for the relevant purpose and under the agreed system settings. Under the current contractual setting for ChatGPT EDU, chat content is retained for no more than twelve months unless it is deleted earlier.

10. What rights do you have in connection with the processing of your data?

Every data subject has the right of access under Art. 15 GDPR, the right to rectification under Art. 16 GDPR, the right to erasure under Art. 17 GDPR, the right to restriction of processing under Art. 18 GDPR, the right to notification under Art. 19 GDPR, the right to data portability under Art. 20 GDPR and the right to object under Art. 21 GDPR. The restrictions under Sections 34 and 35 BDSG apply to the rights of access and erasure.

10.1 [Right to object](#)

You can object to the use of your data for advertising using electronic mail at any time without incurring any costs other than the transmission costs according to the basic rates.

What right do you have in case of data processing on the basis of your legitimate or public interest?

According to Art. 21 paragraph 1 GDPR, you have the right to object at any time, for reasons arising from your particular situation, to the processing of personal data concerning you, which is carried out on the basis of Art. 6 paragraph 1 lit. e) GDPR (data processing in the public interest) or on the basis of Art. 6 paragraph 1 lit. f) GDPR (data processing to safeguard a legitimate interest); this also applies to profiling based on this provision.

In the event of your objection, we will no longer process your personal data unless we can prove compelling reasons for processing which are worthy of protection and which outweigh your interests, rights and freedoms, or unless the processing serves to assert, exercise or defend legal claims.

What right do you have in the case of data processing for direct marketing purposes?

If we process your personal data for the purpose of direct marketing, you have the right to object at any time to the processing of personal data concerning you for the purpose of such marketing, including profiling, in accordance with Article 21, paragraph 2 of the GDPR.

If you object to processing for the purpose of direct marketing, we will no longer process your personal data for these purposes.

10.2 [Revoking consent](#)

You can revoke your consent to the processing of personal data at any time. Please note that the revocation is only valid for the future.

10.3 [Right to lodge a complaint](#)

You have the right to lodge a complaint with the competent data protection supervisory authority (Art. 77 GDPR in conjunction with Section 19 BDSG):

The Hessian Commissioner for Data Protection and Freedom of Information, Postfach 3163, 65021 Wiesbaden

10.4 Exercising your rights

To exercise your rights, you can contact the person responsible or the Data Protection Officer at datenschutzbeauftragter@fs.de. We will process your enquiries immediately and in accordance with the legal requirements and inform you of the measures we have taken.

11.Does automated decision-making or profiling take place?

No decision within the meaning of Art. 22 GDPR is made solely by automated means. AI systems may be used for analysis and preparation. AI outputs concerning personal aspects are independently reviewed by an authorised person with appropriate expertise. Decisions with legal or similarly significant effects are made by authorised persons. AI-based profiling with such effects does not take place.

12.Is there an obligation to provide your personal data?

In order to enter into a business relationship, you must provide us with the personal data that is required to carry out the contractual relationship or that we are obliged to collect due to legal requirements. If you do not provide us with these data, then the execution and processing of the contractual relationship is not possible for us.

13.Changes to this information

Should the purpose or the way in which your personal data is processed change significantly, we will update this information in due time and inform you of the changes in due time.

14.Last updated

July 2026