



Frankfurt School
of Finance &
Management

DATA PROTECTION NOTICE CHATGPT EDU - STUDENTS

Processing of account, usage and
content data | Information pursuant to
Art. 13 GDPR | Last updated: July 2026

A WORLD OF POSSIBILITIES

Scope of this notice

This notice describes only how Frankfurt School and the service providers used for ChatGPT EDU process your account and usage data and the content that you enter or upload. Any separate use of AI systems by Frankfurt School in admissions, examination, assessment or administrative procedures is outside the scope of this notice; the general privacy notices for students apply to those activities.

1. CONTROLLER AND DATA PROTECTION OFFICER

Controller

Frankfurt School of Finance & Management gGmbH
Adickesallee 32-34
60322 Frankfurt am Main
Hesse, Germany
datenschutzbeauftragter@fs.de

Data Protection Officer

intersoft consulting services AG
Beim Strohause 17
20097 Hamburg, Germany
datenschutzbeauftragter@fs.de

2. HOW IS YOUR DATA PROCESSED?

Frankfurt School sets up and administers your ChatGPT EDU access. For this purpose, it processes in particular account, login, authentication and technical usage data.

OpenAI processes the prompts, uploaded files and chat content that you provide, as well as the generated outputs, on behalf of Frankfurt School so that the service can be provided and the output requested by you can be generated.

Access by Frankfurt School employees is limited to what is necessary and follows the need-to-know principle, in particular for account administration, technical support, troubleshooting, IT security or the investigation of a specific suspicion of misuse. Frankfurt School and its staff do not have access to your specific income or expenditure details.

If you export content from ChatGPT EDU or use it outside the service, any further processing is governed by the relevant subsequent process and the privacy notices applicable to that process.

3. CATEGORIES OF PERSONAL DATA

Category	Examples	Purpose of processing
Account and login data	Name, university or work email address, account ID, pseudonym and authentication data	Setting up, providing and administering access
Technical usage and log data	Time and duration of use, frequency of use, session and account ID, security-related log data	Authentication, operation, troubleshooting, IT security and prevention of misuse
Inputs and uploaded content	Prompts, files, chat content and any personal data contained in them	Processing the request and generating the requested output
Outputs	Texts, analyses, summaries, code or other results generated by ChatGPT EDU where they contain personal data	Providing the requested functionality

Category	Examples	Purpose of processing
Support and communication data	Information contained in support requests and communications relating to account or system use	Handling support cases and troubleshooting

4. PURPOSES AND LEGAL BASES

Purpose	Legal basis
Providing and administering access and processing your requests within ChatGPT EDU	Art. 6(1)(b) GDPR where this is necessary to perform the study contract, the EULA or a curricular component; where use is based on consent, Art. 6(1)(a) GDPR
Technical operation, authentication, support, troubleshooting, IT security and prevention of misuse	Art. 6(1)(f) GDPR on the basis of our legitimate interest in providing the service securely, reliably and in a fully functional manner
Compliance with legal obligations where required in an individual case	Art. 6(1)(c) GDPR
Processing of special categories of personal data where such data is contained in the content	An additional condition under Art. 9(2) GDPR must be met

5. RECIPIENTS, PROCESSORS AND SUB-PROCESSORS

- Authorised Frankfurt School employees are granted access only where this is necessary for account administration, technical support, troubleshooting, IT security or the investigation of a specific suspicion of misuse.
- OpenAI processes the data described in this notice as a processor pursuant to Art. 28 GDPR for the provision of ChatGPT EDU.
- Microsoft and bare.id are used, where technically applicable, as processors or IT service providers for authentication, integration or infrastructure.
- OpenAI may engage approved sub-processors under the data processing agreement. OpenAI must contractually bind them in accordance with Art. 28(4) GDPR. Information on the sub-processors currently used may be requested from datenschutzbeauftragter@fs.de.

6. TRANSFERS TO THIRD COUNTRIES

Under the currently agreed settings, chat content is stored on servers in the European Union. Access from countries outside the European Union and the European Economic Area, or another transfer to a third country, cannot be ruled out completely. Any such processing takes place only in accordance with Arts. 44 et seq. GDPR, 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.

7. RETENTION AND MODEL TRAINING

- Account and authentication data is generally retained for the duration of your access and is then deleted unless statutory retention obligations or legitimate documentation interests require longer retention.
- Prompts, uploaded files, chat content and generated outputs are retained in accordance with the agreed system settings. The maximum retention period currently applied within ChatGPT EDU is twelve months unless the content is deleted earlier.
- Frankfurt School does not additionally retain chat content permanently within ChatGPT EDU. Technical log and support data is retained only for as long as necessary for operation, security, troubleshooting, support or prevention of misuse.
- OpenAI does not use inputs and outputs to train its generally available AI models. Within the processing described in this notice, Frankfurt School also does not use your account, usage or chat data to train its own AI models.

8. YOUR RIGHTS

Subject to the statutory requirements, you have in particular the right of access (Art. 15 GDPR), rectification (Art. 16 GDPR), erasure (Art. 17 GDPR), restriction of processing (Art. 18 GDPR), notification under Art. 19 GDPR, data portability (Art. 20 GDPR), objection to processing based on Art. 6(1)(f) GDPR (Art. 21 GDPR), and the right to lodge a complaint with a data protection supervisory authority (Art. 77 GDPR). You may withdraw consent at any time with effect for the future. To exercise your rights, please contact datenschutzbeauftragter@fs.de.

9. AUTOMATED DECISIONS AND USE

The account, usage and content data described in this notice are not used by Frankfurt School for automated decision-making about you or for profiling. In particular, no decision based solely on automated processing within the meaning of Art. 22 GDPR is made.

Use of ChatGPT EDU is voluntary unless it is a mandatory part of a course or the curriculum. Where AI is not essential because of the fundamental orientation of the degree programme, an alternative educational offering without AI use is provided.

Account and login data are required for access; without them, the service cannot be used.