1 Person in Charge

The entity responsible under the General Data Protection Regulation (GDPR) and other national data protection laws, as well as other data protection regulations, is:

Hochschule für Technik Stuttgart

Körperschaft des öffentlichen Rechts, vertreten durch die Rektorin Prof. Dr. Katja Rade

Schellingstraße 24

70174 Stuttgart

Telefon: +49 (0)711 8926 0

E-Mail: rektorat@hft-stuttgart.de

Website: www.hft-stuttgart.de

2 Data Protection Officer: Overarching Goals and Purposes

The following person has been appointed as the Data Protection Officer for the Stuttgart University of Applied Sciences:

Maximilian Musch

Telefon: +49 (0)7542 949 2102

E-Mail: datenschutz@hft-stuttgart.de

3 Description of Data Processing, Objectives, and Purposes

3.1 What is Ask Alma?

Ask Alma is an AI-powered chat and learning assistant developed by Kersta GmbH in Welzheim. It emerged from the “bwGPT” project, which was funded by the state of Baden-Württemberg and in which HFT Stuttgart participated as a pilot university. Language processing is handled using OpenAI language models, which are operated via the Microsoft Azure OpenAI service in a data center located in the European Union.

Starting in the 2026/27 winter semester, HFT Stuttgart will make Ask Alma available to its students, faculty, and staff. Ask Alma is integrated into HFT’s Moodle learning platform (moodle.hft-stuttgart.de). After logging into Moodle, Ask Alma is immediately available there; a separate login or a separate user account with Ask Alma is not required. When launched, Moodle transmits only the Moodle user ID, the role in the course, and course details via the LTI 1.3 interface. First name, last name, and email address are not transmitted to Ask Alma.

3.2 Functions

- **General Chat**: Ask questions, create and edit texts, upload files (e.g., PDFs, spreadsheets) and images, and have them analyzed.
- **Tools**, as enabled by HFT: Web search, search for academic sources, code execution for calculations and spreadsheet analysis, image generation, and dictation (voice input).
- **Course Assistants**: Instructors set up assistants for their courses with their own instructions and teaching materials, which students use during the course.

- **Quizzes and flashcards**: Instructors create them from a document, grade them, and publish them; students complete them, and their learning progress is saved.
- **Personal assistants**: Users can create personal assistants that are visible only to them.
- **Reports for instructors**: summarized, anonymized statistics on the use of course assistants, quizzes, and flashcards. Individual users and the content of conversations cannot be identified in these reports; the reports are only displayed once a minimum number of users has been reached.

3.3 Objectives and Purposes of Data Processing

Personal data is processed for the following purposes:

- Providing the chat and learning features of Ask Alma and supporting the learning process through AI-powered conversation,
- Supporting instructors in designing their courses (course assistants, quizzes, flashcards) and staff in their work-related tasks,
- Supporting self-directed learning,
- Improving digital teaching and learning resources,
- Supporting university-related work processes for employees,
- Promoting media and AI skills,
- Assigning users to their Moodle courses and the content made available there,
- Cost control and billing, particularly adherence to the monthly usage budget per person and the university-wide budget,
- anonymized, aggregated analyses to support the further development of teaching,
- prevention of misuse and ensuring the security of IT systems.

3.4 Important Note Regarding Your Input

Ask Alma only knows your Moodle username, not your name. Please do not enter **any personally identifiable information**—whether about yourself or others—or any confidential or sensitive information in the chat, in uploaded files, or in voice inputs. Entering such information is not permitted under the Terms of Use. Conversations are not visible to employees of HFT Stuttgart or Kersta GmbH.

4 Type of Data and Data Categories

Below, we provide information about the types and categories of data processed in connection with the use of Ask Alma:

4.1 Data from Moodle (when launching via LTI 1.3)

- Moodle user ID (a unique identifier that does not include a name or email address; first name, last name, and email address are not transmitted),
- Affiliation with the university,
- Role in the course (e.g., instructor or participant), course enrollment, course name, and course ID.

4.2 Technical Data and Metadata

- IP address, date, and time of requests (log data),
- Request information and usage data, e.g., number of messages, tools and language models used,
- Usage data per user ID (cost of requests) to ensure compliance with the monthly usage budget,
- Personal settings in Ask Alma,
- Technically necessary cookies for session management.

4.3 Content Data

- Text and image entries in the chat, as well as the responses generated by Ask Alma (chat histories),
- uploaded files,
- voice entries when you use the optional dictation feature,
- For instructors: configuration of course assistants, uploaded teaching materials, quizzes, and flashcards,
- For students: answers and results in quizzes, as well as self-assessments for flashcards (learning progress),
- For personal assistants: their instructions and uploaded files.

Special categories of personal data as defined in Article 9 of the GDPR are not processed, unless users enter them themselves in violation of the Terms of Use.

5 Sources of Data Collection

We process the data you enter yourself when using Ask Alma, as well as the data transmitted from Moodle via the LTI 1.3 interface when you launch Ask Alma. Technical data, such as your IP address, is generated automatically when you access the service.

We do not enrich this data with information from other sources. The anonymized reports for instructors are generated exclusively from the usage data of the respective course content.

6 Legal Basis for Data Processing

The processing of usage, content, course, and learning data generated through the use of Ask Alma is carried out in accordance with Article 6(1)(e) of the GDPR in conjunction with Article 6(3) of the GDPR, Section 4 of the Baden-Württemberg State Data Protection Act (LDSG), and the provisions of the Baden-Württemberg State Higher Education Act (LHG). This processing is necessary for the university to fulfill the statutory duties assigned to it in the areas of academic studies, teaching, continuing education, and university administration.

Log and security data are also processed on this basis to ensure information security, the proper operation of IT systems, and the traceability of security-related events. In addition, the processing is carried out to ensure network and information security in accordance with Recital 49 of the GDPR.

7 Additional Privacy Information

7.1 Existence of Automated Decision-Making (Profiling)

We do not use fully automated decision-making processes or profiling as defined in Article 22 of the GDPR.

7.2 Scope of the Obligation to Provide Us with Data

Use of Ask Alma is voluntary. However, without the processing of the Moodle data and technical data listed under “Type of Data,” use of the service is technically not possible. The dictation feature is an optional service; users who do not use it will not experience any disadvantages with regard to the other features.

7.3 Retention and Deletion Periods

As a general rule, we process data only for as long as is necessary to fulfill the stated purposes. Specifically, the following retention periods apply:

- **Chat histories**, including files uploaded in the chat, are automatically deleted 30 days after the last message. This does not apply to chats that you have pinned yourself; these remain until you delete them. You can delete chats yourself at any time.
- **IP addresses and log data** are deleted or anonymized after 90 days at the latest.
- **All other usage and consumption data** is deleted after 90 days. Only aggregated costs that are not linked to specific individuals are stored for a longer period.
- **Voice inputs** from the dictation feature are not stored. They are processed exclusively in RAM for conversion to text and are then deleted immediately.
- **Content created by instructors** (course assistants, uploaded files, quizzes, and flashcards) remains stored until the instructors delete it or the entire course area.
- **Students' learning progress** (quiz attempts, flashcard evaluations) is deleted when the quiz, flashcards, or course area is deleted.
- **Personal assistants** and **settings** remain saved until you delete them.
- **Anonymized analytics** do not contain any personally identifiable information and are therefore not subject to any retention period.

In addition, data is stored only to the extent that there are legal retention requirements or where it is necessary in individual cases to investigate a specific security incident.

7.4 Cookies

Ask Alma uses only technically necessary cookies to ensure that you can log in, that the application functions properly, and to save your settings. We do not use any third-party cookies or cookies for tracking or analytics purposes.

8 Recipients of the Data

Internal: HFT Stuttgart staff do not have access to your chat histories. Only HFT Stuttgart's IT department has administrative rights in Ask Alma; administrators see only aggregated statistics (e.g., costs, number of messages, and number of users). Instructors see only anonymized, aggregated reports regarding their course content.

Data Processor: Ask Alma is operated by Kersta GmbH, Oberer Wasen 35, 73642 Welzheim. Kersta GmbH processes the data on behalf of HFT Stuttgart pursuant to a data processing agreement under Article 28 of the GDPR.

Unterauftragsverarbeiter:

- Hetzner (Rechenzentrum in Nürnberg, Deutschland): Betrieb der Anwendung und Speicherung der Daten von Ask Alma, darunter die Moodle-Nutzerkennung, die Hochschulzugehörigkeit und die IP-Adresse.
- Microsoft Azure OpenAI Service (Rechenzentrum in Schweden, EU): Verarbeitung der Konversation zur Erzeugung der Antworten. Microsoft erhält dabei nur die Inhalte der Konversation, keine Nutzerkennung und keine IP-Adresse der Nutzenden. Die Daten werden nicht zum Training von KI-Modellen verwendet.
- Microsoft Azure Speech Services (EU): Umwandlung von Spracheingaben in Text bei Nutzung der Diktierfunktion, ohne Speicherung und ohne Metadaten.

Subcontracted Data Processors:

- Hetzner (data center in Nuremberg, Germany): Operation of the application and storage of Ask Alma data, including the Moodle user ID, university affiliation, and IP address.
- Microsoft Azure OpenAI Service (data center in Sweden, EU): Processing of the conversation to generate responses. Microsoft receives only the content of the conversation; it does not receive any user identifiers or IP addresses. The data is not used to train AI models.
- Microsoft Azure Speech Services (EU): Conversion of voice input to text when using the dictation feature, without storage and without metadata.

Transfer to Third Countries: Processing takes place exclusively on servers within the European Union. There are no plans to transfer data to third countries or international organizations.

The data is not used for any purpose other than providing Ask Alma, and in particular not for advertising or for training AI models.

9 Your Rights

Under certain circumstances, you may exercise your data protection rights with us. Requests to exercise your rights should, if possible, be submitted in writing or by email to the address listed above, or directly in writing or by email to our Data Protection Officer.

- You have the right to receive information from us regarding the data we have stored about you, in accordance with the provisions of Article 15 of the GDPR (subject to any restrictions under Section 9 of the LDSG, if applicable).
- Upon your request, we will correct the data we have stored about you in accordance with Article 16 of the GDPR if it is inaccurate or incorrect.
- If you so request, we will delete your data in accordance with the principles set forth in Article 17 of the GDPR, provided that no other legal provisions (e.g., statutory retention requirements or the restrictions under Section 10 of the LDSG) or an overriding interest on our part (e.g., to defend our rights and claims) preclude this.

- Subject to the conditions set forth in Article 18 of the GDPR, you may request that we restrict the processing of your data.
- Furthermore, you may object to the processing of your data pursuant to Article 21 of the GDPR, in which case we will cease processing your data. This right to object applies only under specific circumstances related to your personal situation; however, our company's rights may, in some cases, override your right to object.
- You also have the right, under the conditions set forth in Article 20 of the GDPR, to receive your data in a structured, commonly used, and machine-readable format or to transmit it to a third party.
- In addition, you have the right to withdraw your consent to the processing of personal data at any time, effective for the future.
- You also have the right, under the conditions set forth in Article 20 of the GDPR, to receive your data in a structured, commonly used, and machine-readable format or to **transmit** it to a third party.
- In addition, you have the right to **revoke** your consent to the processing of personal data at any time, effective for the future.
- You also have the **right to file a complaint** with a data protection supervisory authority (Art. 77 of the GDPR). You can contact the supervisory authority responsible for us at:

Der Landesbeauftragte für den Datenschutz und die Informationsfreiheit Baden-Württemberg

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