



*The University of Hohenheim provides information on the use of YouTube.*

## **Assessment of the consequences of YouTube use by the University of Hohenheim**

According to the general rule of Art. 35(1) of the European General Data Protection Regulation (GDPR), a privacy and data protection impact assessment (PIA) must be carried out if a form of processing, in particular when using new technologies, is likely to result in a high risk to the rights and freedoms of natural persons due to the nature, scope, circumstances, and purposes of the processing. [The guideline of the State Commissioner for Data Protection and Freedom of Information \(LfDI\) on the use of social networks by public bodies](#) makes it mandatory to assess the consequences of the intended processing operations for the protection of personal data in accordance with the GDPR.

The **University of Hohenheim's YouTube site itself** does not trigger this consequence due to the very small scope of its own data processing (see the [YouTube Privacy Policy](#) in this regard). However, the YouTube videos often have a direct personal reference. When posting its own content, the University of Hohenheim therefore ensures that the copyrights to the image material and the image rights of any persons depicted are taken into account.

From the point of view of the University of Hohenheim, the use of YouTube itself represents a high-risk processing operation due to its far-reaching effects, in particular with regard to the evaluation of data by Google Ireland Limited (Gordon House, Barrow Street, Dublin 4, Ireland) and/or Google LLC (1600 Amphitheatre Parkway, Mountain View, California, 94043) for advertising purposes, etc., for which a data protection impact assessment must be carried out.

This is because by using a YouTube account, the respective user comes under the systematic observation of Google Ireland Ltd. This can also reveal sensitive data such as political views, sexual orientation, or health problems, which can be linked together and used to create a personality profile. People who are particularly vulnerable, such as young people, can also be YouTube users and therefore data subjects. Even if the user only passively uses YouTube contents without an account, sensitive data can be collected through the collection of log data, such as the websites previously visited or the user's location data.

This is all the more true as Google Ireland Ltd. cannot be audited or can only be audited to a limited extent. As the data of German users may be processed outside Germany, there are higher hurdles for access to (judicial) legal protection than with a company based in Germany.

Users are also made aware of the risks generally associated with the use of social media in the [Privacy Policy](#) of the University of Hohenheim's YouTube account.

The University of Hohenheim has committed itself to these measures in its [Use Concept](#). The advantages and disadvantages of using YouTube are then regularly evaluated, taking into account the terms of use of YouTube. This evaluation of the use concept is carried out annually and takes into account the use figures and reach, as well as the target group structure and use patterns of the networks.

The use of YouTube is thus embedded in a **package of measures**. Against this background, the assessment of the consequences of YouTube use at the University of Hohenheim is as follows:

## Risk identification

The risks described above associated with the use of YouTube exist independently of the University of Hohenheim's own use of YouTube. In the vast majority of cases, the University of Hohenheim's videos themselves do not make any reference to sensitive personal data, but instead disseminate their own factual content.

After all, the data processed through interaction with the YouTube account of the University of Hohenheim or other accounts – namely the posts and/or the account name of a YouTube user – are already public / generally accessible / freely available on the internet.

However, by appearing on the University of Hohenheim's YouTube page and the interaction with such, the data are made available to a broader/"more specific" audience and may thus achieve greater attention and wider dissemination than without this interaction.

The fact that the University of Hohenheim follows other YouTube channels or vice versa also creates additional cross-connections and information about the respective YouTube user; for example, the interest in research topics can be seen from the follower status or regular contributions.

Finally, log data are also collected by YouTube when the page is used passively.

By using YouTube itself, the University of Hohenheim is increasing the amount of data used and analyzed by Google Ireland Ltd. and/or Google LLC.

## Risk analysis

The expansion of the dissemination group and the increase in linking possibilities will facilitate the processing of data for other purposes by Google Ireland Ltd. and/or Google LLC and secret profiling. Openness to visitor contributions can also lead to

negative social consequences such as inappropriate or discriminatory comments or the dissemination of sensitive data.

While this damage may be significant if caused by Google Ireland Ltd. itself, this is increased to a very limited extent by the YouTube channel of the University of Hohenheim. This is because a significant proportion of the account data is already available to Google Ireland Ltd. In particular, there is no obligation to create a YouTube account due to the University of Hohenheim's social media site, as there are sufficient alternative contact and information options for the University of Hohenheim.

The topics of research and studies are also only suitable for triggering hate-filled debates to a limited extent, also meaning that the probability of damage occurring is only very limited.

## Risk assessment

Overall, the additional risk caused by the University of Hohenheim's YouTube account can therefore be classified as low to medium.

It is also possible to implement remedial measures which further reduce the risk. This includes, for example, the University of Hohenheim's influence on providers. The majority of these measures are however within the sphere of the user: For example, there is no obligation to use a clear name when using YouTube. Users can also protect themselves to a certain extent by making various settings, such as erasing their browser history and deactivating cookies.

In addition, continuous editorial support enables us to intervene in the event of comments that are defamatory or violating personal rights, up to and including blocking the account. The University of Hohenheim has compiled a [Netiquette](#) for the use of its social media sites, which the university will ensure is adhered to when maintaining the page.

## Results

The use of YouTube by the University of Hohenheim is justifiable in view of the risks described and the binding measures planned. The University of Hohenheim undertakes to monitor further developments and to regularly repeat and, if necessary, further develop the review carried out here.

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