



The University of Hohenheim provides information on the use of LinkedIn.

Assessment of the consequences of LinkedIn 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, which has applied only since 25 May 2018.

The **University of Hohenheim's LinkedIn site itself** does not trigger this consequence due to the very small scope of its own data processing (see the [LinkedIn Privacy Policy](#)), especially in view of the fact that its posts are mainly purely about sending content without personal reference, and in the event of a reference to other LinkedIn users, only the data that they have voluntarily provided themselves (user name and posts) are processed (since LinkedIn is a career network, information on employer and position can often be found in addition to the user name and posts).

However, from the point of view of the University of Hohenheim, the use of LinkedIn itself represents a high-risk processing operation due to its far-reaching effects with regard to the evaluation of the data by LinkedIn for advertising purposes, for which a data protection impact assessment (by LinkedIn) must be carried out.

By using a LinkedIn account, the respective user comes under the systematic observation of LinkedIn. 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. Particularly vulnerable persons, such as young people, can also be LinkedIn users and thus data subjects, although they are naturally not part of the LinkedIn target group, even if official registration is permitted from the age of 16 (see also "Risk assessment").

Even if the user only passively reads LinkedIn 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 LinkedIn cannot be audited or can only be audited to a limited extent. Since the data of users based in Germany are not processed within Germany, but in a non-European country, there are higher hurdles for access to

(judicial) legal protection than for a company based in Germany. If data protection issues cannot be clarified directly with LinkedIn, the contact person is the Data Protection Officer Ireland.

In this respect, the University of Hohenheim assumes that public bodies using a social network for public relations work and providing general information have co-responsibility.

Co-responsibility does not mean that the University of Hohenheim confirms or guarantees the data protection compliance of LinkedIn products. The university cannot do this under the prevailing circumstances. Rather, co-responsibility means that the University of Hohenheim makes itself and others aware of the risks of social networks. Social networks are currently in need of improvement in many areas from a data protection perspective. For this reason, LinkedIn users are shown alternative, more data protection-friendly communication channels via links to the University of Hohenheim's homepage.

Users are made aware of the risks generally associated with the use of social media in the [Privacy Policy](#) of the University of Hohenheim's LinkedIn account. This can be found on the [University of Hohenheim website](#). LinkedIn itself does not currently offer this option on the LinkedIn corporate page. In addition, the University of Hohenheim regularly runs campaigns to raise awareness and explain the risks on its website.

The University of Hohenheim has committed itself to these measures in its [Use Concept](#).

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

Risk identification

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

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

However, by appearing on the University of Hohenheim's LinkedIn 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 accounts or vice versa also creates additional cross-connections and information about the respective LinkedIn user; for example, the areas of interest in the subscriber/follower status, regular contributions, activities, and group memberships can be seen.

Finally, LinkedIn also collects log data when users passively read the page.

By using LinkedIn itself, the University of Hohenheim is therefore increasing the amount of data used and analyzed by LinkedIn.

Risk analysis

The expansion of the dissemination group and the increase in linking possibilities will facilitate the processing of data for other purposes by LinkedIn 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. For career networks, this is especially relevant in terms of the current or future workplace and professional environment.

While this damage may be significant if caused by LinkedIn itself, this is increased only to a very limited extent by the LinkedIn profile of the University of Hohenheim. This is because a significant proportion of the data is already available to LinkedIn. In particular, there is no obligation to create a LinkedIn 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. In principle, all postings and job vacancies displayed on the LinkedIn account of the University of Hohenheim are also available via the website University of Hohenheim so that they can be consumed without any data being generated.

The topics handled by the University of Hohenheim of science, teaching, research etc. 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 LinkedIn account can therefore be classified as low to medium.

It is also possible to implement remedial measures which further reduce the risk, which the University of Hohenheim also refers to in its [Privacy Policy](#) for LinkedIn.

The majority of these measures are within the sphere of the user: Users can also protect themselves to a certain extent by making various settings, such as erasing their browser history, deactivating cookies, or not sharing their location when using photos.

With regard to particularly vulnerable individuals such as minors, it is clear that they are not generally part of LinkedIn's target audience. Even though it is possible to register with LinkedIn from the age of 16, LinkedIn as a career network is primarily aimed at specialists and managers who want to network with each other worldwide on their own initiative.

This target group is generally much older and has the relevant training and must therefore weigh up the professional benefits of the service against the protection of their data. Nevertheless, it should be emphasized that there is an increased risk of fake profiles and identity theft, especially in business networks, as the business/professional environment of LinkedIn users is often described in detail.

In addition, some LinkedIn practices, such as faking membership of existing LinkedIn user contacts and independently sending email invitations to join LinkedIn, can cause suspicion among LinkedIn users' acquaintances or even damage their professional reputation.

LinkedIn users should therefore be particularly advised to prohibit LinkedIn from accessing address books and other external services and to deactivate the automatic sending of email invitations, as LinkedIn also contacts contacts outside its own network and stores their data. For additional security, users can be advised to use LinkedIn only from the desktop in the browser and not to install any LinkedIn apps on their smartphone/mobile devices.

As a further remedial measure, 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 LinkedIn 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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