



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

Assessment of the consequences of Mastodon 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 Mastodon site itself** does not trigger this consequence due to the very small scope of its own data processing (see the [Mastodon Privacy Policy](#) in this regard), 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 Mastodon users, only the data that they have voluntarily provided themselves (user name and posts) are processed.

However, from the point of view of the University of Hohenheim the [use of Mastodon](#) does not pose a high risk arising from the Mastodon instance of the State Commissioner for Data Protection and Freedom of Information Baden-Württemberg (LfDI BaWü). It is taken into account that the offering has been opened by the data protection supervisory authority itself and it is clearly assumed that it does not carry out any unauthorized practices.

This is because by using a Mastodon account, the respective user may, within the general scope of using Mastodon, access other decentralized servers that may pursue other practices, but the University of Hohenheim or the LfDI BaWü are not culpable for such. On the specific instances, data can theoretically end up in unsafe third countries due to the worldwide access options, but there is no active data transfer and no profiling or similar.

Risk identification

The risks associated with the use of the Mastodon instance of the data protection supervisory authority are considered to be low and it is assumed that data processing under the responsibility of the LfDI BaWü complies with the law throughout.

Risk analysis

In a general context, openness to visitor contributions can lead to adverse social consequences such as inappropriate or discriminatory comments or the dissemination of sensitive data.

However, there is no obligation to create a Mastodon account or to actively participate in communication through the University of Hohenheim's offering, as there are sufficient alternative channels to contact the University of Hohenheim and to find out about such.

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

Risk assessment

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

It is also possible to implement remedial measures which further reduce the risk. The majority of these measures are within the sphere of the user: For example, there is no obligation to use a real name when using Mastodon. 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.

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 Mastodon on the instance of the LfDI BaWü 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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