

**DEPARTMENT FOR COMMUNICATION (DCM)****Privacy Statement on Plagiarism detection service using Turnitin iThenticate**

All personal data are processed in accordance with the provisions of Regulation (EU) 2018/1725 of the European Parliament and of the Council of 23 October 2018 on the protection of natural persons with regard to the processing of personal data by the Union institutions, bodies, offices and agencies and on the free movement of such data and repealing Regulation (EC) No 45/2001 and Decision No 1247/2002.

Identity of controller:

The controller is Cedefop and the responsible department/role is the Department for Communications (DCM), Publications service publications@cedefop.europa.eu

Identity of processors:

- Designated staff in Cedefop's DCM/Publications Service;
- Turnitin LLC (USA-based) provider of the iThenticate antiplagiarism and intellectual property protection tool (<https://www.ithenticate.com/>). Cedefop acquired iThenticate under contract DI-7722 Software for innovation, diversity & evolution (SIDE II)

Purpose and description of processing:

To promote academic integrity by checking for and detecting plagiarism in Cedefop's publications process. As a quality check to avoid reputational risks, all manuscripts go through a plagiarism check (self-plagiarism included).

Cedefop publications sends project managers a summary report of the results. When there is more than 20% detected, project managers are encouraged to revise the text or justify the results. Cedefop removes personal data such as author names etc. from the documents before uploading to iThenticate and deletes content and related reports from iThenticate after check is completed.

Data subjects:

- Designated Cedefop staff who are users of the iThenticate tool;
- Individuals whose names are mentioned in Cedefop's publications and other deliverables (e.g. reports) such as authors, acknowledged experts, etc.).

Categories of personal data processed:

Cedefop iThenticate users

- Institution's administrator details (name, email, phone, and job title);
- User details (password, first name, last name, email, online identifier, IP address);
- Internet or other electronic network activity information related to the use of the Turnitin website

Authors of and/or individuals mentioned or cited in the document:

- Personal data included in the documents submitted to the iThenticate service – Cedefop staff removes all personal data (e.g. names of authors, acknowledgements, etc.) from the documents, before uploading them to iThenticate.

Special categories / Sensitive data:

Cedefop's use of Turnitin iThenticate does not process sensitive / special categories of personal data within the meaning of Article 10 of the [EUDPR](#)¹.

Legal basis / lawfulness:

The lawfulness of the processing is defined by Article 5.1 [a] of Regulation (EU) 2018/1725, stating that: *"processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the Union institution or body"*.

Recipients of data:

- Designated staff in Cedefop's DCM/Publications Service;
- When necessary, access to the personal data may be granted also to internal or external authorized staff in public authorities or audit control or investigation bodies such as: Cedefop Internal Control, external legal contractor, external audit contractors, Court of Auditors, Internal Audit Service of the European Commission, European Anti-Fraud Office (OLAF), European Ombudsman, the European Data Protection Supervisor, the General Court or the European Court of Justice.

The retention period of the collected personal data:

User account details are stored for as long as Cedefop subscribes to the service and a user is registered to use it. Content uploaded to the service and related reports are removed from the iThenticate service after the check is completed and reports are stored in the records bank of the specific project for 10 yrs after the related contract expires.

Transfers of personal data to third countries:

Processor Turnitin LLC is based in the USA. Turnitin transfers personal data outside the EU to the USA in order to perform their services.

Measures adopted:

- Uses a generic account (ie. publications@cedefop.europa.eu);
- Removes personal data from content uploaded;
- Deletes content and related reports from iThenticate after check is completed.

Data subject's rights:

Rights of access and rectification: Data subjects are entitled to access and/or rectify their data, in accordance with the articles 17 and 18 of the Regulation (EU) 2018/1725 respectively.

Right to erasure: as foreseen in article 19 of the Regulation

Right to restriction of processing: as foreseen in article 20 of the Regulation

Right to object: as foreseen in article 23 of the Regulation

Right of recourse: data subjects are entitled to have recourse at any time to the European Data Protection Supervisor: <http://www.edps.europa.eu> as foreseen in article 63

¹ personal data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs; trade-union membership; genetic data, biometric data processed solely to identify a human being; health-related data; data concerning a person's sex life or sexual orientation.

Restrictions of rights: by virtue of Article 25 of Regulation No 2018/1725 and of the Internal Rules laid down under Cedefop's Management Board Decision 6/2020², one or several of these rights may be restricted for a temporary period of time inter alia on the grounds of prevention, investigation, detection and prosecution of criminal offences or breaches of ethics. Any such restriction will be limited in time, proportionate and respect the essence of the above-mentioned rights. It will be lifted as soon as the circumstances justifying the restriction are no longer applicable. You will receive a more specific data protection notice when this period has passed.

Right of recourse at any time to the European Data Protection Supervision at <https://edps.europa.eu/>

DPO Contact:

Data subjects can exercise their rights by contacting Cedefop's ICT as the controller or Cedefop's Data Protection Officer: data-protection-officer@cedefop.europa.eu

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² Internal Rules laid down under Cedefop's Management Board Decision 6/2020: [https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:32020Q1204\(01\)](https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:32020Q1204(01))