Cedefop record of processing activity

Record of Cedefop activities processing personal data, based on Article 31 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 1247/2002/EC.

Nr.	Item	Description
	Plagiarism detection service using Turnitin iThenticate	
1.	Last update of this record	20/03/2023
2.	Reference number	CDFNOT111 – Plagiarism detection service using Turnitin iThenticate
3.	Name and contact details of controller	<u>Cedefop – European Centre for the Development of Vocational Training</u> **Postal address:** Cedefop Service Post, Europe 123, 570 01 Thermi, GREECE **Telephone:** (+30) 2310-490111 **Email:** info@cedefop.europa.eu Responsible department or role: Department for Communications (DCM), Publications service: publications@cedefop.europa.eu
4.	Name and contact details of DPO	data-protection-officer@cedefop.europa.eu
5.	Name and contact details of joint controller (where applicable)	N/A
6.	Name and contact details of processor (where applicable)	• 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)
7.	Very short description and purpose of the 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.

8.	Description of categories of persons whose data is processed and list of data categories	**Categories of data subjects:**
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		 • Individuals whose names are mentioned in Cedefop's publications and other deliverables (e.g. reports) such as authors, acknowledged experts, etc.).
		
		 Categories of data:
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		    • Institution's administrator details (name, email, phone, and job title);
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9.	Time limit for keeping the 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.
10.	Recipients of the 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.
11.	Are there any transfers of personal data to third countries or international organisations? If so, to which ones and with which safeguards?	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.
12.	General description of security measures where possible.	Turnitin iThenticate security measures include: SOC2 certification, sophisticated firewalls, SSL network encryption, encryption of data (in transit and at rest), and appropriate policies, training, and physical security measures.
13.	For more information, including how to exercise your rights to access, rectification, object and data portability (where applicable), see the privacy statement:	Privacy statement available on the Cedefop web portal and Cedefop's Records Management System.