



## **Notice on the treatment of personal data when using the anti-plagiarism service Turnitin**

EU regulations EU 2016/679 “General regulations on data protection” (from here on “GDPR”) formalizes the right of the individual to the protection of any personal data that concerns them.

According to article 13 of the GDPR, the University of Trento intends to provide the following information to

- a. Tutors who use Turnitin to verify their students’ work, whether they are undergraduates, doctoral students, master’s students
- b. Students, undergraduates, doctoral students, master’s students (from here on, “the students”) whose work is submitted to verification via Turnitin.

### **1. Title holder of the service**

The title holder responsible for the treatment of data is the University of Trento, via Calepina n. 14, 38122 Trento (TN); email: [ateneo@unitn.it](mailto:ateneo@unitn.it); [ateneo@pec.unitn.it](mailto:ateneo@pec.unitn.it).

### **2. Contact details of the person in charge of GDPR**

The person in charge of the GDPR can be contacted for information related to personal data at the following email address: [rpd@unitn.it](mailto:rpd@unitn.it).

### **3. Aims of the service and legal background**

The University of Trento deals with the treatment of personal data as required for the implementation of their institutional tasks (art. 6, par. 1, lett. e of the GDPR), exclusively in order to verify that the work produced by the students is authentic and not in breach of the current regulation on copyright.

### **4. Categories of personal data**

- Personal data: name, surname, formal email address.
- Data of browsed information connected to Internet protocols, IP addresses or domain names of the computers used by the students connected to the service, URI addresses and other parameters related to the operative system and to the IT service of the user.

### **5. Reasons for the request of data**

The data is required and indispensable in order to use Turnitin, as the lack of this information means that the users will not be able to utilize the service itself; this applies in particular to the students, in order to participate in the educational activities of their curriculum.

## **6. Modes of use**

The personal data is dealt online by the person in charge, based on tasks and duties assigned, as well as by following the principles of legitimacy, propriety, transparency, adequacy, pertinence, non-excess, e privacy (art. 5, par. 1, GDPR). No profiling or automatic decisions are made.

## **7. Categories of recipients and transfer of data to third countries**

The data will be forwarded to the University staff involved in the tasks mentioned in the previous points, as well as to those who should need to treat the data in order to provide a service according to the aim above mentioned on behalf of the title holder of the service.

With this aim, Turnitin LLC, supplier of the homonymous platform, has been designated as Responsible of the service according to art. 28 of GDPR.

Outside of these cases, personal data can be communicated to third parties only as compliance to a legal obligation and/or to a measure by the judicial authority.

Since the use of Turnitin's antiplagiarism service implies the transfer of personal data to the USA, and considering Turnitin LCC's compliance with the Data Privacy Framework, this transfer is carried out in accordance with the adequacy decision for the EU-US Data Privacy Framework as well as Art. 46, para. 2, letter c) of the GDPR or by subscribing to the standard data protection clauses.

## **8. Period of storage of the data**

The personal data will be stored for the time necessary to accomplish the aims above mentioned, and therefore for the necessary time required to fulfil legal obligations. In any case they will be stored for a period of time as established by the current law and/or by the regulations of the University about the management and storage of documentations produced by the University in carrying out institutional tasks.

## **9. Rights of the interested parties**

At any moment, the interested parties can exercise the rights as declared by articles 15 and following of the GDPR:

- Right of access of their personal data and other information as stated in article 15 of GDPR;
- Right of modification of their personal data when incorrect and/or right of integration of the data when these are incomplete;



- Right of cancellation of the personal data, except in those cases where the University must preserve them according to art. 17, par. 3 of GDPR;
- Right of limitation of the service if for a case as per article 18 of GDPR;
- Right to oppose the service, when allowed, according to article 21 of GDPR.

In order to exercise the rights, it is possible to use the form available on the page "[Privacy and data protection](#)" of the University website.

The right of the interested parties to file a complaint to the authority responsible for data protection, according to art. 77 of the GDPR, is maintained, as well as the right to appeal to the opportune judicial branches.

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