

# **Privacy Notice - Turnitin**

#### 1 WHY WE USE TURNITIN AS A PLAGIARISM PREVENTION LEARNING TOOL?

Turnitin is a teaching technology solution which allows students to submit assignments to have the content checked for text matching with other sources, including the work of other students whose data is stored in the anonymised student database of assignments.

### **2 LEGAL BASIS FOR PROCESSING PERSONAL DATA**

The legal basis for UCD to process your personal data under the GDPR using Turnitin is 'public task', as submission of assignments to Turnitin is a core requirement for students to complete their educational programme in UCD and for staff to review student submissions.

## 3 WHAT INFORMATION WE SHARE WITH TURNITIN

The following minimum, mandatory information is shared with Turnitin in order for you to access your Turnitin account: Generally names, email addresses, student IDs, submission content, examination answers, submission ID, passwords, IP addresses and metadata relating to session logins. Submission content may include special category and sensitive data.

Processing of submissions (student or academic papers, examination answers or proposed published texts) and their associated personal data.

## 4 HOW LONG WE KEEP YOUR DATA?

Students: The minimum, mandatory personal data which is shared with Turnitin will be retained for no longer than 1 Trimester after you cease to be a student at UCD and your account is terminated. Assignments which have been submitted to the UCD assignment archive will be anonymised and retained indefinitely, to allow future student submissions to be checked for text matching against the UCD archive.

<u>Staff</u>: The minimum, mandatory personal data which is shared with Turnitin will be retained until the point that your UCD IT Account becomes disabled. The receiverID field, which contains the email address of the staff member who created the Turnitin assignment will remain in the Turnitin database indefinitely

### **5 HOW WE PROTECT YOUR DATA?**

UCD has advanced IT Security measures in place to protect the integrity and confidentiality of the personal data you share with Turnitin. Please ensure you take care to protect the confidentiality of your UCD Connect user log in details including username and password to protect your account through Brightspace.

### YOUR DATA PRIVACY RIGHTS

# **6 RIGHT TO ACCESS**

You have a right to make a Subject Access request in relation to the information which UCD and Turnitin are processing as part of your account. Information on submitting a Subject Access Request under the GDPR is available from the <a href="https://www.ucd.ie/dataprotection/request.htm">UCD Freedom of information Unit</a> at: <a href="https://www.ucd.ie/dataprotection/request.htm">https://www.ucd.ie/dataprotection/request.htm</a>

- Right of Access: You have the right to know what type of personal data UCD holds about you and to obtain a copy of this data.
- Right of Erasure: Under certain circumstances, GDPR allows you to have personal data erased. We will assess whether it is possible to implement such a request but please be aware that UCD will need to retain certain information about you in order to carry out our lawful functions
- Right to Object: Under certain circumstances, you can object to the processing of your personal data

- Right to Portability: Under certain circumstances, you have the right to request that we
  provide elements of your data in a commonly used, machine-readable format
- Right to Rectification: You have the right to have any inaccurate personal data which we hold about you updated or corrected
- Right to Restriction: You have the right to block the processing of your personal data in certain circumstances. We will assess whether it is possible to implement such a request
- Automated Decision-Making: You have the right to object to automated individual decision-making (i.e. making a decision solely by automated means without any human involvement) and profiling (i.e. automated processing of personal data to evaluate certain things about an individual). UCD does not make any decisions about students using wholly automated means

### **7 RIGHT TO RECTIFICATION**

If you ever identify any inaccurate data which is recorded on your Turnitin account, you have a right to request that your record is updated for accuracy.

### **8 RIGHT TO LODGE A COMPLAINT**

#### a) UCD IT Services

If you have any concerns in relation to how your personal data is being processed by UCD and Turnitin we would appreciate it if you could contact UCD IT Services as a first port of call to discuss any concerns about the protection of your privacy rights by logging a call via <a href="www.ucd.ie/ithelp">www.ucd.ie/ithelp</a> and selecting "Get Help"

### b) UCD Data Protection Officer (DPO)

You also have a right to report any concerns you have in relation to the processing of your personal data under Turnitin to the UCD DPO by emailing <a href="mailto:gdpr@ucd.ie">gdpr@ucd.ie</a>.

# c) Data Protection Commission (DPC)

Finally, you have the right to lodge a complaint with the Supervisory Authority, in Ireland the Data Protection Commission (DPC) if you have serious concerns that your rights as a data subject under the GDPR have been infringed. However, we really wish to help, and would encourage you to contact IT Services with any initial concerns. Details of how to lodge a complaint can be found on the DPC Website.

## **Version History**

Date	Version Control	Approved by
16 November 2023	Final Draft complete	R.Teevan, UCD IT Services