European Union Agency
for Cybersecurity

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RECORD NO: 53

ANTI-PLAGIARISM PROTECTION

Record 53 of processing operation "Anti-plagiarism protection"

Date of last update	1/12/2021
Name and contact details of controller	ENISA, Executive Director's Office, EDoffice [at] enisa.europa.eu
Name and contact details of DPO	dataprotectio [at] enisa.europa.eu
Name and contact details of Joint Controller	N/A
Name and contact details of processor	Service provider Turnitin, based in US, for the provision of iThenticate anti-plagiarism and IPR protection tool (https://www.ithenticate.com/). ENISA has obtained an annual subscription to this service via contract with INTEROPTICS EMPORIA & YPIRESIES ENTYPIS & ILEKTRONIKIS PLIROFORISIS & SYSTIMATON PLIROFORIKIS AEE.
Purpose of the processing	To support anti-plagiarism testing and IPR protection for ENISA's deliverables (e.g. reports published on ENISA's website), in line with ENISA's IPR policy.
Description of data subjects	ENISA staff members who are users of iThenticate tool; Individuals whose names are mentioned in ENISA's reports (e.g. authors, acknowledged experts, etc.). - ENISA staff has been advised to remove all personal data (e.g. names of authors, acknowledgements, etc.) from the reports, before uploading them in the anti-plagiarism tool.
Description of data categories	Account information (name, email address, job title, etc.) for the ENISA staff who are users of the service; Device type and OS (upon connection to the service) for the users that have an account; Personal data included in the reports submitted to the iThenticate service - ENISA staff has been advised to remove all personal data (e.g. names of authors, acknowledgements, etc.) from the reports, before uploading them in the anti-plagiarism tool.
Time limits (for the erasure of data)	User accounts are stored for as long as a user is registered in the service and as long as subscription to the service is in force. Reports/content uploaded to the service can be removed by the users at any time.
Data recipients	Deignated ENISA staff having access to the anti-plagiarism tool; Staff of the processor Turnitin in US.
Transfers to third countries	As the processor is based in US, any personal data involved in the service (mainly user accounts of staff members) are also processed in US. ENISA is in the process of signing the EC SCCs with the processor, as a safegurard for transfers of personal data to US.
Security measures - General description	Security measures of the processor - to be described under the EC SCCs. Best practices and advice to staff provided to minimise personal data processing through the iThenticate service.

Privacy statement	Information has been provided to ENISA's staff via the intranet.