# **Privacy Policy for Urkund**

Urkund is a text-recognition program that can be used in Canvas and in the digital examination tool Inspera Assessment to detect plagiarism. Texts submitted to Urkund are checked for plagiarism against online material and Urkund's own archives. When VID Specialized University (VID) uploads a document in Urkund, any text similarities with other accessible documents are identified.

The purpose of processing personal data in Urkund is to detect plagiarism or cheating in examinations or compulsory coursework. The purpose is also to identify dishonesty or plagiarism in education and research.

The privacy policy is described below.

# 1) Brief presentation of Urkund (plagiarism detection system)

Urkund is a text-recognition program that can be used in Inspera and Canvas to detect plagiarism.

Submitted texts are checked for plagiarism against online material and Urkund's own archives. Urkund analyses uploaded texts for similarities with other accessible documents. It is important to distinguish between text similarities and plagiarism: Urkund identifies text similarities, but it is up to VID to decide whether plagiarism has been committed.

# 2) What is a privacy policy?

This privacy policy describes how VID processes your personal data in Urkund. The purpose of this privacy policy is to inform you of the types of personal data processed, how it is processed, who is responsible for the processing, your rights and whom to contact.

# 3) What is considered personal data?

Personal data is defined as any data, information and assessment that can be linked to you as an individual. The factor that determines whether data is regarded as personal data is whether it can identify a specific person.

Data which, on its own, cannot be linked to an individual, may constitute personal data if it is used in combination with other data.

#### 4) The purpose of and legal basis for the processing of personal data in Urkund

### **Purpose**

The purpose of processing personal data in Urkund is to detect dishonesty or plagiarism in education and research.

#### **Legal basis**

Data processing is authorized under section 4-7 of the Act relating to Universities and University Colleges.

# 5) Which types of personal data are processed in Urkund and how long do we store your personal data?

All students who are registered at VID and who submit work can be subject to plagiarism checks.

The following personal data is processed in Urkund:

- Feide ID
- Candidate number
- Other examination data retrieved from the Common Student System (FS)
- IP address

In principle, answer papers uploaded to Urkund are stored indefinitely.

#### 6) You and Urkund

As a student at VID, your submitted work is registered and analysed in Urkund.

#### 7) Case officers at VID

The case officers at VID are based in academic units and the examination office.

We may disclose your personal data to third parties.

Disclosure or export of data is defined as any transfer of data other than to its own system/processing or to the data subject or someone who receives data on their behalf.

VID may disclose or export data that contains personal data to other systems, i.e. to external data processors, when deemed necessary.

Your personal data will not be transferred to countries outside the EU/EEA, or to international organizations.

#### 8) Third parties

Personal data in Urkund is retrieved from the digital examination system Inspera and the learning platform Canvas.

See the privacy policy for FS for more details of which systems receive personal data from FS.

# 9) The security of personal data

VID regularly conducts risk and vulnerability analyses in order to protect your personal data in Urkund. Various security measures have also been implemented, such as access control to ensure that only employees who require access to your personal data are granted access.

#### 10) Your rights

#### Right to information and access

You have the right to receive information about how VID processes your personal data. It is the intention of this privacy policy to contain the information you have the right to receive.

You also have the right to view/access all personal data registered about you at VID and to receive a copy of the personal data held on you if you so wish.

#### Right to rectification

If we hold incorrect personal data on you, you are entitled to have this data rectified. You are also entitled to have supplementary information added to incomplete personal data held on you. If you believe we have registered incorrect or incomplete personal data about you, please contact us. It is important that you state the reason and, if relevant, document why you believe the personal data is incorrect or incomplete.

#### Right to restriction of processing

In certain cases, you have the right to request that the processing of your personal data is restricted. Restricting the processing of personal data means that your personal data will still be stored, but that the possibilities for further processing will be limited.

If you believe that your personal data is incorrect or incomplete, or if you have lodged an objection to the processing, you have the right to request a temporary restriction on the processing of your personal data. This means that processing will be restricted until, if relevant, we have rectified your personal data, or until we have been able to assess whether your objection is justified.

In other cases, you may also request a more permanent restriction on the processing of your personal data. In order to be entitled to restrict the processing, the conditions in the Personal Data Act and article 18 of the GDPR must be met. If we receive a request from you to restrict the processing of your personal data, we will assess whether the statutory conditions have been met.

#### Right to erasure

In certain cases, you have the right to request erasure of your personal data. The right to erasure is not unconditional, and whether you are entitled to have your personal data erased must be assessed in light of relevant legislation on the protection of privacy, i.e. the Personal Data Act and the GDPR. Please contact us if you want your personal data to be erased. It is important that you justify why you want the personal data erased, and, if possible, that you also specify which personal data you want erased. We will then consider whether the statutory conditions for erasure have been met. It should be noted that in certain circumstances the law allows for us to make exceptions to your right to erasure. For example, we may need to store personal data for the purpose of performing a task in compliance of the Act relating to Universities and University Colleges, or for reasons of public interest, such as archiving, research and statistics.

# Right to object

You may have the right to submit an objection to the processing on the grounds that you have a specific need to stop the processing. This includes if you have a need for protection or have a secret address, etc. The right to object is not unconditional, and is contingent upon the legal basis for the

processing, and whether you have a specific need. The conditions are stipulated in article 21 of the GDPR. If you submit an objection to the processing of your personal data, we will consider whether the conditions for submitting an objection have been met. If we find that you have the right to object to the processing and that your objection is justified, we will discontinue processing, and you will have the right to request erasure of the data. It should be noted that we may under certain circumstances make exceptions from erasure, for example if we have to store your personal data for the purpose of performing a task in compliance of the Act relating to Universities and University Colleges, or for reasons of public interest.

#### Right to lodge a complaint about the processing

If you believe we have not processed your personal data in a correct and lawful manner, or if you believe that we have failed to protect your rights, you have the right to lodge a complaint about the processing. You can find information about how to contact us in section 11.

If we dismiss your complaint, you can appeal to the Norwegian Data Protection Authority (DPA). The DPA is responsible for ensuring that Norwegian organizations comply with the Personal Data Act and the GDPR in the processing of personal data.

#### 11) Contact information

#### Data controller

VID is the data controller of personal data in Urkund.

If you wish to exercise your rights as described in section 10 above, you can contact us at post@vid.no. We will process your request without undue delay, and within 30 days.

# **Data protection officer**

VID has appointed a data protection officer who is responsible for protecting the personal data interests of students and employees at VID. The data protection officer for administrative processing of personal data at VID can be contacted by e-mail: <a href="mailto:personvernombud@vid.no">personvernombud@vid.no</a>.

If you wish to exercise your rights as described in section 10 above, you can contact the data protection officer at VID. We will process your request without undue delay, and within 30 days.

#### Service provider

Urkund.com is the supplier of the plagiarism detection system Urkund.

Contact information for Urkund: URKUND Box 3217, 10364 Stockholm, SWEDEN.