



Stakeholders	Name	Address	Phone	Email
Company	Compilatio	47 Rue Cassiopée 74650 Chavanod FRANCE	+33.4.58.10.08.08	
Data Controller	Frédéric Agnès	47 Rue Cassiopée 74650 Chavanod FRANCE	+33.4.58.10.08.08	gdpr.controller[@]compilatio.net
Data Protection Officer	GDPR generic contact	47 Rue Cassiopée 74650 Chavanod FRANCE	+33.4.58.10.08.08	gdpr.dpo[@]compilatio.net
Representative	N/A			

Identification of processing			
Category of processing activity	REF #	Creation Date	Last update
Detection and measurement of similarities between digital texts and other texts freely accessible and available on the internet	CMPT-CAT-DTCTMESSIM-001	02/28/2018	N/A
Customer support - Customer follow-up	CMPT-CAT-SUIVICLI-002	03/26/2018	N/A
Studium Account Creation Sponsored by a Home Institution	CMPT-CAT-CCMPTPARR-003	03/26/2018	N/A
Product support request	CMPT-CAT-DEMASSIST-005	03/26/2018	N/A

Registration form

CMPT-CAT-DTCTMESSIM-001

Description of processing	
Name of processing	Detection and measurement of similarities between digital texts and other texts freely accessible and available on the internet
REF #	CMPT-CAT-DTCTMESSIM-001
Creation Date	02/28/2018
Updated	N/A
Additional information about the processing	Provide services to detect and measure similarities for students' work at customer institutions as well as for businesses' written output

Type of operation	Description	Software solution & tool used
Collection	Collecting data for user accounts	Compilatio.net
Saving	Saving data	Compilatio.net
Saving	Saving imported documents	Compilatio.net
Use	Analysis of documents	Compilatio.net
Use	View analysis report	Compilatio.net
Use	Provide statistics	Compilatio.net
Erase / Destroy	Delete personal data at the end of the retention period or upon request	Delete nominative personal data that was provided and anonymise logs and statistics.

Personal data commonly processed	Type of common personal data
User Account and Author Data: Name, Email, Description, Language, Phone Number	Civil status, ID, identification data, images...
User login and password	Specific data
User account	Specific data
User Statistics	Specific data
Document database: Directory and documents imported	Specific data
Submission of documents	Specific data
Author data:	Civil status, ID, identification data, images...

Sensitive personal data processed	Type of sensitive personal data
N/A	

Period of storage of personal data
6 months after the end of the business relationship with

Security measures

Technical security measures	Use of the HTTPS protocol Use of login and password for connection Management of rights and authorisations within the system
Organisational security measures	People with access to the production database are subject to a contractual confidentiality clause

Subcontractors involved
OVH datacenter France for hosting sites

Transfers outside the EU	Country	Type of guarantees	Link to the doc
N/A			

Registration form

CMPT-CAT-SUIVICLI-002

Description of processing	
Name of processing	Customer support - Customer follow-up
REF #	CMPT-CAT-SUIVICLI-002
Creation Date	03/26/2018
Updated	N/A
Additional information about the processing	Support the customer in their use of the similarity-detection service

Type of operation	Description	Software solution & tool used
Saving	Customer information	CRM
Organisation	Organisation of the customer & contact	CRM
Consultation	Consulting customer information	CRM
Use	Communication by email with the customer for	CRM, Messaging system
Use	Provide customer support	Internal method

Personal data commonly processed	Type of common personal data
Name and email of the contact	Civil status, ID, identification data, images...
Company, role of the contact	Profession
Information about the contract, date of follow-up	Specific data

Sensitive personal data processed	Type of sensitive personal data
N/A	

Period of storage of personal data
6 months after the end of the business relationship with

Security measures	
Technical security measures	CRM access using HTTPS with login / password Gmail: HTTPS access with login / password PC access by specific login / password
Organisational security measures	All Compilatio employees are subject to a contractual confidentiality clause

Subcontractors involved
Zoho Corp. for the CRM part

Google Gmail for the messaging system

Transfers outside the EU	Country	Type of guarantees	Link to the doc
Google	United States	Privacy shield	https://www.privacyshield.gov/list
Zoho Corporation	United States	Privacy shield	https://www.privacyshield.gov/list

Registration form

CMPT-CAT-CCMPTPARR-003

Description of processing	
Name of processing	Studium Account Creation Sponsored by a Home Institution
REF #	CMPT-CAT-CCMPTPARR-003
Creation Date	03/26/2018
Updated	N/A
Additional information about the processing	Create, on behalf of the institution, accounts for students at client institutions

Type of operation	Description	Software solution & tool used
Collection	From the institutions, to create user accounts	Messaging system
Saving	Store information for processing	File management systems
Use	Process information for the creation of accounts	Internal method
Erase / Destroy	Delete personal data at the end of the retention period or upon request	Internal method

Personal data commonly processed	Type of common personal data
Full name, email Institution	Civil status, ID, identification data, images... Profession

Sensitive personal data processed	Type of sensitive personal data
N/A	

Period of storage of personal data
6 months after the end of the business relationship with

Security measures	
Technical security measures	Gmail: HTTPS access with login / password PC access by specific login / password Access to Compilatio software using https with login and password

Organisational security measures	All Compilatio employees are subject to a contractual confidentiality clause
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Subcontractors involved
Google Suite
OVH

Transfers outside the EU	Country	Type of guarantees	Link to the doc
Google	United States	Privacy shield	https://www.privacyshield.gov/list

Registration form

CMPT-CAT-DEMASSIST-005

Description of processing	
Name of processing	Product support request
REF #	CMPT-CAT-DEMASSIST-005
Creation Date	03/26/2018
Updated	N/A
Additional information about the processing	Create a support request for the similarity-detection and measurement product

Type of operation	Description	Software solution & tool used
Collection	Creating the user account in the tool	Ticketing tool
Saving	Store information for processing	Ticketing tool
Use	Processing information to respond to the support request	Ticketing tool
Erase / Destroy	Delete personal data at the end of the retention period or upon request	Internal method

Personal data commonly processed	Type of common personal data
Name, email	Civil status, ID, identification data, images...
Ticket user account, Creation date, Date of latest activity,	Specific data

Sensitive personal data processed	Type of sensitive personal data
N/A	

Period of storage of personal data
6 months after the end of the business relationship with the customer

Security measures	
Technical security measures	Access to the product and the support request management tool via HTTPS and using a login / password and the authorisation management tool
Organisational security measures	All Compilatio employees are subject to a contractual confidentiality clause

Subcontractors involved
Zendesk
OVH

Transfers outside the EU	Country	Type of guarantees	Link to the doc
Zendesk	United States	BCR - Business Corporate Rules	https://d1eipm3vz40hy0.cloudfront.net/pdf/ZENDE
Zendesk	United States	BCR - Business Corporate Rules	https://d1eipm3vz40hy0.cloudfront.net/pdf/ZENDE