

Privacy Notice for Students Using Grammarly

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This privacy notice explains how University College Dublin (UCD) processes your personal data when you use the Grammarly service provided by us.

1. Who is the Data Controller?

UCD is the "Data Controller" for the personal user data covered by this notice. This means we are responsible for data protection compliance of user data in connection with the use of this tool/service.

2. What Personal Data Do We Process?

When you use the Grammarly account provided by us, Grammarly process the following types of personal data:

- Account Information: Your name and your UCD connect email address.
- User Content: Any text that you submit to Grammarly for review, including essays, assignments, and other written work.
- Usage Data: Information about how you interact with Grammarly, such as the features you use, the number of documents you check, and your general activity.

3. Why We Use Grammarly and Our Legal Basis

We provide Grammarly to you as an educational support tool for spelling and grammar suggestions. Whether you make use of Grammarly or not is your choice.

4. How We Share Your Data with Grammarly

To provide the service, we share your personal data with Grammarly, Inc. ("Grammarly"). Grammarly acts as a "Data Processor" on our behalf. This means Grammarly can only use your personal data according to our instructions and for the purposes outlined in this notice.

Specifically, when you use the service, your User Content, i.e. the material you submit for checking, and some Usage Data are securely transmitted to Grammarly's servers for analysis. Grammarly processes this data to provide you with writing suggestions, check for plagiarism, and offer other features that help you improve your work.

Grammarly uses sub-processors to support the provision of their service. These subprocessors include Microsoft Azure and Amazon Web Services which are both based in the United States. Microsoft Azure's role as a third-party processor for Grammarly is primarily related to their Generative AI features acting as the cloud service provider for secure sub-processing. AWS acts as Grammarly's primary subprocessor for hosting, storage, and general data processing.

Important: Grammarly's policies state that it does not sell your user content, provide it for advertising, or use it to train its generative AI models without your consent. However, we advise you to be mindful of the information you submit. Do not use Grammarly for checking highly sensitive or confidential UCD information.

5. International Data Transfers

Grammarly is a company based in the United States. This means your personal data is transferred outside of the European Economic Area (EEA) to the US.

To ensure this transfer is lawful and your data remains protected, we have a Data Processing Agreement (DPA) with Grammarly that benefits from the protection of the EU-U.S. Data Privacy Framework (DPF) as a safeguard. This framework provides an adequate level of data protection and ensures your rights are upheld even when your data is processed outside of the EEA.

6. How Long Grammarly Keeps Your Data

The user's personal data (name and email address) is retained as long as the user maintains a Grammarly account. All personal data is deleted from Grammarly's internal and external services when the user deletes their account. Some personal data may be stored after the account deletion for up to one month in backups and up to 365 days in logs.

7. Your Data Protection Rights

Under GDPR, you have the following rights regarding your personal data.

- **The Right to Access:** You have the right to request a copy of the personal data we hold about you.
- **The Right to Rectification:** You can ask us to correct any inaccurate or incomplete personal data we have about you.
- **The Right to Erasure ("Right to be Forgotten"):** You can ask us to delete your personal data in certain circumstances.
- **The Right to Restrict Processing:** You can ask us to limit how we use your personal data.
- **The Right to Object:** You have the right to object to the processing of your personal data in some situations.
- **The Right to Data Portability:** You can request to receive your personal data in a structured, commonly used, and accessible format.

8. Contact Us

If you have any questions about this privacy notice or wish to exercise any of your rights, please contact us at disability@ucd.ie.

If you have concerns about your data subject rights regarding the use of Grammarly, you can contact the UCD DPO at gdpr@ucd.ie

You also have the right to lodge a complaint with the Data Protection Commission (DPC), the supervisory authority for data protection in Ireland, if you believe your rights have been violated.