

PERSONAL DATA PROTECTION POLICY FOR HFRI'S PORTAL

1. Policy Objective

1.1. The purpose of this Policy is to provide information to natural persons, whose data of personal nature ("personal data") is processed by HFRI during the provision of its services as a controller, in accordance with the principles and provisions of Regulation (EU) 2016/679 "General Data Protection Regulation ("GDPR") and Law 4624/2019 "Authority for the Protection of Personal Data, implementing measures for the Regulation (EU) 2016/679 of the European Parliament at the Council of April 27th, 2016 for the protection of natural persons against personal data processing and incorporation into national legislation of the Directive (EU) 2016/679 of the European Parliament at the Council of April 27th, 2016 and other provisions." (A' 137), as in force from time to time.

1.2 Personal data constitutes any information concerning an identified or identifiable natural person ("data object"). An identifiable natural person is one whose identity can be verified, directly or indirectly, particularly through mention of a recognizing element of his/ her identity, such as name, identity card number, location data, barcode ID card, or of one or more factors specific to his/ her physical, physiological, genetic, psychological, economic, cultural or social identity.

1.3 Personal data processing constitutes any effect on data taking place by any person, with or without the use of automated methods, meaning any action or series of actions applied to personal data, such as collecting, inputting, sorting, organizing, retaining, storing, modifying, removing, using, transferring, transmitting or distributing by any other means, correlating or associating, connecting, locking, deleting or destroying.

2. Personal Data

2.1 The categories of personal data that HFRI can collect and process are, among others, the following:

- Personal details such as full name, age, sex, date of birth, tax number, identification card information, passport details, or information related to other identification formats.
- Contact details such as an address, phone number, and email.
- Data related to funding.
- Information regarding travel, related to HFRI activities, such as boarding passes, place of stay, ticket stubs, IBAN no, SWIFT code, and bank account number.
- The information included in the Curriculum Vitae or other information related to education, prior employment, years of experience, research interests, or other qualifications.

3. How the HFRI collects data

3.1 HFRI maintains a personal data input system on its digital platform, which covers the process of submitting and evaluating research proposals/ applications, document filing and project management. As such, the collection of personal data

takes place, predominantly, through the HFRI digital platform, apart from cases where submission takes place by hand, by post, or email.

3.2 Personal data is collected and processed at any time during the following procedures:

- Research proposal/ application submission in the framework of an HFRI action.
- Research proposal/ application evaluation.
- Examination of an appeal filed against an administrative act/ decision of an HFRI body.
- Monitoring the implementation and funding of research projects or scholarship awards.
- Publicizing participation in HFRI actions.
- Communication to provide targeted information for e.g. research collaborations, participation in informative events on research technology, and technological development, etc.
- Publicizing the work of HFRI and disseminating the results of its actions.
- Statistical analysis of data and preparing reports to competent state organizations or strategy implementation.

3.3 Furthermore, personal data is indirectly supplied to HFRI through third persons, in line with pertinent legislation regarding the objectives listed below, such as e.g. the event where a person is participating in a research project and his/ her personal details are submitted through the Host Institution and the Principal Investigator.

4. Legal basis and purpose of processing

4.1. HFRI is only allowed to process personal data when at least one of the following GDPR-listed legal bases, applies. In effect, when:

- Processing is necessary for the execution or preparation of a contract to which the data subject is part.
- Processing is necessary for HFRI to comply with legislation or regulations.
- Processing is necessary as to public interest.
- Processing is necessary for safeguarding the vital interests of the data subject.
- Processing is necessary to pursue HFRI legal interests, in understanding that these are not above the rights and freedoms of the data subject.
- Data subject consent has been granted.

4.2. The following table lists the main procedures of personal data processing implemented by HFRI and, as per case, the legal basis they are founded on.

A/N	Processing Activity	Legal basis
1	Digitally informing the research community regarding research and innovation issues	Consent
2	Communication with HFRI action beneficiaries for publicizing HFRI and disseminating the results of its actions.	Consent

3	Evaluation of proposal/ application submitted in the framework of HFRI actions.	Consent The submission of a proposal /application by the subject is considered as consent.
4	Monitoring and managing research projects funded by HFRI and cost eligibility screening	Compliance with the legislation in force and Public Interest
5	Reimbursement of third parties to procure services/ consumables/ equipment etc.	Contract Execution
6	Statistical analysis regarding research and the research web in Greece	Public Interest
7	Posting subject details to 'Diavgeia', 'KHMDHS' (Central Digital Registry for Public Procurement), etc.	Compliance with the legislation in force
8	Transmitting data to other public authorities, such as e.g. Inspection Unit C of Asset Declarations	HFRI compliance with applicable law
9	Serving the scientific community during visitations to or communications with HFRI	Legitimate Interest
10	Examination of appeals against administrative acts/ decisions of HFRI bodies.	Legitimate Interest

5. Confidentiality

HFRI employees, officers, external associates, subcontractors, and all Foundation competent bodies, process all personal data that may be processed with absolute confidentiality. It is noted that in cases where issues of participation in HFRI activities may arise, which fall under the authority of the HFRI Scientific Council, in order to be informed and reach decisions, personal data is transmitted to the Scientific Council members and, if deemed necessary, to the HFRI The Advisory Committee, which assists the Scientific Council in its tasks or also to external experts or advisers who support the work of the Scientific Council and all, is committed to observing the principle of confidentiality.

6. Disclosure and Personal Data Recipients

6.1. Unless it is permissible by law or enforced by court order or decision, personal data shall only be revealed to third parties (data recipients) mentioned in this policy. Basic information on funded projects or data relating to HFRI activities will be posted to the HFRI website for reasons of transparency. Information relating to funded projects that can be posted to the HFRI website may include the reference number to the submitted proposal application, the research project title, the project summary, the project budget, etc. Further information, for reasons of publicizing its work, may only be used from HFRI following the written consent of data objects.

6.2 Upon request, HFRI presents information regarding its activities to the competent inspection authorities and competent inspection bodies of Greece and the European Union or to authorized representatives or to external experts who provide services to HFRI, with the intent of evaluating project implementation or reviewing their financial scope.

6.3 Personal data may also be transferred to professional advisors and service providers, including auditors, legal counselors, and external evaluation counselors, on

the basis of HFRI's vested interest, when such is demanded of laws/regulations in force, or on the basis of consent when deemed necessary.

Subcontractors who perform personal data processing on behalf of HFRI, come under a pertinent contact with HFRI, by which they only process the personal data that HFRI instructs them to and in accordance with its detailed guidelines, while this processing is conducted by taking the appropriate technical and organizational measures for data safety.

6.4. HFRI archives are located at its headquarters (185 Syggrou Ave. & Sardeon St. 2, 171 21, N. Smyrni, Athens).

The information filed into the HFRI web Portal is kept at the National Infrastructures for Research and Technology (GRNET) facilities, on a server assigned to HFRI. The development, maintenance, and customization of the web Portal has been undertaken by the Athens University of Economics and Business on behalf of HFRI, which acts in executing processing by HFRI written directives and guidelines, taking all necessary technical and organizational measures for data safety.

7. Personal Data Transmissions

Personal data may be transmitted for the scientific evaluation of proposals or projects to external experts located in European Union member states, or third countries outside the E.U., for which the E.U. has decided that there is sufficient security and/or other third countries according to GDPR provisions and the greek legislation in force.

8. Security

HFRI is committed to ensuring the confidentiality, integrity, and availability of personal data being processed. The priority is to prevent data breach occurrences, including data tampering and obstructing unauthorized access to HFRI systems. In any case, HFRI implements software safeguards as well as other technical and organizational measures for protecting personal data against loss, unauthorized access, alteration, destruction, and any other security breach. Furthermore, HFRI adopts measures that among others include using pseudonyms (pseudonymization) and other approved methods of encryption.

9. Storing Personal Data

9.1. As of rule, HFRI processes and retains personal data for as long as it is necessary to fulfill its objectives, namely mentioned below:

- When the consent of the data subject is the legal basis and for as long as it remains in force.
- Up to five (5) years from the date that a proposal or an application was submitted, for reasons of evaluation of this proposal or application.
- For as long as it is required by the legislation in force (e.g. taxation, auditing, accounting), state funding regulations in force, or/and other regulations related to the framework of funding from time to time.
- For as long as personal data is mandatory and necessary to establish, enact or support legal claims, either in court proceedings or in an administrative or out-of-court procedure.

9.2 It is being clarified that some personal data may be retained for statistical purposes, as much for submitted proposals/applications as for proposals/applications that have been approved and funded, for as long as it is deemed necessary. The processing will be liable to appropriate guarantees in line with GDPR and Article 89 in specific, as to the rights and freedoms of data subjects. For example, HFRI applies data pseudonymization techniques and organizational security measures, which limits data access to persons holding clearance. When this processing has been rendered obsolete for its objectives, personal data is deleted. Furthermore, provided that said purposes can be fulfilled by HFRI from further processing which does not allow for the identification of data subjects (that is they are anonymous), said purposes will be fulfilled in this manner.

10. Rights of Data Subjects

10.1 Data subjects may exercise the following rights:

- To request that they be notified of additional information regarding their personal data (*Right to be updated*).
- To request access to it, that is to receive confirmation regarding the processing of their data or/and receive a copy of that data (*Right to access*).
- To submit a written or verbal request for the correction of their data, when inaccurate, or to fill out their data, when incomplete (*Right to correct*).
- To request the erasure of their personal data, when they no longer desire this data to be processed, and when there is no legal ground for HFRI to retain them (*Right to be forgotten*).
- To revoke the consent given to HFRI at any time, without this, however, affecting the legality of the processing based on the consent of data subjects, prior to it being revoked (*Right to be forgotten*).
- To object to the processing of their personal data, on condition that public interest is not affected (*Right to object*).
- To request the limitation of their Data Processing so as to limit their process e.g. when they are no longer relevant, but wish that they be maintained for further use in possible legal claims (*Right to processing limitation*).
- To request that they receive their personal data in a structured and commonly used form and transfer them to another controller (*Right to portability*).
- To file a complaint to the Data Protection Authority (www.dpa.gr), after contacting the HFRI Data Protection Officer (dpo@elidek.gr).

10.2 It is noted that data subjects can exercise their right to correct/ to be updated, amending their personal data through the HFRI web Portal. For any questions on this policy or any other issues related to personal data processing by HFRI, please contact the HFRI's Officer responsible for Data Protection:

Chrysavgi Saoulidou
Hellenic Foundation for Research and Innovation
185 Syggrou Ave. & Sardeon St. 2
Postal Code 171 21, N. Smyrni, Athens
Email: dpo@elidek.gr Tel.: 210 64 12 421

11. Amendments

HFRI retains the right to amend this Policy. Any such amendments shall be posted to the HFRI website (www.elidek.gr) and the HFRI Portal (<https://portal.hfri.gr/>)

12. A Briefing regarding the content of the present Policy

12.1. In case personal data of persons is being supplied to HFRI by a third party (for example a Contracted Organization or/and the proposal Principal Investigator, who assumes a managerial and coordinating role for proposal purposes), then the third parties assume the responsibility of confirming to HFRI that they have notified data subjects on the content of said Policy and the possibility of circulating this data to HFRI. In case where this document has not been signed, HFRI retains the right of refusing to accept any personal data on behalf of the Contracted Organization or/and the Principal Investigator/ Candidate and to examine their request/ proposal.

The present Policy has been posted to the HFRI Portal (<https://portal.hfri.gr/>).