

PERSONAL DATA PROTECTION POLICY OF THE HELLENIC FOUNDATION FOR RESEARCH & INNOVATION

1. Policy Objective

1.1. The purpose of this Policy is providing information to natural persons, whose data of personal nature (“personal data”) is processed by H.F.R.I. 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 and 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 and 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 H.F.R.I. 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 address, phone number, email and fax number.
- Data related to funding.
- Information regarding travel, related to H.F.R.I. activities, such as boarding passes, place of stay, ticket stubs, IBAN no, SWIFT code, bank account number.

- 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 H.F.R.I. collects data

3.1 H.F.R.I. 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 H.F.R.I. 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 H.F.R.I. action.
- Research proposal/ application evaluation.
- Examination of an appeal filed against an administrative act/ decision of an H.F.R.I. body.
- Monitoring the implementation and funding of research projects or scholarship awards.
- Publicizing participation to H.F.R.I. 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 H.F.R.I. 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 H.F.R.I. through third persons, in line to 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. H.F.R.I. is only allowed to process personal data when at least one of 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 H.F.R.I. to comply with legislation or regulations.
- Processing is necessary as to public interest.

- Processing is necessary in safeguarding the vital interests of the data subject.
- Processing is necessary to pursuit H.F.R.I. 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 H.F.R.I. 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 H.F.R.I. action beneficiaries for publicizing H.F.R.I. and disseminating the results of its actions.	Consent
3	Evaluation of proposal/ application submitted in the framework of H.F.R.I. actions.	Consent The submission of a proposal / application by the subject is considered as consent.
4	Monitoring and managing research projects funded by H.F.R.I. 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	H.F.R.I. compliance with applicable law
9	Serving the scientific community during visitations to or communications with H.F.R.I.	Legitimate Interest
10	Examination of appeals against administrative acts / decisions of H.F.R.I. bodies.	Legitimate Interest

5. Confidentiality

H.F.R.I. 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 to H.F.R.I. activities may arise, which fall under the authority of the H.F.R.I. 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 H.F.R.I. Advisory Committee, who assists the Scientific Council in its tasks or also to external experts or advisers who support the work of the Scientific Council and all, are committed in 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 H.F.R.I. activities will be posted to the H.F.R.I. website for reasons of transparency. Information relating to funded projects that can be posted to the H.F.R.I. 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 H.F.R.I. following the written consent of data objects.

6.2 Upon request, H.F.R.I. 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 H.F.R.I., to 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, external evaluation counselors, on the basis of H.F.R.I.'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 H.F.R.I., come under a pertinent contact with H.F.R.I., by which they only process the personal data that H.F.R.I. instructs them to and in accordance to its detailed guidelines, while this processing is conducted by taking the appropriate technical and organizational measures for data safety.

6.4. H.F.R.I. archives are located at its headquarters (Vass. Sofias Ave 127, Athens).

The information filed into the H.F.R.I. web Portal, is kept at the National Infrastructures for Research and Technology (GRNET) facilities, on a server assigned to H.F.R.I. The development, maintenance and customization of the web Portal has been undertaken by the Athens University of Economics and Business on behalf of H.F.R.I., which acts in executing processing by H.F.R.I. 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

H.F.R.I. is committed to ensure 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 H.F.R.I. systems. In any case, H.F.R.I. 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, H.F.R.I. adopts measures which among others include using pseudonyms (pseudonymization) and other approved methods of encryption.

9. Storing Personal Data

9.1. As of rule, H.F.R.I. processes and retains personal data for as long as it is necessary to fulfil 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 to GDPR and Article 89 in specific, as to the rights and freedoms of data subjects. For example, H.F.R.I. 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 H.F.R.I. 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 H.F.R.I. to retain them (*Right to be forgotten*).
- To revoke the consent given to H.F.R.I. at any time, without this however affecting the legality of 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 H.F.R.I. Data Protection Officer (dpo@elidek.gr).

10.2 It is noted that data subjects can amend their personal data through the H.F.R.I. web Portal, if they have been granted access, or by a pertinent request sent to the web address of the H.F.R.I. Officer responsible for Data Protection (dpo@elidek.gr) or submitted to H.F.R.I. Headquarters, Vass. Sofias Ave. 127, 115 21, Athens. For any questions on this policy, or any other issues related to personal data processing by H.F.R.I., please contact the H.F.R.I. Officer responsible for Data Protection:

Chrysavgi Saoulidou
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Vass. Sofias Ave. 127
Postal Code 115 21, Athens
Email: dpo@elidek.gr Tel.: 210 64 12 421

11. Amendments

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

12. A Briefing regarding the content of the present Policy

12.1. In case where personal data of persons is being supplied to H.F.R.I. 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 assumes the responsibility of confirming to H.F.R.I. that they have notified data subjects on the content of said Policy and the possibility of circulating this data to H.F.R.I. In case where this document has not been signed, H.F.R.I. 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 any request / proposal.

The present Policy has been posted to the H.F.R.I. website (www.elidek.gr) and the H.F.R.I. Portal (<https://hfri.grnet.gr/>)