

# Privacy Statement

## **Privacy Statement regarding the protection of personal data in the context of EuroCC online Courses "HPC Training Series"**

EuroCC is a project of the European High-Performance computing Joint Undertaking (JU) under grant agreement No 951732 and the Greek Secretariat for Research and Technology. The National Infrastructures for Research and Technology (hereinafter referred to as "GRNET S.A.") organizes the online Courses "HPC Training Series".

### **Data Controller details:**

GRNET S.A.

### **Competent Processing Project:**

Marketing & Communications

### **Department Controller's Contact Details:**

marcomms@admin.grnet.gr

### **Data Processors:**

- "Moosend Ltd"

More detailed information regarding the Terms of Use and Protection of the required applications in its application: <https://moosend.com/trust/privacy-policy/>

- "Zoom Video Communications Inc", (hereinafter referred to as "Zoom")

More detailed information on the provision of "Zoom" services, the Terms of Use and the Privacy Policy thereof, is available on <https://zoom.us/trust>.

### **Scope of this Privacy Statement:**

**GRNET S.A.** is bound by European Regulation 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of individuals with regard to the processing of personal data and on the free movement of such data (General Data Protection Regulation – hereinafter referred to as "**the GDPR**") and Law 4624/2019 (Government Gazette 137/A/2019) on "*Data Protection Authority, measures for the implementation of Regulation(EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of individuals with regard to the processing of personal data and for the incorporation into national law of Directive(EU) 2016/680 of the European Parliament and of the Council of 27 April 2016 and other provisions*", as in force at any time (hereinafter referred to as "the Law"). This Privacy Statement details all information necessary for the processing of personal data for the online Courses "HPC Training Series", as well as the policies and procedures implemented by GRNET SA for the protection of the user's privacy. This Privacy Statement sets out the criteria as well as the terms and conditions under which GRNET SA collects, processes, uses, stores and transmits the personal data of the project users, how it ensures the confidentiality of such information, including any law and/or regulation implemented or enacted in accordance with Union and national laws on personal data

protection and electronic privacy, as well as any law and/or regulation amending, replacing, issuing or consolidating any of the latter, including any other applicable EU and national laws on the processing of personal data and privacy, which may exist in accordance with applicable law.

For the purposes of this Privacy Statement, the terms “data processor”, “data controller”, “third party”, “supervising authority”, “personal data”, “processing”, “data subject” shall have the meaning ascribed to them by applicable legislation on the protection of personal data.

In addition, for the purposes of the present, the following definitions shall also apply:

“Website” – the website accessible via domain names <https://eurocc-greece.gr/> and <https://events.grnet.gr/event/142/> including the entirety of the web pages thereof.

“User”- the EuroCC online Courses "HPC Training Series" user, whom the data refer to, whose identity is known or may be verified, namely it may be directly or indirectly determined.

#### **A. Purpose/s for processing the data collected:**

GRNET S.A.– as data controller- within the framework of the online Courses "HPC Training Series" collects and processes the personal data of the persons who give their consent, for the following purpose / purposes:

1. To register in the online Courses "HPC Training Series"
2. For the implementation of the online event using the "zoom" platform.
3. For the implementation of the sending of messages and the technical support of the project by the executor "Moosend Ltd".

GRNET S.A. collects and processes “users” personal data in the context of providing the online Courses "HPC Training Series" solely for the abovementioned purposes and only to the extent strictly necessary to effectively serve such purposes. These data shall be relevant, appropriate and not more than those required in view of the aforementioned purposes. They shall also be accurate and, if necessary, updated.

Furthermore, the aforementioned data shall be retained only during the period required as mentioned hereinabove, in order to accomplish the purposes of their collection and processing and shall be deleted after the end thereof (see below “Personal data retention periods”).

#### **B. Categories of personal data processed:**

In the context of contact for the online event and for following information, the personal data that are being processed are:

1. To register in the online Courses "HPC Training Series":
  - Name
  - Last name
  - Email address
  - Organization/Company
  - Role in the Organization/Institution
  - How did you find out about the event.
2. For the implementation of the online event using the "zoom" platform:
  - Username
  - Password
  - The video and audio streaming of the online event
  - The IP address wherefrom the “user” connects to the platform
  - Connecting device details (device type, manufacturer, model, operating system)
  - Country
  - Total time of being connected
  - Questions you ask through the platform

3. For the implementation of the sending of messages and the technical support of the project by the processor "Moosend Ltd" the personal data being processed are:
  - Name
  - Last name
  - Email address,
  - Organization/Company
  - Role in the Organization/Institution
  - Responses to participating in accepted events
  - History of emails that have been sent

### **C. Legal bases for processing**

For the aforementioned purposes the processing of users' personal data is based on the provision of the data subject's consent, as required by Article 6 par. 1 par. A of GDPR.

### **D. Access to personal data:**

For the implementation of the dispatch and processing of the online Courses "HPC Training Series" access to the personal data of "users" is provided to the following:

- In the EuroCC project marketing team of GRNET S.A., which consists of staff that maintains a contractual relationship of project leasing and provision of services with GRNET S.A.
- Associates of GRNET S.A., who are bound by a private confidentiality agreement with GRNET S.A.:
  - The staff of the company "Moosend Ltd" in case of technical support.
  - The staff of the company "Zoom" in case of technical support and for the provision of the platform.

The processing of the online Courses "HPC Training Series" "users'" personal data by the aforementioned, is carried out under the supervision and only at the request of GRNET S.A., within the scope of the mission and the role of each associate. Such associates undertake to comply with the same privacy and personal data requirements as GRNET S.A. itself in accordance to the present Privacy Statement.

### **E. Recipients of collected personal data:**

GRNET S.A. shall in no way transmit or in any way disclose the "users'" personal data to any third-party entities, private businesses, natural persons or legal entities, public authorities, agencies or other organizations, other than as expressly set out herein.

The "users'" personal data may be disclosed or transmitted to governmental authorities and/or law enforcement officials, only if necessary for the abovementioned purposes, in the context of enforcement of a court decision or a provision of law or if necessary to secure the legitimate interests of GRNET S.A. in its capacity as controller, in compliance with the terms and conditions of applicable law.

### **F. Rights of data subject**

As regards the data processed in the context of providing the online Courses "HPC Training Series" GRNET S.A. as data controller, shall take the necessary action, pursuant to the terms of this Privacy Statement, both during the collection as well as in every subsequent stage of processing of the online event "users'" personal data, so that every "user" may exercise his/her rights, as laid out in applicable legislation on the protection of personal data, namely the rights of Access, Rectification, Erasure, Restriction of Processing, data Portability, as detailed hereinbelow and in accordance with the terms and conditions of applicable law:

- **Right of access:** The data subject is entitled to request and obtain from GRNET S.A., a confirmation on whether or not his/her personal data are processed and, if so, to exercise the

right to access such personal data pursuant to applicable legislation. The data subject may also request a copy of the personal data undergoing processing, as described in this Privacy Statement. Finally, it should be noted that the right to obtain a copy of the personal data undergoing processing shall not adversely affect the rights and freedoms of others in accordance with applicable law.

- **Right of rectification:** The data subject shall have the right to request GRNET S.A. to rectify any inaccurate personal data concerning him/her. Considering the purposes of the processing, the data subject shall have the right to request that any incomplete personal data be completed, including by means of providing a supplementary statement, in accordance with applicable legislation.
- **Right of erasure:** The data subject has the right to delete all his/her personal data that have been collected and processed in the context of his/her participation in the online Courses "HPC Training Series" in accordance with the terms of the current legislation
- **Right to restriction of processing:** The data subject is entitled to ensure that GRNET S.A. restricts the processing of his/her data, if any of the conditions laid down by applicable legislation on the protection of personal data, is met.
- **Right to data portability:** The data subject has the right to obtain any personal data concerning him/her, which he/she has provided to GRNET S.A. in a structured, commonly used and machine-readable format, as well as the right to transmit such data to another data processor, without any objection from the processor to which the personal data have been provided, in accordance with the provisions of the applicable legislation on personal data.

To exercise any of the above rights, the "user" may contact the EuroCC Team at the following email address: [contact@eurocc-greece.gr](mailto:contact@eurocc-greece.gr) by completing the following form: [Form for the exercise of Data Subject's Rights](#)

The aforementioned rights of the data subjects are subject to restrictions in accordance with the applicable legislation.

GRNET S.A. provides the data subject with information on the action taken upon his request to exercise any of the above rights within one (1) month of receipt of the request. The aforementioned deadline may be extended by two (2) more months, in accordance with the terms of the existing legislation.

#### **G. Personal data retention period**

The personal data collected and processed in the context of the participation in the online Courses "HPC Training Series" based on the consent of the subjects, will be kept until the withdrawal of their consent or until the request for deletion is exercised. The option to withdraw consent and exercise the deletion request will be provided without exception to any EuroCC electronic communication.

#### **H. Technical and Organisational Measures:**

The processing of personal data by GRNET S.A. is carried out in such a way as to ensure its confidentiality and security. Specifically, it is carried out exclusively by authorized associates of GRNET S.A., while all appropriate organizational and technical measures are taken for data security and protection against accidental or unlawful destruction, accidental loss, alteration, prohibited dissemination or access and any other form of unfair treatment.

The "Moosend" data processor maintains its servers in a data center within the European Union. Takes all appropriate organizational and technical measures for the security of the data and their protection against accidental or unlawful destruction, accidental loss, alteration, prohibited dissemination or

access and any other form of unfair processing. For more information see here: <https://moosend.com/privacy-policy/>

The "Zoom" data processor takes all appropriate organizational and technical measures for the security of the data and their protection against accidental or unlawful destruction, accidental loss, alteration, prohibited dissemination or access and any other form of unfair processing. For more information see here: <https://zoom.us/trust>.

#### **J. Contact:**

For any questions or clarifications regarding the present Privacy Statement and as well as in the event of any violation related to personal data issues, "users" may contact the Competent Department of GRNET S.A. at the e-mail address mentioned hereinabove.

They may also contact the Data Protection Officer (DPO) of GRNET S.A., at the e-mail address: [dpo@grnet.gr](mailto:dpo@grnet.gr).

#### **K. Recourse/Complaint**

In the event that any EuroCC "user" request is not satisfied by the processor, the "user" may at any time address to/ file recourse with the Competent Supervisory Authority, namely the Data Protection Authority <https://www.dpa.gr>.