

Privacy Statement

Privacy Statement regarding the protection of personal data

Data Controller details:

GRNET S.A.

Competent Processing Project:

Erasmus +

Funding Body:

State Scholarships Foundation (IKY)

Controller's Contact Details:

marcomms@grnet.gr

Data Processor details:

GRNET S.A. – National Infrastructures for Research and Technology

Marketing & Communication Department GRNET S.A.

Processor's contact details:

marcomms@grnet.gr

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 provision of the event **"eSafety – eCreativity Network for Teachers, Parents and Guardians"** 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://e-safety-network.eu/>, including the entirety if the web pages thereof.

“User”- the online user of the <https://e-safety-network.eu/> to whom the data refers and whose identity is known or can be ascertained, that is, it can be determined immediately or indirectly.

A. Purpose/s for processing the data collected:

GRNET S.A.– as data controller- within the framework of the event “**eSafety – eCreativity Network for Teachers, Parents and Guardians**” collects and processes the personal data of the persons who give their consent, for the following purpose / purposes:

1. To register in the event “**eSafety – eCreativity Network for Teachers, Parents and Guardians**”.
2. For the implementation of the online event using the livestream platform of [Diavlos](#).
3. For the implementation of the sending of messages and the technical support of the project.
4. For statistical purposes.
5. For promoting the event.

GRNET S.A. collects and processes “users” personal data in the context of providing the event “**eSafety – eCreativity Network for Teachers, Parents and Guardians**” 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 event “**eSafety – eCreativity Network for Teachers, Parents and Guardians**”.
 - Name
 - Last name
 - Email address
 - Organisation/Institution
 - Role in the Organisation/Institution
2. For the implementation of the online event using the "diavlos" platform. For further information please look at the [following link](#):
 - 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

3. For the implementation of communication regarding the event and the technical support of the event the personal data being processed are:
 - Name
 - Last name
 - Email address
 - Organisation/Institution
 - Role in the Organisation/Institution
 - History of emails that have been sent
4. For statistical purposes, this information will be shares"
 - Name
 - Last name
 - Email address
 - Organization/Institution
 - Role in the Organization/Institution
5. For promoting the event, personal data of the participants (Photos, videos, livestreaming) will be used and be published on the following social media:
 - a. "e-Safety e-Creativity Network"/Consortium Partners channels:
 - i. LinkedIn (<https://www.linkedin.com/company/e-safety-network>)
 - ii. Facebook (<https://www.facebook.com/profile.php?id=61555818916893>)
 - b. GRNET channels:
 - i. Facebook (<https://www.facebook.com/grnet.gr>),
 - ii. X (former Twitter) (https://x.com/grnet_gr),
 - iii. LinkedIn (<https://www.linkedin.com/company/grnet>),
 - iv. Instagram (<https://www.instagram.com/grnet.gr>),
 - v. YouTube (<http://www.youtube.com/user/EDETvideos>)

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.

It is noted that when registering for the event **"eSafety – eCreativity Network for Teachers, Parents and Guardians"** the subjects may grant their consent for each processing purpose.

D. Access to personal data:

For the implementation of the dispatch and processing of the event **"eSafety – eCreativity Network for Teachers, Parents and Guardians"** access to the personal data of "users" is provided to the following:

- The 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.
- The team of the project Erasmus + on GRNET's side 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 funding body State Scholarships Foundation of the Erasmus+ project for the purpose of statistics (aggregated-statistical data).

The processing of the event's "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 workshop "GRNET S.A." as data controller – takes all 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 "Users'" personal data, so that every "user" may exercise his/her/their 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/their 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/them. 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/their personal data that have been collected and processed in the context of his/her/their participation in the "workshop" in accordance with the terms of the current legislation and the terms of this.
- **Right to restriction of processing:** The data subject is entitled to ensure that "GRNET S.A." restricts the processing of his/her/their 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/them, which he/she/they 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.

In addition, data subjects have the right, at any time, to withdraw their consent, without this withdrawal affecting the lawfulness of the (generally) processing that took place before its withdrawal.

For example, in the event that a “user” has given his/hers/their consent to download and (re)publish photographic material and this material is published/posted on social media of “GRNET S.A.”, if he/she/they revokes his/hers/theirs consent, then “GRNET S.A.” will not make any new publication of the photographic material in question; however, it is pointed out that in this case and regardless of the intentions of “GRNET S.A.”, the company will not be able to control any re-publications of the material in question on the internet by third parties or maintaining such material on social media.

To exercise any of the above rights, the “User” may contact the marketing team at the following email address: contact@e-safety-network.eu 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 of the “Users” in the context of the provision of the event “**eSafety – eCreativity Network for Teachers, Parents and Guardians**” are kept for the necessary period of time for the needs of the provision of the service and the controls to which the service is subject.

A consent withdrawal form is posted on the event’s registration page. It is noted that the legality of the processing of personal data that took place in the context of the granted consent is not affected.

In any case, the duration of retention of personal data shall not exceed:

- For the purposes 1), 2), 3) herein six (6) months.
- For the purpose of 4) and 5) herein until the termination of the project.

The duration of retention of personal data by “GRNET S.A.”’s external partners/processors is specified in detail in the Contracts that “GRNET SA” has signed with them, considering the object and purposes of processing.

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.

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.

K. Recourse/Complaint

In the event that any “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>.