

# Privacy Statement regarding the protection of personal data in the context of the “Pharos AI Factory Project” events

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“Pharos: The Greek AI Factory for Accelerating AI Innovation” is the national hub for AI research, development, and application. Designed to harness the capabilities of the upcoming Greek national supercomputer DAEDALUS, Pharos is positioned as a strategic pillar in Greece's and EU's journey towards AI democratisation, sustainability and innovation. Pharos aims to create a trusted, sustainable AI ecosystem in Greece that bridges the gap between academia, industry and the public sector, by promoting ethical AI innovation, focusing on critical sectors, such as Health, Culture & Language and Sustainability.

**Partners/Joint Controllers** (hereinafter referred to as “the Consortium”):

- \* National Infrastructures for Research and Technology (GRNET)
- \* National Centre for Scientific Research DEMOKRITOS (NCSR)
- \* National Technical University of Athens (NTUA)
- \* ATHENA Research Centre (ATHENA)
- \* Growthfund (HCAP)

**Data Controller details:**

National Infrastructures for Research and Technology (GRNET) on behalf of “the Consortium”

**Data Controller's Contact Details:**

GRNET's Marketing & Communication Department - [marcomms@grnet.gr](mailto:marcomms@grnet.gr)

**Data Processor:**

«Moosend Ltd»

More detailed information for each application from the other, the Terms of Use and

Protection of the required applications in its application:  
<https://moosend.com/trust/privacy-policy/>

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

National Infrastructures for Technology and Research S.A. (hereinafter referred to as “GRNET SA”) acting on behalf of “the Consortium” is bound by the 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 “Pharos AI Factory Project” events. This Privacy Statement sets out the criteria as well as the terms and conditions under which GRNET SA acting on behalf of “the Consortium” collects, processes, uses, stores and transmits the personal data of those who subscribe to “Pharos AI Factory Project” events, 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 Union 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://www.pharos-aifactory.eu/>, including the entirety of the web pages thereof.

**“Participant”**– the “Pharos AI Factory Project” events participant, 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 SA acting on behalf of “the Consortium” within the framework of organizing the “Pharos AI Factory Project” events collects and processes the personal data of those who give their consent for participating in the “Pharos AI Factory Project” events, for the following purpose / purposes:

- A. To register for the “Pharos AI Factory Project” events.
- B. For communication purposes in the context of the events. GRNET SA will contact via email the participants for evaluation/feedback purposes and/or for future events suggestions.
- C. For technical support.
- D. For promoting the “Pharos AI Factory Project” events, personal data of the participants (Photos, videos, livestreaming) will be used and be published on the following social media:
  - “Pharos AI Factory Project”/Consortium Partners channels:
    - LinkedIn (<https://www.linkedin.com/company/pharosaifactory/>)
    - YouTube (<https://www.youtube.com/@PharosAIFactory>)
  - GRNET channels:
    - Facebook (<https://www.facebook.com/grnet.gr>),
    - X (former Twitter) ([https://x.com/grnet\\_gr](https://x.com/grnet_gr)),
    - LinkedIn (<https://www.linkedin.com/company/grnet> ),
    - Instagram (<https://www.instagram.com/grnet.gr> ),
    - YouTube (<http://www.youtube.com/user/EDETvideos>)
- E. For the implementation of sending the invitations of registering for the events and the technical support of the project by the data processor “Moosend Ltd”.

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

In the context of registering for the “Pharos AI Factory Project” events, the personal data that are being processed are:

- For the purpose A: to register for the “Pharos AI Factory Project” events:
  - Name
  - Surname
  - Email address

- Age Category (selection from drop down menu: 18–29, 30–39, 40–49, 50–59, 60+, Prefer not to say)
- Gender (selection from drop down menu: Woman, Man, Non-binary or gender diverse, Prefer not to say, Other)
- Level of knowledge of the subject of the event (selection from drop down menu: Entry, Intermediate, Advanced, Expert)
- Company/Organization/Institution
- Organisation Type (selection from drop down menu: Private - Start-up, Private - Small and medium-sized enterprise, Private - Large Enterprise, Academic - Student, Academic - Researcher, Academic - Instructor, Public organisation, Non for profit, Freelancer, Other)
- Country of Organisation (selection from an alphabetical drop down menu of the extensive list of countries)
- Application Domain (selection from drop down menu: PE1 Mathematics, PE2 Fundamental Constituents of Matter, PE3 Condensed Matter Physics, PE4 Physical and Analytical Chemical Sciences, PE5 Synthetic Chemistry and Materials, PE6 Computer Science and Informatics, PE7 Systems and Communication Engineering, PE8 Products and Processes Engineering, PE9 Universe Sciences, PE10 Earth System Science, PE11 Materials Engineering, LS1 Molecules of Life: Biological Mechanisms, Structures and Functions, LS2 Integrative Biology: From Genes and Genomes to Systems, LS3 Cell Biology, Development, Stem Cells and Regeneration, LS4 Physiology in Health, Disease and Ageing, LS5 Neuroscience and Disorders of the Nervous System, LS6 Immunity, Infection and Immunotherapy, LS7 Prevention, Diagnosis and Treatment of Human Diseases, LS8 Environmental Biology, Ecology and Evolution, LS9 Biotechnology and Biosystems Engineering, SH1 Individuals, Markets and Organisations, SH2 Institutions, Governance and Legal Systems, SH3 The Social World and its Interactions, SH4 The Human Mind and Its Complexity, SH5 Texts and Concepts, SH6 The Study of the Human Past, SH7 Human Mobility, Environment, and Space, SH8 Studies of Cultures and Arts)
- Vertical Topic (selection from drop down menu: Health Sciences, Sustainability-Environment, Language and Culture, Other)
- Role in the Company/Organization/Institution
- Timestamp of the consent
- For the purposes B and C: For communication purposes in the context of the events and the technical support, the personal data being processed are:
  - Name

- Last name
- Email address
- Company/Organization/Institution
- Application Domain
- Vertical Topic
- For the purpose D: For promoting the “Pharos AI Factory Project” events:
  - Photos
  - Videos
  - Livestreaming
  - Recording
- For the purpose E: For the implementation of sending the invitations of registering for the events and the technical support of the project by the data processor “Moosend Ltd”:
  - Mail
  - Full Name

GRNET SA acting on behalf of “the Consortium” collects and processes the aforementioned data solely for the purposes mentioned above 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.

Gender information will only be processed anonymized and aggregated for statistical purposes.

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 “Retention period of personal data”).

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

The processing of participants personal data is based on their consent, as required by Article 6 par. 1 para a’ GDPR.

It should be mentioned that when registering for “Pharos AI Factory Project”, data subjects may give their consent for each processing purpose separately.

In particular, with regard to the processing of personal data for archiving purposes, the legal basis of the overriding legitimate interest of GRNET SA/“the Consortium”/“Pharos Legal Entity” applies (Art. 6 para f’ GDPR). This aims to creating and maintaining the company's/consortium's/entity's historical archive and historical identity.

**D. Access to personal data:**

For the implementation of sending invitations for the “Pharos AI Factory Project” events access to the personal data of the participants is provided to the following:

- To the “Pharos AI Factory Project” management team of GRNET SA, which consists of staff that maintains a contractual relationship of project leasing and provision of services with GRNET SA. “Associates of GRNET SA”, who are bound by a private confidentiality agreement with GRNET SA
- To “Moosend Ltd” company for technical support purposes.

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

GRNET SA acting on behalf of “the Consortium” shall in no way transmit or in any way disclose the collected 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 collected 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 SA in compliance with the terms and conditions of applicable law.

The collected data will be also disclosed to and used (according to the current Privacy Statement) by the “Pharos Legal Entity” when officially formed.

**F. Rights of data subject:**

As regards the data processed in the context of registering for the “Pharos AI Factory Project” events, GRNET SA acting on behalf of “the Consortium” 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 those data, so that every participant may exercise his/her rights, as laid out in applicable legislation on the protection of personal data, 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 SA acting on behalf of “the Consortium”, 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 from GRNET SA acting on behalf of “the Consortium” 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 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 SA acting on behalf of “the Consortium” 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 in a structured, commonly used and machine-readable format, as well as the right to transmit such data to another entity 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.
- **Withdrawal of consent:** In addition, data subjects have the right, at any time, to withdraw their consent, without this withdrawal affecting the lawfulness of the processing that took place prior to its withdrawal.

For example, in the event that a subject has given their consent for the collection and (re)publication of photographic/video material and this material is published/posted on the social media as described on this document, in case withdraw their consent, then GRNET SA acting on behalf of “the Consortium” will not (re)publish any new posts of the photographic/video material in question;

However, it should be noted that in this case, regardless of the intentions of GRNET SA/“the Consortium”/“Pharos Legal Entity”, GRNET SA will not be able to control any republications of the material in question by third parties or the retention of the material in question on social media.

It is also clarified that any withdrawal of consent by the data subject does not affect the right of GRNET SA/“the Consortium”/ “Pharos Legal Entity” -as mentioned above- on the legal basis of its legitimate interest, to retain the relevant photographic/video material for archival purposes and to preserve their historical identity.

To exercise any of the above rights, the participant may contact the “Pharos AI Factory Project” at the following email address: [contact@pharos-aifactory.eu](mailto:contact@pharos-aifactory.eu)

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

#### **G. Personal data retention periods**

The personal data collected and processed in the context of registering for the “Pharos AI Factory Project” events, based on the consent of the data subjects, will be retained until the withdrawal of their consent or until the request for deletion is exercised. At any time, the withdrawal of consent will be possible here by completing the forms [here](#) and [here](#). It is mentioned that in this case, the legitimacy of the processing of personal data that took place in the context of the given previous consent is not affected.

In any case, the retention period, shall not exceed the period of two (2) after the completion of the “Pharos AI Factory Project”.

Photographic/video material that may be kept by GRNET SA/”the Consortium”/ “Pharos Legal Entity” for archival purposes and to preserve their historical identity is kept without time limitation, without further processing.

Finally, photographic/video material posted social media is kept online, in accordance with the data retention rules of those social media.

#### **H. Security measures:**

The processing of personal data is carried out in such a way as to ensure its confidentiality and security. Specifically, it is carried out exclusively by authorized associates, 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 data processor maintains its servers in a data center within the European Union and apply 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 visit the website: <https://moosend.com/privacy-policy/>.

#### **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, participants may contact the DPO of GRNET SA at the e-mail address: [dpo@grnet.gr](mailto:dpo@grnet.gr).



**K. Recourse/Complaint**

In case a request is not satisfied by “the Consortium” the participant may at any time address to/ file recourse with the Competent Supervisory Authority, namely the Hellenic Data Protection Authority <https://www.dpa.gr>.