

PERSONAL DATA PROTECTION POLICY

This Policy describes how the CERTH Lifelong Learning Centre (hereinafter 'CERTH LLC') collects and processes personal data through this website. Data processing on this website is carried out in accordance with the General Data Protection Regulation (EU) 2016/679 (GDPR), as supplemented by the applicable Greek data protection legislation (Law 4624/2019).

It is noted that personal data means only information that relates to an identified or identifiable natural person (data subject). Information relating to legal entities or groups of persons, or statistical information from which the identification or identifiability of a specific natural person is not possible, does not fall into this category and is excluded from the scope of the relevant legislation.

Data Controller

Centre for Research and Technology Hellas, Lifelong Learning Centre (CERTH LLC)

6th km Charilaou – Thermi Road, P.C. 57 001, Thessaloniki

Email: kdbm@certh.gr

Collection and Processing of Personal Data

In the context of the operation and educational activities of CERTH LLC, personal data is collected and processed concerning visitors and users of the website, as well as learners, prospective learners, trainers, and prospective trainers.

A. Data of Learners and Prospective Learners

In the context of application submission, participation assessment, registration and attendance of training programmes, management of financial transactions, as well as the completion and certification of training, different categories of personal data are processed relating either to prospective learners or registered participants, depending on the stage of the process.

The categories of data processed are as follows:

- Identification data: first name and surname
- Contact details: email and mobile phone number
- Invoicing details: type of document (receipt or invoice), name of freelancer/sole proprietorship, Tax Identification Number (AFM), Tax Office (DOY), and billing address.
- User account data: full name, username, email, and password.
- Training data: training programme, thematic module, duration/implementation time, training method, language, cost of participation in the training programme.

- Transaction data: information related to the payment of tuition fees, such as bank transaction details (bank account, IBAN, beneficiary, banking institution, etc.), payment amount, date of transaction, and reason for deposit.

B. Data of Trainers and Prospective Trainers

In the context of the evaluation of applications, the selection of and collaboration with trainers, as well as the delivery of training programmes and the presentation of trainers on the CERTH LLC website, personal data is collected and processed relating to both prospective trainers and collaborating trainers, depending on the stage of the process.

The categories of data processed are as follows:

- Identification and contact details: full name, email, contact phone number
- Location details: city, country
- Tax details: Tax Identification Number (AFM) (where provided)
- Specialisation data: thematic specialisation/subject areas, teaching level, languages of instruction
- Academic education data: highest academic qualification, institution/department, year of graduation
- Professional experience data: short professional profile, summary of professional experience, adult teaching experience, experience with e-learning platforms
- Certification data: EOPPEP certification, other certifications (where provided)
- Professional links and public profiles: LinkedIn profile, Google Scholar, personal website, or other professional profile
- Availability and collaboration preference data: availability, preferred teaching method (asynchronous, synchronous, or hybrid)
- Public trainer profile data: full name, email, photograph, position/role, employer, CV, description of experience, subject areas of specialisation, information about the training programme in which they participate as a trainer.

C. Data of Website Visitors and Users

During the browsing and use of the CERTH LLC website, certain personal data of visitors or users of the website is collected and processed, for the purpose of ensuring the smooth operation of the website, providing information about the training programmes, improving the services provided, and protecting the security of information systems.

The categories of data processed are as follows:

- Technical data on the use of the website: IP address, date and time of access, browser type, device information and operating system, system log files, etc.
- Data from the use of cookies. For more information, please refer to the relevant Cookies Policy.

It is noted that personal data is processed only to the extent necessary and appropriate for achieving the above purposes and in accordance with the personal data processing principles of the General Data Protection Regulation and Greek legislation.

This website is intended exclusively for adult users and is not intended for use by minors. If it is found that personal data of a minor has been collected through the website, such data is deleted immediately.

Legal Basis for Data Processing

One of the fundamental requirements of personal data protection legislation is that any processing of personal data must have a legal basis. The processing of personal data carried out by CERTH LLC is based on one or more of the following legal bases:

- Performance of a contract or taking steps prior to entering into a contract (Article 6(1)(b) GDPR): The processing of personal data is necessary for the management of applications for participation, the registration and participation in training programmes, the management of collaboration with trainers, as well as for the delivery and completion of the educational activities of CERTH LLC.
- Compliance with a legal obligation (Article 6(1)(c) GDPR): Certain personal data is processed for the fulfilment of legal obligations arising from applicable legislation, particularly for accounting and tax compliance purposes (e.g. issuance of documents and maintenance of financial records).
- Legitimate interest of the data controller (Article 6(1)(f) GDPR): The processing of certain personal data takes place within the framework of the legitimate interests of CERTH LLC, such as ensuring the smooth operation and security of the website, improving the services provided, as well as informing the public about the activities and trainers of the programmes.
- Consent of the data subject (Article 6(1)(a) GDPR): In certain cases, the processing of personal data is based on the consent of the data subject, such as, indicatively, in cases of submission of optional personal data through forms or other functions of the website, or publication of trainers' photographs on the website. Consent may be withdrawn at any time, without affecting the lawfulness of the processing carried out prior to its withdrawal.

Personal Data Retention Period

Personal data is retained by CERTH LLC only for as long as is necessary for the fulfilment of the above processing purposes and is subsequently deleted, unless its retention, in whole or in part, is required by law or is necessary for the establishment, exercise, or defence of legal claims.

Disclosure/Transfer of Data to Third Parties

The personal data collected may be disclosed to third parties, where this is required for the fulfilment of legal obligations or is necessary for the fulfilment of the purposes of the processing, in compliance with the obligations arising from applicable legislation. Indicatively, the disclosure of personal data may take place to public authorities, bodies and organisations, courts, and partners of CERTH LLC, such as natural or legal persons who have undertaken the handling of certain services and functions of the website (processors). Only those personal data necessary for the fulfilment of the intended purposes are transmitted to these persons, and they are contractually bound towards CERTH LLC regarding the confidentiality and secure processing of personal data.

CERTH LLC will never transfer, sell, rent, or exchange data to third parties for commercial marketing purposes. It is also noted that CERTH LLC does not transfer personal data outside the European Union/EEA.

Your Legal Rights

In accordance with the GDPR, you have the following rights:

- **Right of access to the data:** You have the right to request and receive information on whether your personal data is being processed by CERTH LLC and, where this is the case, access to such personal data. Specifically, you can obtain information on the purpose of the processing, the category of personal data, the categories of recipients or the recipients to whom your data has been disclosed, the intended storage period, the existence of the right to request rectification, erasure, restriction of processing, or to object to the data controller, as well as the existence of the right to lodge a complaint.
- **Right to rectification:** If you believe that your personal data is inaccurate or needs to be updated, you have the right to request the rectification of inaccurate personal data or the completion of any incomplete data.
- **Right to restriction of processing:** If you believe that your data is inaccurate, or that its processing is unlawful, or you believe that we no longer need your data, or you have objections to automated processing, you have the right to request the restriction of processing, under the conditions of Article 18 GDPR.
- **Right to object to processing:** You have the right to object to the processing of your data at any time and for reasons relating to your particular situation, to the processing of personal data concerning you, unless there are compelling legitimate grounds for the processing which override your interests, rights, and freedoms, or for the establishment, exercise, or defence of legal claims.
- **Right to erasure ('right to be forgotten'):** When you no longer wish for the processing and retention of your personal data, you have the right to request its erasure, provided that the data is not retained for a specific legitimate and declared purpose.
- **Right to data portability:** You are entitled to receive or request the transfer of your data, in a structured, commonly used, and machine-readable format, from us to another data controller, if you wish, in accordance with Article 20 GDPR.
- **Right to withdraw consent:** You have the right to withdraw the consent you have given at any time and without any consequences for you. Where your consent is the sole legal basis for the processing, we will cease processing your data after its withdrawal. The withdrawal of consent does not affect the lawfulness of the processing based on consent prior to its withdrawal.

How to Exercise Your Rights

To exercise the above rights, you can contact us by sending an email to dpo@certh.gr. The response to your request will be provided within one (1) month of its receipt and at no cost to you. The above deadline may be extended by two (2) additional months due to the complexity of the request or an

increased number of requests. In the latter case, you will be informed of the delay and the reasons for it as soon as possible.

If your request is deemed manifestly unfounded or excessive, CERTH LLC may either refuse to handle it or request the payment of a reasonable fee to handle it.

Finally, if you consider that any of your requests has not been satisfactorily addressed, or if you believe that any of the above processing carried out by CERTH LLC infringes your right to the protection of your personal data, you have the right to lodge a complaint with the Hellenic Data Protection Authority.

Data Security

CERTH LLC implements appropriate technical and organisational measures to ensure an appropriate level of protection against the risks arising from processing, in particular from accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to personal data transmitted, stored, or otherwise processed. These measures are reviewed and modified when deemed necessary.

Modification of the Policy

CERTH LLC reserves the right to modify or update this policy whenever required and always in accordance with the applicable national and European law. The applicable version of the policy is posted on this website and enters into force from the moment of its publication. Users are advised to regularly visit the relevant section of the website in order to be informed of any changes. In the event of material modifications that significantly affect the manner of processing of personal data, CERTH LLC will take appropriate measures to inform users, where this is required.

Contact

For any information or clarification regarding this Personal Data Protection Policy or the processing of your personal data, you can contact the Data Protection Officer of CERTH at the email address dpo@certh.gr.