



Information on the processing of Personal Data (Articles 13 and 14 of the GDPR - (EU) 2016/679)

At the Democritus University of Thrace (hereinafter also referred to as "DUTH.") we respect the principles regarding personal data and process them in a lawful and transparent manner for the purposes we pursue by taking the appropriate technical and organizational measures to maintain their confidentiality and integrity throughout the prescribed period of time that we keep them, in compliance with the GDPR and Law 4624/2019 that regulates GDPR issues in the Greek legal order.

1. Data Controller – Contact Details

Data Controller: Democritus University of Thrace

Legal Representative: Rector

Headquarters Address: University Campus, 69100, Komotini

E-mail:

dpo@duth.gr

2. What personal data do we collect about you and how

We process your personal data when we collect them and when we then use them in any way depending on the relationship you have with us, such as an employee, student, visitor, external partner or any other relationship you have with us. We only use those personal data that are necessary for the lawful, specific and objective purpose of the time and we process them in a lawful manner by checking the validity of the conditions set out in the GDPR (lawful basis).

In this context, the processing of your personal data takes place when you are subject to activities that we develop as a university, such as, for example, when you register or use our services and our official websites, when you are recorded by the video surveillance system we have in some places, when you participate in one of our events or fill in an application, when you register as a student or participate in your exams, when we contact you or calculate your salary.

Your personal data may fall into one or more of the following categories:

- Identification Data (User ID, Full Name, Name of Father and Mother, Identity Card or Passport Number, Issuing Authority, Date of Issue).
- Contact data (postal address, landlines and mobile phones, email address).

- Demographic data (Nationality, Citizenship, Religion, Date of Birth, Place of Birth, Country of Birth, Municipal Registry No, Municipal Register).
- Health Data (Medical Certificates, Other Health Issues).
- Biographical data
- Other employee data (tax and financial information, marital status, professional data, evaluations, disciplinary offenses, qualifications, etc.).
- Data for determining income from the exercise of business activity (status, changes in service, inclusion in a regime of part-time employment and suspension of duties, granting of leaves, unpaid and parallel employment, amount of deduction)
- Student status (Department, semester, pathway, registration number, academic ID, course grades, exam grades, courses, assignments, ERASMUS data, etc.).
- User data of electronic services (username, password, IP addresses, log file data).
- Cookie information (find out more later).

3. On what legal basis is the processing and for what purposes

We will only process your personal data if we can justify that at least one of the following six legal bases applies:

- a) Your consent that you have given us for one or more purposes.
- b) The performance of a contract between us or the completion of pre-contractual procedures in which you participate at your request.
- c) The fulfillment of our legal obligations.
- d) The preservation of your own or a third party's vital interest.
- e) The performance of a duty we perform in the public interest or in the exercise of public authority vested in us.
- f) Safeguarding our legitimate interest or a third party's interest when this overrides your legitimate interest

More specifically, for each lawful basis, we may process your personal data for the following indicative actions and their respective purposes:

1. With your consent,

When we ask you:

- to register you in our news service (newsletters) or email lists;
- to film or photograph you and to post the video and/or the photo on our websites,
- to volunteer in our actions,
- to participate in scientific research carried out in our place,
- agree to the use of cookies on our websites;

or when we are filming an event you are attending and we have previously informed you of this action and you have not expressed your objection.

2. For the performance of our contractual obligation or during the pre-contractual procedure

- When we process your application and the supporting documents you submit in one of our invitations to recruit staff.
- To calculate your salary.
- To grant you the work permits you are entitled to as an employee. In the case of sick leave, the processing of your health data is based on article 9 par. 2(b) of the GDPR, which is related to the exercise of your rights in the field of labor law (Code of Status of Public Civil Administrative Employees and Employees of Public Law).

3. To fulfill our legal obligations

- When we provide administrative documents containing your personal data at the request of the interested parties in accordance with Article 5 of the Code of Administrative Procedure.
- When we inform your insurance agency about your insurance contributions and the tax authority about your tax deductions.
- To fulfill our obligations under applicable law when information concerning you is requested by Judicial, Supervisory and Auditing Authorities operating within the framework of their duties.

4. To safeguard your or a third party's vital interest

According to Recital 46 of the GDPR, the processing of your personal data should also be considered lawful where it is necessary to protect an interest that is essential to your life or that of another natural person and only if it is obvious that the processing cannot have another lawful basis.

For example, the processing is necessary for humanitarian purposes, including to monitor epidemics and their spread, or in situations of humanitarian emergency, in particular in cases of natural and man-made disasters.

5. To perform a duty, we perform in public interest or in the exercise of public authority vested in us

As a university, we mainly process your personal data for the fulfillment of our duty of offering higher education, promoting innovation and research, as well as defending the good administration of employees and students, such as:

- When you register as a student in our faculties and departments.
- When you participate in course advancements and exams.
- When recording your online activities and the use of our services for the purposes of protecting our information systems.
- When we implement technical support work on our information systems
- When we investigate any disciplinary misconduct by you as an employee or student.
- When we evaluate you as an employee
- When we (ELKE) implement the process of collecting income from the exercise of business activity of members of our staff.
- When you are recorded by our video surveillance system (CCTV) for the purpose of protecting goods and people within the University premises.

6. Safeguarding our legitimate interest or a third party's interest when this overrides your interest:

- When we publish your contact details for the most effective communication with our services of our students, alumni and interested parties in general.
- When we provide your simple or sensitive personal data at the request of a third party and after weighing that their legitimate interest outweighs yours, such as in the case of judicial use.
- When in an evaluation process we communicate the details of the successful candidate employees to their co-candidates who are not successful within the stipulated time of the objections.

4. Who are the recipients of your personal data?

Our administrative and educational staff has access to your personal data, in the context of the execution of the responsibilities and duties assigned to them by the Administration of the Democritus University of Thrace.

We are obliged or entitled to share your personal data with various third party recipients such as:

- in the Courts when acting in their judicial capacity,
- Independent authorities such as the Transparency Authority and the Public Revenue Authority,
- to the insurance institutions you belong to,
- to the private companies that support our information systems, which we have contractually bound with measures to secure personal data and maintain confidentiality.

5. How long we keep your personal data

We retain your personal data for a period of time defined either by the applicable legal provisions or based on the purpose of the processing. In the following, we indicate retention periods of your personal data in key processing:

- We keep the data of your file as an employee either for as long as the pension is paid, after your resignation for retirement reasons or 5 years after your departure from our University for any other reason.
- The data of your file as a student such as the transcript, the certificate of studies, etc. are preserved in perpetuity.
- Students' exam papers are kept for 1 year.
- Video surveillance system data is retained for 15 days.
- The data of unsuccessful candidate employees who participated in an evaluation process are retained for 6 months from the finalization of the results.
- Details of the revenue collection procedure (ELKE) from the exercise of business activity of staff members 10 years from the time of repayment of debts.

6. What are cookies and why we collect them

To ensure that our website functions properly, or to improve our web services, we may sometimes place a small piece of data known as a cookie on your computer or mobile device. A cookie is a text file that is stored by a web server on a computer or mobile device. The content of a cookie can only be retrieved or read by the server that creates the cookie. The text in a cookie often consists of identifiers, site names, and certain numbers and characters. Cookies are unique to the browsers or mobile applications you use and allow websites to store data such as your preferences. Please find more information [here](#).

7. How we protect your personal data

We work every day to ensure that your personal data:

- ✓ They are processed lawfully and fairly in a transparent manner for you.
- ✓ They are collected solely for specific and legitimate purposes.
- ✓ They are sufficient, related to the purpose for which we collect them and are limited to what is necessary.
- ✓ They are accurate and up to date.
- ✓ They are kept exclusively within the specified time frame and no longer.
- ✓ They shall be processed in such a way as to ensure the necessary protection of their confidentiality, integrity and availability.

8. What are your rights

You can exercise the following rights for your personal data:

➤ **The right of access**

You can be informed at any time by us about your personal data that we hold, how we process them and have access to them by receiving a copy if you wish.

➤ **The right to rectification of data**

You have the option to contact us to correct data that is inaccurate or incomplete. After the correction we will let you know.

➤ **The right to erasure, the "right to be forgotten"**

You have the right to request the deletion of your personal data and we will proceed immediately with the deletion as long as there are no legal restrictions that do not allow us to do so. After the deletion we will let you know.

➤ **The right to restriction of processing**

You can ask us to restrict the processing of your personal data based on the conditions of Article 18 GDPR. In addition to storing them, we will only process them in special cases such as with your consent, for the establishment, exercise or support of legal claims, for reasons of public interest. In any case, we will inform you before the processing is removed.

➤ **The right to data portability**

You can ask us to receive and transmit your data to another entity in a structured, commonly used and machine-readable format.

➤ **The right to object**

In the event that you object to the processing of your personal data that we perform in the context of our duty or our legitimate interest or that of a third party, including profiling, you have the right to object to such processing on your own grounds.

➤ **The right to withdraw consent**

You have the right to withdraw the consent you have given us to process your personal data at any time. You should be aware that the withdrawal of consent does not affect the lawfulness of the processing based on the consent and carried out before its withdrawal.

➤ **The right not to create a profile**

At DUTH, we do not process your personal data for the purpose of making a decision taken solely on the basis of automated processing, including profiling, which produces legal effects that concern you or significantly affect you in a similar way. In order for us to process your personal data in such a way, your consent is first required.

We make every effort to respond to your requests without delay and in any case within one month of receipt. The deadline can be extended for two more months, only if necessary and after we have informed you (within one month), taking into account the complexity of your requests. If you have made the request by electronic means, the information is provided, if possible, by electronic means, unless you request otherwise.

The actions we take to satisfy your requests are provided free of charge. However, in the event that your requests are manifestly unfounded, excessive or repetitive, we may either impose a reasonable fee, informing you accordingly, or refuse to respond to them.

You can exercise your rights by submitting your application in the following ways:

- **Electronically to email:**

dpo@duth.gr

- **By post to the Address:**

Data Protection Officer
Democritus University of Thrace
University Campus, 69100, Komotini

- **In-person delivery** to the local Secretariats of the Departments of the Democritus University of Thrace

You can also use the standard form found [here](#)

9. Data Protection Officer

In case you have any questions about the protection of your personal data and your rights, or you believe that they are being violated, please first contact our Data Protection Officer (DPO) by sending an email to dpo@duth.gr or writing to the postal address:

Democritus University of Thrace, University Campus, 69100, Komotini, Greece

10. Personal Data Protection Authority

If you have not received satisfactory answers from us or the DPO to your questions about the protection of your personal data and your rights, you have the right to lodge a complaint with the Personal Data Protection Authority via www.dpa.gr , which is the competent supervisory authority.

For more information, we encourage you to read the Privacy and Personal Data Protection Policy of the Democritus University of Thrace at the link [**Privacy and Data Protection Policy**](#)