

PRD3. Policy on General Data Protection Regulation (GDPR)

1. Introduction

This Data Protection Policy sets out how CITY ULE handles the Personal Data of its students, staff, alumni, research participants, suppliers, website users and other third parties, according to the General Data Protection Regulation 2016/679 (GDPR) of the European Union and to Greek Law 4624/2019.

2. Scope and role of CITY ULE

This Policy applies to all Information Users i.e., staff, students, associates, and anyone else who may access, use, or manage CITY ULE information (e.g., visitors, contractors, partners). It extends to all situations where CITY ULE is the data controller or a data processor of Personal Data and applies to all Personal Data processed regardless of the media on which the data is stored.

According to GDPR, CITY ULE determines the personal data, the procedures, the means and the purpose of processing them in accordance with the requirements of the GDPR and Law 4624/2019.

CITY ULE in compliance with the applicable legal framework takes the appropriate technical and organizational measures for the secure processing of personal data in order to ensure the appropriate level of security against the risks of improper processing.

3. Data Protection Principles

CITY ULE will ensure Personal Data is:

- A. processed lawfully, fairly and in a transparent manner;
- B. collected only for specified, explicit and legitimate purposes;
- C. adequate, relevant, and limited to what is necessary in relation to the purpose for which it is processed;
- D. accurate and where necessary kept up to date;
- E. not kept in a form which permits identification of data subjects for longer than is necessary for the purposes for which the data is processed;
- F. processed in a manner that ensures its security using appropriate technical and organisational measures to protect against unauthorised or unlawful processing and against accidental loss, destruction, or damage.

CITY ULE will maintain appropriate records to demonstrate compliance with these principles.

4. Methods of collection of personal data

In order to fulfil the above processing purposes, the collection of personal data is done by the staff of CITY ULE, who act as a controller based on their duties.

The collection takes place during the process of submitting applications or student registration statements, as well as when signing a contract or entering into another legal relationship. Collection of personal data may also occur through:

- The use of the website or electronic platforms or other digital means of communication
- Correspondence, electronic mail, completing enquiry forms
- Online surveys
- Participation in research
- Participation in events organised by CITY ULE

5. Personal Data Collected by CITY ULE

- Identity Data (User ID, Full Name, Father's and Mother's Name, Photo, ID or Passport Number, Issuing Authority, Issue Date)
- Family Status Data (marital status, number & ages of children, student status)
- Contact Data (postal address, landline and mobile phone numbers, email address)
- Financial Data (Tax ID, Tax Office, IBAN)
- Student Academic Performance
- Qualifications of students, administrative, academic, and research personnel
- Demographic Data (Gender, Nationality, Citizenship, Date of Birth, Place of Birth, Country of Birth)
- Health Data (Social Security Number, insurance fund registration number, medical history, medical diagnoses, medical certificates only in special cases for the provision of special privileges or the safeguarding of the vital interests of the data subjects or other natural persons or research)
- Data from the use of electronic services (such as cookies, google analytics, IP addresses, etc., and electronic identification details)
- Employment Data, including resumes of students, graduates and staff

6. Personal Data Retention Time

CITY ULE keeps these data for as long as is necessary to fulfil the purposes it seeks and in any case for the entire period of time provided by law (P.D. 768/1980, P.D., 87/1981 & P.D. D. 480/1985 and any other amendment thereof or other relevant provision of the law).

The processing of personal data for the purposes of archiving in the public interest or for the purposes of scientific or historical research or for statistical purposes may entail derogations from the rights of data subjects as long as these are in accordance with the directions of the GDPR and necessary for the fulfilment of the aforementioned purposes.

7. Designation of Data Protection Officer-Contact DPO

In case there are questions regarding the processing, the protection of personal data and the rights that this implies, any data subject can contact the Data Protection Officer.

8. Breach management

All Information Users are responsible for reporting suspected or actual breaches to the DPO immediately on identification. Information Users must also preserve all evidence relating to the potential Personal Data breach whilst an investigation is ongoing.

9. Data sharing

CITY ULE shares Personal Data in accordance with the EU and Greek GDPR. All Information Users are responsible for identifying situations where Personal Data is to be shared outside CITY

ULE or its wholly owned or controlled subsidiaries. Further information on who to contact to assist with drafting appropriate sharing agreements can be found in our data sharing guidance. Where data is to be transferred to a third-party service provider, CITY ULE will ensure that appropriate contracts are put in place to meet GDPR requirements.

10. International transfers

CITY ULE ensures all data transfers outside of Greece are conducted in accordance with the GDPR. All Information Users are responsible for identifying situations where data is to be transferred internationally. Further information on who to contact to assist with drafting appropriate agreements to cover international transfers can be found in our data sharing guidance.

11. Subject rights

CITY ULE maintains procedures to enable individuals to exercise their rights under data protection legislation i.e.,

- Right to be informed;
- Right of access;
- Right to rectification;
- Right to erasure;
- Right to restrict processing;
- Right to data portability;
- Right to object;
- Rights in relation to automated decision making and profiling.

All Information Users are responsible for familiarising themselves with CITY ULE 's subject rights procedures and for forwarding rights requests to DPO immediately on receipt.

12. Data security

CITY ULE has put in place appropriate technical and organisational measures to protect Personal Data. These measures are kept under review. All Information Users are required to comply with the CITY ULE 's Policies.

13. Recordkeeping

CITY ULE maintains full and accurate records of its data processing activities. This includes records of consent and procedures for obtaining consent. Records are retained in line with the CITY ULE 's approved retention schedules. All Information Users are responsible for adhering to these retention schedules and for complying with CITY ULE 's Policy.

14. Training

Staff are required to complete mandatory online data protection training. In addition, CITY ULE will offer bespoke training to groups of Information Users as appropriate.

15. Audit

The CITY ULE will conduct periodic audits to assess compliance with this Policy and the relevant GDPR EU and Greek Law.

16. Changes to this Policy

This policy will be updated as necessary and reviewed at least annually. Historic versions can be requested via email to the DPO