

## INSTRUCTIONS FOR THE PROCESSING OF PERSONAL DATA

### IN THE CONTEXT OF THE HFRI'S EVENTS

HFRI organizes events in order to promote its action and strengthen its extroversion. In the context of these events, the Foundation (a) collects responses from guests on their intention to attend the event and (b) takes photographs and videos, which it then posts on social media, its official websites, and/or media, in order to support its promotion and the dissemination of the results of its action. In addition, these events are likely to be broadcast live. For the above types of processing of personal data that are likely to take place within the Foundation's headquarters at 185 Syggrou Avenue and 2 Sardeon St., in Nea Smyrni, or outside of it, HFRI is the Data Controller.

With regard to the collection of responses regarding the participation of guests in the event, these data are used exclusively for the purpose of organizing the event and are kept by the Office of Communication and Public Relations until the completion of the event.

Furthermore, regarding the audiovisual material that may be collected in the context of an event, in accordance with the General Data Protection Regulation (2016/679/EU) - GDPR and the Greek Legislation (Law 4624/2019) for the protection of personal data, appropriate organizational and technical measures must be taken to inform and protect the data subjects and in particular:

- I. Appropriate measures must be taken to inform the natural persons (invited, interested parties, participants) of these actions, before taking photographs, filming, or live streaming.
- II. Providing consent of the data subjects for the use of the material for any other purpose than record keeping.
- III. Segregation of participants according to whether or not consent is given.
- IV. Information on the exercise of data subjects' rights.
- V. Anonymization of personal data.

#### **Information to data subjects**

In accordance with the requirements of the GDPR, data subjects have the right, prior to the collection of their personal data, to be informed accurately and clearly about the collection and use of their personal data and the purposes of the processing. This right is governed by one of the basic principles of the GDPR, the principle of transparency (relevant Articles 12-14 GDPR).

The information of data subjects participating in HFRI's events on the collection and use of their personal data is provided in three phases:

- I. The invitation to the event states that there will be photography, filming, or live streaming of the event. As an indication, the text of the invitation may summarize the following, as appropriate:

"In the context of the General Data Protection Regulation (2016/679/EU) and the National legislation (Law 4624/2019) for the protection of personal data, we inform you that during the event photos and videos will be taken for the HFRI's archive, which will subsequently be posted for the purposes of promoting the event in the media/ social networking / official websites of the Foundation".

II. At the entrance of the venue where the event is taking place, prominent notices shall be posted informing the participant(s) about the taking of photographs, video recording, or live streaming of the event, as well as about their rights as data subjects. The text of the information at the entrances is included in Annex I of this document.

III. The first speaker shall indicate that photography, filming, or live streaming is taking place on the premises of the event, shall indicate the existence of relevant signs at the entrances to the premises and shall inform data subjects of their right to object.

Provided that the organizational measures described above in relation to the information of the natural persons - data subjects are complied with, by entering the event venue, it is understood that they have been fully informed and consent to the processing of their data during their photographing/videotaping/live broadcasting of the event, in the sense of their recording. Any further use of the material, beyond record keeping, requires the consent of the data subjects as described below.

Any natural person participating in the event, as informed, reserves at any time the right to express his/her objection, effectively withdrawing the consent he/she has implicitly granted to HFRI for the recording of the person entering the event and to request relevant protection (in the context of exercising his/her rights to information, correction, deletion and restriction of the processing of personal data, as provided for in the General Data Protection Regulation 2016/679/EU and Law 4624/2019).

### **Consent of natural persons for the further use of audiovisual material**

In case HFRI wishes to make use of the audiovisual material (photos and videos) of the event, beyond the simple recording, for any other discrete purpose of use (e.g. posting on social media, publication in the media, posting on its website, etc.), it is necessary to obtain the relevant consent from the data subjects. The granting of consent on behalf of the data subject is done by signing the relevant model consent form reproduced in Annex II to this document.

The issues related to the consent of the data subjects that must be taken into account are:

- The management of the consents, which is carried out by the Office of Communication and Public Relations in collaboration with the Data Protection Officer of the HFRI.
- The distinction of individuals who have not given consent from the rest, so that they can be given special treatment with regard to data protection.
- The process of collecting consent also constitutes the processing of personal data. Consents are given by signing a form, which is collected and kept in a file kept by the Data Protection Officer for a period of time, which is specified in the information to the subjects on the need to give consent (Annex II).
- Every person has the right at any time to express his/her objection, effectively withdrawing the consent granted to HFRI and to request relevant protection (in the context of exercising his/her rights to information, rectification, erasure and restriction of the processing of personal data, as provided for in the General Data Protection Regulation 2016/679/EU and Law 4624/2019). The withdrawal of

consent does not affect the lawfulness of the processing that took place before it. Thus, for example, a publication in a magazine cannot be lifted, but if the data subject requests it, HFRI is requested to withdraw the posting from the websites or social media where photos and/or videos of the event were posted. In case of total withdrawal of consent, the consent form shall also be destroyed.

- In case that minors under the age of 15 appear in the photos, or videos of an event, in order to use the audiovisual material for any purpose other than simple recording, the consent of their legal representatives is necessary. On the other hand, in the case of minors who have reached the age of 15, the consent of the minors themselves is necessary, in accordance with the provisions of article 21 of Law 4624/2019.

### **Information on the exercise of data subjects' rights**

Since HFRI processes personal data in the context of its events, it must inform data subjects about their ability to exercise their rights under the GDPR and Law 4624/2019. This information, as reflected below, is included in the text posted at the event entrances (Annex I).

"In accordance with the provisions of the General Data Protection Regulation EU/679/2016, as data subjects, you have, both at the collection phase and afterward, the following rights:

- To request to be provided with additional information about your personal data any processing, the purpose of such processing and the disclosure/transfer to third parties and the identity of such third parties. (Right to be informed)
- Request access to them. (Right of access)
- To make a written or oral request to correct your data where it is inaccurate or to complete your data where it is incomplete (Right to rectification)
- Request the erasure of your personal data, if you no longer wish to have them processed and if there is no longer a legitimate reason for the EL.ID.E.K. to hold them (Right to be forgotten)
- Revoke the consent you have given to the EL.ID.E.K. at any time, but this does not affect the lawfulness of the processing based on your consent prior to its revocation (Right to be forgotten)
- To object to the processing of their personal data, provided that the public interest is not prejudiced (Right to object)
- To request the restriction of the processing of your personal data in order to limit the processing (Right to restrict processing)

For information and to exercise your rights, you can contact the Data Protection Officer at [dpo@elidek.gr](mailto:dpo@elidek.gr).

A model application form for exercising the rights of the Data Subject is reproduced in Annex III of this document.

Please note that in accordance with the General Data Protection Regulation (GDPR), you have the right to lodge a complaint with the Data Protection Authority."

Requests from data subjects are dealt with on a case-by-case basis by the Data Protection Officer of the Foundation.

### **Separation of participants according to whether or not they have given consent.**

Both for the case of further use of the material where consent is requested and not granted, and for the case of simple recording where entering the venue is understood as consent and then it is explicitly withdrawn, the non-provision of consent and the withdrawal of consent are taken into account and on this basis, techniques for separating natural persons shall be organized and instructions shall be given to photographers and/or videographers to enable them to distinguish between cases and to exclude from their shots those who wish so.

Such techniques may be, depending on the venue and the organization of the event:

- Placing those who have not given or withdrawn consent in specific locations in the venue from which no footage or photographs will be taken.
- The distinctive coloring of the tabs/collars of participating members based on their consent.

### **Anonymization of personal data**

As can be seen, in a particularly large-scale event, it is not easy to obtain consent from the individuals participating in the event and it is probably not appropriate to obtain audiovisual material (photos, videos) detailing the characteristics of the individuals in the audience of the event. Therefore, in such cases of events, it is appropriate to use the following techniques in order to avoid distinguishing the characteristics of persons (anonymization technique) and therefore not to require the consent of the individuals participating in the audience of the event. In this respect, consent need may be limited to a minimum number of natural persons who have a specific role in the event (e.g. speakers, dignitaries, etc.).

The techniques that can be used to capture and/or display images (photographs and videos) in order to avoid requiring the consent of the data subjects are:

1. Long distance shots in which the features of persons cannot be distinguished.
2. Low resolution images, so that the faces of the participants cannot be distinguished.
3. Images with the back of the audience, so that faces cannot be seen.
4. In case of close-ups, use of face blurring techniques for those who have not given consent.

### **Disclaimer**

It is noted that the HFRI is not responsible for any photographs or video recordings taken during the Foundation's events for private use by natural persons present at the venue.

## ANNEX I

### Information

In the context of the event "Event Name" organized by HFRI at its headquarters at 185 Syggrou Avenue and 2 Sardeon St., in Nea Smyrni, photos and videos will be taken and used by the Foundation for the promotion of the event in mass media/ communication/ social networking (e.g. e.g. publication of entries in daily and periodical press, websites, social networks, etc.), in order to inform the public and the scientific community about the event and to disseminate its results. The event will be broadcast live via "live streaming media".

By entering the venue of the event, you are understood to have read and apprehended this information and to consent to the processing of your data during your photography/videotaping/live streaming of the event, in the sense of your recording. However, you reserve the right at any time to express your objection, effectively withdrawing the consent you have implicitly granted to HFRI for your recording, by entering the venue of the event and to request relevant protection in the context of exercising your rights as a data subject.

According to the provisions of the General Data Protection Regulation EU/679/2016, as data subjects, you have, both during the collection phase and afterwards, the following rights:

- To request to be provided with additional information about your personal data any processing, the purpose of such processing and the disclosure/transmission to third parties and their identity. (Right to be informed)
- Request access to them. (Right to access)
- To make a written or oral request to correct your data where it is inaccurate or to complete your data where it is incomplete (Right to rectification)
- Request the erasure of your personal data, if you no longer wish to have them processed and if there is no longer a legitimate reason for the EL.ID.E.K. to hold them (Right to be forgotten)
- Revoke the consent you have given to the EL.ID.E.K. at any time, but this does not affect the lawfulness of the processing based on your consent prior to its revocation. (Right to be forgotten)
- To object to the processing of their personal data, provided that the public interest is not prejudiced (Right to object).
- To request restriction of the processing of your personal data in order to limit the processing. (Right to restrict processing)
- To request the transfer of your data to another controller. (Right to data portability)

For information and to exercise your rights, you can contact the Data Protection Officer at [dpo@elidek.gr](mailto:dpo@elidek.gr).

An application form for exercising the rights of the Data Subject is available on the HFRI's website and can also be requested from the event secretariat.

Please note that under the General Data Protection Regulation (GDPR), you have the right to lodge a complaint with the Data Protection Authority.

## ANNEX II

### **Consent form for the use of photographs and videos in the context of the HFRI's Event "Event Name"**

In the context of the event "Event Name" organized by HFRI at its headquarters at 185 Syggrou Avenue and 2 Sardeon St., in Nea Smyrni, photographs and videos will be taken and used by HFRI for the promotion of the event in mass media/ communication/ social networking (e.g. e.g. publication of entries in daily and periodical press, websites, social networks, etc.), in order to inform the public and the scientific community about the event and to disseminate its results. The event will be broadcast live via "live streaming media".

If you wish, please grant your consent for the further use of the photos and videos in which you appear, and in particular for their posting on the official HFRI's websites, social media and their publication in the media in order to promote the event and disseminate its results. Please note that you reserve the right to withdraw your consent at any time by sending an email to [dpo@elidek.gr](mailto:dpo@elidek.gr) and HFRI, complying with the withdrawal of your consent, will proceed immediately to withdraw the material in accordance with your request. However, the withdrawal of consent does not affect the lawfulness of the processing that took place before it. Thus, for example, a publication in a magazine cannot be withdrawn, but if the data subject requests it, HFRI is requested to withdraw the posting from the websites or social media where photos and/or videos of the event were posted. In case of total withdrawal of consent, the consent form shall also be destroyed.

The Hellenic Foundation for Research and Innovation is responsible for the processing of personal data.

The purpose of the processing is the promotion of the Foundation's action and the enhancement of its extroversion.

The legal basis of the above processing is your explicit consent, as and when granted by filling in this form, without which HFRI will not process your data.

HFRI undertakes that the personal data completed in this form will not be used for any other purpose and will be kept by the Foundation for as long as the use of the event material takes place.

If you have any queries about the processing of your personal data or if you believe it has been compromised, please contact the HFRI's Data Protection Officer at [dpo@elidek.gr](mailto:dpo@elidek.gr) and we will respond as soon as possible.

Please note that under the General Data Protection Regulation (GDPR), you have the right to lodge a complaint with the Data Protection Authority.

**OBTAINING CONSENT**

<b>Name:</b>
<b>Surname:</b>
<b>Title:</b>

I consent to the publication of photographs or videos taken as part of the "Event Name" event, in which I appear, in the following media:		
Medium	For the photos	For Video
On HFRI's website	YES _____ NO _____	YES _____ NO _____
On HFRI's Social Media	YES _____ NO _____	YES _____ NO _____
In media	YES _____ NO _____	YES _____ NO _____

\*Please complete one of the two options (YES/NO)

**ANNEX III****Application for Exercising Data Subject Rights**

To the Hellenic Foundation of Research and Innovation (H.F.R.I.)

**Applicant Information:**

<b>Name:</b>	<b>Surname:</b>	<b>I.D. Card No.:</b>
<b>Father's Name:</b>	<b>Mother's Name:</b>	<b>Date of Birth:</b>

**Contact Details:**

<b>Street:</b>	<b>No:</b>
<b>City:</b>	<b>P.O. box:</b>
<b>Telephone No:</b>	<b>Cellphone No:</b>
<b>E-mail:</b>	

I want to exercise the right (please tick the appropriate box):

- To information
- To access
- To rectification
- To erasure
- To object



- To restriction of processing
- To data portability

Request Description
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Regarding the right to **automated decision making**, H.F.R.I. informs/ warrants that it does not implement automated decision making using personal data in its possession, nor does it support userprofiling.

It is noted that exercising/ invoking above rights does not incur any charge. Furthermore, you are informed that any H.F.R.I. actions must be processed within one (1) month from the date of your respective right invocation/ exercise, unless the actions related to meeting your request are characterized by particularities and/ or complications, based on which H.F.R.I. reserves the right to extend the time for completing its actions by two (2) further months. On such occasion you shall be notified within the duration of one (1) month from submitting your request. When invoking your righthas not been satisfied, you retain the right to address the H.F.R.I. Data Protection Officer ([dpo@elidek.gr](mailto:dpo@elidek.gr)).

For exercising each right, you may contact H.F.R.I. via:

<b>Mail</b>	185 Syngrou Ave. & 2 Sardeon St., 171 21 N. Smyrni
<b>Telephone</b>	+30 2106412410
<b>e-Mail</b>	dpo@elidek.gr

Date ...../...../.....  
**The Applicant**  
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