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ΕΛΛΗΝΙΚΟΣ ΟΡΓΑΝΙΣΜΟΣ ΤΟΥΡΙΣΜΟΥ

Data Protection and Privacy Policy

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1 Introduction

In its daily operations, GNTO uses data that concern identified persons such as:

- Subordinates, old and candidate workers or free lance partners with a partnership agreement
- Suppliers
- Webpages users

The goal of the specific policy is to describe the relevant legislation and to present the steps followed by GNTO in order to ensure its compliance hereof.

This control is applied to all systems, men and the procedures of the Organisation, including the members of the administration board, directors, workers, suppliers, partners, subcontractors and other third parties that have access to GNTO systems.

2 Personal Data and Privacy Protection Policy

2.1 General Data Protection Regulation

Data Protection General Regulation 679/2016 (known as GDPR) is one of the most important pieces of the legislation that sets the framework by virtue of which GNTO executes activities related to data processing. In the event that an infringement of the Regulation arises, that is planned to protect personal data of those who are within the European Union, it is possible to impose significant fines. GNTO's policy is to ensure that its compliance to GDPR and other pertinent legislations is clear and can be proved at any time.

2.2 Definitions

Totally, in the GDPR 26 definitions are contained, from which the most essential related to the specific policy are given below:

As Personal Data are characterised:

any information that regards identified or identifiable natural person ("subject of data"); the identifiable natural person is the one that its identity can be verified, directly or indirectly, particularly through reporting to a recognizable identity fact, such as name, to an identity number, to location data, to an epigram identity identifier or to one or more factors that appertain to the physical, physiological, genetic, psychological, financial or social identity of the above person.

As "processing" is defined:

any action or series of actions that is effected with or without the use of automated means, to personal data or personal data totals, such as the collection, the entry, the organisation, the structure, the storage, the adjustment or the modification, the retrieval, the search of information, the use, the notification by transmission, the dissemination or any other form of disposal, the connection or the combination, the limitation, the deletion or the destruction.

"responsible for processing" means:

the natural person or legal entity, public authority, service or other entity that solely or jointly to other entities, they define the purposes and the mode of the processing of personal data; when the purposes and the mode of this processing are defined by the law of the European Union or the law of a member state, the responsible for processing or the specific criteria for his appointment may be provided by the law of the European Union or the law of a member state.

2.3 Principles That Govern The Processing Of Personal Data

There are certain basic principles on which the General Data Protection Regulation is based.

They are set out below:

1. *Personal Data must:*

(a) be subject to a legal and lawful processing in a transparent manner in relation to the subject of data ("legitimacy, objectivity and transparency"),

(b) be collected for specified, explicit and lawful purposes and they are not subject to any further processing in a way that is incompatible to these purposes; further processing for filing purposes for the public interest or purposes of scientific or historical research or statistic purposes is not considered incompatible to the initial purposes, according to article 89, paragraph 1 ("limitation of purpose"),

(c) be suitable, relevant and they must be limited to the necessary for the purposes for which they are subject to processing ("minimisation of data"),

(d) be accurate and, when necessary, they must be updated; all reasonable measures must be taken for the immediate deletion or correction of personal data that are inaccurate, in relation to the purposes of processing ("accuracy"),

(e) be maintained in a form that permits the identification of the subjects of data only for the period required for the purposes of personal data processing; personal data may be stored for longer periods, provided that personal data will be subject to processing solely for filing purposes for the public interest, for scientific or historic research purposes or for statistic purposes, according to article 89, paragraph 1 and provided that the appropriate technical and organisational measures are applied that required by the present regulation for the ensuring of the rights and liberties of the subject of data ("limitation of the storage period"),

(f) be subject to processing in a way that guarantees the advisable safety of personal data, inter alia, their protection from non authorised or illegal processing and random loss, destruction or wear and tear, by the use of appropriate technical or organisational means ("integrity and confidentiality").

2. *The person for processing is responsible and in a position to prove the compliance to paragraph 1 ("accounting for").*

GNTO ensures that it abides by all these principles, to current processing, and to the introduction of new processing methods, such as new information technology systems.

2.4 Individual Rights

The subject of data has significant rights, regarding the Regulation. These include:

1. The right to information
2. The right to access
3. The right to correction
4. The right to deletion
5. The right to limitation of processing
6. The right to data portability
7. The right to objection
8. Rights that are related to the automated decision making for the person and the drawing of profile.

Each one of the rights of natural persons is supported by suitable procedures of the Organisation. These procedures ensure that the necessary actions take place within the scope of the time schedules that are declared in the GDPR.

These time schedules are presented in Table 1.

Petition of the Subject of Data	Time Schedule
The right to information	The time that data are collected (provided that are collected by the subject of data) or within a month (provided that are not collected by the subject of data)
The right to access	One month
The right to correction	One month
The right to deletion	Without unjustifiable delay
The right to limitation of processing	Without unjustifiable delay
The right to data portability	One month
The right to objection	At the time of receiving an objection
Rights that are related to the automated decision making and the drawing of profile.	Not clarified

Table 1-Time Schedules of petitions of data subjects

2.5 Legal basis of processing

There are six alternative ways by which, within the scope of GDPR, the legality of personal data processing of specific case may be established. The obligation of GNT0 is to determine the suitable basis for processing and to document it, under the Regulation. The choices are briefly described in the following paragraphs.

2.5.1 Consent

Unless it is necessary for a reason that is permitted in the GDPR, GNT0 will hold always an explicit consent by a subject of data for the collection and the processing of its data. In case that it concerns children under 15 years of age, the consent of the parent/guardian must be taken. Transparent information related to the use of personal data will be provided to the

subjects of data at the time that the consent is given and their rights will be explained as regards their data, such as the right to revoke the consent. This information will be provided in an accessible form, written in a clear language and for free.

If the personal data are not taken directly from the subject of data, then this information will be provided to the subject of data within a reasonable time period after the retrieval of data and definitely within one month.

2.5.2 Execution of agreement

When the personal data that are collected and are subject to processing concern the execution of the agreement with the subject of data, explicit consent is not required. This occurs often when the agreement may not be completed without the above personal data e.g. a delivery may not be made without an address.

2.5.3 Legal obligation

If the personal data must be collected and submitted according to the national and European legislation, then no explicit consent is required. This may occur for certain data that are related to employment and taxation, for instance, and for many sectors that the Organisation is legally obligated.

2.5.4 Vital interests of the subject of data

In the event that personal data are required for the protection of vital interests of the subject of data or any other natural person, this may be used as legal basis for processing. GNT0 will maintain logical and documented proof that this occurs, therefore this reason is used as legal basis for the processing of personal data.

2.5.5 Processing of data for the Public Interest

When GNT0 needs to fulfill a duty that considers to be for the public interest or as a part of an official duty, then the consent of the subject of data will not be required. The evaluation of the public interest or the official duty will be documented and will be set forth as evidence of proof, if required.

2.5.6 Legal interest

If the processing of specific personal data is for the legal interest of GNT0 and it is considered that does not affect significantly the rights and the freedoms of the subject of data, this may be defined as the legitimate reason for the processing. And again, the reasoning behind this view will be documented.

2.6 Data protection from planning

GNT0 has adopted the principle of data protection already from the planning stage, and ensures that upon planning of each new system -or the significant modification of an

existing system- that collects or processes personal data, the appropriate care will be taken on issues of information security and personal data protection, including the holding of one or more evaluations of the consequences on data protection ((Impact Studies – DPIAs).

The evaluation of consequences on data protection includes:

- The mode by which personal data are set for processing and for which purposes
- The evaluation of whether the proposed personal data processing is simultaneously necessary and proportional to the purpose (or the purposes)
- The evaluation of risks on which the persons are exposed, due to the processing of their personal data
- The selection of measures that are necessary for handling risks that have been found and prove the compliance to the legislation.

The use of techniques such as the minimisation of data and the pseudonym is examined in cases that their implementation is suitable and feasible.

2.7 Personal Data Transmission

The transmission of personal data beyond European Union is carefully examined, before the transmission occurs, so as to ensure that it is effected according to the framework defined by GDPR. This depends partially by the judgment of the European Commission, as well as by the adequacy of security that is implemented in relation to the personal data in the country that will accept the data, and may be modified on the faraway time..

2.8 Head of Data Protection

Within the scope of GDPR the selection of Head of Data Protection (HDP) is required, in case that the organisation is a public authority, and executes large scale processes or processes particularly sensitive categories of data at a large scale. The Head of Data Protection must hold the appropriate level of knowledge and may come from either the organisation or be an external partner.

Based on these criteria, we consider that it is necessary and a Head of Data Protection has been appointed in GNTO.

2.9 Notification of Infringement

GNTO has the obligation to inform all those required, in the event of infringement regarding personal data, by a fair and suitable manner. According to GDPR, when it is made known that an infringement has occurred that is possible to have as a consequence the risking of rights and freedoms of persons, the Personal Data Protection Authority (PDPA) will be notified, within 72 hours. This procedure will be effected according to GNTO's Process of Handling Incidents of Information Security.

Under GDPR, the corresponding Personal Data Protection Authority (PDPA) has the authorisation to impose a variety of fines up to 4% of the annual global turnover or twenty million euros, whichever of the above two fines is greater, for the infringement of the Regulation.

2.10 Implementation of Compliance to the General Data Protection Regulation

The actions below have been effected to ensure that GNT0 complies with, in any event, the principle of accounting for of GDPR:

- The legal basis of personal data processing is clear and unquestionable.
- A Head of Data Protection is appointed, competent for data protection within the Organisation.
- All personnel that is involved in the handling of personal data is aware of its responsibilities, so that it follows the optimum methods of data protection.
- All personnel is trained on data protection.
- The obligations related to consent are observed.
- There are available paths, through which the subjects of data that wish to exercise their rights regarding their personal data have this possibility.
- Reviews of the procedures concerning personal data are conducted regularly.
- Data protection from planning is adopted for all new systems and procedures or in significant modifications of the existing ones.
- In the document where the actions are described taking place in a process, it is recorded:
 - The name of the organisation and the relevant details
 - The purposes of personal data processing
 - The categories of persons and personal data that are under processing
 - The categories of the receivers of personal data
 - The agreements and the mechanisms based on which the transfers of personal data are effected in countries outside the European Union, including the details for the measures taken
 - Maintenance time of personal data
 - The appropriate technical and organisational measures that have been implemented.

These actions will be revised regularly, as a part of the inspection procedure of the Personal Data Protection Program.