



Rhodes Centre for History and Social Research

Rhodes Project SCE

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Personal Data Protection Policy

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List of Amendments

Date	Amendment	Reason
16.07.2024	Fundamental publication	

A. Principles Governing Data Processing

The protection of personal data is crucial to the Rhodes Centre for History and Social Research (hereafter Rhodes Project) for all its activities. We ensure full compliance with the applicable Data Protection Framework, including the Greek law 4624/2019 and the General Data Protection Regulation (GDPR). In this context, we process personal data in accordance with the applicable principles and we ensure that personal data are:

- Processed lawfully, fairly and in a transparent manner in relation to the data subject.
- Collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes.
- Adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed.
- Accurate and, where necessary, kept up to date.
- Kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed.
- Processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures.
- Shall not be transferred to a country or territory outside the European Economic Area unless the country or territory in question provides an adequate level of protection of the data subjects' rights and freedoms with respect to the processing or transfer of personal data.

B. Data Referring to Employees

B1. Legal Basis for Processing

Processing of personal data of Rhodes Project employees, regardless of specialisation or administrative position, is justified as follows:

- **Contract:** processing is necessary for entering into the employment contract or in order to take preparatory steps for such a contract.
- **Legal obligation:** processing is necessary to comply with the Rhodes Project's legal obligations as imposed by pertinent legislation. Indicatively, the Rhodes Project will collect and disclose employee data to tax authorities.
- **Obligations or rights in the field of employment and social security and social protection law:** processing employees' data is necessary for the purposes of carrying out the obligations and exercising specific rights of the employee or of MFI in the field of employment and social security and social protection law, under the conditions laid down by the applicable legislation.
- **Legitimate interest:** processing is necessary for the purposes of the legitimate interests pursued by the Rhodes Project or by a third party, except where such interests are overridden by the interests of the employee.
- **Vital interests:** processing is necessary in order to protect the life or the vital interests of a natural person.
- **Working capacity of the employee:** processing is necessary for assessing the working capacity of the employee.
- **Establishment, exercise or defense of legal claims:** processing is based on the Rhodes Project's right to establish, exercise or defend legal claims.
- **Consent:** data processing for any reason other than the ones presented here will only take place following the data subject's legal consent. This particular consent is unrelated to the employment contract. The employee will be fully informed before consenting; the employee will have the option to freely and voluntarily choose to provide his consent and will be able to revoke it at any time without negative consequences.

B2. Categories of Data Processed

To Rhodes Project διατηρεί τα εξής δεδομένα των υπαλλήλων:

- **Data identifying the employee:** name, surname, name and surname of parents, date and place of birth, gender, nationality, identity card, identity number and issuing authority.
- **Contact details:** address, phone numbers, email addresses.
- **Information necessary to meet the Rhodes Project's obligations to tax authorities, social security funds and bodies for the protection and benefits of workers and the unemployed:** tax identification number, social security number, registration number of other national authorities and bodies.
- **Employees' marital status information:** married / single, and other personal data related to spouse and children.
- **Information necessary to pay employees' wages and remunerations:** bank account, number of days and hours of work / leave, reasons for leave, medical certificates when sick leave, childbirth.
- **Information regarding the employee's education and professional experience:** previous work experience, years of service, academic titles, certifications, seminars, knowledge of foreign languages, knowledge of computer programs.

Before disclosing third party data to the Rhodes Project, employees must inform these third parties.

B3. Special Categories of Data

The Rhodes Project will not ask the employees for data other than the ones explicitly mentioned above, and especially not data that might be considered sensitive. In case such data happens to be revealed by an employee, it will not be recorded or processed by the Rhodes Project in any way.

B4. Reasons for Processing Data

The Rhodes Project processes data for specific purposes and only as much data as necessary for these purposes. In particular, employees' data are processed:

- To complete the recruitment process and to assess whether employees are fit for a particular role or specific tasks.
- To fulfill legal or contractual obligations, such as: paying wages and remunerations; granting leave; granting benefits; ensure the employee's health and safety in the workplace; offering benefits included in the employment contract; disclosing, as required, employee data to tax authorities, social security organizations, employee protection organizations or regulatory authorities that audit and regulate the operation of the Rhodes Project.
- To manage business expenses, such as business travel expenses and transport expenses.
- To improve operations' processes.
- To provide training and information.
- To manage and secure the Rhodes Project's electronic infrastructure and business continuity.
- For enabling authorities and third parties to audit Rhodes Project procedures and/or obtaining certifications.
- To comply with official requests by state authorities.

B5. Receiving and Processing Employees' Information

Within the Rhodes Project, only the President of the Steering Committee, the Treasurer and the Data Protection Officer have access to employees' personal data. Access is granted according to their job description and duties and is limited to the data necessary for the purposes of the particular processing they have undertaken.

Outside the Rhodes Project, to the degree necessary for each processing, data may be transferred to the following categories of recipients:

- To third parties providing services to the Rhodes Project, such as IT companies, payroll companies, telecommunication companies, seminar and training companies, credit institutions, tax and legal advisers, security companies, insurance companies and other service providers. A full list of third parties is available upon request.
- To national or international regulatory, tax or other authorities as required by law, applicable regulations or upon an official order.

B6. Duration of Data Retention

Employees' data are stored for the duration of the employment contract. During that period the Rhodes Project will apply all appropriate measures to safely store employees' data such as:

- Paper records will be archived in secured storage in the Rhodes Project premises.
- Electronic records will be archived in a computer terminal in the Rhodes Project premises with password protection.

Upon termination of the contract, the Rhodes Project will apply all appropriate measures to destroy employees' data as confidential waste:

- Paper records will be shredded inside the Rhodes Project premises.
- Electronic records will be securely deleted from the computer terminal in the Rhodes Project premises.

Documents for which a Litigation Hold Order has been issued, or that are related to an active legal pursuit or to an abnormal termination of the employment contract, will be retained for as long as necessary for these purposes.

B7. Employee Rights

Employees have the following rights regarding their personal data:

- **Right to be informed:** Employees have the right to be informed about the collection and use of their personal data.
- **Right of Access:** Employees have the right to obtain confirmation from the Rhodes Project as to whether or not Personal Data concerning them are being processed. In such a case, they may have access to their personal data in a concise, intelligible, transparent, and easily accessible form.

- **Right to Rectification:** Employees have the right to obtain the rectification of inaccurate or incomplete personal data from the Rhodes Project without undue delay.
- **Right to Deletion:** Employees have the right to demand the erasure of their personal data without undue delay by the Rhodes Project provided that they are no longer required or if the processing is against the law.
- **Right to Restriction:** Employees have the right to demand the restriction of processing only to specific purposes, under the conditions laid down by law.
- **Right to Object:** Employees have the right to object at any time to processing of personal data concerning themselves, on grounds relating to their particular situation.
- **Right to Portability:** Employees have the right to receive the personal data concerning themselves and kept by the Rhodes Project with their approval, in a structured, commonly used and machine-readable format. They also have the right to transmit those data to another controller without hindrance from the Rhodes Project under the conditions laid down by law.
- **Right to Obtain Human Intervention:** In cases of decisions with significant legal or other consequences for the employee, and which are based on automated processing, the employee has the right to request that these decisions are made by natural persons and not computers. The employee also has the right to express his/her opinion and to submit objections.

The possibility of exercising a right conferred by the law does not necessarily mean that it can be fully satisfied, especially when other legal provisions restrict it. In case the Rhodes Project is unable to meet the employee's request, he/she will be informed about the reasons.

B8. The Employees' Obligations

For the duration of the employment contract and indefinitely after its end or termination, employees are obliged to abstain from disclosing, transferring or in any way informing any third party about any type of personal data that came to their knowledge during and because of their employment with the Rhodes Project. This prohibition extends to any physical or legal entity, including Rhodes Project employees who do not have legal access to this information.

Any breach of the above constitutes a reason for termination of employment or any other kind of collaboration.

It also constitutes a reason for legal action, including civil and penal measures, against the perpetrator.

Any compensation, redress, remuneration or indemnification paid by the Rhodes Project as a result of legal action, will be recursively sought from the perpetrator.

C. Data Referring to Customers

C1. Legal Basis for Processing

Processing of personal data of Rhodes Project customers (in reference to natural persons) is justified according to the following legal bases:

- **Legal obligation:** processing is necessary to comply with the Rhodes Project's legal obligations as imposed by pertinent legislation. Indicatively, the Rhodes Project will collect and disclose customer data to tax authorities.
- **Legitimate interest:** processing is necessary for the purposes of the legitimate interests pursued by the Rhodes Project or by a third party, except where such interests are overridden by the interests of the employee.
- **Vital interests:** processing is necessary in order to protect the life or the vital interests of a natural person.
- **Ability to participate:** processing is necessary for the assessment of a customer's ability to participate in an event organized by the Rhodes Project (e.g. disability, allergy) and to take relevant measures towards this purpose.
- **Establishment, exercise or defence of legal claims:** processing is based on the Rhodes Project's right to establish, exercise or defend legal claims.
- **Consent:** processing of data for any legal reason not mentioned above will be performed only following the customer's legal consent. Before consenting, the customer will be fully informed: the choice to consent or not will be at the customer's discretion and the customer will retain the right to remove this consent at any time without negative consequences.

C2. Categories of Data Processed

The Rhodes Project collects the following data of the participants:

- Data identifying the participants: name, surname, identity card, identity number and issuing authority.
- Contact details of the participants: address, phone numbers, email addresses.

- Information necessary to meet the Rhodes Project's obligations to tax authorities: participants' tax identification number.
- Information necessary to be paid or remunerated by customers: bank account.

Before disclosing third party data to the Rhodes Project, customers must inform these third parties.

C3. Special Categories of Data

The Rhodes Project will not ask customers for data other than the ones explicitly mentioned above, and especially not data that might be considered sensitive. In case such data happens to be revealed by an employee, it will not be recorded or processed by the Rhodes Project in any way.

C4. Reasons for Processing Data

The Rhodes Project processes data for specific purposes and only as much data as necessary for these purposes. In particular, employees' data are processed:

- To fulfil legal or contractual obligations.
- To inform the customer of promotional or advertising activities concerning Rhodes Project's services.
- To manage business expenses during legal or contractual tasks.
- To improve the Rhodes Project's operational processes.
- To provide training and information to Rhodes Project employees.
- To manage and secure the Rhodes Project's electronic infrastructure and business continuity.
- To enable authorities and third parties to audit Rhodes Project procedures and/or to give certifications.
- To comply with official requests by state authorities.

C5. Receiving and Processing Customer Information

Within the Rhodes Project the administration as well as the employees have access to customer's personal data relative to their work tasks and limited to the data necessary for the purposes of the particular processing they have undertaken.

Whenever necessary to transmit data outside the Rhodes Project, this is limited to the data strictly necessary for the specific purpose. Third parties that may receive such data fall into the following categories:

- Third parties providing services to the Rhodes Project, such as legal advisers, IT companies, travel agents, hotels. A full list of third parties is available upon request.
- National or international regulatory, tax or other authorities, public bodies or courts, where required by law or regulation or upon an official order.

C6. Duration of Data Retention

Customer's data are retained throughout the duration of the service provision contract and for ten years after that. During this period, the Rhodes Project will apply all appropriate measures to safely store customer's data, such as:

- Paper records will be archived in secured storage in the Rhodes Project premises
- Electronic records will be archived in a computer terminal in the Rhodes Project premises with password protection.

After the end of the specified period of time, the Rhodes Project will apply all appropriate measures to destroy employees' data as confidential waste:

- Paper records will be shredded inside the Rhodes Project premises
- Electronic records will be securely deleted from the computer terminal in the Rhodes Project premises.

Documents for which a Litigation Hold Order has been issued, or that are related to an active legal pursuit or to an abnormal termination of the employment contract, will be retained for as long as necessary for these purposes.

C7. Customer's Rights

Customers have the following rights regarding their personal data:

- **Right to be informed:** Customers have the right to be informed about the collection and use of their personal data.
- **Right of Access:** Customers have the right to obtain confirmation from the Rhodes Project as to whether or not Personal Data concerning them are being processed. In such a case, they may have access to their personal data in a concise, intelligible, transparent, and easily accessible form.
- **Right to Rectification:** Customers have the right to obtain the rectification of inaccurate or incomplete personal data from the Rhodes Project without undue delay.
- **Right to Erasure:** Customers have the right to demand the erasure of their personal data without undue delay by the Rhodes Project provided that they are no longer required or if the processing is against the law.
- **Right to Restriction:** Customers have the right to demand the restriction of processing only to specific purposes, under the conditions laid down by law.
- **Right to Object:** Customers have the right to object at any time to processing of personal data concerning themselves, on grounds relating to their particular situation.
- **Right to Portability:** Customers have the right to receive the personal data concerning themselves and kept by the Rhodes Project with their approval, in a structured, commonly used and machine-readable format. They also have the right to transmit those data to another controller without hindrance from the Rhodes Project under the conditions laid down by law.
- **Right to Obtain Human Intervention:** In cases of decisions with significant legal or other consequences for the customer, and which are based on automated processing, the customer has the right to request that these decisions are made by natural persons and not computers. The employee also has the right to express his/her opinion and to submit objections.

The possibility of exercising a right conferred by the law does not necessarily mean that it can be fully satisfied, especially when other legal provisions restrict it. In case the Rhodes Project is unable to meet the employee's request, he/she will be informed about the reasons.

D. Exercising the Rights

The Rhodes Project respects the rights of employees and customers regarding their personal data and facilitates their exercise.

Any claim, question or complaint about personal data may be addressed to the competent Data Protection Officer, Stamatia Maria Chatzikonstantinou, by phone on +30 22411 81583 or email rhodesproject@rhodesproject.gr.

The Rhodes Project will respond to the request within 30 days of receipt. If an extension of this deadline is required to investigate and/or process the request, the employee or customer will be informed accordingly.

If the employee or customer feels that his/her privacy has been infringed in any way, he/she has the right to lodge a complaint to the Hellenic Data Protection Authority (www.dpa.gr).

E. Legal Disclaim

This Personal Data Protection Policy is a translation of the Greek version. In case of any discrepancy, the Greek version will take precedence.