

# Privacy Statement

**Privacy Statement regarding the protection of personal data in the context of eIDAS Proxy.**

## **Controller details:**

A public limited company (*societe anonyme*) under the corporate name "**National Infrastructures for Technology and Research S.A.**" and the distinctive title "**GRNET S.A.**"

**Controller's Contact Details:** eid-proxy at gnet.gr

## **Scope of this Privacy Statement:**

**National Infrastructures for Technology and Research S.A.** (hereinafter referred to as "**GRNET SA**") is bound by European Regulation 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of individuals with regard to the processing of personal data and on the free movement of such data (General Data Protection Regulation – hereinafter referred to as "**the GDPR**") and Law 4624/2019 (Government Gazette 137/A/2019) on "*Data Protection Authority, measures for the implementation of Regulation(EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of individuals with regard to the processing of personal data and for the incorporation into national law of Directive(EU) 2016/680 of the European Parliament and of the Council of 27 April 2016 and other provisions*", as in force at any time (hereinafter referred to as "**the Law**"). This Privacy Statement details all information necessary for the processing of personal data carried out in the context of eIDAS Proxy, as well as the policies and procedures implemented by GRNET SA for the protection of the eIDAS Proxy users privacy. This Privacy Statement sets out the criteria as well as the terms and conditions under which GRNET SA collects, processes, uses, stores and transmits the personal data of the service users, how it ensures the confidentiality of such information, including any law and/or regulation implemented or enacted in accordance with Union and national laws on personal data protection and electronic privacy, as well as any law and/or regulation amending, replacing, issuing or consolidating any of the latter, including any other applicable Union and national laws on the processing of personal data and privacy, which may exist in accordance with applicable law.

GRNET SA reserves the right to amend and update this Privacy Statement whenever necessary, whereas any such updates shall become effective five (5) days after they have been posted on the eIDAS Proxy website.

For the purposes of this Privacy Statement, the terms "processor", "controller", "third party", "supervising authority", "personal data", "processing", "data subject" shall have the meaning ascribed to them by applicable legislation on the protection of personal data.

In addition, for the purposes of the present, the following definitions shall also apply:

"Website" – the website accessible via domain name <https://grnet.github.io/grnet-eid-proxy/>, including the entirety of the web pages thereof.

"eIDAS Proxy Service" - <<https://eid-proxy.aai.grnet.gr/>>

"User"- the eIDAS Proxy online service user, whom the data refers to, whose identity is known or may be verified, namely it may be directly or indirectly determined.

"Project" - national and EU funded research and development projects

#### **A. Purpose/s for processing the data collected:**

i. GRNET SA– as processor – processes its "users" personal data as referred to in the following section, for the following purposes:

- **For the Authentication of eIDAS Proxy "users"**
  - Seamless operation of the eIDAS Proxy service.
  - Technical support to the external services connected to the eIDAS Proxy service
  - Enhancement of the online experience in providing eIDAS Proxy
  - Proof of Acceptance of the Terms of Use and the Privacy Statement

ii. GRNET SA– as controller – processes its "users" personal data as referred to in the following section, for the following purposes:

- **For providing the eIDAS proxy service**
  - Seamless operation of the eIDAS Proxy service.
  - Technical support to the external services connected to the eIDAS Proxy service
  - Enhancement of the online experience in providing eIDAS Proxy
  - Proof of Acceptance of the Terms of Use and the Privacy Statement

GRNET SA collects and processes "users" personal data in the context of providing the eIDAS Proxy service solely for the above mentioned purposes and only to the extent strictly necessary to effectively serve such purposes. These data shall be relevant, appropriate and not more than those required in view of the aforementioned purposes. They shall also be accurate and, if necessary, updated.

Furthermore, the aforementioned data shall be retained only during the period required as mentioned hereinabove, in order to accomplish the purposes of their collection and processing and shall be deleted after the end thereof (see below "Retention period of personal data").

#### **B. Categories of personal data processed:**

## **i. For the Authentication of eIDAS Proxy “users”**

The authentication to the eIDAS Proxy “users” can be realised through the eIDAS network. For the sole purpose of the authentication of the service “users”, GRNET SA collects through the aforementioned authentication procedure, and processes – as processor- the following personal data:

### **eIDAS network**

#### A. External Identity Provider information

Requested from the user’s eIDAS Member State node:

##### Natural Person

The following Mandatory attributes are required by the Regulation.

- Current First Names
- Current Family Name
- Date of Birth

The following Optional attributes may be supplied by an eIDAS Member State node if available and acceptable to national law.

- First Names at Birth
- Family Name at Birth
- Place of Birth
- Current Address
- Gender

##### Legal Person

The following Mandatory attributes are required by the Regulation.

- Current Legal Name

The following Optional attributes may be supplied by an eIDAS Member State node if available and acceptable to national law.

- Current Address
- VAT Registration Number
- Tax Reference Number
- Directive 2012/17/EU Identifier
- Legal Entity Identifier (LEI)
- Economic Operator Registration and Identification (EORI)
- System for Exchange of Excise Data (SEED)
- Standard Industrial Classification (SIC)

#### B. Identifiers

Identifiers, as provided by the user’s eIDAS Member State node:

- Person Identifier
- Legal Person Identifier

## **ii. For providing the eIDAS proxy service**

For the use of the eIDAS proxy service as well as for the efficient and lawful provision of this service, GRNET SA processes – as controller – the following personal data:

- Log of actions along with timestamps
- Log of the IP address
- The Identity Provider used for authenticating through the Service
- The external Service Providers that accessed through the Service

## **iii. Special categories of personal data**

GRNET SA may collect, process or gain access to specific data categories, as set forth in the provisions of the legislation in force (in particular data relating to gender etc.) .

## **C. Legal bases for processing**

The processing of “users” personal data is necessary for the performance of the Agreement on the provision of eIDAS proxy services, in accordance with the needs (technical and organisational) to provide the best possible services, to serve the “users”, as set to GDPR art. 6.1(b) processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract.

## **D. Access to personal data:**

For providing eIDAS proxy services and the seamless operation of such services, access to the “users” personal data shall be granted to the following:

- To the eIDAS proxy service support team, consisting of personnel engaged in a contractual relationship of either a project or an independent service agreement with GRNET SA hereinafter referred to as “GRNET associates”.

The processing of eIDAS proxy service “users” personal data by the aforementioned, is carried out under the supervision and only at the request of GRNET SA, within the scope of the mission and the role of each associate. Such associates undertake to comply with the same privacy and personal data requirements as GRNET SA itself in accordance to the present Privacy Statement

## **E. Recipients of collected personal data:**

By joining a collaboration or project that is using the eIDAS Proxy Service, you agree that your personal data may be disclosed to other authorised participants of the collaboration or project via secured mechanisms, but only for the same purposes and only as far as necessary to provide the services offered by or provided to participants of that collaboration or project.

These services may be based in the EU/EEA, or in countries with less adequate data protection provisions. Data transfer will be done via secured mechanisms and according to sections 2.f and 2.l of the Data Protection Code of Conduct [[Code of Conduct](#)]. In case of data transfers outside the EU/EEA we will ensure that appropriate safeguards are in place (e.g. Standard Contractual Clauses issued by the European Commission); you can obtain a copy of said

safeguards contacting us at [eid-proxy AT grnet.gr].

The eIDAS proxy service “users” personal data may be disclosed or transmitted to governmental authorities and/or law enforcement officials, only if necessary for the above mentioned purposes, in the context of enforcement of a court decision or a provision of law or if necessary to secure the legitimate interests of GRNET SA in its capacity as processor, in compliance with the terms and conditions of applicable law.

## F. Rights of data subject

As regards the data processed in the context of providing the eIDAS proxy service, GRNET as processor – takes all necessary action, pursuant to the terms of this Privacy Statement, both during the collection as well as in every subsequent stage of processing of eIDAS proxy service “users” personal data, so that every “user” may exercise his/her rights, as laid out in applicable legislation on the protection of personal data, namely the rights of Access, Rectification, Erasure, Restriction of Processing, data Portability, as detailed hereinbelow and in accordance with the terms and conditions of applicable law:

- **Right of Access:** The data subject is entitled to request and obtain from GRNET SA, a confirmation on whether or not his/her personal data are processed and, if so, to exercise the right to access such personal data pursuant to applicable legislation. The data subject may also request a copy of the personal data undergoing processing, as described in this Privacy Statement, by sending an email to the following email address: eid-proxy@grnet.gr. Finally, it should be noted that the right to obtain a copy of the personal data undergoing processing shall not adversely affect the rights and freedoms of others in accordance with applicable law.
- **Right of Rectification:** The data subject shall have the right to request GRNET SA to rectify any inaccurate personal data concerning him/her. Taking into account the purposes of the processing, the data subject shall have the right to request that any incomplete personal data be completed, including by means of providing a supplementary statement, in accordance with applicable legislation.
- **Right of Erasure:** The data subject has the right to obtain from GRNET the erasure of his/her personal data within the framework of eIDAS proxy service, in accordance with the provisions of applicable law.
- **Right to restriction of processing:** The data subject is entitled to ensure that GRNET SA restricts the processing of his/her data, if any of the conditions laid down by applicable legislation on the protection of personal data, is met.
- **Right to data portability:** The data subject has the right to obtain any personal data concerning him/her, which he/she has provided to GRNET SA in a structured, commonly used and machine-readable format, as well as the right to transmit such data to another processor without any objection from the processor to which the personal data have been provided, in accordance with the provisions of the applicable legislation on personal data.

To exercise any of the above rights, the “user” may contact the eIDAS proxy service Support Team at the following email address: eid-proxy@grnet.gr by filling out the following:           

The aforementioned rights of the data subjects are subject to restrictions in accordance with the

applicable legislation.

GRNET SA– acting in its capacity as processor – shall provide the data subject with information about any action taken upon his/her request to exercise any of the above rights within one (1) month as of receipt of the request. This period may be extended by an additional period of two (2) months, in accordance with the terms of applicable law.

GRNET SA, when processing personal data in the capacity of a controller on behalf of an academic or research institution, it shall immediately forward any request filed by a data subject with GRNET SA concerning the processing carried out by the institution in the context of providing eIDAS proxy service, and shall assist the Institution to fulfill its obligation to respond to such request. GRNET SA shall not be responsible to respond to the data subject’s request in such cases.

### G. Personal data retention periods

The eIDAS Proxy service users personal data shall be retained no longer than it is necessary for the needs of the service and the audits the service is subjected to. More specifically:

Categories of personal data collected	Time and place of retention of personal data
<ul style="list-style-type: none"> <li>● IP address</li> <li>● Data from website navigation through Cookies</li> <li>● Last login</li> </ul>	18 months (log retention)
<p>Natural Person</p> <ul style="list-style-type: none"> <li>● Person Identifier</li> <li>● Current First Names</li> <li>● Current Family Names</li> <li>● Date of birth</li> <li>● First Names at Birth</li> <li>● Family Name at Birth</li> <li>● Place of Birth</li> <li>● Current Address</li> <li>● Gender</li> </ul> <p>Legal Person</p> <ul style="list-style-type: none"> <li>● Legal Person Identifier</li> <li>● Current Legal Name</li> <li>● Current Address</li> <li>● VAT Registration Number</li> <li>● Tax Reference Number</li> <li>● Directive 2012/17/EU Identifier</li> <li>● Legal Entity Identifier (LEI)</li> <li>● Economic Operator Registration and Identification (EORI)</li> </ul>	18 months for the Natural or Legal Person Identifier. All other attributes will be deleted on user request

<ul style="list-style-type: none"> <li>● System for Exchange of Excise Data (SEED)</li> <li>● Standard Industrial Classification (SIC)</li> </ul>	
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## H. Privacy and Security of Information:

The processing of personal data by GRNET SA is performed in a manner that ensures both confidentiality and security thereof. All appropriate organisational and technical measures shall be taken to safeguard data against any accidental or unlawful destruction, accidental loss, alteration, prohibited dissemination or access or any other form of unfair processing.

The services provided by GRNET SA are constantly evaluated to be in line with the safety requirements of international standards. GRNET's Information Security Management System (ISMS) has been certified by the accredited certification body, EUROCERT SA.

In particular:

- Access to technical log data is restricted and can only be accessed in a secure way by the eIDAS Proxy service staff.
- When accessing the eIDAS Proxy service adequate security controls are in place to keep your personal data safe in accordance with the classification of the personal data we have collected from you.
- We use encryption (HTTPS) to keep data private while in transit. Data sent using HTTPS is secured via Transport Layer Security protocol (TLS), which provides a) Encryption—encrypting the exchanged data to keep it secure from droppers. b) Data integrity—data cannot be modified or corrupted during transfer, intentionally or otherwise, without being detected. c) Authentication—proves that your users communicate with the intended website.
- The implementation of the eIDAS Proxy Service ensures that no unauthorized user can log in through the Service. An authorised user means a user, who has an active eIDAS account, having passed the authentication process through the eIDAS network.
- We review our information collection, storage, and processing practices, including physical security measures, to prevent unauthorized access to our systems

Although we follow best security practices to ensure your personal data remains secure, there is no absolute guarantee of security when using services online. While we strive to protect your personal data, you acknowledge that:

- There are security and privacy limitations on the internet which are beyond our control and can have a negative impact on the confidentiality, integrity and availability of the information.
- We cannot be held accountable for activity that results from your own neglect to safeguard the security of your login credentials and equipment which results in a loss of your personal data. If you feel this not enough, then please do not provide any personal data.

Your personal data will be protected according to the [Code of Conduct for Service Providers](#), a common standard for the research and higher education sector to protect your privacy.

#### **I. Processing of personal data by Projects**

Every "Project" using the eIDAS service, shall act as a controller with regard to all personal data processed for its own purposes during the use of the eIDAS service and shall be responsible for the collection, the processing and the legal basis thereof, the purpose, for notifying the data subjects and for satisfying their rights as well as for carrying out a Data Protection Impact Assessment (DPIA). It shall also be accountable towards the Data Protection Authority (DPA) and the data subjects, in accordance with applicable law on data protection.

The GRNET S.A. shall act as the controller for the technical logs of the activity of the users on behalf of each Project in compliance with the provisions of law on personal data, and shall not be responsible for the lawfulness of the collection, the processing and the legal basis thereof, the purpose, nor for notifying the data subjects and for satisfying the rights thereof.

#### **K. Contact:**

For any questions or clarifications regarding the present Privacy Statement and as well as in the event of any violation related to personal data issues, "users" may contact the Competent Department of GRNET SA at the e-mail address mentioned hereinabove.

They may also contact the Data Protection Officer (DPO) of GRNET S.A., Ms. Vera Meleti, and/ or the deputy DPO, Ms. Vasiliki Konstantinopoulou at the e-mail address: [dpo@grnet.gr](mailto:dpo@grnet.gr).

#### **L. Recourse/Complaint**

In the event that any eIDAS Proxy "user" request is not satisfied by the processor, the "user" may at any time address to/ file recourse with the Competent Supervisory Authority, namely the Data Protection Authority <https://www.dpa.gr>.