

## **NOTIFICATION REGARDING THE PROCESSING IN THE “ORFEAS” SYSTEM OF PERSONAL DATA OF ENGLISH LANGUAGE TEACHERS AND FOREIGN LANGUAGE CENTERS’ CONTACT PERSONS**

Pursuant to the application of the General Data Protection Regulation (EU) 2016/679 (“GDPR”), the Hellenic American Union (22 Massalias Street, 10680 Athens) (the “HAU”) would like to inform you of the following:

**1. What data is processed by the HAU belonging to which natural persons:** The HAU, in its capacity as data controller, processes personal data of the following persons (“data subjects”): (a) English language teachers or legal representatives/ personnel of Foreign Language Centers, who register at the “Orfeas” system of the HAU. Data processed by the HAU, include, inter alia: (a) personal information (e.g., full name, phone number (home/ mobile), e-mail address); (b) information relating to their capacity (e.g., work position, phone number and business email address) in the case of a Foreign Language Center; and (c) financial data relating to the payment of fees to the HAU, such as credit/ debit card information, bank account numbers, billing and payment data. Data subjects who do not provide the above data or part thereof will not be able to register at the “Orfeas” system of the HAU.

**2. Source of data:** The source of the data is the data subject himself/herself disclosing his/ her data as part of the “Orfeas” system or a third party proceeding to the relevant registration. To the extent that the data subjects transmit third party personal data to the HAU, they shall be responsible for complying with the applicable provisions of the data protection legislation. In this context, they may need to obtain the third parties’ consent, for the purpose of transmitting data to the HAU and for the processing of these data by the HAU, according to the terms of the present Notification.

**3. Purpose and legal basis of processing data:** The HAU processes data subjects’ personal data, as the case may be, for the following purposes: (a) to provide services and in general manage the transactional relationship between the HAU and the data subjects or the Foreign Language Centers regarding the registration of their students at the language competence examinations which are being conducted by the HAU or/ and to provide information to the data subjects about the date, the place, the time and the way of conducting the language competence examinations, as well as any other relevant information about the above examinations (e.g. documents required to be provided). For such data processing, the legal basis shall be the performance of the relevant contract concluded with the HAU (or, as the case may be, the consent obtained by the data subject) and the compliance with a legal obligation of the HAU. (b) To safeguard the interests of the HAU. For such data processing, the legal basis is that processing is necessary for the purposes of the legitimate interests pursued by the HAU which override the interest, fundamental rights and freedoms of the data subject which require the protection of personal data (e.g., for the establishment, exercise or support of legal claims). (c) To send marketing material via electronic mail. It must be clarified that the HAU is entitled to use the data subjects’ electronic mail contact details, lawfully obtained in the context of the provision of its services or any other transaction, for the direct promotion of similar services or for the furtherance of similar purposes, even where data subjects have not given their prior consent, provided that they are given, when contact details are collected, as well with every message, a clear and transparent option to object, easily and free of charge, to the collection and use of their electronic data. For such processing of data, the legal basis is that processing is necessary for the purposes of the legitimate interests pursued by the HAU (i.e., the legitimate interests relating to the promotion of its services), which override the interest, fundamental rights and freedoms of the data subject which require the protection of personal data. In the absence of any such provision of services to or any other transaction with the data subject, as per above, the legal basis for the relevant processing of data, is the consent of the data subject.

**4. Recipients of data:** As the case may be and depending on the purpose of processing, personal data may be transmitted to the authorized employees in each department of the HAU, to companies associated with the HAU with which the HAU has executed a contract and which process the data on its behalf (e.g.

IT companies, IT service providers, etc.), within their competencies and subject to the obligation of confidentiality, secrecy and compliance with the data protection legislation.

In addition, the HAU may transmit personal data to third parties where so required by law or for the purposes of, or in connection with legal proceedings in which it participates, or otherwise for the purposes of supporting, exercising or defending its rights, or to third parties that are law enforcement authorities and have submitted a lawful transmission request, or where it considers that transmission is necessary in connection with any investigation into the suspicion or existence of any illegal activity. Personal data shall not be transmitted outside the European Economic Area.

**5. Data retention time:** The above data will be retained for a period time as required or allowed by the legislation/regulatory framework in force each time, taking into account the applicable prescription period, which may extend to up to 20 years. Specifically: (a) where processing is carried out under a relevant contract, the personal data shall be stored for as long as necessary for the performance of the contract and for the establishment, exercise and/or support of any legal claims of the HAU arising from that contract; and (b) where the processing is imposed as an obligation by provisions stemming from the applicable legal framework, personal data shall be stored for as long as the relevant provisions so require.

**6. Data subjects' rights:** The data subject shall have the following rights under the GDPR: (a) to receive a copy of the personal data held by the HAU, together with other information on how data is processed; (b) to request that personal data concerning him or her be rectified and, under conditions, to request the deletion or restriction of processing, or to object to the processing of personal data; (c) to receive a copy or to request the transmission of a copy of his or her personal data to a third party in a structured, commonly used and machine-readable format (right to data portability). Where the processing of data is based on his or her consent, the data subject shall have the right to withdraw that consent at any time without affecting the lawfulness of processing based on consent before its withdrawal. If the data subject wishes to receive further information about the processing of his or her personal data or to exercise any of his or her above rights, he or she must email the HAU Data Protection Officer exclusively at: [privacy@hau.gr](mailto:privacy@hau.gr), or send a letter to the mailing address mentioned above. Finally, the data subject has the right to file a complaint with the competent supervisory authority about how the HAU handles his or her data ([www.dpa.gr](http://www.dpa.gr)).