

Privacy notice

Privacy Statement on the protection of personal data by the Repository service

Data Controller details:

National Infrastructures for Research and Technology SA (GRNET SA)

Department in charge of this processing operation:

Repository Support Team

Data Controller Contact Details:

NI4OS Controller: infoni4os@gnet.gr

Scope of this Privacy Statement:

The National Infrastructures for Research and Technology is bound by the European Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data (General Data Protection Regulation – GDPR). This Privacy Statement describes the policies and procedures in place by GRNET to protect the privacy of the Repository Users. This Privacy Statement sets out the criteria and the conditions under which GRNET collects, processes, uses, stores and transfers the personal data of the service Users, how the confidentiality of such information is ensured as well as any law and/or regulation implemented or enacted in accordance with the GDPR and the legislation on the protection of electronic privacy, or any law which modifies, replaces, adopts or codifies any of the above laws, as well as any other applicable national laws on the processing of personal data and privacy, as they may exist under applicable law.

GRNET reserves the right to modify and update the present Policy whenever deemed necessary, whereas any changes shall become effective after they are posted on repo.ni4os.eu.

For the purposes of this Privacy Statement, the terms "data controller", "data processor", "third party", "supervisory authority", "personal data", "processing", "data subject" shall have the meaning ascribed to them by the applicable law on the protection of personal data. Moreover, for the purposes of the present, the following terms shall also apply:

"Website" – the website accessible through the domain names repo.ni4os.eu including all of the web pages thereof.

"User" - the internet user of the *"Website"*, whom the data refer to and whose identity is known or who may be, directly or indirectly, identified.

Purpose(s) of processing the collected data:

GRNET collects and processes the personal data of its Clients-Users, referred to herebelow, for the following purposes:

- Technical capability for a smooth and uninterrupted operation of the *"Website"*.
- Easy and user-friendly operation of the *"Website"*.
- Troubleshooting User connection problems
- Metric Collection
- Service Provisioning
- Creating statistics reports and graphics to monitor usage. Information contained in statistics reports and graphics statistics do not comprise any Users personal data.
- Sending online updates to the Service Users via e-mail, only in the event of major service changes requiring from Users to perform certain necessary actions in order to continue using the Service smoothly.

GRNET collects and processes Users-clients' personal data *solely and exclusively for the purposes mentioned above and only to the extent strictly necessary to effectively satisfy such purposes*. These data are always relevant, reasonable and not more than those required to meet the purposes set out above. Moreover they are accurate and, where appropriate, subject to updates. Furthermore, such data are *retained only during the*

period required for collection and processing purposes as aforementioned, and are deleted at the end of that period..

Categories of data processed:

(a) When entering and using the Website, either through a user account or anonymously

- IP address
- Navigation data within the Website through the installation of cookies (see [Cookies policy](#))

(b) When creating a personal account for the Repository

- E-mail address
- Name
- Role
- Unique User Identifier

GRNET does not collect or have access in any way, to sensitive User-client data (racial or ethnic origin, religion, etc.).

Lawfulness of the processing operation:

The personal data of "Users" are processed in the context of the provision of the Repository Service and for the purposes described in this Privacy Statement, in line with the need (technical and organizational) to best perform the Repository Service as well as to respond to "Users" requests concerning the Repository Service.

Access to collected data:

GRNET may provide access to, or provide data related to, or necessary for supporting the Website, to the following natural persons or legal entities:

- The Repository Support Team, personnel under an employment relationship with GRNET
- NI4OS Service Onboarding Team¹

¹ https://wiki.ni4os.eu/index.php/Service_onboarding_team

The processing of the Users personal data by the aforementioned natural persons and/or legal entities, in their capacity as GRNET's partners, may be conducted only under the control and upon authorization issued by GRNET. Finally, such partners should comply with the same privacy requirements as GRNET in accordance with the present Privacy Statement.

Recipients of collected data:

GRNET SA does not, in any way, transfer/transmit or disclose the personal data of the "Users" to any third party business organizations, natural persons or legal entities, public authorities or agencies or any other organizations, other than those specifically referred to herein.

The personal data of the "Users" may be communicated or transferred to government authorities and/or law enforcement officers, if that is required for the above purposes, or within the scope of enforcing a court decision or order, or for complying with a provision of law, or if so required in order to serve the legitimate interests of GRNET as Data Controller, in accordance with applicable law.

Rights of Data Subjects:

GRNET performs all necessary actions both during collection and at each subsequent processing stage of the Repository Users personal data, so that each User is fully enabled to exercise the rights guaranteed by applicable data protection laws, namely *the rights to access, rectify, erase and restrict processing, as well as the right to data portability, which are described below:*

Right of Access: The data subject has the right to request and obtain from the Controller, within a time-period of one (1) month, confirmation as to whether or not personal data concerning him or her, are being processed, and, where that is the case, access to the personal data and to certain information, as laid out by applicable law. It may also request a copy of the personal data undergoing processing as described herein by sending an email message to the address: ni4os-repo@gnet.gr

Right to rectification: The data subject has the right to require the Controller to rectify inaccurate personal data concerning him/her. Taking into account the purposes of the processing, the data subject is entitled to have incomplete personal data completed, including by means of providing a supplementary statement in accordance with the applicable law.

Right to erasure: The data subject has the right to obtain from the Controller the erasure of all personal data collected and processed within the scope of the Repository Service, in accordance with the applicable law.

Right to restriction of processing: The data subject is entitled to obtain from the Controller the restriction of processing of his/her data where the accuracy of the data is questioned or where any of the other conditions set out by the applicable law, is met.

Right to data portability: The data subject shall have the right to receive any personal data relating to him/her and which he/she has provided to the Controller in a structured, commonly used and machine readable format, as well as the right to transmit such data to another controller without objection by the controller to whom such personal data were provided in accordance with the law.

These rights are subject to various restrictions pursuant to applicable law, including for example if the fulfillment of the data subject's request may disclose personal data of another person or in the event that GRNET is required by law to retain such data.

To exercise any of the aforementioned rights, the "User" may contact the Repository Support Team at the email address referred to hereinabove.

Data retention period:

The personal data of the Repository "Users" shall not be retained for a period of time longer than is necessary for the operations of the Service and the audits that it undergoes to that effect.

Categories of personal data collected

Time and place of retention of personal data

IP address Data from website navigation through Cookies	18 months (log retention)
Unique User Identifier, Email address Name, Role	18 months (db) for the Unique user Identifier , Email, Name, Role will deleted from db on user request

Confidentiality and Security of Information:

The processing of personal data by GRNET is conducted in a manner that ensures both confidentiality and security thereof. More specifically, it is carried out by GRNET's personnel, exclusively authorized for this purpose (Repository Support Team) where as all appropriate organizational and technical measures are taken to ensure data security and the protection thereof against accidental or unlawful destruction, accidental loss, alteration, unauthorized disclosure or access, as well as and any other form of unfair processing.

Communication:

For any questions or clarifications regarding this Privacy Statement and as well as in the event of any issues related to violation of personal data, "Users" may contact the Repository Support team at the e-mail address mentioned above.

They may also contact the GRNET Data Protection Officer (DPO), Vasiliki Konstantinopoulou, at the e-mail address: gdperteam@grnet.gr

Complaint / Termination:

In case a request of a Repository "User" is not satisfied by the Data Controller or by the Data Protection Officer, the User may at any time file a complaint with the Competent Supervisory Authority, namely the Data Protection Authority <http://www.dpa.gr>.