



# UNIVERSITY OF WEST ATTICA

## TRAINING AND LIFELONG LEARNING CENTER



### SECURITY AND PERSONAL DATA PROTECTION POLICY

The Training and Lifelong Learning Center of the University of West Attica, hereinafter referred to as the "CENTER," acknowledges the critical importance of protecting the personal data of individuals and ensuring their lawful and proper processing. In this context, the Center complies with the fundamental principles of personal data processing, respects the rights of individuals, and ensures the personal data in its possession:

- Are collected after obtaining the consent of the individual where required,
- Are collected for specific, clear, and lawful purposes,
- Are processed only for the purposes for which they were collected, and/or for legal and regulatory reasons, and/or for the protection of public interest,
- Are not subjected to further processing beyond the specified purpose,
- Are appropriate, relevant, and limited to what is necessary for the purposes of processing,
- Are processed lawfully in accordance with the rights of individuals, are accurate, and are updated when necessary, especially before making significant decisions about individuals,
- Are not kept for a period longer than required for the processing purpose or compliance with the Center's regulations,
- Are kept secure from unauthorized access, loss, or destruction,
- Are transferred to third parties only if an adequate level of protection is ensured.

Please read these terms and the related Security and Personal Data Protection Policy carefully. By using our websites and/or signing the relevant consent declaration, where applicable, you unconditionally accept the practices described in this policy, which will govern our contractual relationship and are incorporated into the terms of use of each of our services.

#### 1. WHAT ARE YOUR PERSONAL DATA?

Your personal data includes any information, whether in paper or electronic form, that can lead, either directly or in combination with other data, to the unique identification/recognition of you as an individual. This category may include information such as your name, physical and electronic addresses (emails), academic qualifications and professional experience, phone numbers (landline and mobile), and any other information that allows your unique identification under the provisions of the General Data Protection Regulation (GDPR 2016/679), applicable Greek legislation, and decisions of the Personal Data Protection Authority (DPA).

#### 2. WHAT PERSONAL DATA DO WE COLLECT FROM YOU?

For example, we process and protect your personal data in compliance with the relevant legislative and regulatory framework for Higher Education Institutions, including the collection of data from your participation applications in seminars, participation in trainings, seminar implementation, promotional actions (Marketing), and general communication/support/information.

### 3. PROCESSING WITH YOUR EXPLICIT CONSENT

Our Center will use your information for the following lawful processing purposes, within the framework of our agreement, or if you have provided your explicit and specific consent, as required by each service (which you can freely revoke at any time):

- For the management of data and information in the context of implementing educational programs,
- For support regarding our organization's services and responses to requests, questions, and suggestions about our services,
- For internal quality assurance of our services,
- To provide information related to services and educational programs,
- For the transfer of data to external collaborators for the implementation of registration, education, and technical support in our educational programs.

For internal operations and analysis, such as internal management, fraud prevention, use by management information systems, invoicing, accounting, billing, and auditing.

For website traffic analysis and to improve your experience and provide information related to services, educational programs, and general/technical updates.

In any case, candidates can change their preferences at any time or request the deletion of their personal data from our organization by sending an email to [gramkediv@uniwa.gr](mailto:gramkediv@uniwa.gr).

### 4. PRINCIPLES OF COLLECTION AND PROCESSING

This Personal Data Protection Policy aims to inform you about the terms of collection, processing, and transfer of your personal data that may be collected as Data Controllers or Processors.

Our Center and its trained staff apply all the Principles of Processing as outlined in GDPR 2016/679 (lawfulness, fairness, transparency, purpose limitation, data minimization, accuracy, storage limitation, integrity, confidentiality, and accountability).

At the same time, our Center protects and ensures your rights regarding the use of your personal data (information, access, correction, deletion, restriction of processing, portability, objection, and automated decision-making based on profiles) as specified in the GDPR and Greek legislation. These apply without discrimination and are implemented in all processes carried out and services provided by our Center.

### 5. METHODS OF COLLECTING YOUR PERSONAL DATA

Our Organization collects your personal data with your consent and acceptance of the terms of use of each of our services, for example:

- When you call our numbers, send us emails, or fill out a request for information or an Educational program,
- As part of the implementation of Trainings,
- When you provide a mailing address for invoicing or service provision receipts, as well as delivery details for documents (e.g., a Training Certificate),

- When you voluntarily register in print or electronic directories to receive printed, electronic, or SMS marketing material or newsletters,
- When you visit our websites through which we collect, via cookies, necessary information from your terminal device and browser.

## 6. DATA MINIMIZATION, STORAGE, AND DELETION

Our Center will always request only the minimum required personal data under the law for providing our Services and best serving you.

We will retain your personal data only as long as required by the Center's internal regulations, in combination with applicable regulations for Education Institutions and general telecommunications, tax, and other legislative and regulatory frameworks, based on the processing purpose, after which the data will be anonymized or destroyed. You can inquire and be informed about which data we collect about you and correct or delete it, unless the retention is required by law for tax, legal, or judicial purposes or for prosecuting unlawful acts.

## 7. COOKIES POLICY

In compliance with the European e-Privacy Directive 2009/136/EC, our website (<https://kedivim.uniwa.gr>) uses cookies. Cookies are online tools for collecting and analyzing information from third-party websites or social media platforms to measure traffic, improve functionality, content, and the overall appearance of our website, and tailor it to the needs of our Clients.

By using our website, you agree (opt-in) to the processing of your personal data collected from search engines or social networks, such as Google Analytics, Facebook social plugins, Google+, etc., which are exclusively managed by these third parties, and are transferred either within or outside the European Economic Area (28 EU member states plus Iceland, Liechtenstein, and Norway), for which these third parties are solely responsible.

If you do not want third parties such as Google, Facebook, Twitter, etc., to receive information from your browser when visiting our websites, you can opt-out via the respective Policy provided by each such third party.

## 8. DATA TRANSFER TO THIRD PARTIES

In principle, our Organization does not transfer your personal data to third parties unless explicitly required by law or regulation, or when it is necessary to complete a service and fulfill requests related to the services we provide.

These third parties may include, for example, Educational Program Providers/Collaborating Entities/Technical support staff for platforms or when we are required to comply with Educational Institution Regulations or prevent illegal actions (e.g., fraud, defamation, personal injury).

We cooperate with reputable Academics and other Partners (Instructors/Trainers) and aim to set contractual restrictions on third parties who may receive your personal data, ensuring, to the extent possible, that they use it in accordance with this Policy and applicable data protection laws in Europe and internationally.

## **9. SECURITY OF YOUR PERSONAL DATA**

In any case, we take appropriate technical and organizational measures to ensure that your personal information is transferred, stored, and processed in accordance with the appropriate security standards and procedures, in compliance with this Policy and the applicable data protection laws.

Our Center has trained and responsible staff, recognizing the importance of protecting privacy and all of your personal information. For this purpose, we have appropriate security policies and use suitable technical and operational tools, such as data encryption, firewalls, access levels, authorized personnel, staff training, regular audits, and compliance with international security standards and Business Continuity.

Anyone who has access to this information uses it solely to serve the purposes mentioned above. We share the information you provide only in the ways described in this Policy and according to your explicit and specific consent for each type of processing, which you may freely revoke at any time by contacting us.

## **10. TARGETED ADVERTISING**

We may use your personal data along with other information we have collected (basic contact details like name/company/phone/address/email) after human intervention by our Commercial Department or other staff, to carry out promotional marketing activities (emails, newsletters, etc.) for your better information.

However, we do not use automated tools to track and assess your consumer profile and preferences with other personal information (such as your email address) to display advertisements or send you personalized offers. Additionally, we do not share your personal information with third parties for them to send you targeted ads unless you have explicitly consented to this.

## **11. LINKS TO THIRD-PARTY WEBSITES**

Our Organization's websites may contain links to other third-party websites, operated exclusively by these third parties, such as consulting service providers, which we do not control. Therefore, we are not responsible for the content, actions, or policies of these websites. Please read the respective data protection policies on the different websites you visit, as they may differ significantly from ours.

## **12. UNSOLICITED COMMERCIAL COMMUNICATION**

Our Center does not allow the use of our website or services for the transmission of mass or unsolicited commercial emails (spam). Additionally, we do not permit the sending of messages to and from our trainees that use or contain invalid or falsified headers, invalid or non-existent domain names, techniques to hide the origin of any message, false or misleading information, or that violate the terms of use of websites.

We do not allow and do not authorize any attempt to use our services in a way that could damage, disable, overload any part of our services, or interfere with anyone who wishes to use our services.

If we believe that unauthorized or inappropriate use is being made of any of our services, we may, without warning and at our sole discretion, take appropriate measures to block messages from a

specific domain, email server, or an IP address. We have the ability to immediately delete any account that uses our services and, at our sole discretion, transmits or is linked to the transmission of any messages that violate this policy.

### **13. CONTACT FOR QUESTIONS OR COMMENTS**

If you have any questions or comments about this Security and Personal Data Protection Policy, or if you believe that we have not adhered to the principles outlined in this policy, please send us an email at: [gramkediv@uniwa.gr](mailto:gramkediv@uniwa.gr)

### **14. VALIDITY OF SECURITY AND PERSONAL DATA PROTECTION POLICY**

This Policy was published by our Center on 30/04/2019 and is subject to periodic improvement and revision.

Any changes to this Policy will apply to information collected from the date the revised version is published, as well as to existing information that we hold. Continued use of the website after the publication of changes implies your acceptance of these changes.