



Privacy and Personal Data Protection Policy

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1 Introduction

In its everyday business operations, DIGEA makes use of a variety of data about identifiable individuals, including data about:

- Existing, old and prospective employees or external associates with a cooperation agreement
- Suppliers
- Customers (TV stations)
- Greek Television Audience
- Users of Digea websites and other media through Internet
- Shareholders

The purpose of this policy is to set out the relevant legislation and to describe the steps DIGEA is taking to ensure that it complies with it.

This control applies to all systems, people and Digea procedures, including board members, managers, employees, customers, suppliers, partners, subcontractors and other third parties who have access in Digea systems.

The following policies and procedures are relevant to this document:

- *Data Protection Impact Assessment Process*
- *Personal Data Mapping Procedure*
- *Information Security Incident Response Procedure*
- *GDPR Roles, Responsibilities and Authorities*
- *Records Retention and Protection Policy*

2 Privacy and Personal Data Protection Policy

2.1 The General Data Protection Regulation

The General Data Protection Regulation 679/2016 (GDPR) is one of the most significant pieces of legislation affecting the way that Digea carries out its information processing activities. Significant fines are applicable if a breach is deemed to have occurred under the GDPR, which is designed to protect the personal data of people in the European Union. It is DIGEA's policy to ensure that our compliance with the GDPR and other relevant legislation is clear and demonstrable at all times.

2.2 Definitions

There are a total of 26 definitions listed within the GDPR and it is not appropriate to reproduce them all here. However, the most fundamental definitions with respect to this policy are as follows:

Personal data is defined as:

any information relating to an identified or identifiable natural person ('data subject'); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person;

'processing' means:

any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction;

'controller' means:

the natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of personal data; where the purposes and means of such processing are determined by Union or Member State law, the controller or the specific criteria for its nomination may be provided for by Union or Member State law;

2.3 Principles Relating to Processing of Personal Data

There are a number of fundamental principles upon which the GDPR is based.

These are as follows:

1. *Personal data shall be:*

(a) processed lawfully, fairly and in a transparent manner in relation to the data subject ('lawfulness, fairness and transparency');

(b) collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes; further processing for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes shall, in accordance with Article 89(1), not be considered to be incompatible with the initial purposes ('purpose limitation');

(c) adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed ('data minimisation');

(d) accurate and, where necessary, kept up to date; every reasonable step must be taken to ensure that personal data that are inaccurate, having regard to the purposes for which they are processed, are erased or rectified without delay ('accuracy');

(e) 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; personal data may be stored for longer periods insofar as the personal data will be processed solely for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes in accordance with Article 89(1) subject to implementation of the appropriate technical and organisational measures required by this Regulation in order to safeguard the rights and freedoms of the data subject ('storage limitation');

(f) 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 ('integrity and confidentiality').

2. *The controller shall be responsible for, and be able to demonstrate compliance with, paragraph 1 ('accountability').*

DIGEA must ensure that it complies with all of these principles both in the processing it currently carries out and as part of the introduction of new methods of processing such as new IT systems. The operation of an information security management system (ISMS) that conforms to the ISO/IEC 27001 international standard is a key part of that commitment.

2.4 Rights of the Individual

The data subject also has rights under the GDPR. These consist of:

1. The right to be informed
2. The right of access
3. The right to rectification
4. The right to erasure
5. The right to restrict processing
6. The right to data portability
7. The right to object
8. Rights in relation to automated decision making and profiling.

Each of these rights are supported by appropriate procedures within DIGEA that allow the required action to be taken within the timescales stated in the GDPR.

These timescales are shown in Table 1.

Data Subject Request	Timescale
The right to be informed	When data is collected (if supplied by data subject) or within one month (if not supplied by data subject)
The right of access	One month
The right to rectification	One month
The right to erasure	Without undue delay
The right to restrict processing	Without undue delay
The right to data portability	One month
The right to object	On receipt of objection
Rights in relation to automated decision making and profiling.	Not specified

Table 1 - Timescales for data subject requests

2.5 Legal basis of the processing

There are six alternative ways in which it can be established in the framework of the GDPR, the legality of the processing of personal data specific case. Digea's obligation is to identify appropriate basis for processing and document it in accordance with the Rules. The options are briefly described in the following sections.

2.5.1 Consent

Unless necessary for reasons permitted by the GDPR, it must obtain clear consent from the data subject for collection and the processing of its data. In case of children below 15 years of age, the consent of the parent / guardian must be obtained. The data subjects must be informed of their rights – in relation to their personal data - such

as the right to consent, at the time their consent is obtained. The information about the rights of subjects should be easy accessible, free of charge, and clearly written.

If the collection of personal data is not done directly by the data subject, then this information should be given within a reasonable period of time after the acquisition of the data and certainly not later than within one month.

2.5.2 Execution of a contract

When personal data is collected and submitted to processing concerning the completion of the contract with the data subject, no explicit consent is required. This often happens when the contract cannot be completed without such personal data e.g. a tradition cannot be done without an address.

2.5.3 Legal obligation

Whether personal data needs to be collected and processed in accordance with national and European law, then no explicit consent is required. This may be the case for some items related to employment and taxation for example and for many areas that the company is obliged by law.

2.5.4 Vital interests of the data subject

In case personal data is required for their protection vital interests of the data subject or other natural person, then this can be used as a legal basis for processing. Digea will maintain reasonable and substantiated evidence that this is the case whenever this reason is used as a legal basis for the processing of personal data. For example, this can be used in aspects of social care, especially in the public sector.

2.5.5 Data processing for the Public Interest

When Digea needs to perform a task that it considers to be public interest or as part of an official duty, then the consent of the data subject will not be requested. The evaluation of the public interest or official duty will be substantiated and put forward as evidence, if required.

2.5.6 Legal interest

If the processing of specific personal data is legal in the interests of Digea and is not considered to prejudice the rights and freedoms of the data subject, this can be defined as legitimate reason for processing. Again, the reasoning behind this view will be documented.

2.6 Privacy by Design

Digea has adopted the principle of privacy by design and will ensure that the definition and planning of all new or significantly changed systems that collect or process personal data will be subject to due consideration of privacy issues, including the completion of one or more data protection impact assessments.

The data protection impact assessment will include:

- Consideration of how personal data will be processed and for what purposes
- Assessment of whether the proposed processing of personal data is both necessary and proportionate to the purpose(s)
- Assessment of the risks to individuals in processing the personal data
- What controls are necessary to address the identified risks and demonstrate compliance with legislation

Use of techniques such as data minimization and pseudonymisation should be considered where applicable and appropriate.

2.7 Transfer of Personal Data

Transfers of personal data outside the European Union must be carefully reviewed prior to the transfer taking place to ensure that they fall within the limits imposed by the GDPR. This depends partly on the European Commission's judgement as to the adequacy of the safeguards for personal data applicable in the receiving country and this may change over time.

Intra-group international data transfers must be subject to legally binding agreements referred to as Binding Corporate Rules (BCR) which provide enforceable rights for data subjects.

2.8 Data Protection Officer

A defined role of Data Protection Officer (DPO) is required under the GDPR if an organization is a public authority, if it performs large scale monitoring or if it processes particularly sensitive types of data on a large scale. The DPO is required to have an appropriate level of knowledge and can either be an in-house resource or outsourced to an appropriate service provider.

Based on these criteria, Digea requires a Data Protection Officer to be appointed.

2.9 Breach Notification

It is Digea's policy to be fair and proportionate when considering the actions to be taken to inform affected parties regarding breaches of personal data. In line with the

GDPR, where a breach is known to have occurred which is likely to result in a risk to the rights and freedoms of individuals, the relevant Data Protection Authority (DPA) will be informed within 72 hours. This will be managed in accordance with our *Information Security Incident Response Procedure* which sets out the overall process of handling information security incidents.

Under the GDPR the relevant DPA has the authority to impose a range of fines of up to four percent of annual worldwide turnover or twenty million Euros, whichever is the higher, for infringements of the regulations.

2.10 Addressing Compliance to the GDPR

The following actions are undertaken to ensure that Digea complies at all times with the accountability principle of the GDPR:

- The legal basis for processing personal data is clear and unambiguous
- A Data Protection Officer is appointed with specific responsibility for data protection in the organization
- All staff involved in handling personal data understand their responsibilities for following good data protection practice
- Training in data protection has been provided to all staff
- Rules regarding consent are followed
- Routes are available to data subjects wishing to exercise their rights regarding personal data and such enquiries are handled effectively
- Regular reviews of procedures involving personal data are carried out
- Privacy by design is adopted for all new or changed systems and processes
- The following documentation of processing activities is recorded:
 - Organization name and relevant details
 - Purposes of the personal data processing
 - Categories of individuals and personal data processed
 - Categories of personal data recipients
 - Agreements and mechanisms for transfers of personal data to non-EU countries including details of controls in place
 - Personal data retention schedules
 - Relevant technical and organisational controls in place

These actions will be reviewed on a regular basis as part of the management review process of the Personal Data Protection Program.