

Privacy Statement

Privacy Statement on the protection of personal data in the context of the "ZEUS Electronic Voting" service

Details of the Data Controller:

"National Infrastructures of Research and Technology SA" (under the distinctive title "GRNET S.A")

Competent processing department:

ZEUS Support Team.

Data Controller's Contact Details:

helpdesk@zeus.grnet.gr

Scope of this Privacy Statement:

The National Infrastructures of Research and Technology SA (hereinafter "**GRNET SA**") is bound by the European Regulation 2016/679 of the European Parliament and of the Council 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, hereinafter "**GDPR**") and Law 4624/2019 (Government Gazette 137/A/2019) on "Data Protection Authority, measures of the implementation 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 transposition 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 the "ZEUS Electronic Voting" service, as well as the policies and procedures implemented by GRNET SA for the protection of the privacy of the "ZEUS Electronic Voting" service users. This Privacy Statement sets out the criteria as well as the terms and conditions, under which GRNET SA collects, processes, uses, stores and transfers the personal data of the service users, how the confidentiality of such data is safeguarded, as well as any law and/or regulation that is applied or enacted in accordance with EU and National data protection legislation and e-privacy laws, or any law that amends, replaces, enacts or consolidates any of the said laws, as well as any other applicable EU and National data protection and privacy laws as they may exist and apply, under applicable law.

GRNET SA reserves the right to modify and update this Privacy Statement, whenever deemed necessary, whereas any such updates shall become effective as soon as they are posted on the "ZEUS Electronic Voting" service website. For the purposes of this Privacy Statement, "the controller", the "processor", the "third party", the "supervisory authority", the "personal data", the "processing", the "data subject" shall have the meaning ascribed to them in the data protection law currently in force.

Moreover, for the purposes of the present, the following definitions shall apply:

- "Website" - the website accessible via the domain name <https://zeus.grnet.gr/zeus/> including any sub-websites thereof.
- "ZEUS Electronic Voting" - is an information system for the unassailable conduct of confidential polls/votings in an entirely electronic manner. Both the preparation of the voting by the Conducting Authority and the submission of vote by the voters is done remotely online.
- "The Zeus Electronic Voting" service is an information system offered as a service by GRNET SA – in the capacity of processor- to the Conducting Authority by providing a support team.
- "Conducting Authority" - The body conducting the voting.
- "User" - the online user of the ZEUS Electronic Voting service, whereto the data refer and whose identity is known or can be verified, namely it is directly or indirectly identifiable. In the context of the "ZEUS Electronic Voting" service, four distinct "User" categories are supported, distinguished on the basis to the user rights awarded to each category. The first user category is "Voters", the second is "Election Committee", the third category is "Administrator" and the fourth category is "Candidates":
 - "voter" - the online user of the "ZEUS Electronic Voting" service, who upon invitation by the "administrator" can cast an online vote.
 - "Election Committee"- the members of the Election Committee in the «ZEUS Electronic Voting» service are the key-holders of the voting process, namely the ones with capacity to decrypt ballots.
 - "Administrator" – the person, on the side of the "Conducting Authority" responsible for conducting the voting.
 - "Candidates" - the subjects who stand for election by the voters.

In the context of this Privacy Statement, the "Voters", the members of the "Election Committee", the "Administrator" and the "Candidates" are all understood under the term "User".

A. Purpose/-es for processing the collected data:

I. GRNET SA - as Data Controller - processes the personal data of the "Users" referred to in the next paragraph, for the following processing purposes:

- **For conducting an online voting through the "ZEUS Electronic Voting"**
 - Seamless operation of the service
 - Creation of an "Administrator" account
 - Improvement of the web experience during the online voting through the "ZEUS Electronic Voting".
- **For authenticating the "Administrator "**
 - Seamless operation of the service
 - Provision of technical support to "Administrators".

- **For authenticating "Users"**
 - Seamless operation of the service
 - Proof of connection and vote to "Users"
- **For communicating with "Users"**
 - Solution of connection problems
 - Sending e-mail updates to the "Election Committee" and/or the "Administrator", strictly in case of major changes in the operation of the information system requiring the execution of certain tasks by the "Election Committee" and/or the "Administrator" in order to continue the uninterrupted use of the electronic service.
- **For Communicating with the service Support Team**
 - Solution of interconnection problems
- **Creating statistical reports and graphs for monitoring the service**
 - Data in statistical reports and charts shall not contain any "Users" personal data to the extent that they result from anonymized information.
- **For providing the "ZEUS Electronic Voting" service**
 - Proof of acceptance of the Terms of Use and Notice of the Privacy Statement
 - Seamless operation of the service
 - Technical support

II. GRNET SA - as Data Processor - processes the Users personal data, mentioned in the following paragraph, for the following processing purposes:

- **For conducting an online voting through the "ZEUS Electronic Voting" information system**
 - Seamless operation of the service
 - Easy and user-friendly
 - Improvement of the web experience while providing the ZEUS system services
 - Solution of interconnection problems
 - Sending e-mail updates to "Voters" and the "Election Committee", upon relevant action taken by the "Administrator".
- **For the security of the Service**
 - Seamless operation of the service
 - Technical support to "Users"
 - Proof of connection and vote to "Users".

GRNET SA collects and processes "Users" personal data in the context of providing the "ZEUS Electronic Voting" service exclusively for the aforementioned purposes and only to the extent strictly necessary to

efficiently accomplish such purposes. Such data shall always be relevant, adequate and limited to what is necessary in view of the above purposes. They shall be accurate and where necessary, kept up-to-date;

Furthermore, such data shall be kept for no longer than it is necessary as mentioned hereinabove for achieving the purposes of the collection and processing and shall be deleted upon the accomplishment thereof (see below "*Data retention period*").

B. Categories of personal data processed :

1) For the use of the «ZEUS Electronic Voting» service by "users" and the efficient and lawful provision of such service, GRNET SA, processes - as Controller - the following personal data:

I. For conducting the online voting through the information system "ZEUS Electronic Voting "

- the Administrator's name
- the Administrator's contact details (e-mail)
- IP address wherefrom "Users" connect

II. For authenticating the "Administrator"

- The Administrator's username
The Administrator's password
The Administrator's title within the Conducting Authority

III. For authenticating "Voters"

- the IP address wherefrom "Voters" are connected to vote

IV. For the Users communication with the service Support Team (helpdesk)

- Name/surname
- Contact details (email)
- Title - Role.

V. For the security of the Service

- Timestamp - Proof of acceptance of the Terms of Use and the Notice of the Privacy Statement
- IP address wherefrom the "user" connects to the service
- Timestamp of the service use

2) GRNET SA - as Data Processor- processes the following Users personal data:

I. For conducting the electronic voting through the "ZEUS Electronic Voting" information system:

- "Users" e-mail address, more specifically the email address of the "Election Committee", the "Voters" and the "Candidates"
- Body of the "Election Committee"
- The public parts of the cryptographic keys of the members of the "Election Committee".
- "Voters" mobile phone number, if entered by the Administrator
- "Users" name/surname
- "Users" title-role

II. For the security of the service

- Timestamp of the service use
- IP address wherefrom "Users" connect for the voting

III. Special categories of personal data

- GRNET SA -as Data Processor- may collect, process, special categories of data, as set out in the provisions of the law currently in force, subject to data posted by the "Administrator" when conducting the voting.

C. Legal basis of the processing

The processing of "Users" personal data is necessary for the performance of the Agreement for the provision of the "ZEUS Electronic Voting" service, as set out in Article 6 par. 1 par. B of GDPR, and / or is necessary for compliance with a legal obligation to which the data controller is subject as defined in Article 6 par. 1 par. C of the GDPR.

D. Access to personal data:

For the provision of the "ZEUS Electronic Voting" service and the smooth operation of such service, access to the "Users" personal data is provided to the following associates of GRNET SA:

- To the "ZEUS Electronic Voting" service support team, consisting of personnel engaged in a project contractual relationship with GRNET SA and bound by a confidentiality agreement with the latter.
- To external partners, with whom GRNET SA maintains a contractual relationship for the provision of support services, bound by a Data Processing Agreement -DPA- with GRNET SA.

E. Recipients of personal data collected:

GRNET SA does not in any way assign/transfer or in any way disclose the personal data of the "ZEUS Electronic Voting" service "users" to any third party entities, private companies, natural or legal persons, public authorities or agencies or other organizations, other than as expressly set forth herein.

The personal data of "ZEUS Electronic Voting" service "users" may be disclosed or transferred to government authorities and/or law enforcement officials, if so required, for the aforementioned purposes, in the context of enforcing a court decision or complying with a provision of law, or if so required, to serve GRNET SA's legal interests as data controller, under the law currently in force.

It is noted that the personal data of the "Administrator" and the members of the "Election Committee" may be visible to "Voters" invited to participate in an electronic voting.

F. Rights of the data subjects:

GRNET SA, with regard to data processed in the context of providing the "ZEUS Electronic Voting" service - as Controller – proceeds, in accordance with the terms of the present Privacy Statement, to all such necessary actions both during the collection phase as well as during each subsequent phase of processing of the "ZEUS

Electronic Voting” service “users” personal data, so that each “user” has a full opportunity to exercise his/her rights, as guaranteed in the law currently in force, on the protection of personal data, e.g. the *rights of Access, Rectification, Erasure, Restriction of processing, Data Portability*, in accordance with the terms and conditions of applicable law.

To exercise any of the above rights, the “user” may contact the “ZEUS” Support Team at the following email address helpdesk@zeus.grnet.gr.

The aforementioned rights of the data subjects are subject to restrictions, in accordance with applicable law as in force.

GRNET SA - acting as Data Controller- shall provide the data subject with any information on action taken in response to his/her request to exercise any of the above rights, within one (1) month as of the receipt of such request. Said period may be extended by further two (2) months, in accordance with the terms of the law as currently in force.

GRNET SA, with regard to the processing of personal data performed in its capacity as data processor on behalf of the “Conducting Authority”, shall forward, with no delay, the request of the data subject and shall assist the “Conducting authority” in performing its obligation to respond to such request. **GRNET SA shall not be responsible for responding to the request of the data subject in such cases.**

G. Duration of the personal data retention period:

The personal data of “ZEUS Electronic Voting” service “users” shall be maintained for a period of time necessary in view of the needs of the service and the controls such service is subject to.

H. Confidentiality and Information Security:

GRNET SA carries out the processing of personal data in a way that ensures both the confidentiality and security thereof. All appropriate organizational and technical measures are taken for the security of the data and the protection thereof against any accidental or unlawful destruction, accidental loss, alteration, prohibited dissemination or access and any other form of unfair processing.

I. Contact:

For any question or clarification regarding this Privacy Statement as well as in case of any breach related to personal data issues, the “users” may contact the Competent Department of GRNET SA, at the email address referred hereinabove. In addition, they may contact the GRNET Data Protection Officer (DPO), and/or its deputy at the email address: dpo@grnet.gr.

J. Complaint:

In case a request filed by a "ZEUS Electronic Voting" service "user" is not satisfied by the controller, the "user" can appeal at any time before the Competent Supervisory Authority, the Data Protection Authority <http://www.dpa.gr>