

**HELLENIC AMERICAN EDUCATIONAL CENTER INFORMATION TO
GRADUATES
REGARDING THE PROCESSING OF PERSONAL DATA**

In accordance with Regulation (EU) 2016/679 General Data Protection Regulation hereinafter "GDPR", HELLENIC AMERICAN EDUCATIONAL CENTER (22 Massalias Street, 10680 Athens) hereinafter "HAEC" wishes to inform you on the following actions:

1. HAEC, in addition to personal data of persons who have graduated from HAEC ("data subjects" and / or "graduates" / "alumni"), collected during the period they participated in its educational programs, processes for as long as it is obliged or entitled as controller, the following personal data, for the following purposes: a) personal information, such as name, father's name, gender, date of birth, e-mail address, academic department, field of study, year of graduation, etc., b) audio data (voice) and image of the data subject in the context of relevant photography, videography or audio recording, for the creation of promotional material and / or any photograph and / or other material containing data provided by the data subject to HAEC and c) professional information, i.e. information concerning the work of the data subject he might disclose.
2. The source of the data is the data subject himself who discloses the aforementioned data.
3. The purposes of the processing of personal data processed by HAEC are, as appropriate, the following: (a) The general management of data subjects as graduates of HAEC (e.g. communication with data subjects for answering relevant questions / requests that may be addressed to HAEC, for the issuance of certificates / educational programs' certificates of attendance, etc.). The legal basis for the processing of the aforementioned data, is the consent of the data subject expressed through the relevant form i.e. the execution of the relevant agreement concluded with HAEC and the regulatory compliance of HAEC with the applicable legislation. (b) Conducting research on HAEC graduates (e.g. regarding their professional development). If HAEC is required to communicate with graduates in order to notify them of the research, the legal basis for the relevant

processing of their data is that such processing is necessary for the purposes of the legitimate interests pursued by HAEC (e.g. legitimate interests related to the evaluation of its services), which take precedence over the interest or fundamental rights and liberties of the data subject requiring the protection of personal data, and in the event that graduates participate in such researches, the legal basis of the processing of their relevant data (including those resulting from their responses), is the consent of the data subjects manifested by the relevant explicit positive action, i.e. the fact that they participate in the research. (c) Defending the interests of HAEC. Legal basis for the relevant processing of data is that such processing is necessary for the purposes of the legitimate interests pursued by HAEC, which take precedence over the interests or fundamental rights and liberties of the data subject which require the protection of personal data (e.g. for the establishment, exercise or defense of legal claims). (d) Sending promotional material via email. It is specified that HAEC is entitled to use the e-mail contact details of the data subjects obtained legally, in the context of the provision of its services or other transactions, for the direct promotion of similar services or by way of contribution to similar purposes, even when the subject has not given its prior consent, provided that it is clearly and unequivocally given the opportunity to oppose, in an easy and free manner, the collection and use of its electronic data and the collection of contact information in each message received. For the aforementioned data processing, the legal basis for such processing is that such processing is necessary for the purposes of the legitimate interests pursued by HAEC (i.e. legitimate interests related to the promotion of its services, sending of newsletters relating to upcoming events, scholarships, sponsorships and / or grants of educational programs, which take precedence over the interest or fundamental rights and liberties of the data subject which require personal data protection. (e) Finally, if the informed consent of the data subjects is obtained, HAEC will use their image and / or their voice, in the context of relevant photography, videography or recording and / or any photograph or other material with their data, which they have provided to HAEC, as material to be included in HAEC newsletters and / or for the creation of promotional material, which HAEC may use in its brochures, its website, its promotional videos or in any other way

for its promotional activities. HAEC for all of the aforementioned purposes does not make automated decision-making, including profiling of data subjects.

4. Personal data may be transmitted on a case-by-case basis and, depending on the purpose of processing, to HAEC authorized staff / department or, upon obtaining the consent of the data subject, may be incorporated into HAEC newsletters; be posted on the HAEC website or on third party websites, embedded in program brochures, which will be distributed either on paper or online or integrated into other program promotions (e.g. e-mail campaigns). Personal data may also be transmitted to HAEC partner companies with which HAEC has concluded partnership agreements and which will process data on its behalf (e.g. IT companies, IT service providers, etc.), in the context of their duties and under the obligation of observing, privacy, confidentiality and personal data legislation. In addition, HAEC may transfer personal data to third parties when required by law or for the purposes or in connection with legal proceedings in which it is involved, or otherwise for the purposes of upholding, exercising or defending its rights or to third party law enforcement agents and who have made a lawful request for data transmission or if he considers that transmission is necessary in connection with any investigation into the suspicion or existence of illegal activities. Personal data shall not be transmitted outside the European Economic Area.

5. Data retention duration is the time frame required or allowed by applicable law / the current regulatory framework, taking also into account the prescribed limitation period, which may extend up to 20 years. In particular: (a) when the processing is carried out under a relevant contract, personal data is stored as deemed necessary for the execution of the contract and the establishment, exercise and / or defense of legal claims of HAEC that may arise from this contract and (b) where processing is required by the provisions of the applicable legislation, personal data shall be retained for as long as the relevant legal provisions so require.

6. The data subject has the following rights under the GDPR: (a) to receive a copy of the personal data held by HAEC, accompanied by other information regarding data processing; (b) to request the correction of his data and, subject to conditions, request their deletion or restriction of processing, or scope of processing; (c) receive a copy or request that a copy of his personal data be transmitted to a third

party, in a structured, commonly used; and machine readable format (right to data portability). If data processing is conducted on the basis of the data subject's consent, he / she has the right to withdraw the aforementioned consent at any time without prejudice to the legality of the processing based on the consent prior to its withdrawal. If the data subject wishes to obtain further information / be informed on the processing of his / her personal data or to exercise any of the above rights, he / she must send an email to the HAEC Data Protection Officer at: privacy@haec.gr, or send a letter to the aforementioned mailing address. Finally, the data subject has the right to file a complaint to the competent supervisory authority regarding the way HAEC handles its data (www.dpa.gr).