

PRIVACY NOTICE

Dear Student,

We would like to inform you about the Personal Data Protection Procedure Perrotis College implements in accordance with Regulation (EU) No 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, known as the General Data Protection Regulation (hereinafter GDPR).

Definitions

All terms included in this Notice are interpreted as precisely defined in 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 (the General Data Protection Regulation) and in particular Article 4 thereof.

The following definitions in particular should be stressed:

- **“Personal data”**: 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”**: 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.
- **“Restriction of processing”**: the marking of stored personal data with the aim of limiting their processing in the future.
- **“Profiling”**: any form of automated processing of personal data consisting of the use of personal data to evaluate certain personal aspects relating to a natural person, in particular to analyse or predict aspects concerning that natural person's performance at work, economic situation, health, personal preferences, interests, reliability, behaviour, location or movements.
- **“Pseudonymisation”**: the processing of personal data in such a manner that the personal data can no longer be attributed to a specific data subject without the use of additional information, provided that such additional information is kept separately and is subject to technical and organisational measures to ensure that the personal data are not attributed to an identified or identifiable natural person.
- **“Filing system”**: any structured set of personal data which are accessible according to specific criteria, whether centralised, decentralised or dispersed on a functional or geographical basis.

- **“Controller”**: 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.
- **“Processor”**: a natural or legal person, public authority, agency or other body which processes personal data on behalf of the controller.
- **“Personal data breach”**: a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, personal data transmitted, stored or otherwise processed.

Data Processing

The processing of personal data shall be done by the American Farm School Post Secondary Educational and Training Association (**Thereinafter Perrotis College / Data Controller**), Tax Reg. No. 998072110 / Thessaloniki 7th Tax Office, whose registered offices are in Thessaloniki at Marinou Antypa Street No. 54, GR-57001, as duly represented, which as an educational institution operates as a Data Controller. It is mandatory to process your personal data, as recipient of educational services in order for Perrotis College to be able to provide its Services, pursuant to Article 6(1)(b) of the General Data Protection Regulation (GDPR) and national laws on the establishment and running of educational establishments. As recipient of educational services (hereinafter Data Subjects), your personal data will be processed by Perrotis College in accordance with the provisions of the GDPR (which Perrotis College is subject to as a Data Controller) and in particular the provisions of Article 5 on fundamental processing principles.

The personal data may be processed using Perrotis College’s automated processing systems and by specially authorised staff (non-automated processing). In the specific case where data is processed by a Data Processor, Perrotis College will ensure that technical and organisational measures are in place to safeguard the Data Subjects.

More specifically, Perrotis College may process personal data for the following purposes:

- The registration, transfer and studying of Data Subjects at the College (including participation in competitions, examinations, excursions, educational courses), including possible accommodation at the Residence Hall, and participation in educational, sporting, cultural and other activities run by Perrotis College.
- The safeguarding of students’ health at a personal level and the health of the educational community (students, the College’s academic, administrative and technical staff) for precautionary reasons and for handling medical emergencies given the nature of the studies. The collection and processing of health data takes place, only if the Data Subject gives his/her consent.
- The provision of a certificate of studies.
- The issuing of the necessary tax records.
- Communication with the Data Subject’s parents or Scholarship provider(s) (in case a Scholarship has been awarded to the Data Subject) to inform them about the academic progress and/ or the life as a student on campus of the latter (extra-curricular activities, any breach of the student handbook), whether via telephone, ordinary mail or email or sms. This communication happens if only the Data Subject gives his/her consent.

This list is indicative and may be adjusted to meet Perrotis College’s needs in order to optimise the educational services it offers.

Categories of personal data which are processed

Perrotis College processes personal data which is necessary to achieve specific purposes related to the provision of its educational services (such as personal data related to registration, studies, etc.).

The following indicative categories of personal data are processed:

a. Personal data relating to Data Subjects

- Data which identifies Data Subjects (such as name-surname, father's name, mother's name, home address, birth certificate, guardian, etc.) and other personal data specified in the legislation in force from time to time (Male Citizen's Registry Number or Municipal Registry Number, religion, ethnicity etc.)
- Data on the Data Subjects' academic performance, studies and conduct, which is required by the legislation in force from time to time (such as the detailed and general academic transcripts, mid-term and exam grades, absences, prizes, any learning difficulties, etc.).
- Data relating to the individual health records of Data Subjects and Vaccination Certification/Copy of Health Booklet.
- Data of the Data Subjects relating to health provided by themselves to adjust educational services to the data subjects' special needs.

b. Personal data relating to the person(s) financially responsible for the Data Subjects

- Data identifying the person who is **financially responsible** for the data subject (name-surname, father's name, home address, Tel. no., email address, correspondence address) and data required to issue lawful tax records (Tax Reg. No. – Tax Office, occupation).

c. Personal data relating to the Data Subject and processing thereof where the lawful basis for processing is consent

- Personal data relating to the Data Subject and specific materials (photographs and/or videos) which may be provided:
 - while the latter is studying at Perrotis College's facilities and from participation in other educational, sporting, cultural or other activities of Perrotis College (such as competitions, exams, events, presentations, games, awards, participation in activities, excursions, educational courses, etc.), **subject to the strict condition that the Data Subject consents to the said processing.**

The Data Controller intends to take and retain commemorative photographs and videos of you

- during your studies in Perrotis College premises
- during your participation in educational, sporting, cultural and other activities carried on at Perrotis College.

The purpose of this data is:

- Creating commemorative albums in hard copy and/or electronic format (including sound and image media) which will be distributed to the participants and will be kept on Perrotis College's records.
- Using the said data in presentations of the work of the Data Controller in academic colloquia and Perrotis College events.
- Posting photographs/videos to Perrotis College's website and social media accounts. .

- Sing the data in promotional activities (posting the above mentioned data in promotional flyers, posters, websites and the social media, etc.).

We would like to inform you that in case the Data Subject decides not to give his/her consent to the personal data being obtained and processed, this means that the Data Controller will exclude the Data Subject from participating in any group photos or videos.

Withdrawing your consent does not affect the legality of the processing which has already taken place (publication in albums, posting on websites, etc.).

- The Data Controller intends to inform the Data Subjects' parents or Scholarship provider (s) (in case a Scholarship has been awarded to the Data Subject) about the academic progress and/or the life of the Data Subject as a student on campus (extra-curricular activities, any breach of the student handbook), whether via telephone, ordinary mail or email or sms.
- The Data Controller intends to receive and process the data relate to the Data Subject's health in order to safeguard students' health at a personal level and the health of the educational community (students, the College's academic, administrative and technical staff) for precautionary reasons and for handling medical emergencies given the nature of the studies. The collection and processing of health data takes place, only if the Data Subject gives his/her consent.

Recipients of Personal Data

When providing its services Perrotis College may transfer personal data to the following recipients:

- Public authorities (Ministry of Education and its decentralised departments, the Independent Authority for Public Revenue, the Special Educational Needs Differential -Ordinary Diagnosis and Support Centres or similar public bodies).
- Companies or public/local authorities who act as internship providers.
- Parents
- Donors-Scholarship providers
- Judicial and prosecution authorities in the case were claims are filed or there are criminal acts.
- Other academic institutions (whether public or private) in case a student decides to continue his/her studies elsewhere and s/he exercises his/her data portability rights.

Personal data retention period

Perrotis College will retain and process the said personal data for the entire time during which the Data Subjects are recipients of educational services.

After the completion of studies by Data Subjects, part of the personal data will be retained for such time as there is an obligation to do so under the relevant Greek laws on educational and tax matters. Selected photographs of college activities may be retained in Perrotis College's historical archives where you (during such time you were a minor) do not exercise the right of erasure.

After the completion of studies by Data Subjects, Perrotis College may retain and update their contact details in order to provide updates about American Farm School and Perrotis College's activities (such as alumni events, workshops, charity events etc.). Moreover, Perrotis College can communicate with its alumni in order to inform them for services of their interest, such as the alumni office or career office or to ask them to participate in surveys related with Perrotis College and American Farm School Post Secondary Educational and Training Association (e.g. statistics of graduate prospects and employability) or in scientific

studies. Such communication will take place provided the Data Subjects have not exercised their right to object.

Data Subjects' Rights

You are entitled to submit a written request to Perrotis College to update, access, correct or erase data relating to you or to restrict the processing of data relating to you (including the right to object to processing), and have a right of portability, where that is feasible, in accordance with the provisions of Article 20 GDPR. Those rights can be exercised either by sending a letter to the address: Perrotis College, 54 Marinou Antypa St., PO BOX 60097 Thermi GR-57001 (Attn: Data Protection Officer, Mrs. Evangelia Rizou) or by email to Perrotis College's Data Protection Officer (dpo@afs.edu.gr). A response concerning your rights will be provided within a period of 30 days. You also have the right at any time to contact the Hellenic Data Protection Authority which accepts complaints either in written format at its protocol office (address: 1-3 Kifissias Ave., Athens, GR-11523) or in electronic format (www.dpa.gr).

According to the Authority's website, a complaint can be submitted to the Authority only after a complaint has first been submitted to Perrotis College.