# CHILDREN'S NOTICE FOR THE PROCESSING OF PERSONAL DATA

This notice is informing the signatories about the processing, by the association under the name "Network for Children's Rights", Alkamenous 11b, Athens, Data Protection Officer: Anastasia Karkoulia, phone: 210 8846590po, e-mail: dpo@ddp.gr ("Association"), both their personal data and the personal data of the minor children, the custody or the guardianship of which they have, as well as the information of their rights based on the General Data Protection Regulation (EU) 2016/679 ("GDPR") and the Greek legislation on personal data protection.

#### 1. PURPOSES AND LEGALIZATION OF THE PROCESSING

- 1.1. The Association processes the personal data of the Children in accordance with the GDPR and the Greek legislation on personal data protection:
  - **a.** For the execution of a contract and to the extent that the processing of personal data is necessary for this purpose (Article 6 § 1 b 'of the GDPR). In the context of a contract for the provision of social care or other services, the Association processes personal data of children and caregivers for the more specific indicative and not restrictively stated purposes:
    - The identification of these children and their caregivers during the contractual relationship.
    - The fulfillment of the obligations arising from the contracts with the children.
    - Communicating with children and their signatory caregivers.
  - **b.** In order to protect the legal interests of the Association (Article 6 § 1 of the GDPR) Where necessary, the Association processes personal data of children for the aim of the legal interests of the Association or third parties. Such processing takes place in the following cases of legitimate interests:
    - Ensuring the health and safety of children and their caregivers.
    - Ensuring hygiene and safety in the premises of the Association.
    - Evaluation and improvement of procedures of the Association for the best response to the needs of the children.
    - Research and / or analysis for better understanding of the needs, preferences, interests, experiences and / or habits of the children.
    - Improvement of the existing services and development of new ones for the benefit of the children.
    - Establishment, exercise and support of legal claims in favor of the children.
    - Ensuring the safety and confidentiality of the Association's technical systems for the protection of children's data.

- Child risk management strategy.
- **c.** When processing is necessary for health or social care and treatment purposes and this data is processed by or under the responsibility of a professional who is obliged to maintain professional secrecy under Greek law, the Association processes the above-mentioned special categories of children's data for the purposes of providing the above care and treatment to children (Article 9 § 2 i of the GDPR).
- **d.** For compliance with a legal obligation (Article 6 § 1 c) of the GDPR) or for the fulfillment of a duty performed for the public interest (Article 6 § 1 e) of the GDPR) The Association processes personal data of children for compliance with its legal obligations as indicatively with obligations arising from:
  - Tax legislation.
  - Social security legislation.
  - The administrative acts of supervisory authorities and bodies.
  - Legislation for non-profit public service providers.
  - Any other legal obligation of the Association.
  - The public interest.
- **e.** In order to ensure the vital interest of the children (Article 6 § 1 d of the GDPR) The Association may process personal data of the children and their caregivers, in order to ensure the vital interest of the children to the extent that such processing is necessary given the circumstances, in particular the health data of the children in the context of ensuring their health and safety.
- 1.2 The non-provision of personal data by the Caregivers or Children, which is necessary a. for the execution of the contract b. for the legal interests of the Association, c. for the compliance of the Association with a legal obligation or for the fulfillment of the duty of the Association that is performed for the public interest  $\kappa\alpha\iota$  d. in order to ensure the vital interests of the children, it may lead to the inability to provide them the relevant service. The Association processes personal data of the children and their caregivers exclusively for the purposes for which they were collected.

## 2. CATEGORIES OF THE RECEIVERS OF THE DATA

- 2.1. Receivers of the personal data of children within the Association are limited to the each time authorized staff and assignee to the Association and the processing is necessary for the fulfillment of the contractual and legal obligations of the Association towards children.
- 2.2. The Association does not transmit or disclose personal data of children to third parties outside the Association, except in the following restrictive cases::

- External collaborators, such as professionals in the field of children's education or mental health, etc.
- Companies to which the Association has assigned to partially or fully execution for its own account, the processing of personal data under the terms and conditions of the law, such as, among other things, companies organizing cultural, sports or educational events, online hosting and file storage companies, tax and accounting firms, experts, postal service providers, material support providers and production, development, support, service, parameter service and updating software providers.
- Employers and / or Donors for information on the progress of projects and services undertaken by the Association.
- Administrative or judicial authorities, if required by applicable law.
- Transmission or notification, imposed by law or court decision.

#### 3. TRASMISSION IN THIRD COUNTRIES OR INTERNATIONAL ORGANIZATIONS

The Association keeps the personal data of the children and their caregivers exclusively within the European Economic Area. The Association may use the services of processors based in a Third Country only if the processors provide appropriate guarantees for compliance with the level of protection of personal data within the European Union and provided that there is a written commitment to the standard conventional clauses, approved by the European Commission.

#### 4. RETENTION PERIOD

- 4.1. The Association retains the personal data of the children and their caregivers for as long as the purposes remain, for which they have been collected and reported above. The Association may retain personal data of these children and their caregivers even after fulfilling the purposes of collecting and processing them in the following restrictive cases:
  - If there is a legal obligation of the Association under a relevant provision of law.
  - For use before tax and social security authorities as well as any other auditing authority within the statutory limitation period.
  - If required for the good organization and operation of the Association provided that there has been data anonymization.
  - Until the limitation of the relevant claims for the defense of the rights and the legitimate interests of the Association in front of any competent Court and any other authority.
  - If there is an administrative or judicial dispute, which is directly or indirectly related to the personal data of the Child, until the issue of irrevocable court decision.

- 4.2. In particular, and without prejudice to the above, the Association keeps the following times for retention of personal data of children:
  - Five (5) years from the termination of the relevant contract regarding personal data of the child and its caregiver, who has concluded a contract with the Association
  - One (1) year from the collection regarding personal data of the child and its caregiver, which had no contractual relationship with the Association
  - Immediately after the expiration of the service contract regarding special categories of child data.
  - Twenty (20) years for the tax data of children and caregivers up to the limitations of the relevant obligations of the Association, deriving from the tax legislation.

### 5. RIGHTS

- 5.1. Without prejudice to applicable law, children and their caregivers have the right to access, update, correct, limit, delete, remove, portability and oppose their personal data and to appeal to the Personal Data Protection Authority (complaints@dpa.gr).
- 5.2. The above requests are addressed in writing by mail or e-mail to the contact details of the Association's Data Protection Officer(DPO), referred to herein

I HAVE A FULL KNOWLEDGE OF THE ABOVE	
	(Date, Name & Signature)