PRIVACY AND PERSONAL DATA PROTECTION POLICY

Donation-based Crowdfunding Platform of the National and Kapodistrian University of Athens

1. Introduction

The National and Kapodistrian University of Athens (“NKUA” or the “University”) recognises the importance of protecting the privacy and personal data of natural persons who visit or use the online Donation-based Crowdfunding Platform.

This Policy describes how the personal data of the Platform's visitors, users and donors are collected, used, stored and protected.

Processing takes place in accordance with the General Data Protection Regulation (Regulation (EU) 2016/679 - GDPR), Greek Law 4624/2019, Greek Law 3471/2006 where applicable, and other relevant legislation.

This Policy supplements NKUA's general personal data protection policy.

2. Data controller

The controller of personal data collected in connection with the operation of the Platform is:

National and Kapodistrian University of Athens

Address: 30 Panepistimiou Street, 106 79 Athens, Greece

Website: https://www.uoa.gr

Data Protection Officer (DPO) contact details:

Email: dpo@uoa.gr

The details of the Data Protection Officer and the competent departments are updated in accordance with official NKUA announcements.

3. Categories of personal data

Depending on how the Platform is used, NKUA may collect and process the following categories of data, insofar as they are necessary and actually collected by the application:

a) Identification and contact information

Full name, legal entity name, legal representative details, email address, postal address and telephone number.

b) Tax and financial identification information

Tax identification number, billing details or other information required to issue lawful documentation and fulfil tax or accounting obligations.

c) Donation and transaction information

Donation amount, date, supported activity, transaction number or identifier, payment status and information necessary for reconciliation with the payment provider.

d) Technical data

IP address, browser and device information, technical logs, security data and operational cookies, where used.

e) Communication data

The content of messages, requests or reports submitted to the competent departments of the Platform.

NKUA applies the principle of data minimisation and does not seek to collect information that is unnecessary for a specific and lawful purpose.

4. Purposes and legal bases of processing

Personal data are processed for the following purposes:

a) Recording and administration of donations

For the submission, recording, completion and administrative management of donations and related communication with donors.

Legal basis: Article 6(1)(b) GDPR, where processing is necessary for pre-contractual steps or contractual performance, and/or Article 6(1)(e), where it takes place in the exercise of NKUA's lawful public responsibilities.

b) Compliance with legal obligations

For keeping financial and accounting records, fulfilling tax obligations, carrying out donation acceptance procedures and meeting prescribed publicity obligations.

Legal basis: Article 6(1)(c) GDPR.

c) Technical operation and security

For protecting information systems, preventing unauthorised access, managing security incidents and ensuring the proper operation of the Platform.

Legal basis: Article 6(1)(c) or (e) GDPR, depending on the particular processing activity.

d) Updates and optional communication

For sending optional updates about future University activities, initiatives and opportunities for support, provided that the required lawful consent or other applicable legal condition has been secured.

Legal basis: Article 6(1)(a) GDPR, where processing is based on consent.

e) Optional public recognition of donors

For publishing a donor's name or legal entity name in an optional list of supporters, where specific and freely given consent is provided.

Legal basis: Article 6(1)(a) GDPR, for natural persons.

Optional recognition is distinct from mandatory disclosure required by law.

The final allocation of a legal basis to each processing activity is confirmed by the competent departments and the Data Protection Officer.

5. Recipients of personal data

Access to personal data is restricted to persons and departments that require it to perform their lawful duties.

Recipients may include:

- Authorised administrative and financial departments of NKUA.
- The departments responsible for the financial management of donations.
- The payment service provider and cooperating financial institutions.
- Providers of technical support and hosting for the Platform.
- Public authorities and audit bodies, where disclosure is required by law.

Providers acting as processors are bound by appropriate contractual obligations in accordance with Article 28 GDPR.

NKUA does not sell donors' personal data to third parties.

6. Processing of payment data

Payments through the Platform are made using the electronic payment services available at the relevant time.

Card or other payment instrument details are entered, transmitted and processed in accordance with the technical implementation and security policies of the relevant provider.

The University processes only the transaction information necessary to administer and document donations.

More specific information about the payment provider, its capacity as controller or processor, and the storage of card details is communicated on the basis of how the service actually operates.

7. Data retention

Personal data are retained only for as long as necessary to fulfil the purposes of processing and applicable legal obligations.

Financial, accounting and tax data are retained in accordance with the specific periods prescribed by applicable legislation and the University's record-keeping rules.

Data submitted on the basis of consent are retained until that consent is withdrawn or the relevant purpose has been completed, unless a different legal retention obligation applies.

Technical logs are retained in accordance with documented periods based on security and operational needs.

The specific retention period, or the criteria for determining it, for each category of data is established by the competent NKUA departments.

8. Rights of data subjects

Every natural person whose data are processed is entitled, subject to the conditions of the GDPR:

- To request access to data concerning them.
- To request the rectification of inaccurate or incomplete data.
- To request the erasure of data where provided for.
- To request restriction of processing.
- To object to processing where the applicable legal basis provides for this.
- To exercise the right to data portability where the relevant conditions are met.
- To withdraw consent at any time, without affecting the lawfulness of prior processing.

The exercise of these rights does not always entail an obligation to erase information that the University must retain by law.

To exercise their rights, interested parties may contact the NKUA Data Protection Officer at dpo@uoa.gr.

9. Security of personal data

NKUA implements appropriate technical and organisational measures to protect personal data against unauthorised access, loss, alteration, unlawful disclosure or destruction.

These measures are determined according to the nature of the data, the processing risks and the capabilities of the technological infrastructure used.

Access to data is restricted to authorised persons and is subject to appropriate security and confidentiality rules.

10. Cookies and related technologies

The Platform may use cookies or related technologies necessary for its operation, transaction security and management of user sessions.

Where cookies that are not strictly necessary are used, such as certain analytics or promotional cookies, they are installed only in accordance with the legal requirements for information and consent.

Users receive more specific information about cookie categories, purposes, providers and storage periods through the Platform's Cookie Policy and related settings.

11. Transfers outside the European Economic Area

If operation of the Platform requires personal data to be transferred to a country outside the European Economic Area, the transfer takes place only where the conditions of Chapter V GDPR are met.

Where required, information is provided about destination countries, transfer safeguards and how to access those safeguards.

12. Publicity of donations and privacy protection

Protecting donors' personal data is a fundamental principle of the Platform's operation.

Disclosure of donor information is limited to cases where it is mandatory under legislation or covered by another appropriate legal basis.

In particular, acceptance of donations by the competent University bodies may entail obligations to publish information under the “Diavgeia” transparency programme, in accordance with applicable legislation.

Any option to display a donation anonymously on the Platform's public page does not remove any obligations concerning identification, accounting records or lawful disclosure.

13. Automated decision-making

The ordinary administration of donations does not envisage decisions producing legal effects for data subjects based solely on automated processing, including profiling, within the meaning of Article 22 GDPR.

If such functions are introduced, the Policy will be updated and the prescribed information provided.

14. Right to lodge a complaint

Any natural person who considers that the processing of their personal data infringes applicable legislation is entitled to lodge a complaint with the competent supervisory authority:

Hellenic Data Protection Authority

Website: https://www.dpa.gr

The right to lodge a complaint does not restrict other administrative or judicial rights.

15. Amendments to the Policy

NKUA may update this Policy to reflect changes in legislation, technological infrastructure or actual processing activities.

The updated version is published on the Platform, indicating the date of the latest amendment.

In the event of substantial changes, additional information is provided where required by law.

16. Contact

For questions about personal data protection or the exercise of the rights provided for:

National and Kapodistrian University of Athens

Data Protection Officer (DPO)

Email: dpo@uoa.gr

Website: https://www.uoa.gr

This Policy takes effect after completion of the prescribed review and approval procedure by the competent bodies of the University.