



# **Privacy Policy**

## **Hellenic Industrial Property Organisation**

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## Introduction

The Hellenic Industrial Property Organisation (Organisation) according to article 1 of the Greek Law 1733/1987 is a legal entity of private law and has the following purposes:

- a. Granting patents, utility model certificates, and certificates of utility model examination, as well as issuing opinions according to Article 13, for non-conventional exploitation licenses.
- b. Registration of technology transfer agreements.
- c. Cooperation with relevant organizations of other countries, with international organizations, with research and technology institutions of the country, as well as maintenance of connections with organizations and information banks.
- d. Preparation and monitoring of the implementation of international agreements on patents, trademarks, industrial designs, and technology transfer agreements.
- e. Representation of Greece in European and international organizations, such as the European Patent Office (E.P.O.), the World Intellectual Property Organization (W.I.P.O.), the European Union Intellectual Property Office (E.U.I.P.O.), and in any corresponding union or international organization or body, regarding the powers exercised by it.
- f. Provision of advice and information regarding new technologies and know-how, subject to the provisions of the law on confidential registers, files, and books.
- g. Monitoring and recording the use of patents, innovations, and transferable technology in Greece and abroad.
- h. Classification of patents and technology transfer agreements by category of use, taking into account the applicable international criteria.
- i. Granting national trademarks, maintaining the trademark register, and generally exercising the competencies provided by national legislation for the trademarks, as well as exercising competencies related to the above in relation to trademarks.
- g. Collaboration with the Interministerial Market Control Unit (DIMEA) and other authorities for the control of illegal trade in counterfeit products.

This Privacy Policy (hereinafter the "Policy") concerns the Organisation (hereinafter "OBI") and the personal data it collects and processes for natural persons.

OBI is committed to protecting the confidentiality and privacy of Personal Data and complies with the relevant provisions of the "General Data Protection Regulation" hereinafter "GDPR",

while taking appropriate technical and organizational measures to protect the personal data it collects and processes, ensuring the legality of such processing.

## 1. Definitions

- **Personal Data:** Any information relating to an identified or identifiable natural person, such as: identification details (name, age, address, profession, marital status, etc.), physical characteristics, education, employment (work experience, work behavior, etc.), economic status (income, assets, economic behavior), interests, activities, habits, or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural, or social identity of that natural person.
- **Data Subject:** The individual (natural person) to whom the data refers.
- **Sensitive Personal Data or Special Categories:** Personal data concerning racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, health, sex life, criminal convictions and offenses, as well as the individual's participation in related organizations.
- **Health Data:** Personal data relating to the physical or mental health of a natural person, including the provision of healthcare services, and which reveal information about the person's health status.
- **Genetic Data:** Personal data concerning the inherited or acquired genetic characteristics of a natural person, obtained particularly from biological samples of that person, providing unique information about the physiology or health of that natural person.
- **Filing System:** Any structured set of personal data accessible by specific criteria, whether centralized, decentralized, or distributed on a functional or geographical basis.
- **Pseudonymization:** The processing of personal data in such a way that the 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 subject to technical and organizational measures to ensure that the data cannot be attributed to an identified or identifiable natural person.
- **Data Subject's Consent:** Any freely given, specific, informed, and unambiguous indication of the data subject's wishes, by which the data subject, either by a statement or by a clear affirmative action, signifies agreement to the processing of personal data

- **Data Breach:** The breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorized disclosure of, or access to, personal data transmitted, stored, or otherwise processed.
- **Data Controller:** The natural or legal person who determines the purposes and means of the processing of personal data.
- **Processor:** The natural or legal person, public authority, agency, or other body that processes personal data on behalf of the controller.
- **Processing of Personal Data:** Any operation or set of operations related to personal data, such as collection, recording, organization, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination, or otherwise making available, alignment or combination, restriction, erasure, or destruction.

## 2. Who is the Data Controller

The Hellenic Industrial Property Organisation is the data controller responsible for processing personal data, which is processed to fulfill its aforementioned purposes.

## 3. Principles We Rely On

The DPO adheres to the following principles of personal data processing (Article 5 GDPR):

- **Lawfulness, fairness, and transparency** - Personal data is processed lawfully, fairly, and in a transparent manner in relation to the data subject.
- **Purpose limitation** - Personal data is collected for specified, explicit, and legitimate purposes and is not further processed in a manner that is incompatible with those purposes.
- **Data minimization** - Personal data is limited to what is necessary in relation to the purposes for which it is processed.
- **Accuracy/data quality** - Personal data is accurate and, where necessary, kept up to date.
- **Storage limitation** - Personal data is kept for no longer than is necessary for the purposes for which it is processed.

- Personal data processed for archiving purposes in the public interest, for scientific or historical research purposes, or statistical purposes may be stored for longer periods. In such cases, appropriate technical and organizational measures are applied to ensure the rights and freedoms of the data subject.
- **Integrity and confidentiality** - We are committed to processing personal data securely, protecting it from unauthorized or unlawful processing, accidental destruction, or damage, and using appropriate technical or organizational measures.
- We commit to and adhere to the **Principle of Accountability**, demonstrating compliance with the above principles.

## 4. Collection of Personal Data

We collect information about you, among other instances, in the following cases, both through physical and electronic means, as follows:

- When you directly communicate with us, at OBI reception and service centers, through our call center, or our website, to request information about the services we offer.
- When you apply for the protection of your patent, trademark, or industrial design.
- If your personal data is transferred to us by an authorized attorney or third party regarding the submission of the above requests.
- **Before providing services to you**, in order to contact you and schedule the best possible assistance.
- We also **occasionally** collect data **from third parties** who may lawfully provide us with information about you or whose files we may lawfully access, such as our external partners, public services (administrative, tax, judicial, regulatory authorities, Insurance funds), or other Legal Entities or Public Law Entities.

We process personal data for the purposes, as outlined below.

Please help us keep your information up to date by informing us of any changes to your personal data.

## 5. What types of your personal data we collect?

The types of personal data we collect, maintain, and process about you are absolutely necessary, essential, and appropriate for achieving our intended purposes. The following categories of your personal data may be collected and subjected to further processing:

- **Identification data:** Full name, father's name, mother's name, ID number, Tax Identification Number (in case of financial transactions).
- **Address and contact data:** Residential or work address, contact phone number, email address.
- **Financial data:** We collect information about your payments in the context of monitoring programs and trainings provided by the OBI, your IBAN number, and issued invoices.
- **Curriculum vitae details:** Professional title, especially in the context of filing a patent or dependent invention application.
- **Special category data:** Nationality.

In Appendix 2: "Indicative Categories of Data," personal data that we process are presented indicatively.

## 6. Categories of Data Subjects

OBI's services are exclusively for individuals over 18 years old with full legal capacity.

## 7. Purposes of the processing and the legal basis

OBI processes your data for the purpose of providing you with its services, as outlined in the Introduction of this policy.

Processing is based on the following legal bases, according to Article 6 of the GDPR:

- processing is necessary for the performance of a contract to which the data subject is a party or in order to carry out obligations at the request of the data subject prior to entering into a contract
- processing is necessary for the compliance with a legal obligation of OBI
- processing is necessary for the performance of a task carried for reasons of public interest or in the course of the legitimate activities of the controller,
- in pursuit of the legitimate activities of the OBI
- with your consent to the processing of your personal data.

It is noted that OBI does not use automated decision-making processes.

The processing of your personal data is based on one of the "legal bases" referred to in Article 6 of the GDPR.

Processing of special categories (sensitive) of personal data is generally prohibited.

It is only allowed if it meets one of the conditions of Articles 9(2) and 10 of the GDPR.

The explanation of the legal bases for processing, as well as the conditions for processing special categories of personal data, is available in Annex 1 of this document.

## 8. For how long we keep your personal data

The personal data collected by OBI are kept for a predetermined and limited period of time, depending on the purpose of the processing, after which the data are deleted and/or securely destroyed unless there is explicit legislative regulation establishing a mandatory minimum period to keep them. The primary criterion for data deletion is the absence of a lawful reason for keeping them.

## 9. Recipients of Data

The personal data we collect may be transferred to third parties, provided that the legality of the transfer is justified.

OBI uses a variety of service providers who collaborate to provide the services mentioned.

Although the protection from cyberattacks of data transfer over the internet or a website is not guaranteed, both we and our partners work to maintain physical, electronic, and procedural security measures to protect your data.

## 10. Where Does the processing Take Place?

The personal data we collect and process are subject to processing within the European Union. If there is a need to transfer personal data to third countries (outside the European Union) or to international organizations, OBI undertakes to carry out such transfer, ensuring compliance with the provisions of Articles 44-50 of the GDPR, on a case-by-case basis.

## 11. Personal Data Breach

In the event of such a breach of the security and integrity of the personal data we keep, OBI will take the following measures, in accordance with Articles 33 and 34 of the GDPR:

- It will examine and evaluate the procedures required to limit the breach.
- It will assess the risk and the impact on the rights and freedoms of the data subjects.



- It will endeavor to mitigate the damage caused or potentially caused.
- It will notify the data subject of the personal data breach within 72 hours of becoming aware of the breach, if required.
- It will assess the impact on the subjects' privacy and take the appropriate measures to prevent the reappearance of the breach.

## 12. Your Rights as a Data Subject and How to Exercise Them

Every natural person whose data is subject to processing has all rights deriving from the General Data Protection Regulation (GDPR) and the applicable legislative framework, namely:

### **(a) Right to withdraw consent:**

In cases where the processing is based solely on your prior consent, e.g., for the purpose of receiving informational messages about the actions of OBI, you have the right to withdraw your consent at any time. The withdrawal of consent does not affect the lawfulness of processing based on consent before its withdrawal.

### **(b) Right of access:**

You have the right to know the data we process about you and to verify the legality of the processing. Therefore, upon request, you have access to the data and can receive additional information regarding their processing, to whom we disclose them, or for what purpose we process them.

### **(c) Right to rectification:**

You have the right to supplement, correct, update, or modify your personal data by submitting a request to the relevant department of OBI that maintains your personal data.

### **(d) Right to erasure (“right to be forgotten”):**

You have the right to request the deletion of your personal data when we process them based on your consent or to protect our legitimate interests. In all other cases (obligation to process personal data imposed by law), this right is subject to specific restrictions or may not apply depending on the case. In any case, we will examine whether your request can be legally satisfied.

### **(e) Right to restriction of processing:**

You have the right to request the restriction of processing of your personal data in the following cases: (i) when you contest the accuracy of the personal data, pending verification, (ii) when you oppose the deletion of personal data and request, instead of deletion, the restriction of their

use, (iii) when the personal data are no longer necessary for us, but are necessary for you to establish, exercise, or support legal claims, and (iv) when you object to processing pending verification of whether our legitimate grounds override your grounds for objection.

**(f) Right not to be subject to a decision based solely on automated individual decision-making, including profiling**

You have the right to object at any time to the collection and processing of your personal data in cases where, as described above, it is necessary for purposes of legitimate interests pursued by us, as data controllers. However, it should be noted that OBI does not engage in automated decision-making.

**(g) Right to Data Portability:**

You have the right to receive, free of charge, upon your identification, your personal data in a format that allows you to access them (PDF, Word, etc.), in order to use and process them with commonly used processing methods. Additionally, you have the right to request, where technically feasible, that we transmit the data directly to another data controller. This right exists for the data you have provided to us, and their processing is carried out by automated means based on your consent or in performance of a relevant contract.

In the event of exercising the aforementioned rights, the relevant requests will be forwarded to any third-party recipients to whom your personal data have been disclosed/transferred, as described above.

In the case of exercising any of the rights mentioned below, OBI is obliged to respond to you within one (1) month from receipt and verification of your request. This deadline may be extended by two (2) additional months, if necessary, taking into account the complexity of the request and the number of requests. In this case, OBI will provide you with relevant information regarding the extension within the prescribed period from the receipt of the request, as well as the reasons for the delay. If the request is submitted electronically, you will be informed in the same manner, unless you request otherwise.

The exercise of the above rights is free of charge for you, by sending a relevant request/letter/email to the Data Controller. Abusive exercise of the above rights (Article 12 §5) may result in the imposition of a reasonable fee.

If you are not satisfied with the use of your data by us or with our response to the exercise of your rights mentioned above, you are entitled to lodge a complaint with the Data Protection Authority.

You can exercise the above rights at the contact details provided below.

### 13. Contact Information of the Data Controller

For any matter related to the processing of your personal data and for the exercise of the aforementioned rights, you can contact OBI by phone at: +302106183542 (Monday - Friday 10:00-14:00). Email Address of the Data Protection Officer: [dpo@obi.gr](mailto:dpo@obi.gr) Mailing Address: 5, Gianni Stavroulaki , 15125 Paradissos Amaroussiou.

### 14. Contact Information of the Data Protection Authority

Phone: +30 210.64.75.600 Website: [www.dpa.gr](http://www.dpa.gr) Mailing Address: Kifisias Avenue 1-3, Postal Code 115 23, Athens.

### 15. Privacy Policy Update

The last revision took place on 01/12/2022.

## ANNEX 1: LEGAL BASIS FOR PROCESSING PERSONAL DATA

### **Simple personal data:**

According to Article 6 of the GDPR: Processing is lawful only if and to the extent that at least one of the following conditions applies: a) The data subject has consented to the processing of their personal data for one or more specific purposes. b) Processing is necessary for the performance of a contract to which the data subject is a party or in order to take steps at the request of the data subject prior to entering into a contract. c) Processing is necessary for compliance with a legal obligation to which the controller is subject. d) Processing is necessary in order to protect the vital interests of the data subject or of another natural person. e) Processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller. f) Processing

is necessary for the purposes of the legitimate interests pursued by the controller or by a third party, except where such interests are overridden by the interests or fundamental rights and freedoms of the data subject which require the protection of personal data, especially if the data subject is a child.

### **Sensitive Personal Data:**

According to Article 9 §1 of the GDPR, the processing of special categories of data is allowed only in specific cases defined by law, particularly when:

a) the data subject has given explicit consent to the processing of such personal data for one or more specified purposes,

b) the processing is necessary for the performance of obligations and the exercise of specific rights of the data controller or the data subject in the field of employment law and social security and social protection law,

c) the processing is necessary to protect the vital interests of the data subject or another natural person, if the data subject is physically or legally incapable of giving consent,

d) the processing is carried out, with appropriate safeguards, by a foundation, association, or another non-profit organization with a political, philosophical, religious, or trade union aim, provided that the processing relates exclusively to the members or former members of the organization or to persons who have regular contact with it in connection with its purposes and that the personal data are not disclosed outside that organization without the consent of the data subjects,

e) the processing relates to personal data which are manifestly made public by the data subject,

f) the processing is necessary for the establishment, exercise, or defense of legal claims or whenever courts are acting in their judicial capacity,

g) the processing is necessary for reasons of substantial public interest, based on Union or Member State law which shall be proportionate to the aim pursued, respect the essence of the right to data protection, and provide for suitable and specific measures to safeguard the fundamental rights and the interests of the data subject,

h) Processing is necessary for purposes of preventive or occupational medicine, assessment of the working capacity of the employee, medical diagnosis, the provision of health or social care or treatment, or the management of health or social systems and services on the basis of Union law or Member State law or pursuant to contract with a health professional,

i) processing is necessary for reasons of public interest in the area of public health, such as protecting against serious cross-border threats to health or ensuring high standards of quality and safety of healthcare and medicinal products or medical devices,

j) processing is necessary for archiving purposes in the public interest, scientific or historical research purposes, or statistical purposes pursuant to Article 89(1) based on Union or Member State law which shall be proportionate to the aim pursued, respect the essence of the right to data protection and provide for suitable and specific measures to safeguard the fundamental rights and the interests of the data subject.

Personal data referred to in paragraph 1 may be processed for the purposes referred to in point (e) of paragraph 2 when such data are processed by or under the responsibility of a professional

subject to the obligation of professional secrecy under Union or Member State law or rules established by national competent bodies or by another person also subject to an obligation of secrecy under Union or Member State law or rules established by national competent bodies.

## ANNEX 2: INDICATIVE PERSONAL DATA CATEGORIES

### **Identification Information:**

- Full Name
- Title (Mr./Ms.)
- Date of Birth
- Tax Identification Number (TIN)
- Identity Card Number

· Address

### **Contact Information:**

- Address
- Email
- Landline / Mobile Phone Number
- Fax

### **Professional Status Information:**

- Occupation
- Income (for personal)
- Registration Number in Associations, Unions, Chambers
- Financial behavior information (insurance, tax compliance)
- Tax-related information (TIN, Tax Office)

### **Payment Information:**

- Bank Account Number / IBAN
- Preferred payment method
- Credit/Debit Card Number

### **Identification Data (Indicative):**

- Contract number

- AMKA (Social Security Number in Greece)
- Date of Insurance Coverage

**Special Categories of Personal Data (Indicative):**

- Nationality
- Personal health data
- ...

**Application / Website / Social Media Data:**

If the interested party has registered or logged in, the following data may be used:

- Website visits
- Cookie data (subject to cookie policy acceptance)