

Personal Data Protection Framework

Regarding the policy to be followed for compliance with the General Regulation on Data Protection (Regulation 2016/679 of the European Parliament and of the Council of 27 April 2016), based on the new data and Relevant 1, we know the following:

A. Based on what has become known so far, there are some regulatory problems which are also of a technical nature regarding the telematics services of the Foundation, as it has arisen after its merger, with educational units from the former TEI of Peloponnese and Of Western Greece.

1) There is no newly established security policy in the Foundation, so that, among other things, it can be regulated:

- The security of all information contained in the Foundation.
- The issue of copyright, both the stored information and the copyrighted work in progress.
- The ownership of electronic files and the hierarchical rights and obligations of users. E.g., to whom the files belong and whether modifying or not providing them by users leads to penalties.
- Compliance with personal data and the measures and procedures to be followed in this regard.
- The controlled electronic access of all the staff of the institution but also of the legal parties with it, as well as the compliance obligations arising from this access.
- The division of actions in case of breach of security, but also the attribution of responsibilities, e.g., where the liability of the institution or its bodies ceases and where the liability of the personal user begins.

However, although the regulatory details governing such matters have not yet been clarified, technical measures have been taken and efforts are being made to renew, upgrade and extend them.

2) There are also regulations for the operation and compliance of the individual telematics and electronic services provided by the Foundation.

3) There are individual operating regulations of the Foundation regarding the processing, management and storage of information of both the produced academic work and the personal data of its members.

4) The Foundation, as an entity before the merger, is committed to complying with the new GDPR regulation on personal data, explicitly stating that "it is committed to protecting and respecting the privacy of users of its online services and complies with the General Data Protection Regulation (Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016). It does not disclose personal data to third parties and implements reasonable policies and technical and organizational measures to protect users' personal data".

5) Clearly the new situation requires attention, as to the procedures to be followed, since the technologies used for the remote examination now impose some additional safety valves which the institution must provide to reduce its risk and responsibilities, as they arise from the GDPR regulation.

B. Based on the above, it is proposed / declared:

1) The University of Peloponnese undertakes that it will comply with all those necessary procedures to ensure compliance with the GDPR, regarding the additional procedures that will be introduced through the distance examination. All personal data, which will result from the collection or processing, will not be used by the Foundation for any purpose other than that of the academic process of assessing student progress or for internal statistical tests.

2) Obtaining the consent of the student coming to the distance examination, regarding all the procedures of the institution. This consent will be given once for the specific examination period, it will be valid only for it.

3) In the same form once, the student will declare his compliance with the rules of procedure. At the same time, he will be informed about the administrative or legal sanctions that may be induced by his non-compliance with the procedure. E.g. Illegal video recording of the examination, which is provided as an opportunity by open platforms, imposes administrative as well as legal sanctions as it is contrary to the current legislation. Administrative and legal sanctions are also imposed for the trafficking of such illegal material by anyone, regardless of whether he made the recording himself.

4) As due to the special circumstances concerning the population practices for coronavirus protection, the student's personal data (temporary change of permanent residence, telephone contact details, etc.) may have been temporarily modified, it is suggested in the same form of the declaration of consent to complete the updated contact details of the student, which is the obligation of the institution for each obtaining new consent in the collection, processing and storage of personal data such as the GDPR.

5) The consent, compliance and information form can be downloaded electronically from the relevant website of the Institution and which must be submitted signed by the student, digitized in a scanner and with the original signature as provided by the website gov.gr via taxisnet.

6) In any case, the student will be given the opportunity electronically to submit a new statement, which will involve the modification of any of his personal data that changed during the procedure or the withdrawal of his consent from the 10 procedures, throughout the rest of its duration, with consequences to be determined by the institution. This new statement will be given at any time during the process by the student with a method similar to B.5 and will have as date the date of the certification system of the original signature of gov.gr.

C. This ensures:

1) The unhindered access of citizens to the data and the process that have a legal interest. [Article 15 of the GDPR Regulation]

2) Ensuring to the citizen that the personal data collected for this process will be protected from any other collection or processing for a purpose other than that collected. [Article 5 §1.b "Principles governing the processing of personal data: Collection for specified, express and lawful purposes"]

3) The obligation of collectors on up-to-date data regarding personal data. [Chapter II, Article 5, §1.d]

4) The validity period of the storage and processing of personal data to be collected. [Article 4 §3 "restriction of processing"]

5) The possibility of removing the consent of the citizens as they change their opinion with their right to be forgotten but also to inform them about the consequences that such a decision will have, always regarding the purpose of this extraordinary academic process. [Right of Correction (Article 16), Right of Deletion - Right to Oblivion (Article 17 - Right to be forgotten), Right of Objection (Article 21), Article 7 Conditions for Consent §3: "The data subject has the right to revoke consent of at any time "].