

Hellenic Public Administration Root Certification Authority (HPARCA)



Privacy Policy for Electronic Identification

Version 1.0

Publication history

Date	Version	Changes
30/6/2026	1.0	Original document

Privacy Policy

Introduction

This document constitutes the Privacy Policy for the electronic identification of the Hellenic Public Administration Root CA (HPARCA), which sets out the details of the processing of personal data during the provision of electronic identification services by HPARCA, in the context of the Greek electronic identification scheme (GReID scheme). Purpose of the scheme is the reliable electronic identification and authentication of users when accessing public and private electronic services, with a level of assurance determined in accordance with the applicable EU and national regulatory framework.

Under the scheme, HPARCA issues and manages the means of electronic identification, including the certificates supporting the operation of these means. These certificates for electronic identification (hereinafter referred to as 'certificates' or 'electronic identification certificates') are electronic certificates, which identify the holder of the certificate.

A. Collection & Processing of Personal Data

The Ministry of Digital Governance, and specifically HPARCA, as a Data Controller within the meaning of Regulation (EU) 2016/679 (General Data Protection Regulation - GDPR) fully complies with the regulatory framework governing the collection and processing of personal data. The HPARCA as an Electronic Identification Provider (eIDP) must collect the necessary information required for electronic identification.

The registration and identification of users in the online application of HPARCA for the issuance of electronic identification means is carried out through the electronic identification means issuance portal (eID Portal). The personal data, which are collected during the registration and verification of identity (identification), at the request of the user, and the legal documents, remain in the database (information system) of HPARCA for a period of seven (7) years from the date of expiry or revocation of the means of electronic identification, in accordance with Regulation (EU) 910/2014 (eIDAS), as in force, the Regulation on Electronic Identification of HPARCA, as well as Law 4727/2020, as amended by Law 5313/2026.

More specifically, HPARCA collects the following information for the above purpose: name, surname, father's name, mother's name, identification document details (identity card or passport or residence permit), identification document details, mobile phone, date of birth, VAT number. Information is also collected for communication with the natural person, including: e-mail address, home address (street, number, city, postal code).

For LoA High, identity verification is carried out by prior verification of all Subscriber Identification Data only in physical presence.

For LoA Substantial, the verification of the identity is carried out by prior verification of all the Subscriber's Identification Data either a) in physical presence, or b) by using remote authentication methods that provide the basic level of assurance in accordance with the requirements of Implementing Regulation (EU) 2015/1502.

In the case of remote identification, the following information is entered in the database (information system) of HPARCA: first name, surname, father's name, mother's name, e-mail address, contact telephone number, identification document details, date of birth, photo of the Identification Document, facial image (selfie) and the video. In case of issuance of electronic identification means, these data are kept for 7 years from the date of expiration or revocation/cancellation of them. In case the application is rejected or the citizen does not proceed with the final issuance/receipt of the means of electronic identification, the data is kept for 2 years from the date of remote identification. These data will be accessible for review by the Registration Authority of HPARCA. If for any reason the identification is not completed (e.g. interruption of the video call), no personal data is recorded or stored.

In remote identification, biometric data is processed by comparing facial features between the photo of the identification document and the facial image (selfie) submitted by the user, solely for the purposes of identity verification and issuance of the means of electronic identification.

The information collected by the HPARCA is used exclusively for the issuance, revocation and processing of electronic identification means, as defined in the Electronic Identification Regulation of the HPARCA, and is communicated to third parties, only with the explicit consent or after sufficient information of the natural person. In addition, at the request of the natural person, the HPARCA informs them about the data stored.

All the procedures provided for the issuance of electronic identification means are executed after the submission of a relevant application/declaration by the data subject (requester/subscriber).

The legal documents required for the issuance of the Certificates are described and stored in accordance with the provisions hereof, in accordance with the Electronic Identification Regulation of HPARCA, as well as the provisions of Law 4727/2020, as amended by Law 5313/2026.

The HPARCA and its online application [in terms of the technical requirements that ensure the protection of the personal data of the subjects (users)], have been harmonized with the General Data Protection Regulation and in particular article 32, par. 1 thereof and implement the appropriate organizational and technical measures in order to provide the appropriate level of security against the risks involved in the processing.

Processors. HPARCA may entrust the processing of personal data to third parties acting as "processors" on its behalf, in accordance with its instructions and exclusively for the specified

processing purposes. The processors are contractually bound to comply with appropriate technical and organizational security measures, to ensure the confidentiality of the data and not to carry out any further processing without its prior authorization HPARCA. HPARCA remains responsible for the overall compliance of the processing with the applicable legislation on the protection of personal data. The processing of personal data is carried out in accordance with the lawful bases provided for by the General Data Protection Regulation, including, where applicable, the consent of the data subject, the performance of a contract, compliance with a legal obligation or the pursuit of a legitimate interest of HPARCA. Data subjects are informed in a clear and transparent manner about the processing of their personal data, in accordance with the requirements of the General Data Protection Regulation.

Specifically, the processors in the context of the provision of this service are the following:

- a) INTELLISOLUTIONS S.A.: processes personal data related to remote identification, exclusively for the purpose of verifying the identity of the natural person.
- b) ADACOM S.A.: processes personal data related to the issuance, revocation, suspension, etc. electronic identification certificates (authentication certificates).
- c) PwC Technology Consulting Services P.C.: processes the personal data related to the eID portal for the issuance and lifecycle management of electronic identification means.
- d) Oracle Hellas Ltd.: processes personal data related to the list system of electronic identification means of natural persons.

The delegation to any sub-contractors is carried out only in accordance with the requirements of the GDPR and with the prior approval of the HPARCA, while the sub-contractors are bound by the same personal data protection obligations.

B. Objectives

The personal data collected by HPARCA in accordance with chapter A of this policy serve one or more of the following purposes:

- 1) The ability to verify the identity of citizens in accordance with the Electronic Identification Regulation of the HPARCA,
- 2) The receipt and processing of the application/declaration of the applicants for the issuance of electronic identification means by the HPARCA,
- 3) The processing of the necessary procedures for the issuance, revocation and lifecycle management of the electronic identification means issued by the HPARCA,
- 4) The creation and management of the account on the HPARCA web portal for the issuance of electronic identification means (eID Portal),
- 5) Compliance with procedures or requirements provided for the legal rights of users pursuant to law, or court decision;
- 6) The provision of technical support and resolution of issues that arise during the processing of the application for the issuance, revocation, suspension, etc. means of electronic identification,
- 7) To draw conclusions and results for statistical purposes;
- 8) Informing end users if this is necessary in accordance with the GDPR, Article 34.

C. Cookies Policy

HPARCA reserves the right to collect information automatically, when users visit the HPARCA web portal for the issuance of electronic identification means (eID Portal), using cookies. A cookie is a small file for which permission is requested by the user in order to be placed on the hard drive of the user's computer. After the user agrees, this file (cookie) is installed on his computer and helps to analyze the user's web traffic, which can be carried out by HPARCA or helps to adapt the operation of the page to the needs and preferences of the user.

Exception to the above obtaining of the user's consent, in accordance with par. 5 of article 4 of Law 3471/2006, are the cookies that are considered technically necessary for the connection to the website or for the provision of the internet service. This type of cookie is used by the HPARCA web portal for the issuance of electronic identification means (eID Portal).

HPARCA implements all appropriate technical and organizational measures to ensure the protection of users' personal information from unauthorized access, use, or disclosure. The personal information provided is stored on computer servers in a controlled, secure environment, protected from unauthorized access, use, or disclosure.

All submitted data is encrypted using the Secure Sockets Layer (SSL) protocol.

D. Linking to other websites

The HPARCA website may contain links to other websites. HPARCA is not responsible or has any control over these websites, which, moreover, are not governed by or apply this policy.

E. Subject's Rights

In accordance with the General Data Protection Regulation and the present, all users of HPARCA, as subjects of personal data, have the following rights:

- (a) Transparency in information, in accordance with the above,
- (b) Right to information when collecting data,
- (c) Right of access,
- (d) Right to rectification;
- (e) Right to time limitation of data storage, in accordance with the policy of this
- (f) Right to be informed about what personal data is collected and stored for the purposes mentioned above;
- (g) Right to the legal basis for processing (Article 58A of Law 4727/2020, as in force above under A').

In addition to the information referred to in Chapter A, the controller, when receiving the personal data, grants the data subject the right to submit a request to the controller for access and rectification or erasure of the personal data or restriction of processing concerning the data subject.

Users of HPARCA's services have the right to file a complaint for any violations of the above provisions before the Personal Data Protection Authority (HDP), in accordance with the procedure provided by the Authority.

The Data Controller of HPARCA makes every effort to facilitate the data subjects in exercising their rights, in accordance with the above.

Regarding the above rights of the data subject and their specific content, you can consult the website of the HDP¹ and the section "my rights".

F. Changes to the Privacy Policy

HPARCA reserves the right to modify this Privacy Policy at any time. Users should search for the latest version of the Privacy Policy in the HPARCA storage area at the email address: <https://pki.HPARCA.gov.gr/repository/gr/data-protection/>
<https://pki.HPARCA.gov.gr/repository>

G. Contact Details

Data Controller

Ministry of Digital Governance, Directorate of e-Government, Department of Trust Services:
APED@mindigital.gr

Data Protection Officer

Ministry of Digital Governance: dpo@mindigital.gr

¹ <https://www.dpa.gr/>

H. Definitions

Mount	Definition
eIDAS Regulation	Regulation (EU) No 910/2014 of the European Parliament and of the Council of 23 July 2014 'on electronic identification and trust services for electronic transactions in the internal market and repealing Directive 1999/93/EC', as amended by Regulation (EU) 2024/1183 of the European Parliament and of the Council of 11 April 2024 'amending Regulation (EU) No 910/2014 of the European Parliament and of the Council. 910/2014 on the establishment of a European Digital Identity Framework".
Registration Authority (AE)	An entity that has been approved by the HPARCA and assists the interested parties for electronic identification means during the submission of their applications, approves or rejects the registrations / applications as well as requests the Certification Authority to revoke electronic identification means.
Certification Authority (CA)	An entity that is certified to issue, handle, and revoke certificates or other means of electronic identification.
Identification data	A data set that allows the identification of a natural or legal person or a natural person representing other natural or legal persons.
Identity Verification	An electronic process that allows the confirmation of the electronic identification of a natural or legal person or the confirmation of the origin and integrity of data in electronic form.
Level of Assurance	The degree of trust in the identity invoked or declared by a person and designated in accordance with the relevant technical specifications, standards and procedures, including the technical controls governing the relevant electronic identification means, issued in the context of an electronic identification system. It is divided into low, basic and high as provided for in Commission Implementing Regulation (EU) 2015/1502.
Register or Apply	The electronic procedure described herein concerns the steps that the citizen must take in order to obtain electronic identification means.
Electronic Identification	The process of using personally identifiable data in electronic form that uniquely represents either a natural or legal person, or a natural person representing another natural person or a legal person.
Means of Electronic Identification	A physical and/or intangible unit, which contains personal identification data and is used for identity verification in an online service or, where applicable, a non-online service.
Electronic Identification Scheme	An electronic identification system under which electronic identification means are issued to natural or legal persons ₂ or to natural persons representing other natural persons or legal persons.