

Hellenic Public Administration Certification Authority (APED)



PRIVACY POLICY

Version 1.2

Version History

| Date | Version | Changes |
|------------|---------|---|
| 15/12/2021 | 1.0 | Initial Document |
| 14/5/2024 | 1.1 | Addition of remote authentication service. Typo fixes |
| 10/7/2025 | 1.2 | Clarifications on cookies in the context of the provision of services by APED, clarifications on the retention and storage period of personal data and on the subject's rights. |

Privacy Policy of APED

A. Data Collection

The Hellenic Public Administration Certification Authority (APED) fully complies with the regulatory framework governing the collection and processing of personal data. APED, as a Trust Service Provider, must collect the necessary information required for the issuance of Qualified Electronic Signature Certificates.

The registration and identification of users in the APED web application for the issuance of Qualified Electronic Signature Certificates is carried out through the authentication service of the AADE and the use of the relevant personal codes (TAXISnet). Personal data collected during the registration and identification for the issuance of Qualified Electronic Signature Certificates, upon request of the user, as well as legal documents, remain in the APED database (information system) for a period of seven (7) years from the date of expiration or revocation/cancellation of the qualified electronic signature certificate, in accordance with the Certification Regulation of APED, as well as the regulation of the National Telecommunications and Post Commission (EETT) No. 837/1B 2017 (Government Gazette 4396/B/14-12-2017).

More specifically, APED collects the following information for the above purpose: name, surname, father's name, mother's name, type of identification document (police identity card or passport or military identity card or passport), identification document details, mobile phone number, date of birth, VAT number. Information is also collected for communication with the natural person, including: email address, residential address (street, number, city, postal code).

In the case of remote identification, the following information is recorded in the database (information system) of the remote identification provider (INTELLISOLUTIONS S.A.): name, surname, father's name, mother's name, email address, contact telephone number, identification document details, date of birth, photo of the Identification Document and the video of the videoconference. This information is retained for 7 years from the expiry date or revocation date of the certificate if the certificate is issued, or for 2 years from the date of remote identification if the application is rejected. This information will be accessible for inspection by the Registration Authority of APED. If for any reason the identification is not completed (e.g. interruption of the video call) no personal data is recorded/ stored. In the event that the application is approved but the citizen does not proceed with the issuance/installation of the certificate, all the above information/Data is retained for forty-five (45) days from remote identification. Remote identification provider (INTELLISOLUTIONS S.A.), has also access to the following information during

identification, without it being recorded in its database: residential address (street, number, city, postal code).

The Remote Identification Provider (INTELLISOLUTIONS S.A.) ensures the protection of personal data, as described in the amendment to the contract No. 104/2023, in the Annex hereto, in paragraph G. "Protection of personal data". This paragraph is published in the APED repository (<https://pki.aped.gov.gr/repository/gr/data-protection/>) under the title "Protection of Personal Data for Remote Identification".

Information collected by APED is used exclusively for the issuance, revocation and processing of electronic signature certificates, as defined in the APED Certification Regulation, and is communicated to third parties, only with the explicit consent of the natural person. Furthermore, upon request of the individual, APED informs him/her of the data it has stored.

All the procedures provided for the issuance of Qualified Electronic Signature Certificates are carried out after the submission of a relevant application/declaration by the owner of the data (user).

The legal documents required for the issuance of Qualified Electronic Signature Certificates are described, maintained and stored in accordance with the provisions set forth herein, in application of the APED Certification Regulation as well as the provisions of the regulation of the National Telecommunications and Post Commission (EETT) No. 837/1B 2017 (Government Gazette 4396/B/14-12-2017).

For the ticketing service provided by APED to users for the issuance of Qualified Electronic Signature Certificates, identification is carried out through the authentication service of the AADE and the use of the relevant personal codes (TAXISnet). Information collected and stored to process support requests is the following: name, surname, email address, VAT number, year of birth.

APED 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 (GDPR, GDPR EU/2016/679) 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 posed by processing.

B. Purpose

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

- 1) Carrying out the necessary procedures for the issuance, revocation and management of the life cycle of certificates issued by APED,
- 2) Receiving and processing the application/statement of applicants for the issuance of Qualified Electronic Signature Certificates by APED,
- 3) Providing technical support and resolving issues that arise during the processing of the application for the issuance and/or revocation of Qualified Electronic Signature Certificates,
- 4) The ability to verify the identity of users and the right to use products or services in accordance with the Practice Statement of APED,
- 5) The creation and management of the account in the online application of APED for the issuance of Qualified Electronic Signature Certificates,
- 6) The submission of comments and/or requests for the resolution of technical issues,

- 7) The compliance with procedures or requirements provided for the legal rights of users pursuant to law or court decision,
- 8) The drawing of conclusions and results for statistical purposes,
- 9) Information end users if this is necessary in accordance with the GDPR, article 34.

C. Cookie Policy

Aped reserves the right to collect information about applicants for the issuance/revocation of Qualified Electronic Signature Certificates automatically, when visiting the website (www.aped.gov.gr) and the web application of the APED (<https://services.aped.gov.gr/apedcitizen/>, <https://services.aped.gov.gr/apedkep/>), using cookies. A cookie is a small file for which permission is requested from the user, in order to be placed on the hard drive of the user's computer. After the user agrees, this file is installed on his computer and the cookie helps in the analysis of the user's web traffic, in which APED may proceed or helps in adapting the operation of the page to the user's needs and preferences.

An exception to the above obtaining of the user's consent, in accordance with paragraph 5 of article 4 of law 3471/2006, are cookies that are considered technically necessary for the connection to the website or for the provision of the internet service. The website and the online application of the APED uses such cookies.

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

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

D. Links to other websites

The APED website may contain links to other websites. APED is not responsible for, and has no control over, these websites, which, moreover, are not governed by or implement this policy.

E. Subject's Rights

In accordance with the General Data Protection Regulation (GDPR, GDPR EU/2016/679) and this policy, all users of APED, as personal data subjects, have the following rights:

- a) Transparency in information, in accordance with the above,
- b) Right to information during data collection,
- c) Right to rectification,
- d) Right to time limitation of data storage, in accordance with this policy,
- e) Right to information on which personal data is collected and stored for the purposes mentioned above,
- f) Right to the lawful basis for processing (article 58 of Law 4727/2020, as also applicable above under A').

In addition to the information referred to in Chapter A', the data processing entity, upon receiving personal data, provides the data subject with the right to submit a request to data processing entity for access and correction or deletion of personal data or restriction of processing concerning the data subject.

Users of APED services have the right to submit a complaint for any violations of the above provisions before the Data Protection Authority (DPA), in accordance with the procedure provided for by the Authority.

The data processing entity makes every effort to facilitate 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 DPA¹ website and the section "my rights".

F. Changes to this Privacy Policy

APED reserves the right to modify this Privacy Policy at any time. Users should search for the most recent version of the Privacy Policy in the APED repository at the following address:
<https://pki.aped.gov.gr/repository>

G. Contact Information

Data Processing Entity

Ministry of Digital Governance, Directorate of Electronic Governance, Department of Trusted Services:
aped@mindigital.gr

Data Protection Officer

Ministry of Digital Governance: dpo@mindigital.gr

¹ <https://www.dpa.gr/>