

APPENDIX I – INFORMATION ON THE COLLECTION AND PROCESSING OF PERSONAL DATA

Subject of this Update

The respective municipality through this Update aims to inform users about the manner and purpose of processing their personal data when using the **Shared Bike System** provided by the Municipality.

Definitions

For the purposes of this Update, the following terms have the following meanings:

"Personal Data": any information relating to an identified or identifiable natural person ("**data subject**") the identifiable natural person is one whose identity can be ascertained, directly or indirectly, in particular by reference to an identifier such as a name, to an identity number, to location data, to an online identifier or to one or more factors that characterize the physical, physiological, genetic, psychological, economic, cultural or social identity of that natural person.

"Special categories of personal data": personal data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs or trade union membership, as well as the processing of genetic data, biometric data for the purpose of unambiguous identification of a person, data concerning health or data concerning a natural person's sex life or sexual orientation.

"Processing": any operation or series of operations carried out with or without the use of means, on personal data or sets of personal data, such as collection, recording, organization, structuring, storage, adaptation or alteration , retrieval, information retrieval, use, disclosure by transmission, dissemination or any other form of disposal, association or combination, restriction, deletion or destruction.

"Anonymization": the processing of personal data in such a way that the data can no longer be attributed to a specific data subject.

"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 separate and subject to technical and organizational measures to ensure that cannot be attributed to an identified or identifiable natural person.

"Processor": the natural or legal person, public authority, service or other entity that, alone or jointly with others, determines the purposes and manner of processing personal data; when the purposes and manner of of such processing are determined by Union law or the law of a Member State, or the specific criteria for its appointment may be provided for by Union law or the law of a Member State. In this particular case, the Municipality acts as the Data Controller.

"Processor": the natural or legal person, public authority, agency or other entity that processes personal data on behalf of the controller.

"Data Subject": the natural person whose personal data is processed, in this case the users of the Shared Bike System.

"Consent": of the data subject: any indication of will, free, specific, explicit and fully informed, by which the data subject expresses that he agrees, by statement or by a clear positive action, to be the subject of personal data processing concerning it.

"Personal Data Breach": the breach of security resulting in the accidental or unlawful destruction, loss, alteration, unauthorized disclosure or access of personal data transmitted, stored or otherwise processed.

"Existing legislation": The national and EU legislation on personal data protection and specifically the General Data Protection Regulation (EU) 2016/679 (hereinafter "GDPR"), Law 4624/2019 as well as the Authority's Decisions, Instructions and Opinions Protection of Personal Data (hereinafter "PDPA").

Data collected by the System in the context use and operation.

User data, processing purposes and legal basis

For the use and operation of the shared bicycle system, the system collects and further processes personal data, which it obtains from multiple sources through the electronic platform. Specifically:

Personal data	Source	Shit	Legal Base
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Name	The same the subject	Operation of the shared bicycle system and protection of the system against theft, damage, etc.	The processing is necessary for the execution of the contract & necessary for the fulfillment of a duty performed in the public interest (Article 6 para. 1 para. e GDPR & Article 5 Law 4624/2019)
Last name			
E-mail			
Mobile / Stationary			
Address			
Tk			
Father's name	Ministry Digital Government (Taxisnet)		The processing is necessary for the execution of the contract & necessary for the fulfillment of a duty performed in the public interest (Article 6 para. 1 para. e GDPR & Article 5 Law 4624/2019)
VAT number			
Location, traffic and parking metadata	From the bike	Protection of bicycles from theft, damage, etc.	Necessary for the fulfillment of duty which is performed in the public interest (article 6 par. 1 c. e' GDPR & article 5 Law 4624/2019)

Collection and processing of Personal Data of Minors

The service is not intended for persons under the age of 18. Therefore, the Municipality does not seek or receive personal data of minors (i.e. from persons under the age of 18), either directly or

indirectly through third parties. However, as it is impossible to always check the age of persons who may use the electric bicycles, it is recommended that parents and guardians of minors contact the Municipality immediately if they find any unauthorized disclosure of data by the minors for whom they are responsible , in order to respectively exercise the rights granted to them, such as e.g. to delete their data. In the event that the Municipality realizes that it has collected personal data of a minor, it undertakes to delete it immediately and to take all necessary measures to protect this data.

Receivers

The company “ **AMCO S.A. , which has been entrusted by the Municipality** with the processing of personal data on its behalf in the context of management and operation of the system for a period of one year from the receipt of the project by the Municipality, which is contractually bound to the Municipality with a confidentiality clause as well as being subject to all the obligations provided for by the Existing Legislation to respect the rights of the data subjects. If the Municipality assigns the management and operation of the system to a new contractor after the expiry of the contract, the Municipality is also bound by a confidentiality clause.

At the same time, the personal data of the users may be transmitted to employees of the Municipality in the context of their work, to public authorities, independent authorities etc. (e.g. Police departments, Prosecution Courts, Tax, Customs authorities, the APDPH, etc.) for a purpose for reasons compliance of the Municipality with its legal obligations.

Transfer of Personal Data outside the EU

As a rule, users' data are not transferred to countries outside the EU. However, in the event that users' personal data are transferred to a country outside the European Union (EU) or the European Economic Area (EEA), the Municipality first checks whether:

- a) The Commission has issued a relevant adequacy decision for the third country to which the transfer will take place (Article 45 GDPR) and
- b) Appropriate guarantees are observed in accordance with the Directives of the European Data Protection Board (EDPB) for the transmission of such data (Article 46 GDPR),
- c) It is based on one of the exceptions (e.g. the express consent of the user and information about the risks involved in the transfer, the transfer is necessary for the execution of a contract at the

request of the subject, there are reasons of public interest, it is necessary for support of legal claims and vital interests of the data subject, etc.) provided for in article 49, for occasional and non-repetitive processing.

Otherwise, transmission to a third country is prohibited and the Municipality will not transmit users' personal data to it, unless one of the special exemptions provided for by the GDPR applies.

Data Retention Period

The personal data of the users being processed is kept as long as the user's account is active. This means that for the performance of a contract, they are kept for as long as is necessary for the performance of the contract and for the establishment, exercise, and/or support of legal claims based on the contract.

When the processing is imposed as an obligation by provisions of the applicable legal framework or a specific retention period is provided, the personal data of the subjects will be stored for as long as the relevant provisions impose.

Security of Personal Data

Taking into account the latest technological developments, the cost of implementation and the nature, scope, context and purposes of the processing, as well as the different intensity and extent of risks of occurrence and seriousness for the rights and freedoms of the subjects from the processing of their personal data, the Municipality takes the necessary technical and organizational measures to protect the rights and freedoms of users. Although no method of transmission via the Internet or method of electronic storage is completely safe, the Municipality takes all the necessary digital data security measures (antivirus , firewall etc.), complying with its obligations according to the Existing Legislation.

Breach of Personal Data

In the event of an incident of breach takes place, the Municipality applies a specific Personal Data Security Breach Incident Management Policy. If you realize or suspect that a breach of personal data may/has taken place, please inform without delay the Department of Electronic Governance &

Transparency of the Municipality Planning Department at the respective municipality email address.

Users' rights regarding their personal data

The Municipality ensures that it is able to respond immediately to the requests of users as data subjects, for the exercise of their rights in accordance with the Existing Legislation.

In particular, each user is able to:

- a) Request access to his personal data held by the Municipality. More specifically, the user can request to receive a copy of the file kept by the Municipality with his personal data and to check the legality of their processing.
- b) Request the correction of his personal data in case of inaccuracy or incomplete registration by the Operator or the Municipality.
- c) Request the deletion of his personal data if they are not necessary for the purposes for which they were conducted and if their retention is not based on any legal basis or legitimate interest.

- d) Request restriction of the processing of his personal data.
- e) Request the portability/transmission of his personal data either to himself or to third parties.
- f) Revoke at any time the consent he gave for the processing of his personal data, without this revocation affecting the legality of the processing until then.

In addition, the data subject has the right **to object to the processing** of his personal data by the Municipality for the cases in which it is not possible to delete the data.

In case of exercising any of the above rights, the Operator or the Municipality will respond immediately - in any case within thirty (30) days from the submission of the request and the identification of the user - informing the user in writing of the progress of its processing.

For any complaint regarding this Update or personal data protection issues, users can contact the Greek Personal Data Protection Authority via the following link: [www . dpa . gr .](http://www.dpa.gr)

Contact Details for Personal Data Protection issues

To exercise all the above rights, as well as for any issue concerning the processing of personal data by the Bike Sharing System, users can contact the Operator or the Municipality's Personal Data Protection Officer.

More information regarding the collection and processing of personal data is available on the website of the respective Municipality.