



HELLENIC FOOTBALL FEDERATION/H.F.F.

Goudi Park, P.O. Box 14161
11510, Athens, Greece
(next to Badminton Theatre)
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Update:
January 2024

PRIVACY AND DATA PROTECTION POLICY

(In accordance with the General Data Protection Regulation (EU) 2016/679, on the protection of natural persons with regard to the processing of personal data / GDPR, as well as the respective Greek Law no. 4624/2029)

of the Hellenic Football Federation, as Data Controller and/or Processor of Personal Data.

The Hellenic Football Federation (hereinafter referred to as the H.F.F.) located in Athens, Goudi Park, P.O. Box 14161, Postal Code 11510, as the Processor on behalf of U.E.F.A. and F.I.F.A., but also as Data Controller for its domestic obligations, within the meaning of Articles 4 § 8,7 of the General Data Protection Regulation, collects and processes personal data within the framework of its legally established responsibilities and for its explicitly defined purposes. H.F.F considers your privacy seriously and appreciates the importance of maintaining the confidentiality of your personal data and other information processed. In fulfilling its purposes and activities and in compliance with applicable data protection laws, H.F.F. is committed to ensuring the confidentiality, integrity and availability of your personal data.

In the context of the General Data Protection Regulation (EU) 2016/679 (GDPR), which entered into force on 25/05/2018, as amended, this document provides useful information on how we collect, use, share and protect personal data and on the rights of data Subjects, in accordance with Article 13 of the aforementioned Regulation. H.F.F is fully compliant with the General Regulation (EU) 2016/679 of the European Parliament and of the Council on the protection of individuals with regard to the processing of personal data (GDPR).



1 **Preamble:**

In accordance with the General Data Protection Regulation:

- 1.1 **«personal data»:** means any information relating to an identified or identifiable natural person ('data Subject'); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person;
- 1.2 **«processing»:** means any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction;
- 1.3 The Hellenic Football Federation is a legal entity under private law, a third-tier non-profit association. According to article 1§5 of its Statutes, H.F.F. is the sole and exclusive authority for the organisation, administration, operation and management of Greek football and its representation in Greece and worldwide. H.F.F. is governed and operates exclusively on the basis of its Statutes and the rules and guidelines of U.E.F.A. and F.I.F.A.
- 1.4 According to article 15 of Law no. 4326/2015, as in force, *«Issues of football and the organization and operation of the football federation are regulated by the Hellenic Football Federation (H.F.F.), within the framework of its self-governing function in accordance with its Statutes and regulations, which must be in line with the Constitution, the applicable legislation, given that the H.F.F. manages its affairs independently and without influence from third parties, and in accordance with the regulations of the International and European Football Federations, of which the H.F.F. is a member».*
- 1.5 This Privacy Policy refers to and applies to the processing of your Personal Data by H.F.F. with or without the use of electronic means.
- 1.6 The protection applies to all personal data that have come or will come to the knowledge of H.F.F. in the context of its lawful operation and its cooperation with natural persons and public or private sector entities.
- 1.7 Please note that with regard to the online activity on the website of H.F.F. and the information on the processing of personal data and the provision of information on your rights as a data Subject, you should refer to the Privacy Policy of the website <http://epo.gr/>
- 1.8 In order to operate in compliance with the applicable legal framework, H.F.F. has undertaken a series of actions required, implementing the appropriate technical and organizational measures for the lawful maintenance, processing and safe retention of personal data files, so as to ensure and protect in every way the processing of personal data of natural persons, from accidental loss or leakage, alteration, unauthorized disclosure or any other unlawful processing.



2 Details of the Data Controller:

- 2.1 The Hellenic Football Federation (H.F.F.), based in Athens, Greece, is the Data Controller of the Personal Data that you have provided to us or that we collect about you, in accordance with this Privacy and Personal Data Protection Policy.
- 2.2 H.F.F. has assigned the duties of Data Protection Officer (D.P.O.) (article 37 GDPR) to the Legal Counsel/ MSc. Ms. Sdrolia Magdalini. You may address the Hellenic Football Federation & its Data Protection Officer (DPO) in writing to:

Hellenic Football Federation,
(next to the Badminton Theatre)
Tel. +30 210 930 6000
Fax: + 30 210 210 935 9666
E-mail: dpo@epo.gr

3 Categories of Personal Data:

- 3.1 The Hellenic Football Federation (H.F.F.) collects and processes the following categories of personal data:
 - 3.1.1 Identification data: full name, maiden name, ID, VAT, Social Security Number, date, place of birth, etc.
 - 3.1.2 Contact data: postal and e-mail address, fixed and mobile telephone number, etc.
 - 3.1.3 Payment data: bank account numbers, debit/credit, other bank cards, etc., either for the purpose of settling through them the fees or other financial obligations to the Federation, or for the crediting of amounts due or other amounts payable to you.
 - 3.1.4 Data necessary for the issuance of coach's diplomas, for the issuance of player's ID cards, for refereeing issues, as well as all such data necessary for participation in matches and training sessions. In this context, special data such as health data or data concerning medical treatment or medication may be processed.
 - 3.1.5 Data necessary, where applicable, for the issuing and granting of certificates and the processing and publication of decisions by the judicial bodies/decision-making bodies of the H.F.F.
 - 3.1.6 Data of the national teams and of the match officials.

4 Lawfulness of processing:

- 4.1 H.F.F., within the framework of its competences, collects, stores and processes personal data of natural persons for the purposes of exercising its legal competences and purposes, in accordance with its Statutes and in particular (but not limited to):
 - 4.1.1 For the licensing procedure of the Clubs.
 - 4.1.2 For the maintenance of a Register and issuance of players' ID cards.
 - 4.1.3 For the conduct of the transfers of football players, the registration of Intermediaries within H.F.F. and the registration of Match Intermediaries within F.I.F.A.
 - 4.1.4 For the keeping of match sheets, the participation of players in national team matches, the management of the accommodation and movement of players during national team



- matches, the registration of persons inside the stadium and the implementation of the sanitary measures to deal with the pandemic (covid regulations.)
- 4.1.5 For the organisation of refereeing in a system completely independent of any other body, public or private, and ensuring that it has sole responsibility on all matters of refereeing. For the maintenance of data records for all training courses for referees at the various levels, the identification of persons and the proper conduct of the football refereeing training process and the appointment of Referees/Assistant Referees/Observers in domestic and international competitions.
- 4.1.6 For the maintenance of an archive of certified football academies, the granting of certification of such academies, the organisation of Grassroots matches and the maintenance of photographic material of the matches.
- 4.1.7 For the organization and operation of a football coaching schools, the maintenance of a record of coaching instructors and the issuance of football coaches' diplomas as well as their renewal.
- 4.1.8 For the purpose of ensuring the integrity of matches.
- 4.1.9 For the sale of national team match tickets and the provision of invitations and complimentary match tickets.
- 4.1.10 In case you are a member of the Board of Directors of a club, CEO or representative of an S.A.(football Société Anonyme) your data are processed for the possibility of representing clubs and S.As, before H.F.F., before H.F.F. Committees, in Cup and Championships draws, before the Regional Amateur the Associations, etc. b) for the possibility of signing documents related to the issuance of players' ID cards, c) for the issuance of identity cards, certification cards, other certifications, etc., and d) for the imposition - and uploading on the dedicated website - of disciplinary sanctions imposed on team officials on the grounds of their participation in the sport.
- 4.1.11 For finding and possibly cooperating with sponsors and suppliers.
- 4.1.12 For the participation of volunteers in its competitions and events.
- 4.1.13 For the operation and security of the H.F.F. website and the management of communication through the website.
- 4.1.14 For the exercise, establishment or support of legal claims and the handling of the legal obligations of the H.F.F.
- 4.2 **Lawful grounds for processing your personal data also include:**
- 4.2.1 The actions we undertake to provide you with the services you expect and wish to receive from H.F.F., in accordance with its statutory purposes.
- 4.2.2 The consent you provide to us under the specific conditions set out in the legal framework. We assure you that under this legal basis we process your personal data solely for the purpose for which you provide your consent.
- 4.2.3 The processing of personal data carried out in the context of compliance with an obligation imposed by law. With regard, in particular, to the sport of football, Article 15 of Law no. 4326/2015 states that *«Issues of football and the organization and operation of the football federation are regulated by the Hellenic Football Federation (H.F.F.), within the framework of its self-governing function in accordance with its*



Statutes and regulations, which must be in line with the Constitution, the applicable legislation, given that the H.F.F. manages its affairs independently and without influence from third parties, and in accordance with the regulations of the International and European Football Federations, of which the H.F.F. is a member.” Consequently, all of the above provisions (originating either from state bodies or from private law bodies such as H.F.F.) form a "distinctive sporting regime", which is subject to the overall legal system.

- 4.2.4 The processing that is necessary for the purposes of the legitimate interests pursued by the Federation.
- 4.2.5 The processing is permitted if the personal data is necessary for the performance of a contract to which you are a party or in order to take measures at your request prior to the conclusion of the contract (Article 6 §1(b) GDPR).
- 4.2.6 H.F.F. carries out processing, collection and storage of "sensitive" Personal Data (as defined in Article 9 of the GDPR) only in specific cases and where required by law, its Statutes and the rules and guidelines of U.E.F.A. and F.I.F.A.
- 4.2.7 With regard to the installation of cookies for personalised browsing on our website, the legal basis is your consent pursuant to Art. 1 (a) of the GDPR.

5 Principles of processing:

- 5.1 Personal data shall be collected by the Federation for specified, explicit and legitimate purposes and shall not be further processed in a way incompatible with those purposes; further processing for archiving purposes in the public interest or for scientific or historical research or statistical purposes shall not be considered incompatible with the original purposes pursuant to Article 89 § 1.
- 5.2 The processing of personal data by the H.F.F. shall be governed by the principles clearly described in Article 5 of the GDPR.
- 5.3 The relevant Departments and the Standing and Ad Hoc Committees of H.F.F, in accordance with Article 42 of its Statutes, process Personal Data in accordance with the applicable legislation and in a transparent manner. In the context of transparency, we seek to inform you in a concise, understandable, clear and simple manner ("lawfulness, fairness and transparency").
- 5.4 The Personal Data provided to H.F.F. shall not be further processed in a manner incompatible with the purposes collected. These purposes are specified, explicit and legitimate, in the context of the smooth operation of the Federation and the effective provision of services to individuals ("purpose limitation").
- 5.5 H.F.F. only processes your Personal Data that is adequate, relevant and limited to what is necessary for the purposes for which it is processed ("data minimisation").
- 5.6 It is the aim of the institutions of the H.F.F. that your Personal Data processed is accurate and updated when necessary, taking all reasonable steps to promptly correct or delete inaccurate information taking into account the intended purposes of the processing ("accuracy").



6 Data collection:

Personal data, including any special data for the issuance of the various cards/certifications and match sheets:

- 6.1 are collected by the Data Subject, directly or through Regional Amateur Associations or through Clubs or football S.As.,
- 6.2 are communicated to H.F.F. by another international federation to which the Data Subject holds a footballer's or coach's or referee's ID card at the request of the Data Subject for the relevant transmission,
- 6.3 are sent to the H.F.F. by the authorised attorneys, the authorised intermediaries or through third parties having power of attorney,
- 6.4 are included in the notification of decisions of international judicial bodies, of the decisions issued by the judicial bodies/decision- making bodies of the H.F.F. or by its members.

In addition, the collection of information from the Subjects may include:

- 6.5 The direct collection of information from you when you submit requests, apply for participation in events or contract with H.F.F., by submitting a document, via phone, e-mail or fax, the collection of information during your visits to our websites and our online communication, the display of our online content, your subscription to our newsletter, or the use of our other services.
- 6.6 The transmission of Personal Data by the football clubs/members of the H.F.F. in order to serve the aforementioned purposes and to organise the operation of the H.F.F. in accordance with its Statutes.
- 6.7 Information from third parties: The personal data we collect may be combined with information that you register publicly, such as your contact details that you share publicly through your own websites, social media, your email newsletters, the forms you use in your transactions, your business cards and so on. Finally, we may receive your data from other free databases, such as business and telephone lists, in order to call you for contact.

7 Cookies, beacons and Similar Technologies:

- 7.1 As you browse a website, certain information may be passively collected (i.e., gathered without you actively providing it) through the use of various technologies and means, such as Internet Protocol addresses, cookies, Internet tags, and the collection of browsing data. We, as well as certain third parties that provide content, advertising or other features on our Services, may use these types of technologies in certain areas of our Services.
- 7.2 For more information you can refer to the Cookie Policy and check the Cookie Settings Panel for detailed information on cookies and other tracking technologies used on our website www.epo.gr. In this Policy, you will also find information on how to disable cookies and tracking technologies if you do not consent to their use. If you do not disable any cookies or other tracking technologies, we will infer your consent to their use. With regard to cookies in particular, you can withdraw your consent at any time and by simply



deleting them from your search engine and computer or by simply changing your online cookie settings. However, if you choose to refuse cookies, please be aware that you may not be able to fully use the services of the website or download certain material and/or access other links etc.

8 Terms of Third-Party Access to your Personal Data:

- 8.1 The information we collect from you is not transferred, sold, leased or otherwise disclosed to unauthorised third parties without your notice and consent. The recipients or third parties who have access to or to whom we may disclose personal data are primarily the following:
- 8.2 **Directorates, Secretariats, Committees and Employees of H.F.F.:** In order to provide you with the best possible service, we provide access to your personal data or specific categories of your personal data to our relevant and authorised staff. In this case, we make sure that we obtain contractual commitments (such as contractual clauses) from our staff to protect your personal data and maintain the confidentiality of your personal information.
- 8.3 **International Federations, foreign Associations etc.:** The relevant Departments of the H.F.F. depending on the case, within the scope of their competences, may also transmit your data to third party service providers (foreign Federations, Associations etc.) located either within or outside the EU, when this is deemed necessary for the execution of the Subjects' applications. Please note that some countries may not provide the same level of protection.
- 8.4 **Service providers and/or any third parties who carry out processing on our behalf:** We may share your personal data with affiliated companies and subcontractors, representatives or service providers who work for us or provide services to us, such as accountants, IT subcontractors, bulk emailing companies on our behalf, attorneys, postal service companies, etc. In any case, if during the execution of the contract, access or processing is provided to personal data of natural person / Subjects of H.F.F., then a confidentiality agreement is drawn up under the responsibility of the relevant departments, the terms of which are binding and form an inseparable part of the main contract.
- 8.5 We may disclose your information to **government bodies and agencies, courts, commercial or other dispute resolution bodies, supervisory and regulatory authorities**, for our compliance with applicable law, in cases where we consider that this would be permitted or required by law or regulatory or legal proceedings or in order to defend our or others' interests, rights or property.

9 Protection of Personal Data during International Transfer:

- 9.1 The H.F.F., in the context of its activities, as the supreme authority of football in Greece, may transfer your personal data to competent supranational or national federations in accordance with the law, the regulations of the H.F.F. and the regulations and instructions of the bodies of F.I.F.A. and U.E.F.A. The transfer of personal data, in cases where the recipients are located outside the European Economic Area, shall take place



where the European Commission has decided that an adequate level of protection is ensured by the third country, territory or one or more specific sectors in that third country or international organisation. No specific authorisation or consent is required for such a transfer, and this means that personal data can be freely transferred to these countries. In the absence of an adequacy decision under Article 45§3, the H.F.F. may transfer personal data to a third country or international organisation only if the Controller or Processor has provided appropriate safeguards through the drafting of standard DP clauses adopted by the Commission.

10 Retention of your personal information:

The period of time for which data is stored is determined on the basis of the following specific criteria depending on the case:

- 10.1 Where processing is imposed as an obligation by provisions of the applicable legal framework, your personal data will be stored for as long as the relevant provisions require.
- 10.2 Where the processing is carried out on the basis of a contract, your personal data will be stored for as long as necessary for the performance of the contract and for the establishment, exercise, and/or support of legal claims based on the contract. In addition, we will retain your Personal Data for as long as necessary until the limitation period for any claims has expired.
- 10.3 Especially in cases of volunteer work at Federation matches or various events, all personal data will be deleted if they are no longer necessary for the purposes for which they were collected, i.e. usually after the completion of the service, unless you have explicitly consented to a longer storage period or if the Federation is entitled or obliged to store the data for a longer period of time due to legal requirements.
- 10.4 Where the processing of your Personal Data is based on your prior consent, your Personal Data will be retained until the withdrawal of the consent you have expressly given us. This can be carried out by you at any time. Withdrawal of consent does not affect the lawfulness of the processing based on consent in the period prior to its withdrawal.
- 10.5 H.F.F. will process the personal data for as long as the Subject remains in football either as a football player or as a coach or as a referee or as a consultant or as a club or team representative. In any case, the data will be retained for a period of five (5) years from the loss of the status (player, referee, coach, etc.) in football. If the law or regulatory acts oblige H.F.F. to keep personal data for a longer period than the aforementioned, the retention periods will be extended accordingly. Finally, if until the expiry of this period, legal actions are in progress with the Hellenic Football Federation, which directly or indirectly concern you, the aforementioned retention period of the data held by the Hellenic Football Federation will be extended until the issuance of a final court decision. The documents bearing the signature(s) of the Subjects in which personal data have been recorded may, after five years, be kept in electronic digital form. After the aforementioned intervals, your personal data will be destroyed.



11 Information Security:

- 11.1 H.F.F. has taken reasonable organisational and technical measures to protect your personal data that it collects in connection with its purposes and services and in particular any special category (sensitive) personal data that is collected. Our IT partners follow international standards and practices in order to ensure the security of our facilities and the encryption of data. However, although we take reasonable steps to protect your personal data, security cannot be completely guaranteed against all threats.

12 Your Rights:

Under the Personal Data Protection legal framework, you have all the following rights:

- 12.1 Right to information: You have the right to be informed about the collection and use of your personal data.
- 12.2 Right of access: You have the right to receive from H.F.F. confirmation as to whether or not your personal data is being processed and, if so, you have the right to access the personal data in a short, understandable, transparent and easily accessible form.
- 12.3 Right to rectification: You can also request H.F.F. will ensure that without undue delay it will correct inaccurate or incomplete Personal Data, including through a supplementary statement, providing any necessary document from which the need for completion or correction arises.
- 12.4 Right to erasure: You have the right to request from H.F.F. the erasure of the Personal Data concerning you, without undue delay and we are obliged to proceed with the deletion, under the conditions stipulated by law and if either the above-mentioned retention period has passed, or if it is data that does not concern the participation of football activities directly or indirectly, nor in proving or establishing or documenting rights or obligations that directly or indirectly derive from it.
- 12.5 Right to restriction of processing: You have the right to request from H.F.F. to limit processing activities only to specific purposes, under the conditions set by law.
- 12.6 Right to object: You have the right to object, at any time and for reasons related to your particular situation, to the processing of personal data concerning you. The Federation will no longer process the personal data, unless it demonstrates compelling and legitimate reasons for the processing which override your interests, rights and freedoms or to establish, exercise or support legal claims.
- 12.7 Right to data portability: You have the right to receive the personal data concerning you, which you have provided to us, in a structured, commonly used and machine-readable format, and the right to request the transfer of the data to another Controller without objection, under the conditions set by law.
- 12.8 If the processing of Personal Data concerning you is based on your prior consent for one or more specific purposes, you have the right to withdraw your consent at any time, without this affecting the lawfulness of the processing based on the consent before its withdrawal.



12.9 Automated individual decision-making & profiling: H.F.F. does not subject your Personal Data to automated processing, including profiling, which produces legal effects that concern you or significantly affect you in a similar way.

H.F.F. will satisfy any of your requests in accordance with the conditions set by law. The ability to exercise a right granted to you by law does not always imply the ability to fully satisfy it, especially when there are other legal provisions that limit it. If we are unable to fulfill your request, we will inform you of the reasons.

13 How you can exercise your rights:

13.1 H.F.F. respects your rights to your personal data and facilitates your exercise of them. Any request regarding personal data and the exercise of your rights must be addressed in writing to H.F.F. and its Data Protection Officer (DPO) using the following contact details:

Legal Counsel (MSc.) /Data Protection Officer (D.P.O.):

Ms. Sdrolia Magdalini

Contact Details:

Hellenic Football Federation),

(next to Badminton Theatre)

Tel. +30 210 9891843

Fax: + 30 210 210 935 9666

E-mail: dpo@epo.gr

13.2 Once the legitimacy of your request has been verified, we will respond to your request within thirty (30) days of receipt. In the event that an extension of the above deadline is required to investigate and/or process your request, we will inform you, accordingly, explaining the reasons why an extension of the deadline is necessary.

13.3 If no notification is provided (Article 31 §1 of Law no. 4624/2019) due to the existence of a temporary impediment, the Federation, taking into account the specific circumstances of the processing, will provide the necessary information within a reasonable period of time after the removal of the impediment, within a period of two (2) weeks.

14 Right to apply to the Hellenic Data Protection Authority:

14.1 In any case, if you feel that your personal data protection has been violated in any way, you have the right to lodge a complaint to the Hellenic Data Protection Authority on issues relating to the processing of your personal data. For the competence of the Authority and how to lodge a complaint, you can visit its website (www.dpa.gr / My rights / File a complaint), where detailed information is available.

15 Processing for Other Purposes:

15.1 H.F.F. may further process personal data for a purpose other than the purpose for which the personal data were collected in accordance with article 24 of Law no. 4624/2019. In this case, we will provide you, prior to any further processing, with any necessary



information, in accordance with the applicable legal framework, for this purpose and any other necessary information.

16 Update:

16.1 This Policy may be amended in accordance with applicable law or so as to achieve best practices.

16.2 In the event that the above terms are subject to any change, notification will be provided via the Federation's website at <http://epo.gr/>.
(Section: Personal Data Protection.)

17 Availability:

This Policy:

- It is posted on the H.F.F. website <http://epo.gr/>.
- It shall be displayed in a visible place on its headquarters/premises.
- It shall be available to everyone in hard copy upon request.

18 Final provisions:

18.1 The above terms and any amendment thereto are governed and supplemented by the Greek legislation, the Law no. 4624/2019, the European Union legal framework and the relevant international treaties. Any provision of the above terms that is contrary to the law, shall automatically cease to be valid and shall be considered as not valid, without affecting the validity of the other terms.