Athens, 06-07-2022 Prot. No.: 1479 DECISION 27/2022 (Department) of the President of the Authority, Constantinos Menoudakou, The Personal Data Protection Authority met as a Department via teleconference on 11-05-2022 at the invitation of Its President, in order to examine the case referred to in the present history. Georgios Batzalexis, Deputy President, was present, as the substitute member was hindered, Maria Psalla as rapporteur, replacing regular member Grigorios Tsolia, who, although he had been legally invited in writing, was absent due to disability, and the substitute members Nikolaos Livos and Demosthenes Vougioukas in replacement of regular members Charalambos Anthopoulos and Konstantinos Lambrinoudakis respectively, who, although they had been legally invited in writing, were absent due to disability. The meeting was attended, by order of the President, Eleni Kapralou, legal auditor - lawyer, as assistant rapporteur and Irini Papageorgopoulou, employee of the Authority's administrative affairs department, as secretary. The Authority took into account the following: "Center for Social Protection-Solidarity, Education With the no. prot. C/EIS/5417/26-08-2021 his complaint to the Authority A (hereinafter "complainant") complains about the legal entity under public law with the name and Environment of the Municipality of Alexandroupolis" with the distinguishing title "Polysocial" (hereinafter "complainant") for the loss of documents, specifically two medical opinions that concerned him and had been submitted as attachments (with his consent) to an application submitted to the complainant by 1 Kifisias Ave. 1-3, 11523 Athens T: 210 6475 600 E : contact@dpa.gr www.dpa.gr of the new coronavirus the measures to limit the spread of his wife, B, who works as a social worker in the "..." Program of Municipality X. In particular, the complainant's wife submitted to the complainant, an application with matter of "execution of back office service", which received the first number..., due to the fact that her husband and the complainant belong to the vulnerable groups, also according to (DIDAD MINISTRY of .A11). In particular, in her application, the complainant's wife had included as attached documents the medical opinion of the General Hospital ... with reference no. complainant and the disease from which he suffers. Subsequently, in the month of ... it was verbally announced by the complainant to the complainant's wife that the two above medical opinions had been lost. Subsequently, on ..., the President of the complainant with her document no. first... asked the wife of the complainant to provide "the necessary supporting documents, which justify the back office work". Following this, the complainant submitted the application no. ... for the granting of copies, namely copies of the above two medical opinions concerning him, to which the complainant replied that "On ... the application with the attached documents was delivered to the Head of Department ... C, who received them signed. A copy of the application was kept in the incoming file of the administrative service, without the attached medical opinions, for the protection of personal data, which, since they

did not concern the employee of the service, were not included in her personal file." However, as the complainant claims, this response does not 1 See https://diavgeia.gov.gr/doc/%CE%A9%CE%A9%CE%94%CE%A946%CE%9C%CE%A4 %CE%9B6- 2%CE%9E%CE%A7? inline=true) and in particular: "A.1 Redefining groups of increased risk (...) Finally, it is recalled that based on the decisions of the above competent Committee, on which the relevant circular instructions of our Service have been issued, in the event that employees of the State live with people who belong to the groups of increased risk for serious infection of COVID 19, they take all the necessary measures in order to protect the health of their loved ones, just like the general population, without, however, being entitled to a special leave of absence, in the absence for the moment relevant need and forecast. However, and in the context of the effective management of the human resources that serve in each organization, it would be possible to assess this particular circumstance by the competent administrative body and to examine the possibility of employing these employees in tasks that do not require daily contact with public (back office)'. 2 the exact path of his personal data and it cannot be ascertained who is their owner at this time, due to the flawed procedure followed by the complainant in the management of the submitted application. He even claims that the above two medical opinions seem to have been lost. It is noted that for the above incident, a Sworn Administrative Examination (SOE) was ordered with the document no. The Authority, in the context of the examination of the above complaint with its document No. G/EX/2139/27-09-2021, requested from the complainant clarifications on the complainants, and specifically to let it know in particular: a) the procedure which follows the complaint regarding the filing and placing in folders of all kinds of incoming documents in general, whether in physical (paper) or electronic form, as well as in particular what procedure was followed in this case for the processing of the above two medical opinions concerning the complainant, b) whether and in what way the complainant responded to the above request of the complainant for the granting of copies of the above two disputed medical opinions (attaching the relevant request and his response), mentioning at the same time, in case of non-response, the reasons for the delay and c) if the Sworn Administrative Examination (SAR) has been completed, and in case of an affirmative answer, to provide a copy of the relevant report. In response to the above, the complainant sent the Authority under no. prot. C/EIS/6533/11-10-2021 his document, with which he specifically argued: That the correspondence is received by the Director ..., who duly charges the document and gives it to the secretariat to be recorded and the handling and archiving. That the clerk of the secretariat makes the photocopies corresponding to the charge, delivers them and the receiving clerk signs with the date he received them on the original document, which is placed in the Inbox folder. That when there is the designation

"CONFIDENTIAL" by the Director then it is filed in the CONFIDENTIAL ADMINISTRATIVE DOCUMENTS or CONFIDENTIAL SOCIAL SERVICE DOCUMENTS folder, depending on the content of the document. That in this case, the clerk of the secretariat who 3 processed the application with the attachments, did not hand over the document-application for classification to Mrs. Pr/ni ... (the Director ... was absent on sick leave), but handed over the application in writing with the attached medical opinions to the Director of ... C, where the applicant organically belongs. That subsequently, the complainant's wife was verbally informed of the approval of her application for an employment service in tasks that do not require daily contact with the public (back office) by the manager of G. That on ... of ... when the President of of the complainant wanted to review the right of the complainant's wife for employment service in duties, for which daily contact with the public is not required (back office), it was established that the medical opinions were lost, as well as that the employees involved were summoned to an apology in the context of the Preliminary Examination by the President of the complainant herself and two of them filed memoranda. Finally, he asserted that with her letter No. ..., the President of the complainant imposed the penalty of a written reprimand on ... employee D and Assistant Director ... C for the disciplinary offense of simple negligence, recognizing two, the mitigating factor of the very short period of time they served in the respective positions. It is noted that the disciplinary penalty imposed on employee D concerned her failure to keep copies of the documents attached to the request, while the disciplinary penalty imposed on employee C concerned the granting of a verbal order to work for employment in duties, for which it is not required daily contact with the public (back office), without any relevant decision being made by the Board of Directors. The Authority called with no. prot C/EX/425/15-02-2022 and C/EX/426/15-02-

2022 calls both parties to a hearing, via teleconference, so that they can be heard at the meeting of the competent Department from 23-02-2022, giving a deadline for the submission of any memoranda to further support their claims until 11-03-2022, which was then extended of the complainant's request until 03-22-2022. At the above meeting, the complainant appeared in person, and on behalf of the complainant, the attorney-at-law Mr. Christos Fotiadis, ..., and, in case there was a need for 4 further clarifications, Ms. Alexandra Poirazidou, Chairman of the Board of Directors and E, Deputy Head … . Subsequently, both parties involved timely submitted their pleadings. In particular: The complainant in his memorandum document No. G/EIS/3786/09-03-2022 states that in accordance with articles 4 and 8 of PD 480/1985, the documents listed as attachments to each main document they follow the retention time of the main document and that the destruction time is indicated in the body of the main document, which is placed after the lapse of three years. Also, that the illegal actions of the complainant do

not constitute an isolated or random event, because - as he claims - they are described as a permanent tactic of the Polycommunity Management. He further pleads that the complainant belatedly raises the allegation of destruction of the two medical reports and points out that the complainant failed to draw up the required destruction protocol and did not follow the strict procedure for documents governed by special confidentiality. He adds that any premature destruction of them is not justified, given that these two medical opinions were the legal basis for the employment of his wife in tasks that do not require daily contact with the public ("back office") and would serve in a possible audit, since during the critical period all employees, and those who had been placed in employment in tasks, for which daily contact with the public (back office) is not required, were recorded in the electronic application "attendance log", according to a circular of the Ministry of Internal Affairs. Finally, it states that the President of the complainant issued the no. first ... her document on the pretext - as there was no reason to review his wife's application, given that the medical opinions related to unchangeable conditions of his health - still, and if he wanted to assume that it really falls under the duties of the superior to seek at any time from the employee the supporting documents certifying a fact, the issuance of the above document cannot be considered as a mere coincidence, since it was issued only four days after his wife was verbally informed that these opinions had been lost. 5 The result of all the above, according to his claims, is that his sensitive personal data has escaped the control of the controllers. Finally, the complainant submitted both in writing and orally to the Authority a request for copies of all the documents in the case, including the documents related to the conduct of the Sworn Administrative Examination (SOE). On the other hand, the denounced legal entity in the case number C/EIS/4740/18-03-
2022 document his memorandum states that "his constant tactic is the destruction of documents and the data contained in them, those that are not useful and necessary for the operation of his services, in accordance with the law". Also, that both the applications and the approvals were not recorded in the service file of each employee, due to the particularity of the situation that prevailed at that time due to covid (reduced staff) and that after the application of the complainant's wife was approved, it was not deemed necessary from the service to keep the medical opinions that did not concern the employee herself, but her relative. The complainant claims that copies of the disputed medical documents were not given to the complainant because they had been destroyed. In fact, the complainant points out that it was never established, nor was there a previous case of violation in any way of the legislation on the protection of personal data, that, even if it wanted to consider that there is a violation of the law from the "loss-destruction" of the complainant's personal data, the he was informed immediately, as well as

that with the imposition of the relevant disciplinary penalties on the employees involved, the complainant believes that something similar will not be repeated in the future. Finally, regarding the complainant's request to the Authority for the granting of copies of the documents in the case file, including the administrative procedure (EDE) that was initiated, the complainant invokes the Authority's incompetence to decide on the said request, with the argument that this cannot be considered as a request to exercise the right of access of the data subject due to the fact that these documents do not constitute personal data, to which any interested party can have access. 6 The Authority, after examining all the elements of the file and after hearing the rapporteur and the assistant rapporteur, which assistant rapporteur left after the discussion of the case and before the conference, after a thorough discussion, OUGHT IN ACCORDANCE WITH THE LAW 1. According with the provisions of Articles 51 and 55 of the General Data Protection Regulation (EU) 2016/679 (GDPR) and Article 9 of Law 4624/2019 (Government Gazette A´ 137), the Authority has the authority to supervise the implementation of the provisions of GDPR, this law and other regulations concerning the protection of the individual from the processing of personal data. 2. Furthermore, according to article 4 par. 2 GDPR as processing of personal data means, among other things, "the dissemination or any other form of disposal of personal data", and in para. 7 of the same article of the GDPR, the controller is defined as "the natural or legal person, public authority, agency or other entity that, alone or jointly with others, determines the purposes and manner of processing personal data; when the purposes and the manner of such processing are determined by Union law or the law of a Member State, the controller or the specific criteria for his appointment may be provided for by Union law or the law of a Member State". Also, in the article 12 of the same article above, personal data breach is "a security breach that leads to the accidental or illegal destruction, loss, alteration, unauthorized disclosure or access of personal data transmitted, stored or otherwise processed". 3. In addition, in art. 5 par. 1 para. f of the GDPR states that: "Personal data: (...) f) are processed in a way that guarantees the appropriate security of personal data, including their protection from unauthorized or illegal processing and accidental loss, destruction or damage, using appropriate and confidential)". ("integrity of organizational technical measures or 7 4. According to article 5 par. 2 "The data controller bears responsibility and is able to demonstrate compliance with paragraph 1 ("accountability")". According to the principle of accountability2 , which the GDPR introduces in this article, the controller bears the responsibility and must be able to demonstrate compliance with the processing principles established in paragraph 1 of Article 5 of the GDPR. As follows from this provision , with the GDPR a new model of compliance was adopted, the central dimension of which is the principle of accountability in the context of which

the controller is obliged to design, implement and generally take the necessary measures and policies, in order for the data processing to be in accordance with In addition, the data controller is burdened with the further duty to prove by himself and at all times his compliance with the principles s of article 5 par. 1 GDPR. Accountability is, therefore, a mechanism to guarantee compliance with the principles governing the processing of personal data. Furthermore, the controller is obliged, based on the principle of accountability, to choose the appropriate legal basis and to legally document a processing carried out in accordance with the legal bases provided by the GDPR and the national data protection law. Thus, it constitutes the obligation of the data controller, on the one hand, to take the necessary measures on his own in order to comply with the requirements of the GDPR, and on the other hand, to prove his compliance at all times, without even requiring the Authority, in the context of conducting research- of its audit powers, to submit individual specialized questions and requests to ascertain compliance. The introduction of the accountability principle shifts the 'burden of proof', regarding the lawfulness of processing and GDPR compliance, from data protection authorities to the controllers or processors themselves. It should be noted that the adoption of appropriate technical and organizational measures for the implementation of accountability is taken into account 2 https://www.dpa.gr/el/foreis/arxi_logodosias. For more information on the principle of accountability: 8 when deciding on the imposition of an administrative fine, as well as on its amount. 5. Article 9 GDPR (Processing of special categories of personal data) states that: "1. The processing of data is prohibited of a personal nature (…) concerning health (…). 2. Paragraph 1 shall not apply in the following cases: a) the data subject has provided express consent to the processing of such personal data for one or more specific purposes, unless Union or Member State law provides that the prohibition referred to in paragraph 1 cannot be removed by the data subject". 6. Furthermore, Article 32 GDPR (processing security) states that "1. Taking into account the latest developments, the cost of implementation and the nature, scope, context and purposes of the processing, as well as the risks of different probability of occurrence and severity for the rights and freedoms of natural persons, the controller and the executor the processing implement appropriate technical and organizational measures in order to ensure the appropriate level of security against risks, including, among others, as appropriate: (…) a) the pseudonymization and encryption of personal data, b) the ability to ensure privacy, the integrity, availability and reliability of processing systems and services on an ongoing basis, c) the ability to restore availability and access to personal data in a timely manner in the event of a natural or technical event, d) procedure for regular testing, assessment and evaluation of the effect technical and organizational measures to ensure the security of the processing. 2. When assessing the appropriate level of security,

particular account shall be taken of the risks deriving from the processing, in particular from accidental or unlawful destruction, loss, alteration, unauthorized disclosure or access, transmitted, stored or otherwise processed. (...)". personal data that 9 7. On the other hand, Article 15 para. 1 GDPR "the data subject has the right to receive confirmation from the data controller as to whether or not the personal data concerning him is being processed (...) , while in paragraph 2 of the same article it is stated that "the data controller provides a copy of the personal data being processed". 8. In addition, according to article 37 par. 1 of the GDPR, "the data controller and the processor appoint a data protection officer in every case in which: a) the processing is carried out by a public authority or body (…)". Furthermore, in par. 7 of the same article above, it is stated that the data controller or processor publishes the contact details of the data protection officer and communicates them to the supervisory authority. 9. Finally, according to article 6 par. 5 of the Authority's Regulation of Operation: "Information provided to the Authority by any party in complaint cases may be shared with the other parties involved, with the exception of confidential information or if there is a case of safeguarding superior legal interests of third parties of persons or if the provision of information may substantially hinder the investigation of administrative, judicial, police or military authorities." 10. In this particular case, it appears that the two disputed medical opinions contained personal data and indeed, among other things, special categories of personal data (Article 9 GDPR). This data specifically concerned the health of the complainant and was related to his physical health, revealing information about his state of health, with reference to his medical history and the disease from which he suffers, information concerning an identifiable natural person (the complainant), whose identity can be directly ascertained (Article 4, para. 1 GDPR). At the same time, the complained public legal entity has the status of data controller, according to article 4 par. 7 GDPR, given that it only determines the purposes and method of processing personal data, which in this case is the examination - through the submitted request of the spouse of the complainant and her entry in a file, which includes the documents attached to her - the possibility of her employment in tasks that do not require daily contact with the public ("back office"). After all, this results from what is mentioned in the documents submitted by the complainant, but also based on the relevant information provided by the latter to the Authority. In this capacity, therefore, the data controller, the complainant, must carry out processing in accordance with the general spirit of the GDPR, as well as comply with the principles governing the processing of personal data (Article 5 GDPR), as well as the other obligations that he imposes on data controllers. 11. With reference to the data breach incident under consideration, it appears that the two medical opinions were lost. This is what the accused himself admits i) in no. prot. C/EIS/6533/11-10-2021 his written response to the Authority3,

where it is mentioned verbatim that: "On ... of ... when the President of the NP wanted to review the right of B for back office service, the loss of the medical opinions was established", but also ii) in no. first ... document of the complainant to the Decentralized Administration ..., where it is stated verbatim that: "The finding of the loss of the attached medical opinions arose when the President of the NP on ... of ... asked B again for the documents justifying the back office service'. The loss of the documents in question was, after all, the reason why the President of the accused Ms. Poirazidos requested with no. ... her letter from the complainant's wife to provide these documents, as they had to be placed again in her service file as necessary documents that founded and justified her placement in the specific employment position and had to accompany her submitted application. 12. Furthermore, it emerged that the allegation of the accused regarding the destruction of the disputed medical opinions, was presented first orally during the meeting, as well as with his written memorandum, and not 3 See the one with no. first ... document of the accused. 11 had been raised in any previous document, and especially in none of the two above pre-trial documents4. In fact, the position of the accused, as it was formulated both during the pre-trial, and in the written memorandum that he presented before the Authority after the end of the hearing, contains most of the contradictions, which the Authority points out, as follows: a. In no. first ... in his written response to the Authority, the complainant claims that the loss of the documents was discovered when its President wanted to "review" the right of the complainant's wife, a claim which, however, contradicts the claim later presented in the memorandum, where the complainant claims that "Due to the particularity of the situation prevailing at the time due to covid (reduced staffing), and because the back office work permits were not leaves of absence from work, but work in offices without access and communication with the public , without this being an official change because their job scope did not change, both the applications and the approvals were not registered in the official file of each employee. Given this fact, after the approval of the work in the form of back office, it was not deemed necessary by the service to keep the medical opinions that did not concern the employee herself but her relative. For this reason, like any other document that is not required to be kept in the service, they were destroyed." However, this last claim, according to which during the critical period the employees' applications were examined once, as they were not even registered in the employee's official file, contradicts the initially presented claim regarding the possibility of re-examining the applications. b. However, even if the above allegation of the complainant regarding the destruction of the disputed opinions could be considered true, which in this case is not proven at all, given that no destruction protocol or other similar is provided by the complainant 4 This allegation does not refer to the . first ... the complainant's response to the clarification document sent to him by the Authority, as well as it

is not mentioned in no. first ... document of the complainant to the Decentralized Administration ... . 12 evidentiary document5, and given that the President of the complainant had, as explained above, the possibility at any time to review the right of the wife of the complainant for employment in tasks, which do not require daily contact with the public (back office), it arises again that the disputed medical opinions would be useful in the event of a review and for this reason they had to be kept in the official the employee's file, together with her application, as documents that proved and established her above right, an issue related to the functioning of the services of the complainant, and not to be destroyed, since, moreover, it is a regular practice of the complainant - according to what the he claims the same – is to destroy only those documents that are not useful and necessary for the operation of his services. c. Finally, there is a logical inconsistency between what the complainant claims regarding, on the one hand, the management of the complainant's wife's application, which, according to his claims, was not registered in her official file, while the attached medical opinions were destroyed, as they were not required to be retained in the service6 and of the disciplinary penalty imposed on employee D, on the other hand, on the grounds that she failed to keep copies of the attachments to the request for medical opinions. In this case, it is accepted that the imposition of the disciplinary penalty on the specific grounds clearly demonstrates that the already lost medical opinions should have been kept in the service, the contrary, in fact, the complainant's claim about the destruction of said opinions lacks a logical basis, it is argued in retrospect, entirely pretextually, and is therefore rejected. 13. Following all of the above, the following conclusions emerge: 5 In accordance with the Authority's Directive no. 1/2005 for the safe destruction of personal data after the end of the period required to fulfill the purpose of the processing. 6 See the claim of the complainant in the document numbered ... sent in response to the Authority's explanatory document: "Given this fact, after the approval of the work in the form of back office, it was not deemed necessary by the service to keep the medical opinions which did not concern the employee herself but a relative of hers. For this reason, like any other document that is not required to be kept in the service, they were destroyed." 13 A) The process of managing, on the part of the complainant, requests that also contain personal data of special categories does not meet the level of protection of the GDPR and its general spirit, especially the principle of accountability. Also, the risks deriving from the specific processing from accidental or illegal loss were not taken into account when assessing the appropriate level of security, B) Furthermore, appropriate technical and organizational measures (Article 32 GDPR) were not taken when processing the data of complainant, in order to achieve the security of the data from prohibited dissemination or access, C) And the claim of the complainant that the documents were destroyed, is rejected as belatedly presented,

completely pretentious and unfounded, given that the accidental or illegal "destruction" and the " "loss" of the data are conceptually distinguished from each other as consequences of the data security breach (Article 4 c. 12 GDPR), and in the case of the first, the second is excluded, while the term "destruction" can also refer to the fate of the data after the expiry of the observance period. In fact, the complainant uses the term "loss-destruction" in his memorandum, which is indicative of his admission that he still does not have a clear picture of what ultimately happened to the disputed medical opinions, D) The complainant with his application with no. first ... to the complainant for granting copies of the medical documents exercised the right of access, which however was not satisfied, due to the already previous loss of the data (art. 15 GDPR), E) Following a relevant search in the register of Data Protection Officers kept by Authority, during the disputed time period, no communication of contact details of the Data Protection Officer was found by the above-mentioned complainant, as required in accordance with article 37 par. 1 and 7 of the General Data Protection Regulation (Regulation (EU) 2016/679 GDPR), F) Finally, regarding the complainant's request to be notified of the documents submitted by the complainant to the Authority, as described in his memorandum, but also in no. prot. C/EIS/2507/18-02-2022 14 his application to the Authority, the Authority partially accepts said request and decides to grant the complainant the complainant's response to the Authority's clarification document with no. first ... , as well as the one with no. prot. C/EIS/4740/18-03-2022 memorandum of the complainant, and not to grant the rest of the documents concerning the EDE procedure, some of which have been classified as confidential by the administrative bodies that issued them, due to the fact that contain information and personal data of third parties, which are considered confidential (see also article 6 par. 5 of the Authority's Operating Regulations). Finally, having also rejected the relevant claim of the complainant regarding the destruction of the disputed opinions, in accordance with the above, there is no need to examine the allegations of the complainant regarding the time of observance and destruction of the medical opinions. 14. Based on the above, the Authority considers that there is a case to exercise its corrective powers according to article 58 par. 2 of the GDPR in relation to the violations found. 15. The Authority further considers that, based on the circumstances established, it should be imposed, pursuant to the provision of article 58 par. 2 sub. i of the GDPR, an effective, proportionate and dissuasive administrative fine according to article 83 of the GDPR both to restore compliance and to punish illegal behavior. 16. Furthermore, the Authority took into account the criteria for measuring the fine defined in article 83 par. 2 of the GDPR, paragraphs 4 and 5 of the same article that are applicable in the present case, article 39 par. 1 and 2 of Law 4624/2019 regarding the imposition of administrative sanctions on public sector bodies, and the Guidelines for the

implementation and determination of administrative fines for the purposes of Regulation 2016/679 issued on 03-10-2017 by the Article 29 Working Group (WP 253)8, as well as the facts and all the individual circumstances of the case under consideration and in particular: i) the fact that the breach did not result in the leakage of the affected person's health data to a third party, 15 ii) the fact that the violation in question constitutes an isolated incident and affected only one subject, i.e. the complainant, iii) the fact that the violation in question is not due to the intention of the complainant iv) the fact that the person responsible the data controller did not delay in responding to the Authority's documents, v) the fact that the data controller still does not have a clear picture of the source of the breach. He first mentions that it was a loss of documents, then he speaks of destruction, while at the same time he uses the dubious term "loss-destruction" in his memorandum, and to this day he cannot with certainty provide clear explanations about what ultimately happened to the lost documents, vi) the fact that the DPO has not yet been designated by the data controller, with the result that, among other things, the data controller has a significant financial benefit from the violation of its relevant obligation, if the amount of expenditure is taken into account , which would be avoided by the timely statutory designation of DPO, vii) the fact that the controller did not immediately take action to deal with the incident, but attempted to cover up the incident of loss by requesting that the lost documents be resubmitted, and much later, after actions of the complainant himself towards the Decentralized Administration..., initiated the procedure E of the Administrative Investigation (EDE) to investigate the incident and assign responsibilities to the persons involved, viii) the fact that no previous corresponding violation has been established by the data controller, ix) the fact that from the data brought to the attention of the Authority and with on the basis of which it established the above violations of the GDPR, it does not appear that the data controller caused, from the data breach incident that took place, material damage to the affected person, x) The fact that the violation of the provisions regarding the rights of the subjects falls under, in accordance with the provisions of article 83 par. 5 sec. II GDPR, 16 in the higher prescribed category of the administrative fine classification system. 17. Based on the above, the Authority unanimously decides that the administrative sanctions referred to in the executive order should be imposed on the complained controller, which are considered proportional to the gravity of the violations. FOR THOSE REASONS The Authority, -Imposes the legal person of public law with the name "Center for Social Protection-Solidarity, Education and Environment of the Municipality of Alexandroupolis" with the distinctive title "Polysocial", as the controller, the effective, proportional and deterrent fine that is appropriatein this particular case according to its special circumstances,
in the total amount of nine thousand euros (€9,000), for the above established

violations and in particular a fine of three thousand (€3,000) euros for the violation of article 15 of Regulation (EU) 2016/679, a fine of three thousand (€3,000) euros for the violation of article 32 of the Regulation (EU) 2016/679, and a fine of three thousand (€3,000) euros for the violation of article 37 of Regulation (EU) 2016/679, in accordance with article 58 par. 2 i) of the GDPR in combination with article 83 par. 4 and 5 of the GDPR and articles 39 par. 1 of Law 4624/2019.

-Rejects in part the complainant's request for documents and accepts the granting of the documents referred to in the ordinance.

The Deputy President

The Secretary

George Batzalexis

Irini Papageorgopoulou