

Athens, 02-02-2023 Prot. No.: 268 DECISION 5/2023 (Department) The Personal Data Protection Authority met, at the invitation of its President, in a regular meeting in the composition of the Department at its headquarters on 11/01/ 2023, in order to examine the case referred to in the present history. The meeting was attended by teleconference by Georgios Batzalexis, Deputy President, in opposition to the President of the Authority, Constantinos Menoudakos, and was attended by the alternate member Nikolaos Faldamis, as rapporteur, as well as the alternate members Demosthenes Vougioukas and Maria Psalla, in place of the regular members Konstantinos Lambrinoudakis and Grigorio Tsolia who did not attend due to disability although they were legally summoned in writing. The meeting was attended, by order of the President without the right to vote, by Haris Symeonidou, specialist scientist - auditor as assistant rapporteur and Irini Papageorgopoulou, employee of the Authority's administrative affairs department, as secretary. The Authority took into account the following: With the no. prot. C/EIS/5170/05-08-2021 complaint by A (hereinafter complainant), directed against the company Vodafone - PANAFON S.A.E.T. (hereinafter the complainant), complaining about the illegal processing and transmission to a third company of his personal data for the purpose of direct marketing, despite his express objection as a subject. In particular, according to the complaint, on ..., the complainant obtained a new Vodafone prepaid phone connection with a number he transferred from another network (...). At 1-3 Kifissias Ave., 11523 Athens T: 210 6475 600 E: [contact@dpa.gr](mailto:contact@dpa.gr) [www.dpa.gr](http://www.dpa.gr) in this context, the complainant submitted on ... to the complained of responsible statement regarding the telephone directory information and his choices as to the use of his personal data, on the basis of which he expressly objected (by selecting the indication "I DO NOT CONSENT" on the standard form of the complainant), among others, to the following actions: "to Vodafone's processing of his personal data and to the announcement to cooperating or affiliated companies, consisting of information identifying his identity and information concerning the services he uses, with the aim of providing personalized service and the commercial promotion of personalized Vodafone products or services", "in the processing by Vodafone of his personal data and communicating them to cooperating or affiliated companies which are related to his behavior when browsing the internet or his habits based on the movement and location data available to Vodafone as well as the data concerning his devices, with the aim of personalized service and commercial promotion of personalized Vodafone products or services", "to receive advertising communications for the purpose of marketing Vodafone products or services tailored to his interests without human intervention", "to receive advertising communications with human intervention". Nevertheless, as alleged, on ... the complainant received through a courier company, without having previously placed an order on his part, a package with the logo of the complainant (Vodafone

CU), with the sender being the company Chapter Five A.E. and promotional content (trade samples, discount coupons, etc.).

Following his relevant protest via e-mail to the address [data.privacy.gr@vodafone.com](mailto:data.privacy.gr@vodafone.com) on the same day, for the fact that despite his express objection the complainant communicated to a third advertising company, at least his name, address and phone number for marketing purposes, the complainant received, as he states, from the complainant the reply that "this action took place in the context of Vodafone's customer-centric philosophy [...] as a small 'thank you' from you [...] and is in no way a promotional action", while in addition the complainant stated that "[name and address]'s personal data for sending the parcel were forwarded to the cooperating company "Chapter Five SA", which acted on behalf of Vodafone in the relevant distribution, exclusively and only for the termination of the distribution in question and subsequently they were completely deleted from it".

The Authority, in the context of examining the above complaint, with no. prot. C/EX/2495/04-11-2021 its document, invited the complainant to state her views on the complaints, clarifying in particular, what is the Policy she applies regarding the sending of advertising material by mail and how are they received taking into account the objections that may have been expressed by the subject during the conclusion of the contract, as in the case of the complainant in this case. The complainant in her response from ... (with Authority no. C/EIS/7664/23-11-2021) maintains that the sending of the specific gift package to the complainant is not an action for the purpose of promotion, but is an incidental provision of already drawn up between the parties to a contract for the provision of telecommunications services. According to the same answer, this additional provision concerns all new subscribers who register through the website [www.vodafonecu.gr](http://www.vodafonecu.gr), regardless of their choices regarding promotional actions ("The gift was not sent for a promotional purpose, it took place within the framework of the already concluded contract and concerned the new subscribers, who submitted their application electronically, i.e. through the company's website. For this reason, the subscriber's choices, which have been declared during the drawing up of his contract with our Company and concern the processing of his personal data for marketing purposes, are not applicable in this case, and were therefore not taken into account when sending the parcel to the complainant"). At the same time, from the overview of the information provided to the subjects of the complaint (<https://www.vodafonecu.gr/privacy-policy/#?panel=note-403>), it appears that this text does not make any reference to the processing in question data of new subscribers. website of the above

Given the above, the Authority, with relevant calls, invited those involved to the Council of the Authority's Department on 02-11-2022, in order to present their views on the case. During the meeting, the attorneys of Emmanuel Chalkiadakis (...), Apostolos Vorras (...), Emmanouil Dimogerontakis (...) and Konstantina - Maria Karopoulou (...) and B, the company's Data Protection Officer,

attended the meeting on behalf of the complained-about company. complainant did not appear but submitted the under no. prot. G/EIS/11358/27-10-2022 his memorandum. During the meeting, the complainant was given a deadline and then she timely filed the no. prot. C/EIS/11923/21-11-2022 document her memorandum, after previously requesting and receiving a copy of the aforementioned memorandum of the complainant. With his memorandum, the complainant stated that the facts he sets out in his complaint are acknowledged by the complainant through her opinion document G/EIS/7664/23-11-2021, while he pointed out that contrary to what was claimed by the complainant, it was forwarded not only his name and address but also his mobile phone number. Regarding the type and purpose of the communication received by the complainant, he emphasized that the package he received mainly contained commercial samples of various consumer products, such as coffee capsules, body deodorant, instant soup packaging, soft drinks, etc., while, as he stated, no some direct connection of the samples in question with the main subject of his underlying relationship with the complained-of company is perceived, which is a contract for the provision of telecommunications services, reiterating that the package included an accompanying leaflet stating the following: "Become a PICKAboxer too" ... "...go to [www.picka.gr](http://www.picka.gr) click where you need to sign up, fill in your details" (...) and prompt "open it, try it, experience it, share it on social networks" (in English), concluding that it is a communication with an advertising - commercial promotion character. asserted the following: The complainant, both at the hearing and with her pleading, a) That it was not a communication for the purpose of commercial promotion, as the company has chosen not to carry out commercial promotion actions by mail. b) That the purpose of sending the parcel in this case was the fulfillment of the relevant collateral obligation that it had undertaken under a contract, in the context of a decision taken by the company to reward its new customers in various ways that appear from time to time on its website, in the specific case with the sending of the gift in question which was of insignificant value. c) That for this reason he did not take into account when sending the gift the responsible statement of the complainant, in which the latter had declared his opposition to promotional actions. d) That with regard to the data processing of its subscribers for the above purpose, it is itself the data controller, while Chapter Five A.E. I was processing. However, for the processing of collected data via the website [www.picka.gr](http://www.picka.gr) of Chapter Five, Processing Manager is the last one. e) That the relevant information was provided at the time of the actual events on the website from which the complainant requested a new subscription, while he was also informed by sms before the package was sent. f) That this action falls within its contract with the complainant, and that if the Authority were deemed to require consent for subscribers to receive beneficial additional benefits for reward purposes, this would have very significant consequences,

since messages could not be sent information on providing e.g. additional GB, airtime etc. and the said benefits to subscribers would be dependent on their consent being given, which would not be free as it would be provided for a financial benefit. g) To the question of a member of the Authority whether the right to enter into a contract is granted without receiving the gift in question, the company reserved to answer with the memorandum. However, no relevant response was given to her memorandum. The Authority, after examining the elements of the file and after hearing the rapporteur and the clarifications from the assistant rapporteur, who was present without the right to vote, after a thorough discussion, DECIDED IN ACCORDANCE WITH THE LAW 1. From the provisions of articles 51 and 55 of General Data Protection Regulation (Regulation (EU) 2016/679 - hereinafter, GDPR) and Article 9 of Law 4624/2019 (Government Gazette A' 137) it follows that the Authority has the authority to supervise the implementation of the provisions of the GDPR, this law and other regulations concerning the protection of the individual from the processing of personal data. In particular, from the provisions of articles 57 par. 1 item f of the GDPR and 13 par. 1 item g' of Law 4624/2019 it follows that the Authority has the authority to deal with A's complaint against Vodafone - PANAFON A.E.T. and to exercise, respectively, the powers granted to it by the provisions of articles 58 of the GDPR and 15 of law 4624/2019. 2. Article 5 par. 1 of the General Regulation (EU) 2016/679 for the protection of natural persons against the processing of personal data (hereinafter GDPR) sets out the principles that must govern a processing. In particular, paragraph 1 states that: "Personal data: a) are processed lawfully and legitimately in a transparent manner in relation to the data subject ("legality, objectivity and transparency"), b) are collected for specified, explicit and legitimate purposes and are not further processed in a manner incompatible with those purposes; further processing for archiving purposes in the public interest or for the purposes of scientific or historical research or statistical purposes is not considered incompatible with the original purposes in accordance with Article 89(1) ("purpose limitation"), [...]' According to the principle of accountability introduced by the second paragraph of the aforementioned article, the controller "bears the responsibility and is able to demonstrate compliance with paragraph 1 ("accountability)". This principle, which is a cornerstone of the GDPR, entails the obligation of the data controller to be able to prove his compliance to the supervisory authority. 3. When personal data concerning a data subject is collected from the data subject, the data controller, when receiving the personal data, provides the data subject with all the information defined in article 13 par. 1 and 2 GDPR. According to the OE 29 Guidelines on transparency (WP260 rev.01) when informing subjects in accordance with Articles 13-14 GDPR, the information provided should be specific and definitive: "The use of language designations such as " might', 'certain', 'often' and

'likely' should also be avoided. Where data controllers choose to use vague wording, they should be able, in accordance with the principle of accountability, to demonstrate why the use of such wording could not be avoided and why it does not undermine the lawfulness of the processing." (§ 13). 4. According to article 6 par. 1 of the GDPR "1. The processing is lawful only if and as long as at least one of the following conditions applies: a) the data subject has consented to the processing of his personal data for one or more specific purposes, b) the processing is necessary for the performance of a contract whose the data subject is a contracting party or to take measures at the request of the data subject prior to the conclusion of a contract, c) the processing is necessary to comply with a legal obligation of the controller, d) the processing is necessary for the preservation vital interest of the data subject or other natural person, e) the processing is necessary for the fulfillment of a task performed in the public interest or in the exercise of public authority delegated to the controller, f) the processing is necessary for the purposes of legitimate interests pursued by the controller or a third party, unless these interests are overridden by the interest or the fundamental rights and freedoms of the data subject which require the protection of personal data, in particular if the data subject is a child". In addition, paragraph 4 of the same article states that "when the processing for a purpose other than that for which the personal data have been collected is not based on the consent of the data subject or on the law of the Union or the law of a Member State which is necessary and proportionate measure in a democratic society to ensure the purposes referred to in Article 23 paragraph 1, the controller, in order to ascertain whether the processing for another purpose is compatible with the purpose for which the personal data are initially collected, takes taking into account, among others: a) any relationship between the purposes for which the personal data have been collected and the purposes of the intended further processing, b) the context in which the personal data were collected, in particular with regard to the relationship between the subjects of the data and the controller, c) the nature of the personal data, in particular for the special categories of personal data processed, in accordance with Article 9, or whether personal data related to criminal convictions and offenses are subject to processing, in accordance with article 10, d) the possible consequences of the intended further processing for the data subjects, e) the existence of appropriate guarantees, which may include encryption or pseudonymization". Furthermore, according to Recitals 47 and 50 of the GDPR "The legitimate interests of the controller, including those of a controller to whom the personal data may be disclosed or of third parties, may provide the legal basis for the processing, provided that they do not override the interests or fundamental rights and freedoms of the data subject, taking into account the legitimate expectations of the data subjects based on their relationship with the controller. Such a legitimate

interest could for example exist where there is a relevant and appropriate relationship between the data subject and the controller, such as if the data subject is a client of the controller or is in its service. In any case, the existence of a legitimate interest would need a careful assessment, including whether the data subject, at the time and in the context of the collection of the personal data, can reasonably expect that for this purpose it can be carried out processing. In particular, the interests and fundamental rights of the data subject could prevail over the interests of the controller, when personal data are processed in cases where the data subject does not reasonably expect further processing of his data" (App. . 47) and "The processing of personal data for purposes other than those for which the personal data were originally collected should only be allowed if the processing is compatible with the purposes for which the personal data were originally collected. In this case, a legal basis separate from that which allowed the collection of the personal data is not required. [...] In order to ascertain whether the purpose of the further processing is compatible with the purpose of the initial collection of the personal data, the controller, if it meets all the requirements for the lawfulness of the initial processing, should take into account, among others: any links between of these purposes and purposes of the intended further processing; the context in which the personal data have been collected, in particular the reasonable expectations of the data subject based on his relationship with the controller regarding their further use; the nature of the personal data; the consequences of the intended further processing for the data subjects; and the existence of appropriate guarantees both for the initial and intended acts of further processing" (Ref. 50).

5. Article 21 par. 1-3 of the GDPR regarding the right to object provides the following: "1. The data subject has the right to object, at any time and for reasons related to his particular situation, to the processing of personal data concerning him, which is based on Article 6 paragraph 1 letter e) or f), including profiling under the provisions in question. The controller no longer processes the personal data, unless the controller demonstrates compelling and legitimate reasons for the processing which override the interests, rights and freedoms of the data subject or for the establishment, exercise or support of legal claims claims. 2. If personal data are processed for the purposes of direct marketing, the data subject has the right to object at any time to the processing of personal data concerning him for such marketing, including profiling, if related to it direct marketing. 3. Where the data subjects object to the processing for direct marketing purposes, the personal data shall no longer be processed for these purposes.' In the case under consideration, from the data in the file and after the 6th hearing, the following emerged: On ... of ..., the complainant obtained a new Vodafone prepaid phone connection with a number he transferred from another network (...), submitting the relevant application through the website [www.vodafonecu.gr](http://www.vodafonecu.gr). In this context, the complainant submitted on

... to the complainant a responsible statement regarding the telephone directory information and his choices regarding the use of his personal data, to which he expressly objected (by selecting the indication "I DO NOT CONSENT" on the pre-formulated form of the complainant) , among others, in the following actions: "in Vodafone's processing of his personal data and in their communication to collaborating or affiliated companies, consisting of elements identifying his identity and information concerning the services he uses, with the aim of providing personalized service and the commercial promotion of personalized Vodafone products or services", "in the processing by Vodafone of his personal data and their communication to collaborating or affiliated companies which are related to his behavior when browsing the internet or his habits based on traffic data and location that Vodafone has at its disposal as well as the data concerning his devices, for the purpose of personalized service and commercial promotion of personalized Vodafone products or services", "to receive advertising communications for the purpose of marketing products adapted to his interests or Vodafone services without human intervention", "to receive advertising communications with human intervention". Subsequently, on ... the complainant received, through a courier company, a package with the Vodafone CU logo, with Chapter Five A.E. as the sender. and advertising content (commercial samples, discount coupons, etc.), which included a brochure advertising the website [www.picka.gr](http://www.picka.gr) of the advertising company in question ("Become a PICKAboxer too" ... "...go to [www.picka.gr](http://www.picka.gr) , click where you need to sign up, fill in your details" (...)  
"open it, try it, experience it, share it on social networks"). Following his relevant protest via e-mail to the address [data.privacy.gr@vodafone.com](mailto:data.privacy.gr@vodafone.com) on the same day, for the fact that despite his express objection the complainant communicated to a third advertising company, at least his name, address and phone number for marketing purposes, the complainant received the reply that this action took place in the context of Vodafone's customer-centric philosophy as a small "thank you", that it is not a promotional action, and that his data was transmitted for this purpose to company Chapter Five S.A. which carried out the relevant distribution on behalf of Vodafone and subsequently they were completely deleted from it. The complainant submitted to the Authority the Data Processing Agreement dated 7/17/2018 between Vodafone as Data Processor and Chapter Five A.E. as you were processing. According to Annex 3 (Schedule 3) of the contract in question, the processor is an advertising and commercial company ("advertising and commercial company"), the purpose of the processing of personal data on behalf of Vodafone is to attract new subscribers (" Purpose of the processing: Recruitment of new subscribers"), while regarding the data retention period ("Retention period") no period of time is mentioned ("no"). According to the complainant, the sending of the gift in question was an ancillary provision of the complainant's contract, although it did not appear that this

provision was provided for in the text of his contract, which had as its main object the provision of telecommunications services. The complainant claims that the complainant was informed on the one hand of the fact that every online order of a new CU Sim card is accompanied by the receipt of a gift, through the relevant banner posted on the website [www.vodafonecu.gr/ela-sto-cu/](http://www.vodafonecu.gr/ela-sto-cu/) , on the other hand, for the sending of the specific package, through an informative sms message that he received on his mobile phone three days before the sending of the gift, although the sending of such an informative sms message was not documented by the complainant nor confirmed by the complainant. In addition, the complainant did not answer the question whether it is possible to conclude a contract without sending the gift, but from her memorandum it emerged her position that she had undertaken to provide "as an ancillary obligation of the main contract of telecommunications services, to provide certain gifts , indiscriminately, to its subscribers" (p. 3 of the memorandum). It therefore emerged that there was no possibility of objecting to the said ancillary provision: each request for a new CU sim card via the website [www.vodafonecu.gr](http://www.vodafonecu.gr) resulted in the processing described above, i.e. the transmission of the new subscriber's data to the processing Chapter Five A.E., for the purpose of processing, in accordance with the above agreement between them, "attracting new subscribers" and using the data for sending parcels with advertising content (commercial samples and promotion of the website [www.picka.gr](http://www.picka.gr)). Regarding the transparency of the processing, in the general information included on the page of the complainant <https://www.vodafonecu.gr/privacy-policy/> regarding the execution of the contract the following is mentioned: "Execution of the contract: Vodafone processes your personal data in the context of performing your contract or entering into a new contract with you, as well as to be able to take actions related to your requests. For example, this processing is carried out so that you can make calls, send and receive text messages (SMS), browse the internet and generally be able to provide you with connectivity. This also allows us to bill you based on your usage and conduct credit checks when you make a request for a product or service." In relation to promotional actions, the following is stated: "Promotional actions - To keep you informed generally about new products and services, we will send you newsletters, invite you to participate in a survey or inform you about offers or competitions. We tailor these messages based on the types of products and services you have purchased from us, only if you have previously given us your express consent to process this information for this purpose.[...] If you have given us your consent you, we will contact you to tell you about products and services of other Vodafone Group companies and other companies that we think may be of interest to you (unless you opt-out of such marketing messages from us)'. Therefore, despite the claimant's claim to the contrary, it does not follow from the



information in question that the company may, in the context of the execution of the contract, send any kind of gifts, unrelated to the main subject of the contract, nor transmit the data of its subscribers to third parties for this purpose. It should be noted that the purpose of any such additional provision is preeminently advertising: from the contract of the defendant with I did the editing, advertising agency Chapter Five A.E. resulting that the purpose of transmission and processing of the subscribers' data is "n attracting new subscribers". Toward this end, it initially appears advertising banner from time to time on the website [www.vodafonecu.gr](http://www.vodafonecu.gr) through of which all prospective subscribers are notified of the present's gift period, which is sent to those who choose to subscribe, as reward. The processing of the data of these subscribers for the sending the gift, even though it is after the signing of the contract, it serves exactly the purpose of implementing the promotional energy it has start by placing an advertising banner on the provider's website, and cannot be considered processing necessary for performance of the contract, in such a way that the relevant processing falls within the legal basis of article 6 par. 1 b). It should be noted that the processing of the data subscribers for the purpose of offering additional benefits, such as those that the complainant refers to on p. 3 of her memorandum (gifts such as free messages, additional minutes of talk, MB, or electronic devices related to mobile telephony, such as speakers or power banks) and on p. 5 of her memorandum (providing free data (MB) in view of festive period, providing benefits in case of electronic bill payment, provision of a free device mobile phone to earthquake victims etc., or providing privileges and free of charge upgrading services in certain areas), i.e. benefits that are related to the main subject of the contract, could, as the case may be, and under conditions, or to constitute processing for a further compatible purpose

according to article 6 par. 4 GDPR or to fall under the legal basis of article 6 par. 1 f) GDPR (superior legal interest of the provider to promote relevant its products and services to its subscribers), but under no circumstances it cannot fall under the legal basis of contract execution (article 6 par. 1 b) GDPR), since said additional benefits are by definition not necessary for the execution of the contract. Therefore said processing anyway depends on the "non-objection" of the data subject, which has the right to oppose it, in accordance with article 21 par. 1 GDPR. For the reason after all, the complainant includes a relevant option in her form new subscriber contract, in which the complainant actually chose the indication "I DO NOT CONSENT" ("...to receive advertising communications for the purpose of marketing of products or services tailored to his interests Vodafone without human intervention" and "I do not wish to accept in general such calls', i.e. calls with human intervention of any kind advertising purposes including Vodafone). On the contrary, in case of additional benefits which are not related to the main one object of the contract, as happened in this case, the processing of subscriber data cannot be considered to serve a purpose compatible with that of their original collection, taking into account its criteria article 6 par. 4, as such processing is neither relevant nor reasonable expected for the subject, who as a contracting party wishes to in principle to receive services related to mobile telephony. According to basic principle of purpose limitation (Article 5 para. 1 b) GDPR), the person responsible processing may not form part of the legal basis of its execution contract in an arbitrary manner any action which entails data processing, on the grounds that this action is beneficial

(financially) for the subjects. For this reason, data processing subscribers for such additional benefits cannot be included in legal basis of article 6 par. 1 b) (execution of contract). Not much more, a separate check is required for the legitimacy of the purpose and then a choice appropriate legal basis for processing, when the benefits in question require the transmission of subscribers' personal data to a third party recipient as well their use for the purpose of promoting the products/services in question third party, as happened in this case through the advertising brochure which it concerned the website [www.picka.gr](http://www.picka.gr) of the company Chapter Five A.E.

7. Following the above, from the information in the file and after the hearing procedure, the Authority finds that in the present case it took place processing of the complainant's data by the complainant, as controller, and specifically their transmission to the operator edit Chapter Five A.E. for the purpose of marketing both of services of the complainant as well as the website of the one executing it processing, without this processing being able to rely on any legal basis and despite the fact that the complainant had expressly objected to the use and transmission of his data to third parties for marketing purposes.

In addition, the processing in question took place without the conditions being met transparency of processing and specifically without having been properly informed the complainant in accordance with Article 13 GDPR for the fact that his choice to requesting a new connection through the website [www.vodafonecu.gr](http://www.vodafonecu.gr) entails the transmission of his data to the above advertising company and use them for the purpose of advertising its own products and services. Therefore a violation of the principle of legality, objectivity and transparency of processing in accordance with article 5 par. 1 a) GDPR in combination

with articles 6 par. 1 and 13 GDPR, as well as violation of the limitation principle of the purpose, in accordance with article 5 par. 1 b) GDPR in conjunction with article 6 par. 4 GDPR.

8. Based on the above, the Authority considers that there is a case to exercise the v the article 58 par. 2 i) and 83 GDPR corrective powers (imposition of a fine), regarding the violations identified above. To determine it sanction, the Authority takes into account the criteria for measuring the fine which are defined in article 83 par. 2 of the GDPR that apply herein case.

In particular, particular consideration is given to:

a) The nature, gravity and duration of the violation: It is taken into account that this is a violation of the basic principles of processing, which falls under provision of article 83 par. 5 of the GDPR, therefore incurs the maximum penalty of the amount of 20 million euros. The processing concerned by the infringement in question is unrelated directly but indirectly with the core business of the complained enterprise (provision of telecommunication services).

c) The fact that in this case the violation concerns simple data of a single person subject, which did not appear to have suffered damage, beyond moral damage from the transmission, against his will, of his personal data to a third party advertising company.

c) The degree of responsibility of the complainant, who considers the general one legal its practice, given its size and the fact that processes personal data of too many subjects.

d) The fact that the defendant had a turnover of 907,300,000 euros in the year 2021, according to the balance sheet published on its website.

FOR THOSE REASONS

## THE BEGINNING

A. Enforces, in the company Vodafone – PANAFON S.A.E.T. as responsible

processing, based on article 58 par. 2 sec. i) of the GDPR, administrative fine

in the amount of ten thousand (€10,000) euros, for the identified processing of

data of the complainant in violation of the principle of legality,

objectivity and transparency of the processing in accordance with article 5 par. 1

a) GDPR in combination with articles 6 par. 1 and 13 GDPR, as well as the principle of

limitation of the purpose, in accordance with article 5 par. 1 b) GDPR in combination with

article 6 par. 4 GDPR.

B. Directs an order to the company Vodafone – PANAFON A.E.T. as responsible

processing, based on article 58 par. 2 sec. d) of the GDPR, such as, within a month of

notification of this decision, adapt the practice accordingly

of, so that in any case additional provision to subscribers which

implies further processing of their personal data, on the one hand

provided that full information is provided in accordance with Article 13 GDPR, especially for any

recipients of the data, on the other hand to be provided to the subjects n

possibility to object to further processing, and to inform about it

Principle.

The Secretary

The president

George Batzalexis

Irini Papageorgopoulou