

# <u>DETAILED INFORMATION ON THE PROCESSING OF PERSONAL DATA OF</u> <u>FOOTBALL PLAYERS</u>

(In accordance with Regulation no 2016/679 of the European Parliament of 27 April 2016, the "G.D.P.R." and with Greek Law no 4624/2019.)

### 1) Data Categories:

- The necessary data for the identification of the Subject (i.e., among others: surname, name, nr. of identity card or passport, contact details, etc.).
- Payment data: bank account numbers, debit / credit, other bank cards, etc., either for the payment of fees or for the fulfillment of other financial obligations towards H.F.F., or for the credit of amounts due or other amounts attributable to you.
- Data regarding the issuance of the necessary documents for participation in training sessions and competitions, in order the fulfillment of the health criteria that imply the ability of the football player to exercise the sports activity with safety to be verified. In this context, sensitive personal data such as health data or medical data may be processed (According to Article 9§2 h G.D.P.R.).
- The necessary data for the compilation of match sheets by the competent Match Official.
- The important data, as the case may be, for the issuance and granting of certificates.
- Data related to the processing and publication of decisions by the Courts and competent decision-making Bodies.

#### 2) Data Sources:

Personal data are provided:

- either by the Data Subject directly, or through the Associations, clubs etc.,
- or are notified to H.F.F. by another International Federation in which the data of the Subject are kept,
- or are sent to H.F.F. by attorneys, or by third parties having power of procuration,
- or through the notification of the decisions issued by the International Courts, by the Courts, decision-making Bodies and Committees of H.F.F. or by the Bodies of H.F. F's members.

## 3) <u>Purpose of Processing:</u>

• H.F.F., as well as the Regional Amateur Football Associations ("E.P.S.") as Data Processors on behalf of U.E.F.A. and F.I.F.A. and as Data Controllers as regards their domestic obligations, based on their statutory, but also regulatory obligation, collect and use the abovementioned personal data and proceed to their processing, with or without the use of automated means. All the information obtained will only be used to fulfill the said purposes and will not be used in an immoral manner or in violation of the provisions of the G.D.P.R.



- Processing is lawful and necessary for compliance with a legal obligation to which the Controller is subject (Article 6§1 c G.D.P.R.). In some cases, the legitimate interests pursued by the controller can be established as lawful basis of processing (Article 6§1 f G.D.P.R.). At the same time, it aims to serve your requests either directly or through a third party (upon your relevant authorization), as well as to provide services to you, but also to issue the necessary documents, certification cards and certificates etc.
- Data processing is also imperative for the legitimate participation in training sessions and competitions.
- In addition, it is required for the most accurate possible cross-checking / verification of the data declared by the players and the clubs.
- Moreover, necessary data are recorded in the Match Sheet, so as all the information about the matches to be recorded and in case an issue arises, they are used in order the parties to be called by the competent Committees as well as in the imposition of penalties.
- It is noted that based on the Common Ministerial Decision No. 11596 / 09.05.2013 "Registration of athletes with sporting distinctions in the special table of distinctions of the General Secretariat of Sports (provided in article 34 of Sports Law no. 2725/1999) as in force after its amendment by article 38 par. 1 and 2 of Law no. 4115/2013 (Government Gazette 1218 / B / 20.05.2013)", for the issuance of a decision as regards the existence of the right for the registration of a candidate at the abovementioned table, which will provide extra points in the final scoring at Panhellenic Exams, a certification from the relevant Sports Federation is required. The certification includes, among others, certified copies of match sheets. Therefore, the processing of the data listed in them becomes necessary to meet this requirement.
- Processing also serves in the posting of the necessary data in electronic systems such as the FIFA TMS.
- Especially for the players who are called to staff and play in the National Team, their data are used for the dispatch of the invitation list to them (which is also posted on the official website of the Federation), for all the reservations made within the international obligations of the national teams (ticket reservations, accommodation reservations, etc.), as well as for any diagnostic tests in accordance with the applicable health protocols.
- In addition, processing is also carried out by the medical staffs of the National Team and consequently by the competent stuff of Hellenic Football Federation. (e.g., for the recall of players in case of injuries). It should be pointed out that the doctor can transmit your medical data and information to the medical staff of your club. The purpose of this transfer is the doctor of your club to be informed, in order him to continue your monitoring in the best possible way, as well as to be able to apply any possible treatment after your return to the club's sports obligations.



- The data (including user identification data such as IP address) are also used in order to allow you to use specific H.F.F.'s or third-party football-related applications and services.
- In addition, processing in some cases is necessary for the prevention and prosecution of criminal offence.
- Moreover, the personal data received are used in order to contact you in case any issues arise.
- Finally, the processing of data becomes necessary for the issuance and by any chance publication of the decisions by the decision-making Bodies.

#### 4) Data Recipients:

The competent Departments of H.F.F. and the E.P.S., within their responsibilities, process your personal data through their staff and may transmit them to third - party service providers (foreign Federations, Associations etc.) located either inside or outside the EU., when this is deemed imperative for the execution of the Subjects' requests (e.g., international transfers.) Please note that some countries may not provide the same level of protection. In addition, the recipients may be the Match Officials (e.g., Referees, Referee Observers etc.), Disciplinary Bodies of H.F.F., of the Associations and of the International Federations. Moreover, in case of payments, the recipients are the Financial Services of H.F.F. and of Associations. Under special circumstances, either in defense of the rights of H.F.F., or when provided by law or court decisions or decisions issued by the Hellenic Data Protection Authority, the recipients may be the Judicial Authorities, the Hellenic Data Protection Authority, or other Independent Authorities. Finally, if required, the Federation may transmit the above data to authorized partners who own an increased level of protection of personal data for the fulfillment of the above purposes.

#### 5) Data Protection:

The Hellenic Football Federation as well as the E.P.S. implement an Information Security Management System to provide adequate protection for your data. Additionally, advanced technological measures of protection are adopted, as well as appropriate organizational measures.

#### 6) <u>Time of Retention of Personal Data:</u>

H.F.F. processes the personal data for the necessary period of time, in order to fulfill the above-mentioned purposes, which is the shortest possible. In any case, the data will be kept for a period of five (5) years from the loss of the status of football player. If the law or regulatory acts oblige the H.F.F. in keeping personal data for a period longer than the above, the retention periods will be extended accordingly. Finally, if until the end of this period of time, legal actions which concern you directly or indirectly are in progress, the above retention time, is extended until the issuance of an irrevocable court decision. The documents signed by



the Subjects, in which personal data have been registered, may, after the lapse of five years, be kept in digital form. After the above periods of time, your personal data will be destroyed.

## 7) Your rights and how to exercise them:

You have the rights provided in Articles <u>12-22</u> of G.D.P.R. At the same time, you have the right to request the transfer of the data you have provided to us, to another Federation. You also have the right to file a complaint to the Hellenic Data Protection Authority (www.dpa.gr), if you consider that your rights are violated in any way.

The exercise of the above rights can be realized via the electronic address: <a href="mailto:dpo@epo.gr">dpo@epo.gr</a>. (Ms. Sdrolia Magdalini, Lawyer/D.P.O.)

H.F.F. will use all the possible means so as to satisfy your requests and will respond to you within thirty (30) days and, only if this is not possible, will inform you of the necessary extension of the above deadline, but which will not exceed sixty (60) additional days. The exercise of the rights is free of charge and there may be a charge only in cases of proven abuse of the right, which entails costs for H.F.F.

(-Following the reading and complete understanding of the abovementioned information you are invited to sign the **updated declaration** regarding the processing of your personal data.

\* In case of a minor football player, the statement is signed by the legal guardian (the person that exercises the parental responsibility.)