

Summary of Annual Report 2024

Athens 2025



SUMMARY OF ANNUAL ACTIVITY REPORT 2024



HELLENIC DATA
PROTECTION AUTHORITY

ATHENS 2025

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Foreword

Among its many activities in 2024, the Hellenic DPA examined significant cases, issuing 46 decisions concerning violations of the law. A total of 1,820 appeals/complaints were submitted, of which 1,422 were handled, and fines totaling €4,301,249 were imposed through 22 decisions. However, it should be noted once again that the Authority, in line with the broader spirit of data protection legislation, does not consider the imposition of sanctions as its primary goal. Sanctions are applied as a deterrent measure. In this context, the conclusion that can be drawn is that six years after the GDPR came into force, compliance violations continue to be identified. Moreover, the adoption of the principles underlying data protection regulations remains a continuous exercise for organizations and businesses, including the public sector itself. Despite the emergence of new challenges due to rapid technological advancements, the GDPR has brought significant results, as was also recognized in the European Commission's second report on its implementation, published in July 2024.

Regarding its advisory - consultative role, in 2024 the Authority issued three significant opinions: opinion No. 1 concerned the Presidential Decree stipulated in Article 107(6) of Law 4727/2020, relating to the Personal Number; opinion No. 2 included several observations on the provisions of the Draft Law regarding measures for the implementation of Regulation (EU) 2022/2065 of the European Parliament and of the Council of 19 October 2022 on a Single Market for Digital Services and amending Directive 2000/31/EC (Digital Services Act). Another important opinion (No. 4) concerned the surveillance system intended for crime prevention and control and traffic management for the needs of the Attica General Police Directorate.

Aligned with its European obligations, the Hellenic DPA also contributes to the consistent implementation of the GDPR within the European Union. To this end, it cooperates with fellow supervisory authorities of EU Member States—through Greece's representation on the European Data Protection Board (EDPB)—as well as with the European Commission. Within this framework, in January 2024, the EDPB's coordinated action on the role of Data Protection Officers was completed, and shortly thereafter, on February 28, a new coordinated action began, focusing on the implementation of the right of access. These actions fall under the so-called Coordinated Enforcement Framework (CEF), which involved 31 data protection authorities across the EEA and aims to harmonize GDPR compliance and enhance cooperation among EDPB supervisory authorities regarding the implementation of data subjects' right of access. The Hellenic DPA participated in both of these actions, also exercising its official investigative powers.

In the crucial field of awareness-raising and information, the Authority regularly updates and upgrades its website (www.dpa.gr www.dpa.gr/en). It is noteworthy that at the beginning of the 2024, a new microsite for children and teenagers was launched along with two systems designed to assist citizens and entities in exercising their rights and fulfilling their obligations.

Furthermore, given its limited financial resources, the Authority makes the most of funding opportunities provided by the European Commission through relevant programs, aimed at developing awareness initiatives on personal data protection and offering appropriate tools to facilitate compliance with data protection rules. Following the successful completion of the "byDesign" project during 2020–2022, the Authority, in collaboration with the University of Piraeus and the IT Company Abovo, successfully completed the "byDefault" project in the period 2022–2024. This project included the creation of a dedicated platform offering specialized information for Data Protection Officers and professionals in the field of data protection, as well as the development of educational material on data protection for primary and secondary school students and teachers. The outcomes of this project were presented at a successful international online conference organized by the Hellenic DPA on July 24.

As part of its strategic priority to educate children and raise their awareness about the protection of personal data, the Authority, under the European "byDefault" project and in cooperation with the University of Piraeus, developed an Augmented Reality game. This game aims to educate children on managing themselves and their relationships in the digital world, with an emphasis on the protection of personal data. On December 10, this educational material and the game were presented to the Minister of Education, who agreed to support their use in both primary and secondary education.

In December, the Authority began implementing a new two-year project titled "byRisk", again in collaboration with the University of Piraeus and Abovo, with funding from the European Commission. The aim of this new project is to raise awareness among small and medium-sized enterprises and help them accurately identify and assess all

aspects and risks related to data protection within their processing operations.

On the occasion of the celebration of the 18th Data Protection Day, the Authority successfully held an information day on January 30 at the American School of Classical Studies, titled: "Current Issues in Data Protection – Recent Developments." Additionally, marking six years since the entry into force of the GDPR the Authority and the Faculty of Law of the National and Kapodistrian University of Athens co-organized a scientific conference in memory of the late Professor Spiros Simitis of Goethe University Frankfurt a.M.. The event took place on Tuesday, May 21, at the University of Athens. Finally, on September 13, the Authority and the Scientific Council for the Information Society held a conference at the Eugenides Foundation on the topic: "Recent Developments in Data Protection."

In another important field of action, following Memoranda of Cooperation signed in previous years with Hellenic Accreditation System, the Hellenic Competition Commission, the National Transparency Authority, and the Law School of the University of Athens, in 2024 the Authority signed a Memorandum of Cooperation with Panteion University of Social and Political Sciences. The goal is the joint promotion of educational, research, and overall scientific activities, for the benefit of raising awareness and offering continuous training to both academic staff and the Authority's personnel, as well as to students, regarding the protection of personal data.

In today's digital era—marked by significant challenges to privacy—the Authority continues to make sustained and intensive efforts to meet the high expectations of society and citizens. However, its very small size stands in stark contrast to the breadth of its responsibilities, the complexity of required interventions, and the growing societal demands. Therefore, the competent state authorities must ensure that the Authority is adequately equipped with the necessary resources, in accordance with the relevant provisions of the GDPR.

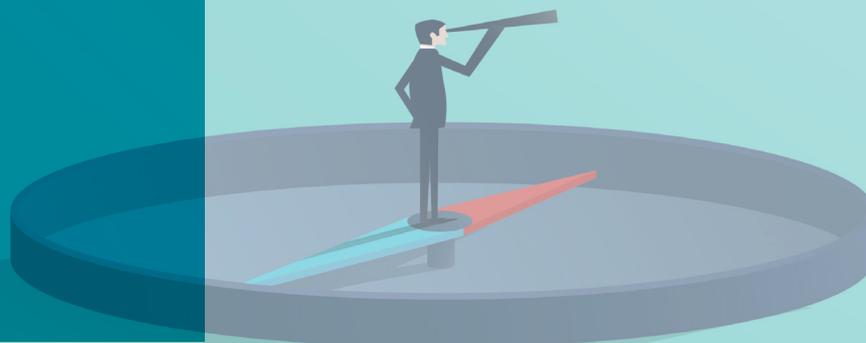
All in all, during the year covered by this report, the Authority continued to face persistent problems stemming from understaffing and insufficient resources. Despite these challenges—which intensify each year due to the increasing workload in all areas of its duties and responsibilities—the Hellenic DPA once again responded with dedication and consistency, to the fullest possible extent, in fulfilling its obligations as defined by the GDPR, other EU legislation, and corresponding national laws.



Konstantinos Menoudakos

President of the Hellenic Data Protection Authority

Overview



ROLE, MISSION AND RESPONSIBILITIES

The Hellenic DPA is a constitutionally consolidated independent public Authority (Article 9A of the Constitution) established by Law 2472/1997 transposing European Directive 95/46/EC into Greek law on the protection of individuals with regard to the processing of personal data and on the free movement of such data. The Authority is assisted by a Secretariat that operates at a Directorate level and has its own budget.

Regulation (EU) 2016/679 of the European Parliament and of the Council (General Data Protection Regulation - GDPR), which entered into force on 25 May 2018 in all EU countries, repealed Directive 95/45/EC. As of August 29th, 2019, Law 4624/2019 ("Hellenic Data Protection Authority, measures for implementing Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data, and transposition of Directive (EU) 2016/680 of the European Parliament and of the Council of 27 April 2016, and other provisions") has been in force. Articles 9 - 20 of the above law are dedicated to the Hellenic Data Protection Authority.

As for Law 2472/1997, it has been repealed, except for certain provisions explicitly mentioned in Article 84 of Law 4624/2019. Law 4624/2019 also transposed Directive (EU) 2016/680 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data by competent authorities for the purposes of the prevention, investigation, detection or prosecution of criminal offences or the execution of criminal penalties, and on the free movement of such data, and repealing Council Framework Decision 2008/977/JHA.

Furthermore, as regards the protection of personal data in electronic communications, the Authority applies Law 3471/2006 which transposes European Directive 2002/58/EC into national law. The Authority is responsible for monitoring the application of the provisions of the GDPR (Article 51(1), Recital 123), Law 4624/2019 and other regulations relating to the protection of natural persons with regard to the processing of their personal data (Article 9 of Law 4624/2019). It also contributes to the consistent application of the GDPR throughout the European Union and, to this end, it cooperates with the supervisory authorities of EU Member States and the European Commission (Article 51(2), Recital 123 GDPR; Article 10 of Law 4624/2019).

Additionally, the Hellenic DPA represents Greece to the European Data Protection Board (EDPB) and other committees or bodies tasked with data protection, and it cooperates with respective third-country authorities and international bodies (Article 50 GDPR, Article 10 of Law 4624/2019). The Authority is competent for performing its tasks (Article 57 GDPR and Article 13 of Law 4624/2019) and exercising the powers conferred on it (Article 58 GDPR and Article 15 of Law 4624/2019) on its territory (Article 55(1), Recitals 122, 129 GDPR; Article 9 of Law 4624/2019) acting with complete independence (Article 52, Recitals 117-118, 121 GDPR; Article 11 of Law 4624/2019).

COMPOSITION

Konstantinos Menoudakos, Honorary President of the Council of State was the President of the Hellenic DPA in 2024. Also, Georgios Batzalexis, Honorary Judge of the Supreme Civil and Criminal Court of Greece, served as Deputy President.

The regular and alternate members were as follows:

- **Spyridon Vlachopoulos**, Professor at the Faculty of Law, National and Kapodistrian University of Athens (NKUA), with **Christos Papatheodorou**, Professor at the Department of History and Philosophy of Science (NKUA), as his alternate.
- **Konstantinos Lambrinoudakis**, Professor at the Department of Digital Systems, University of Piraeus, with **Dimosthenis Vougioukas**, Professor at the Department of Information and Communication Systems Engineering, School of Engineering, University of the Aegean (Electrical Engineer, NTUA), as his alternate.
- **Charalampos Anthopoulos**, Professor of Law and Administration at the Hellenic Open University, with **Nikolaos Livos**, Assistant Professor of Criminal Law, Faculty of Law, NKUA, as his alternate.
- **Christos Kalloniatis**, Professor at the Department of Cultural Technology and Communication, School of Social Sciences, University of the Aegean, with **Georgios Kontis**, PhD in Civil Procedure Law (NKUA Faculty of Law), as his alternate.
- **Aikaterini Iliadou**, Associate Professor of Public Law at the Faculty of Law, NKUA, with **Nikolaos Faldamis**, President of the Hellenic IT Professionals

Network and national representative to the European Council of IT Professionals, as her alternate.

- **Grigorios Tsolias**, Lawyer and PhD holder in Criminal Law from the Faculty of Law of the University of Athens, with **Maria Psalla**, Lawyer, as his alternate.

HUMAN RESOURCES OF THE SECRETARIAT

As of June 12, 2024, and in accordance with Article 20(1) of its founding law (Law 2472/1997) and Presidential Decree 207/1998 (concerning the structure and staff positions of the Authority's Secretariat), which remained in force under Article 18(3) of Law 4624/2019, the Authority was served by a Secretariat operating at the Directorate level. It consisted of four departments: 1) Department of Auditors, 2) Department of Communication, 3) Department of Administrative Affairs and 4) Department of Financial Services.

Following the adoption of Presidential Decree No. 30 (Official Gazette A' 89/13.06.2024), titled "Organization of the Hellenic Data Protection Authority", the Secretariat has since been elevated to the level of a **General Directorate**, and the organizational units of the Authority are now structured as follows:

- 1. Directorate of Supervision**, which comprises the following organizational units at the Department level: a) Advisory and Compliance Department, b) Department of Complaints A, c) Department of Complaints B, d) Department of Research and Studies, e) Department of Audits and Security.
- 2. Directorate of Administrative, Financial Affairs, and IT**, which comprises the following organizational units at the Department level: a) Department of Administrative Affairs and Secretarial Support, b) Department of Financial Services, comprising the Budget Execution Office, the Budget Planning and Payments Office, the Procurement Office and the Department of IT and Infrastructure.
- 3. Department of Communication and Public Relations (autonomous unit).**

With the adoption of the new organizational structure, the following collective bodies were also established: a) Administrative Coordination Council b) Quality Control Committee and c) Committee on the Security of Technological Infrastructure. These bodies were formed to oversee the functioning of the Authority, coordinate its work, design actions and measures to improve its services, and submit relevant proposals to the President of the Authority.

OPERATIONAL CHALLENGES

In 2024, as in all previous years, the Authority continued to face significant challenges—some of which have persisted since its establishment. These have been highlighted in all annual reports, repeatedly brought to the attention of the Hellenic Parliament's Committee on Institutions and Transparency, and were also presented in 2023 to the competent European Commissioner, Didier Reynders, during his visit to the Authority on March 16, 2023, and to the Ministers of Justice and State (through document Ref. G/

EX/2163/17-08-2023), accompanied by proposals for amendments to Law 4624/2019.

Operational problems

The Authority continues to suffer from severe understaffing. It has never been possible to align its staffing levels with the broad range of responsibilities it is assigned under European and national legislation, nor with the associated workload. The steadily increasing volume of incoming cases is a major obstacle in the Authority's efforts to fully carry out its mission. The combined effect of understaffing and limited budget is particularly evident in the Authority's preventive work, such as systematic audits and raising awareness among data subjects and data controllers/processors.

As of now, the Authority's Secretariat includes approximately 50 staff members, out of the 91 positions foreseen in its new organizational structure (Presidential Decree 30/2024). These positions are distributed among specialized legal, IT and communication experts, as well as administrative staff. According to a study conducted by the Hellenic DPA, fulfilling its core responsibilities requires a minimum of 135 staff positions. This number was initially proposed in the draft of the new organizational plan, but it was reduced to 91 following instructions from the then Minister of the Interior, who also expressed an intention to support the filling of the vacant positions.

It is important to note that the staffing needs assessment did not consider recent or anticipated new responsibilities stemming from legislative developments at the EU level. These include the Digital Services Act (DSA), Digital Markets Act (DMA), Data Governance Act (DGA), Data Act, Artificial Intelligence Act (AI Act), and the European Health Data Space, all part of the broader EU strategies for digital transformation and data governance. Additionally, adequate staffing was explicitly recommended in the most recent Schengen evaluation of Greece.

For all these reasons, there is an urgent need to fill all positions provided for in the Authority's official organizational structure, through open recruitment procedures overseen directly by the Authority itself, as further discussed in the next section. The mobility mechanism, which enables staff transfers between public bodies, has proven ineffective in this regard, as the Authority's attempts to use it have yielded no results so far.

Ensuring the Authority's independence in staffing and Human Resources management

A. From its establishment until the early years of the economic crisis, the Authority was exempt from the ASEP (Supreme Council for Civil Personnel Selection) procedures for staff recruitment—a status that was aligned with its institutional independence. Although ASEP is itself an independent authority, its involvement deprives the Authority of control over the timing of recruitment announcements, the duration of the process, and the final staff selection. This undermines the Authority's ability to manage its own staffing autonomously, thus violating its independence. Despite the urgent need to

reinforce the Authority with personnel, the current legal framework, which mandates recruitment solely through ASEP, hinders the Authority's ability to effectively and promptly manage its human resource needs. ASEP's procedures are rigid and time-consuming, suitable for large organizations with long-term planning—but entirely unsuitable for small-sized authorities like the DPA, which must respond flexibly to sudden reductions in staff. Given the pressing need to reinforce the Authority's personnel, it is absolutely essential to introduce legislative provisions that allow the Authority to fully manage its own staffing, including filling approved vacancies—as required by Article 52(5) of the GDPR.

The most recent Schengen evaluation of Greece, conducted in October 2021 under Regulation (EU) 2022/922, expressed concern that the Authority does not have the power to select its own staff. The Authority's representatives on ASEP's staff selection committee do not have a decisive vote in the final candidate ranking. Furthermore, the evaluation emphasized that recruitment processes must be accelerated to allow the Authority to fill vacancies more rapidly. These findings were formalized in Council Implementing Decision No. 6955/24, which issued Recommendations to address deficiencies identified in Greece's implementation of the Schengen acquis in the field of data protection. The decision explicitly requires Greece to: "Ensure that the Hellenic DPA selects its own staff in accordance with Article 52(5) of Regulation (EU) 2016/679 (GDPR) and Article 42(5) of the Law Enforcement Directive, and accelerate recruitment procedures to allow the Authority to promptly fill vacant posts." Consequently, as Greece submits an Action Plan to implement the Recommendations as part of the monitoring process, a legislative revision of the Authority's recruitment mechanism is also necessary.

It is worth noting that eight non-constitutional independent authorities have already been legally exempted from ASEP procedures under Article 57 of Law 5043/2023 (Official Gazette A' 91/13.04.2023).

Therefore, the Authority must be included within the scope of Article 57 of Law 5043/2023, aligning with Article 52(5) of the GDPR. This would be a rational adjustment that does not undermine the general principle of ASEP-led recruitment in public services, given the Authority's small size and corresponding vulnerability to staffing fluctuations, unlike larger bodies such as the Hellenic Telecommunications and Post Commission (EETT) or the Competition Commission, which are already covered by these exemptions.

B. Regarding the secondment or transfer of staff to the Authority from other public entities, general legal provisions apply, including those of the mobility mechanism. However, special provisions allow the transfer or secondment of Authority staff to other public sector bodies without requiring a decision or approval from the Authority. In contrast, secondments to EU institutions require a decision by the Authority. Article 58 of Law 5043/2023 gives eight independent authorities (not constitutionally enshrined) the power to approve or reject the secondment or transfer of their staff to other public bodies, subject to the consent of their governing board, and introduces restrictions

such as limiting secondments to a maximum of 5% of total positions. These provisions should be extended to the Authority to prevent operational disruptions caused by such transfers, which contradict the Authority's legally protected independence under Article 52(5) of the GDPR in managing its own personnel.

C. The new staff evaluation system (Law 4940/2022) also applies to the Authority's personnel. While it significantly differs from previous systems, the designation of employees as high-performing and the review of objections are subject to oversight and approval by the Evaluation Oversight Committee under Article 15 of Law 4940/2022, appointed by the Minister of the Interior. Notably, independent evaluation systems exist for other authorities—such as the Greek Ombudsman—and remain in force. To safeguard the Authority's independence, as required under Article 52(5) of the GDPR, the Authority needs a self-contained evaluation system, free from third-party involvement

D. Article 20(1) of Law 4622/2019 stipulates that the internal regulations of independent authorities are to be drafted, amended, or replaced by decisions of their governing bodies. However, the Authority is excluded from this rule: under Article 18 of the subsequent Law 4624/2019, its organizational structure is approved by presidential decree. This divergence from the general rule is detrimental to the Authority. It likely stems from the simultaneous drafting of both laws and the fact that Law 4622/2019 was enacted after the completion of the draft of Law 4624/2019, which had already included the delegation provision requiring a presidential decree. Therefore, the relevant provision of Law 4622/2019 should be extended to include the Authority, enabling it to define and revise its internal organization autonomously.

Addressing the Authority's housing problem

In recent years, one of the persistent challenges the Authority has faced relates to its housing situation. As early as 2019, the Authority foresaw that the issue of its office accommodation was becoming increasingly serious. For this reason, it informed the Athens Real Estate Service and the Ministry of Finance of its need for an adjustment of its rental contract to reflect market prices, but received no response. In 2020, the Authority revised its office space requirements and submitted a formal housing request to the Athens Real Estate Service. Since then, six calls for public bidding for office lease contracts have been issued—all of which failed—along with seven calls for direct leasing, also unsuccessful.

Due to uncertainty over whether the Authority's offices must be located within the municipality designated as its official seat (the Municipality of Athens), the Authority sent a letter to the Region of Attica—which also holds approval authority—arguing that no such legal requirement exists. Nonetheless, a legislative amendment is recommended, designating the Region of Attica as the Authority's official seat. A draft provision to this effect has been included in recent proposals to amend Law 4624/2019.

It is worth noting that the rent cap per square meter set by the public sector for

approving office leases is significantly lower than prevailing market rates, making the task of securing suitable office space especially difficult. In a recent offer, the Athens Real Estate Service ultimately approved a much higher rent (approximately €507,000 per year) than it had previously accepted, acknowledging the real risk of the Authority being left without office space altogether.

The housing issue could have been resolved earlier, with fewer difficulties and lower costs, if the Real Estate Service had been allowed to respond more flexibly to market conditions in a timely manner. It should also be recalled that in March of the previous year, the Authority was forced to vacate one of the two floors it occupied due to a court eviction order issued upon a landlord's lawsuit. This resulted in substantial operational disruption, with many of the Authority's services left without office space. There is now an imminent risk of eviction from the remaining floor, as the landlord has requested a rent increase that the Real Estate Service and the Ministry of Finance cannot approve under current legislation. Consequently, the landlord has filed another eviction lawsuit with the Athens Single-Member Court of First Instance.

In light of these developments, drastic measures must be taken to resolve the issue—either through appropriate legislative action or administrative solutions, such as allocating to the Authority a suitable state-owned building (broadly defined), possibly through purchase, or by providing the necessary funding to secure office leases at rates reflective of actual market conditions.

Provision of adequate budget and ensuring independent financial management

A. The budget allocated to the Hellenic DPA for operational expenses is not sufficient. An increase in funding is required to maintain infrastructure at a high standard; cover housing costs, especially in view of the significant increase in office rental prices (see previous section); finance official travel of Authority staff, both for participation in committees and working groups under the European Data Protection Board (EDPB), and cooperation with counterpart supervisory authorities across Member States within the consistency mechanism under the GDPR. Given the constant legal and technological developments, ongoing staff training is also essential. During the latest Schengen evaluation, the issue of the Authority's budgetary independence was also raised. One of the official recommendations was to safeguard the Authority's full financial independence by including a provision whereby the Authority's budget proposal, submitted to the General Accounting Office, could be discussed with it, and any amendments made by the Office should be formally communicated to Parliament.

B. Although Authority personnel are recruited with exceptionally high qualifications, their salaries fall short compared to those of other entities, particularly for newly hired staff. Therefore, it is necessary to ensure a remuneration level that serves as an incentive for qualified young professionals to work at the Authority. This may be achieved through the introduction of a special salary scale.

C. The Authority participates in EU-funded programs for awareness campaigns, training activities, and research projects. These programs impose specific rules

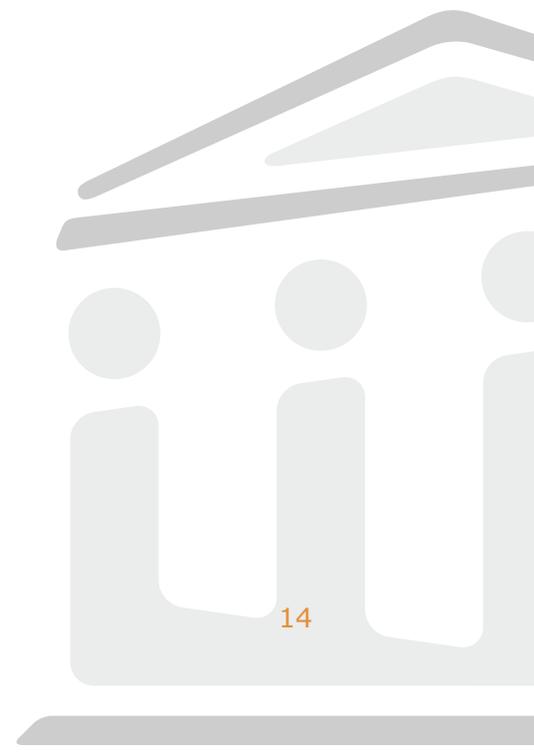
for financial management. Therefore, the relevant provisions of Article 19 of Law 4624/2019 must be aligned with these EU rules to ensure compliance and efficiency in fund administration.

Facilitating the execution of the Authority's tasks

Due to the high volume of complaints and requests, combined with limited staffing, the Authority requires greater flexibility in managing its workload, particularly in handling complaints and addressing serious data protection issues effectively.

To that end, the Authority has already requested an amendment to Law 4624/2019, allowing its Rules of Procedure to include a provision for implementing a friendly settlement procedure to resolve complaints concerning alleged GDPR violations that: a) affect a limited number of data subjects, or b) have limited impact on the rights and freedoms of data subjects.

Additionally, a request has been made to amend Article 15(1) and Article 39 of Law 4624/2019 to clarify that, in the context of an investigation of a controller or processor, the Authority's investigative powers extend to third parties, whether public or private entities, to ensure effective oversight and enforcement over the data controller or processor in question.



Key statistics



In 2024, the number of incoming complaints amounted to 1.820, an increase of around 29% compared to 2023 (1.414), while 1.422 complaints were resolved, showing a very large increase of around 61% compared to the previous year (883). The number of data breach incidents notified to the Authority under the GDPR amounted to 205, an increase of approximately 16% compared to the previous year (177 in 2023), while 24 data breach notifications were also submitted by providers of electronic communications services under Law 3471/2006, reduced by 7 from 31 in 2023, as well as 1 incident under Article 63 of Law 4624/2019 (2 in 2023), i.e. the total breach incidents amounted to 230, an increase of approximately 10% compared to 2023 (out of a total of 210). In 46 cases, the examination was completed with the adoption of a decision by the Plenary or the Chamber.

As regards the above-mentioned notifications of data breaches under the GDPR, 13 concerned cross-border processing, in 74 cases data subjects were informed, while, among those related to electronic communications, all cases concerned processing without a cross-border character and in 18 cases data subjects were informed.

In 35 of the Authority's decisions, sanctions are imposed on controllers. In 11 cases the penalty of a reprimand - warning for compliance was imposed or a compliance order was given after a complaint and hearing and in 24 cases a fine ranging from 700 € to 2.995.140 € was imposed. It is clarified that in 9 of these 24 decisions of the Authority, the penalty of the reprimand was imposed in addition to the financial fine, while a relevant order for compliance and recommendation was given. In total, fines of 4.302.149 € were imposed.

The above decisions of the Authority are categorised in the main thematic areas as follows: 2 in the field of Health, 1 in the field of Education and Research, 4 in the field of Private Economy, 1 in the field of New Technologies, 2 in the field of Promotion of products and services (advertising, spam, telephone nuisances), 3 Prosecution Authorities – Security, 3 in the field of Industrial Relations, 2 in the field of Closed Circuits for Television, 8 in the field of Public Administration, 4 in the field of Internet Services, 1 in the field of Electronic Communication Services and 4 in Others.

In 2024, the Authority was informed of the submission of 23 applications for annulment to the Council of State, 19 of which concerned decisions of the Authority of 2024 and 4 decisions of the Authority of 2023. 12 applications for annulment against decisions of the Authority of previous years (2019-2023) were discussed and 2 decisions were issued rejecting the submitted applications for annulment.



Complaints

Number of complaints resolved: **1422**.

Fines

Amount of fines imposed: **4.302.149** euros
(in **35** decisions)



Decisions

46 decisions were issued

Data Breach Notifications

Number of Data Breach Notifications
received:

205 for **GDPR** and

24 for **Law 3471/2006**



Enforcement

SELECTED DECISIONS ON COMPLAINTS

Decision 9

Examination of complaints related to telephone calls for the promotion of products and services of an energy service provider

Summary: The Hellenic DPA examined a large number of complaints concerning the making of telephone calls for the promotion of products and services of the energy service provider company Elpedison. The Authority analyzed the related activities of Elpedison and five cooperating companies conducting advertising calls (call centers). After examining the complaints, the Authority imposed a fine of €127,709 on Elpedison for deficiencies in the control measures of the cooperating companies and fines on three call center companies (Call Experts, Zitatel, PLEGMA) amounting to €10,000, €6,000, and €20,000 respectively, for lack of security measures during the telephone calls, which resulted in subscribers who had been registered in the registry of Article 11 of Law 3471/2006 (which incorporated [Directive 2002/58/EC](#)) being called. Additionally, the Authority imposed a fine of €5,000 on the company Zitatel because the collection of telephone numbers via the website fthinoreyma.gr had been carried out in violation of the provisions of the GDPR. Beyond the fines, the Authority imposed a warning and other corrective measures to ensure the legality of the relevant procedures.

Decision 10

Imposition of a fine for improper implementation of technical and organizational measures, resulting in unauthorized access by third parties

Summary: The Authority imposed a fine of €2,995,140 on the data controller ELTA (the Hellenic Post) for a personal data leak, which was later published on the dark web. The examination of the incident revealed that the data controller did not maintain the required technical and organizational measures and failed to ensure the implementation of the data processing security policy.

Decision 13

Ex officio investigation into the development and deployment of the “Centaur” and “Hyperion” programs by the Ministry of Migration and Asylum regarding the control of reception and accommodation facilities for third-country nationals

Summary: An administrative fine totaling €175,000 was imposed on the Hellenic Ministry of Migration and Asylum (MMA) — following an ex officio investigation — for the integrated digital system managing electronic and physical security (“Centaur”) and for the integrated entry-exit control system with a reader combined with fingerprint identification — that is, processing biometric data — (“Hyperion”), two programs implemented in the facilities of Closed Controlled Structures and Reception and Identification Centers for third-country nationals, covering guests, employees, and certified members of non-governmental organizations.

The Hellenic DPA found inadequate cooperation on the part of the Ministry, as data controller, and further considered that the required DPIAs carried out by the Ministry were substantially incomplete and limited in scope, and that serious shortcomings remain as regards the Ministry’s compliance with certain provisions of the GDPR in relation to the implementation of the systems in question. In addition to the administrative fine, the Authority issued a compliance order requiring the Ministry to fulfill its GDPR-related obligations within three months.

Decision 16

Imposition of a fine and order to comply following a leak of expats’ personal data file

Summary: The Authority imposed an administrative fine of €400,000 on the Hellenic Ministry of Interior and a fine of €40,000 on the other data controller (MEP) following a large number of complaints regarding unsolicited political communication sent via email on 1/3/2024, as part of an initiative related to the European elections, by one of the data controllers.

Following a series of on-the-spot audits and the receipt of evidence and data, it was found that a file containing personal data of all registered expatriate voters for June 2024 elections was transferred outside the Ministry of the Interior. For this file,

the Ministry is the controller and the legislation in force does not provide for any case of transmission to recipients outside the Ministry. The file contained, in addition to the known details of the electoral roll, the email addresses and telephone numbers of Greek expatriate voters, which are excluded from being provided to the recipients of copies of the electoral roll. The file was sent to the second of the potential controllers from a sender, whose identity and capacity have not been determined to date, in order, allegedly, to use it for the analysis of the election results.

The Hellenic DPA noted that the infringements identified are not related to the voting process and ordered the deletion of those data unlawfully processed. As regards the political party of New Democracy and the other potential controller involved, the Authority postponed the adoption of a decision because it considered that the case needed further investigation.

Decision 32

Imposition of fine on the Ministry of Citizen Protection

Summary: The Authority imposed an administrative fine of €150,000 on the Ministry of Citizen Protection (data controller) for shortcomings in providing general information to data subjects concerning the introduction of the new type of identity cards for Greek citizens, as well as delays and deficiencies in the required data protection impact assessment. The Hellenic DPA emphasized the obligation to update and codify the legal framework regarding the elements of the new type of identity cards for Greek citizens and issued a compliance order to the Ministry to be fulfilled within six months.

Opinion 1 regarding the Personal Number

Summary: The Ministry of Digital Governance submitted for an Opinion to the Authority a draft Presidential Decree as stipulated in Article 107, paragraph 6 of Law 4727/2020, regarding the Personal Number (PN). In its Opinion, the Authority emphasized the importance of the Personal Number for verifying the identity of natural persons in their transactions with public sector entities and underlined the need for the PN to be used exclusively for the intended purpose and not for other purposes, which would require legislative regulation and legality assessment. Furthermore, the Authority stressed that with the establishment of the PN, the need to maintain multiple sectoral identifiers by public entities ceases, as such practice would conflict with the principle of data minimization. The Opinion contains general remarks as well as specific comments on the provisions of the draft Presidential Decree.

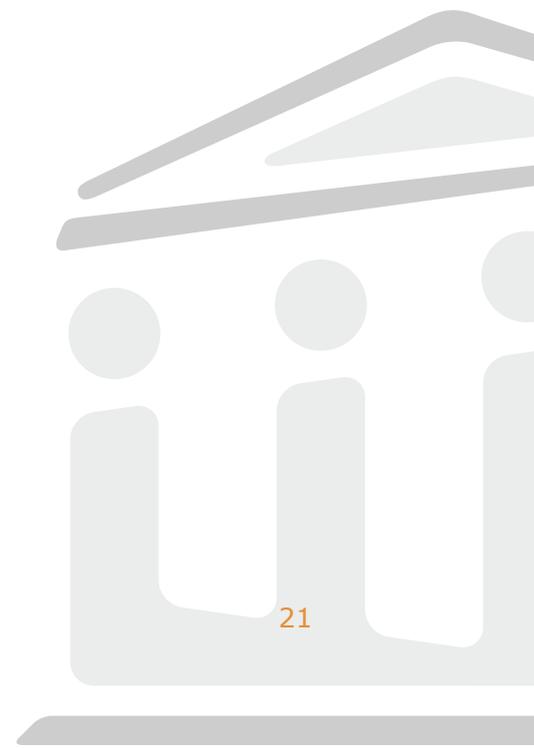
Opinion 4 regarding the surveillance system for the prevention and combating of criminal offenses and traffic management for the needs of the General Police Directorate of Attica

Summary: The Hellenic DPA examined a consultation request from the Hellenic

Police concerning the data protection impact assessment study of a surveillance system aimed at preventing and suppressing criminal offenses as well as managing traffic for the needs of the General Police Directorate of Attica. The Authority concluded that the said study adequately addressed the risks posed to the protected legal interests of the data subjects and provided recommendations on specific issues.

Specifically, the Hellenic DPA recommended:

- Enhancing transparency by using multi-level information provision and utilizing modern technologies to visualize the monitored areas, while simultaneously publishing the full text of the decision to install the systems.
- Providing sufficient resources to the Data Protection Officer of the Hellenic Police.
- Defining minimum specifications for image/audio capture devices.
- Specifying the anonymization process when using data for training purposes.





This section outlines several of the most significant advisory and consultative actions.

The Ministry of the Interior submitted to the Hellenic DPA a draft law entitled *“Electing MEPs, facilitating voters by postal vote, clearing of electoral lists, and other provisions of the Ministry of the Interior,”* requesting its opinion regarding the exercise of the right to vote by post for the election of the country’s representatives in the European Parliament, as well as for a national referendum.

In its response, the Authority highlighted that the fundamental elements of the processing of postal voters’ personal data are not specified, that is, the identity of the data controller, the legal basis for processing, the data subjects’ rights under Articles 15–22 of the GDPR, any categories of recipients of the data, and the retention period or criteria for determining it. Additionally, the draft law does not outline appropriate data security measures, nor does it contain any enabling provision authorizing their specification by regulatory act. These essential details are also omitted for the processing of data through a television system used to monitor polling locations.

Additionally, the Ministry of Education, Religious Affairs, and Sports submitted to the Hellenic DPA a draft law entitled *“Measures to Prevent, Address, and Combat Violence in the Context of Sporting Events”*, requesting the Authority’s opinion, particularly on the proposed provisions of Articles 7 and 8. Regarding Article 7, on the use of modern technological means for identifying ticket holders attending sporting events, the Authority observed that this provision introduces an additional personal data processing activity. However, it is unclear whether the functionality and effectiveness of the existing provisions, including the central electronic ticket

system established under Article 41C of Law 2725/1999 ("*Sports Law - Amateur and professional sports and related matters*"), have been properly assessed, especially with regard to the mandatory issuance of a fan card the necessity of which is questionable. Furthermore, the Authority noted that Article 7 designates two data controllers without clearly specifying the purpose of processing for each. Moreover, the source of the personal data to be processed for ticket procurement/e-booking and entry control is not identified.

The Authority also pointed out the absence of a provision limiting the retention period of e-ticket data and emphasized the obligation to conduct a Data Protection Impact Assessment (DPIA) prior to the commencement of processing, as required by Article 35 of the GDPR. Concerning the electronic supervision of sports facilities via cameras, the Hellenic DPA recommended that the Ministry provide clear and appropriate information tailored to the method of ticket issuance (e.g., electronic and multi-level formats). Finally, the Authority proposed including a clear retention period for personal data and specifying the nature, duration, and criteria of any processing that occurs both before and after the conclusion of the sports event.

In a letter addressed to the Presidency of the Government, more specifically the Directorate for the Legislative Drafting Process of the Secretariat-General for Legal and Parliamentary Affairs, the Authority submitted its remarks on a draft law from the Ministry of Economy and Finance entitled "*Conditions for the Use of Public Property in Coastal Areas, Regulations for the Acquisition of Private Property Owned by the State, and Other Provisions*".

The Hellenic DPA provided observations particularly on Articles 15 to 19, as well as Article 22(8) of the draft law, in light of the provisions of the GDPR. It reserved the right to examine further specific issues that may be brought to its attention, in accordance with Article 57(1)(c) of the GDPR. Furthermore, the Authority noted that Article 15, which establishes the operation of a platform for monitoring and controlling concessions for the simple use of the seashore and beach, should clearly specify the personal data to be processed, the retention period or the criteria determining it, and any recipients of such data. Regarding Article 16, the Authority emphasized that the provision should first define the purpose of public access to the "concession for the simple use of the seashore and beach" and the map of the respective area granted, as well as specify the data to be made publicly accessible, in accordance with the principle of data minimization (Article 5(1)(c) GDPR).

The Ministry of Justice requested the Authority's opinion, on draft provisions of the Criminal Code and the Code of Criminal Procedure related to the electronic surveillance of convicts under restrictive conditions or serving sentences at home (Articles 105, 283, 288, and 497 of the Code of Criminal Procedure). The Authority submitted its opinion to the Ministry, providing detailed comments. In particular, it concluded that the processing of personal data by competent authorities for the electronic surveillance of convicted persons on leave falls within the scope of Directive (EU) 2016/680, as transposed into national law by Chapter D of Law 4624/2019

(“*Hellenic Data Protection Authority (HDPa), measures for implementing Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data, and transposition of Directive (EU) 2016/680 of the European Parliament and of the Council of 27 April 2016, and other provisions*”). Accordingly, the proposed draft provisions should fully comply with the requirements of EU law. In this context, the Authority recommended rewording draft provision 288(1) of the Code of Criminal Procedure and emphasized that the accused, as a data subject, must be informed of the personal data to be processed and of their rights before the commencement of processing, in line with the Authority’s Opinion No 1/2014.

Furthermore, the Authority noted that Article 45A(2) of Law 4624/2019 defines the required content of any special national legislation governing the processing of personal data for the prevention, investigation, detection, or prosecution of criminal offenses or the execution of criminal penalties. It also proposed a review of the existing broader legal framework governing electronic surveillance measures against the requirements of Directive (EU) 2016/680 and Chapter IV of Law 4624/2019.

The Ministry of Digital Governance submitted to the Authority the draft Presidential Decree implementing the provisions of Article 107(6) of Law 4727/2020 concerning the Personal Number (PN) and requested the Authority’s opinion. In Opinion No 1/2024, the Authority emphasized the importance of the PN for verifying individuals’ identities in their interactions with the public sector. It underscored that the PN must be used exclusively for its intended purpose and not for any other purposes, which would require separate legislative regulation and legality assessment.

Additionally, the Authority noted that the introduction of the PN eliminates the need for public bodies to maintain multiple sector-specific identifiers, in line with the data minimization principle.

Also, the aforementioned Ministry submitted a draft law on “*Measures to Implement Regulation (EU) 2022/2065 of the European Parliament and of the Council of 19 October 2022 on a Single Market for Digital Services and Amending Directive 2000/31/EC (Digital Services Act)*”, and requested the Authority’s opinion. In Opinion No 2/2024, the Hellenic DPA welcomed its role in supervising the provisions of the Act, recognizing that their purpose aligns closely with its mission to oversee the implementation of data protection regulations.

Furthermore, the Ministry forwarded to the Authority the recommendation from the Hellenic Telecommunications and Post Commission (“EETT”) addressed to the Minister for Digital Governance, concerning measures to ensure equivalent access for persons with disabilities to electronic communications services, in accordance with Law 4727/2020, as amended. The Ministry also requested the Authority’s final comments to proceed with drafting the joint ministerial decision.

The Authority noted that EETT’s recommendation incorporated its previous comments and added further observations. These included the need to assess the proposed purpose of data processing in line with the principle of lawfulness under

Article 5(1)(a) of the GDPR, the selection of an appropriate legal basis for the intended processing, and the evaluation of whether collecting the proposed data of entitled persons with disabilities is necessary—particularly in relation to the principle of data minimization. The Authority also emphasized the importance of requiring providers, as data controllers, to clearly specify either the retention period or the criteria for data storage, to implement adequate data security measures, and to ensure that data subjects can effectively exercise their rights.

The Ministry of Citizen Protection submitted to the Authority a draft amendment to Article 1(5) of Law 3103/2003, concerning the transmission of passports and other security-related issuance documents by the Hellenic Police, and requested the Authority's opinion in accordance with its mandate.

The Hellenic DPA pointed out that the supporting documentation necessary for exercising its advisory competence had not been submitted in relation to the proposed regulation. In line with the accountability principle under Article 5(2) of the GDPR, such documentation should demonstrate how the proposed measures meet their stated objectives, ensure compliance with the general principles of personal data processing, and outline the safeguards in place to address risks to the rights and freedoms of individuals arising from the transmission of all supporting documents for the issuance of passports, other security documents, and the passports themselves. The Authority issued its opinion, highlighting key observations within the relevant timeframe. It maintained that, for the processing activities related to the circulation of passport and other security documents via appropriate network infrastructure and the use of Information and Communication Technologies, the data controller is required to conduct a Data Protection Impact Assessment (DPIA). It also emphasized the need for the proposed regulation to clearly define the fundamental elements of the processing, including the identity of the data controller, the types of data involved, the categories of recipients, the data retention period, and the roles of data processors.

The Hellenic DPA submitted its comments to the Standing Committee on Public Administration, Public Order and Justice regarding the draft law titled "*Transposition of Directive (EU) 2022/2555 of the European Parliament and of the Council of 14 December 2022 on measures for a high common level of cybersecurity across the Union, amending Regulation (EU) 910/2014 and Directive (EU) 2018/1972, and repealing Directive (EU) 2016/1148 (NIS 2 Directive), and other provisions*".

The Authority stated that it had no objections to the draft law but provided the following remarks:

- The existing competences of the Hellenic DPA remain unaffected. These competences are safeguarded under the provisions of the GDPR, Law 4624/2019, and Law 3471/2006, which include, among other obligations, the requirement to notify data breach incidents. The two laws, although often resulting in similar technical and organizational security measures, protect different rights and work in a complementary way, as in the case of breach incidents, where the Authority aims at the measures taken by the operator

to safeguard citizens from the consequences of the incident, without being actively involved in the technical response to the incident.

- A proper legal basis is established for the exchange of information between CSIRTs (Computer Security Incident Response Teams), including the processing of personal data necessary for handling incidents.
- Systematic cooperation between agencies involved in network and information security is appropriately foreseen, including collaboration between the Data Protection Authority (DPA) and the National Cyber Security Authority for incident management. It is deemed appropriate to formalize this cooperation through a memorandum of understanding to ensure seamless coordination between the two authorities.
- It is positive to establish that the tasks of the NSA are incompatible with those of the Data Protection Officer (DPO).
- Finally, the proposal for a standardized template for a uniform cybersecurity policy is welcomed, as specifying minimum policy requirements is considered good practice. However, imposing a uniform format and methodology for policy development is not deemed reasonable. In this context, the Authority has recommended clarifying that the completeness check is necessary and purposeful but should neither constitute an endorsement of the policy nor replace other activities such as certifications.

The Hellenic DPA also examined a consultation request submitted by the Hellenic Police concerning a data protection impact assessment (DPIA) for a surveillance system designed to prevent and suppress criminal activity and manage vehicle traffic. In its Opinion 4/2024, the Hellenic DPA concluded that the submitted DPIA satisfactorily addresses the risks to the legitimate interests of data subjects and issued the following recommendations: a) Enhance transparency through multi-level information provision, the use of modern imaging technologies in monitored areas, and the public posting of the full decision authorizing the installation of the systems; b) Allocate adequate resources to the Hellenic Police's Data Protection Officer; c) Define minimum technical specifications for image and audio capture devices; d) Specify procedures for anonymization when data is used for educational purposes.



Increasing data subjects' awareness of the risks, rules, safeguards and rights related to the processing of personal data, as well as controllers' and processors' awareness of their obligations, has consistently been one of the main pillars of the Authority's mission, which is explicitly provided for in the GDPR.

This section provides an overview of some of the most notable communication activities carried out during 2024:

Data Protection Day, 30 January 2024

On the occasion of the celebration of the 18th Data Protection Day, the Hellenic DPA organized, on 30 January 2024, at the Cotsen Hall Amphitheatre of the American School of Classical Studies in Athens, an Information Day on "Current data protection issues - recent developments". The Information Day was dedicated to the late Professor Spyros Simitis.

Welcome speeches were delivered by the Minister of Justice, George Floridis, and the President of the Hellenic DPA, Konstantinos Menoudakos. Professor Lilian Mitrou, collaborator and student of Spyros Simitis, read former Prime Minister's Costas Simitis message.

Joint Conference of the Hellenic DPA and the National and Kapodistrian University of Athens for the 6 years of GDPR

On the occasion of the 6th anniversary of the implementation of the GDPR, the Hellenic

DPA and the Law School of the National and Kapodistrian University of Athens co-organized, on Tuesday 21 May, a scientific conference in memory of Professor Emeritus of Goethe University Frankfurt Spyros Simitis, at the "Alkis Argyriadis" amphitheater of the University of Athens. Deputy Minister of Justice Ioannis Bougas, President Konstantinos Menoudakos and the Dean of the Faculty of Law of the National and Kapodistrian University of Athens Linos Alexandros Sicilianos gave welcome speeches. Giovanni Sartor, Professor of Law at the University of Bologna, was the keynote speaker.

Hellenic DPA's contribution to the implementation of EU-funded research and other projects

As part of its responsibilities to raise awareness among the public, controllers and processors of data protection legislation, the Authority continued and completed, in August 2024, the research project "Informed by default: promoting awareness among critical social and professional groups (children and data protection professionals) - byDefault", which was launched on 1 September 2022 (<https://bydefault-project.eu/>). The implementation was carried out jointly with the University of Piraeus and the Greek IT company ICT-ABOVO with co-funding by the European Commission.

The project had two main objectives: on the one hand, to create an online platform for cooperation and exchange of views for data protection professionals. The platform, which operates under the guidance and supervision of the Hellenic DPA, aims to share specialized knowledge in various areas facilitating the practical application of data protection principles. The second main objective was to develop a comprehensive training programme to raise awareness about the protection of personal data from an early age. The programme is addressed to primary and secondary school students, while providing training and support to teachers so that they are able to use it in their work.

In the framework of the operational programme "Public Sector Reform 2014-2020", which includes the project "Extension and provision of services of the Integrated Information System for the management of requests of citizens, businesses, public services and other bodies through the portal of the Hellenic Data Protection Authority", two systems were created to assist citizens and bodies in the exercise of their rights and obligations (new system of assistance for the exercise of a right and for the notification of an incident of breach), as well as a microsite for children and teenagers ("Young Citizens").

Educational game "Tzimanious"

In the context of the above "byDefault" project, the Authority, in cooperation with the University of Piraeus, created educational material for students and an augmented reality game (called "Tzimanious"), as well as relevant training material for teachers.

The President of the Hellenic DPA K. Menoudakos, along with his associates from the University of Piraeus, presented, on Tuesday 10 December, the educational material and tool to the Minister of Education, Religious Affairs and Sports Kyriakos Pierrakakis, proposing its use in primary and secondary schools. The Minister of Education responded immediately by adopting these proposals and aiming to integrate them into the computer science course or other related courses.

International conference on the results of the "byDefault" project

An online conference entitled "Presentation of the results of the project 'byDefault'" was held on 24 July to present the conclusions and results of this two-year project.

The topics presented and discussed were:

- The online platform and the digital library (<https://collab.dpa.gr>)¹ created for data protection officers and professionals, the needs and wishes of the platform's and library's users;
- The educational programme and the "Tzimanious" data protection game, created for primary and secondary school students, and related supporting material for teachers.

The conference also included a special section dedicated to similar projects implemented by counterpart authorities and agencies of the European Union. It is noted that colleagues from the EDPB presented the EDPB Data Protection Guide for Small Business.²

European project "byRisk"

The Authority is participating in a new two-year EU-funded research programme (CERV-2024-DATA), entitled "byRisk" (<https://byrisk-project.eu/>), and launched on 1 December 2024.

The project has two strategic goals:

- Assist small and medium-sized enterprises (SMEs) in the proper identification and analysis of all data protection risks arising from their data processing activities.
- Raise awareness among the general public about data protection and privacy risks.

Participation in training seminars

Throughout 2024, the training seminars at the National Centre for Public Administration and Local Government (EKDDA) continued on "The General Data Protection Regulation: the obligations of the public administration" with special scientists from the Authority's

1 Webpage in Greek.

2 See press release here <https://www.dpa.gr/en/enimerwtiko/press-releases/international-conference-presentation-project-bydefault-outcomes>

Directorate of Supervision acting as instructors.

Furthermore, on 10 January, Dr Efrosini Siougle, Head of the Advisory – Compliance Department of the Authority, participated in a webinar for the members of the Panhellenic Scientific Association of Directors in the context of the 8th Training Cycle 2023-2024 on “Protection of personal data in schools”. On 9 February, Authority member, Professor Christos Kalloniatis, gave a speech at the High School of Chalkida entitled “Security and Privacy on the Internet”. Dr Siougle, participated, also on 27 February, in an online training session (webinar) for the directors and deputy directors of the school units under the Directorate of Secondary Education of Athens on “Personal Data Protection in school units”. Finally, on 13 March, Professor Kalloniatis, participated as speaker in the conference entitled “We Stay Safe on the Internet” organized by the Directorate of Secondary Education of Lesvos in Mytilene. The title of Professor Kalloniatis presentation was “Security and Protection of Privacy on the Internet”. The presentation was repeated, on April 17, in the context of the same event organized by the Directorate of Secondary Education of Chios.

Participation in workshops and conferences

During 2024, the President, members and scientific staff of the Authority participated as speakers or coordinators in scientific conferences and workshops:

- On 13 March, the President of the Authority K. Menoudakos, addressed the 10th Conference of Technology & Communication Law entitled “Cutting Edge Issues in Communications, Information and Technology”. In this conference, the member of the Authority, Professor Costas Lambrinouidakis, also participated as a speaker.
- On 14 March, President Menoudakos, gave also a welcome speech at the presentation of Manos Sfakianakis and Evi Voukelatou children’s book entitled “Cyber Story – Adventure on the Internet”.
- President Menoudakos addressed the webinar entitled “Audit Procedure and Protection of Personal Data”, organised by the National Transparency Authority on 24 April. The same event was attended by the special scientist-lawyer of the Authority, Kalli Karveli who is also Head of Complaints Department. Her presentation was entitled “The implementation of the GDPR in the Public Administration: Responsibility and Obligations”.
- On 14 May, President Menoudakos delivered a welcome speech at the workshop “Sanctions and fines: The Supervisor’s approach”, organized by the Hellenic Association of Regulatory Compliance Professionals, while Dr G. Rousopoulos, Head of Directorate of Supervision, presented a paper entitled “The methodology for determining the fines imposed by the Hellenic DPA”.
- On December 18, Konstantinos Menoudakos gave an opening speech at the 20th Graduation Ceremony of the Postgraduate Program in Accounting and Finance of the Athens University of Economics and Business.

The Authority was also represented by members and special scientists in the following events:

- The member of the Authority, Professor Ch. Kalloniatis participated in a workshop entitled "Artificial Intelligence: Challenges and Opportunities for Society and Economy" organised by the Institute for Social Democracy on 25 January. His presentation was entitled "Ensuring Privacy in the Age of AI".
- On 10 February, Dr Grigoris Tsolias, member of the Authority, presented a paper entitled "Electronic "Biometric" Signature and Protection of Personal Data" in the 6th meeting of the Hellenic Association of Forensic Sciences dedicated to the "Biometric Signature as a secure medium for transactions".
- On March 13th, the member of the Authority, Professor Lambrinoudakis participated with a presentation entitled "AI and Personal Data" at the 10th Anniversary Conference on Technology and Communication Law held in Athens.
- On 15 April, during the official visit of the Vice-President of the European Commission for Values and Transparency to Athens, Ms Věra Jourová, in the context of her "Democracy Tour", the Representation of the European Commission in Greece organized a roundtable for an exchange of views with institutional actors. The Authority was represented by Professor K. Iliadou, member of the Authority, and Dr Rousopoulos, Head of the Supervision Directorate.
- On 19 April, Dr Kostas Limniotis, Head of Studies and Research Department of the Authority, presented remotely "The critical crossroads of the EU: The proposal for a CSAM Regulation and the limits of cryptography" to postgraduate students on the MSc "Law and Information and Communication Technologies" of the Digital Systems Department of the University of Piraeus.
- On 22 May, on the occasion of the completion of six months of operation of the new portal of "Nomiki Bibliothiki Daily" (NB Daily), a meeting of 12 associates was organized, including the member of the Authority, Professor Spyros Vlachopoulos and the Head of the Department of Communication and Public Relations of the Authority Dr Elias Athanasiadis, in order to exchange views, ideas and comments on the news portal.
- On 27 May, Dr Limniotis, participated with a presentation in the Public Employment Service (DYPA) training program "The General Data Protection Regulation and its implementation in the public sector", in the "Special issues of GDPR implementation" session.
- On July 1st, the member of the Authority Professor Kalloniatis participated also as a speaker at the Summer School on Cybersecurity in Porto (speech title: "Privacy by Design").
- On 3 October, Dr. Ef. Siougle, Head of Advisory and Compliance Department of the Authority, gave an online presentation in order to inform representatives

of the primary school Argyris-Laimos on personal data protection issues.

- The member of the Authority C. Kalloniatis, presented a paper entitled "Privacy satisfaction as a technical and organizational requirement in the modern digital age", at the event entitled "The new landscape for #Cybersecurity and Privacy", organized by the Greek KnowledgeNet Chapter of IAPP on October 17th. He also participated as a speaker in Olympia Forum V, in the "Digital Innovation in Education" panel on 18-10-2024.
- On 14 November, Dr Kostas Limniotis and Dr Elena Maragou, lawyer special scientist of the Authority, participated in a discussion-focus group dedicated to the preparation of a special report on educational and information needs related to the EU Charter of Fundamental Rights. This action was part of the "Fair Project - Access to rights", implemented, in Greece, by the Centre for European Constitutional Law - Tsatsos Foundation. Responding to the European Commission's invitation on the "Strategy to strengthen the application of the Charter of Fundamental Rights in the EU", the Tsatsos Foundation is carrying out awareness and communication actions.
- On 5-6 December, Hellenic DPA special scientist of the Department of Audits and Security Leonidas Roussos, represented the Authority in the annual meeting of the "Working Group on the Exchange of Practices in Handling Complaints" organized under the auspices of the Spring Session on Data Protection, in Tallinn, Estonia. In collaboration with its UK counterpart, the Hellenic DPA hosted a Workshop on New Technologies, Data Security and Data Breach Incidents, in which three relevant case studies were presented.
- On 11 December, Dr Limniotis, represented the Authority at the Online Annual Meeting of the advisory body of the Hellenic Safer Internet Centre with a presentation entitled "The role of the Data Protection Authority in the implementation of the DSA".
- On 13-14 December, Dr Efrosini Siougle and Charis Symeonidou, lawyer, special scientist of the Authority, participated in the 13th Panhellenic Conference of the Association of Greek Lawyers e-Themis on "Credit Institutions - Legal & Institutional Aspects", with a joint presentation entitled "Banks as Data Controllers: risks and liabilities". Dr George Kontis, deputy member of the Hellenic DPA, was the chair of the session; his presentation was entitled "Civil liability in cases of fraud through electronic banking transactions".

E-newsletter

During 2024, the Hellenic DPA published four new issues of its e-Newsletter (No 43 - 46) which aims to provide brief but comprehensive information on its work, key statistics, the latest developments on the protection of personal data at national, European and international level, news on recent or upcoming events and, finally, bibliographical news.

Interviews and publication of articles in the news media

- On 25 January, the President of the Authority K. Menoudakos gave an interview to journalist Eleftheria Kollia for <https://daily.nb.org/> ("Konstantinos Menoudakos: Authorities are not all the same").
- On 21 January, a letter from the President of the Authority K. Menoudakos was published in the newspaper KATHIMERINI as a reply to an article by A. Drimiotis. Similarly, on 3 February 2024, a letter from the President of the Authority was published in the column "Letters from our Readers" of the same newspaper entitled "The Hellenic DPA and Cameras".
- On 5 April, an article including statements by the President of the Authority was published on the AFP-France 24 news network, entitled "Political spam sparks uproar in Greece ahead of EU vote".
- An article by the President of the Authority K. Menoudakos, entitled "How to strengthen Independent Authorities?" was published in VIMA KYRIAKIS on 6-10-2024 (print version).
- On 17 October, an article by the President of the Authority K. Menoudakos was published in the newspaper TO VIMA, entitled "Do we need a constitutional lifting?".
- On 12 December, an article entitled "Making geniuses in personal data" was published in the daily newspaper KATHIMERINI, in which the member of the Authority C. Lambrinouidakis presents the "Tzimanious" augmented reality game created as part of the European project "byDefault".
- The General Director of the Secretariat of the Authority Dr. Vasileios Zorkadis published the following articles: "Digital platform for cooperation and specialised information for data protection professionals" (daily.nb.org 11-7-2024); "Informing school-age children and training teachers on data protection" (KATHIMERINI, 30-7-2024).
- The former President of the Hellenic Parliament Nikolaos Voutsis and the member of the Authority, Professor Charalambos Anthopoulos discuss institutional and political issues in their article ("The limits of the discussion about the President") in newspaper TO VIMA (20-12-2024).
- Professor and member of the Authority Spyros Vlachopoulos gave an interview to <https://www.liberal.gr/> (30-12-2024) entitled "Constitutional review: Presidency of the Republic and Artificial Intelligence at focus".
- On 15 October, a news report on security cameras inside catering establishments was presented in the main news bulletin of ALPHA TV, including statements by Dr Rousopoulos, Head of Directorate of Supervision.
- On 29 July, Dr Maragou gave an interview to Lefteris Helioudakis, associate-investigator of AWO Belgium, on issues arising from the use of biometric data for the identification of individuals by law enforcement authorities, on the

occasion of the examination – by the Authority – of a case concerning the Supply of Smart Policing Systems for the Hellenic Police.

Furthermore, the Authority responded to a series of queries from the following media outlets: SKAI RADIO, BALKAN INSIGHT, ZEIT ONLINE, GRTIMES, ALPHA TV, TA NEA et.c.

Publicity activities

The Hellenic DPA published, in 2024, 15 press releases and 2 announcements, which are available at <https://www.dpa.gr/en> (section “Information”, subsection “Press releases”). 7 of them were also published in English (see here <https://www.dpa.gr/en/enimerwtiko/press-releases>).

The issues related to the protection of personal data and the Authority that, in 2024, attracted publicity, were (in chronological order):

- Coordinated action by supervisory authorities on the role of Data Protection Officers. See press release of 18/1/2024 available at <https://www.dpa.gr/el/enimerwtiko/deltia/oloklirothike-i-syntonismeni-drasi-ton-epoptikon-arhonga-ton-rolo-ton> (in Greek)
- The post-event press release for the Information Day of the Hellenic DPA on the occasion of the 18th Data Protection Day. See press release of 14/2/2024 available at <https://www.dpa.gr/en/enimerwtiko/press-releases/hellenic-dpa-successfully-holds-information-day-occasion-18th-data>
- The launch of a coordinated EDPB action 2024 on the right of access. See press release of 27/2/2024 available at <https://www.dpa.gr/el/enimerwtiko/deltia/enarxi-syntonismenis-drasis-toy-esp-d-2024-shetika-me-dikaioma-prosbasis> (in Greek)
- The investigation into the alleged sending of unsolicited electronic communication by an MEP. See press release of 4/3/2024 available at <https://www.dpa.gr/el/enimerwtiko/deltia/ereyna-gia-ti-feromeni-apostoli-anepithymitis-ilektronikis-epikoinonias-apo> (in Greek)
- The administrative fine and the order to comply with the GDPR to the Ministry of Migration and Asylum in the context of an ex officio investigation by the Authority. See press release of 3/4/2024 available <https://www.dpa.gr/en/enimerwtiko/press-releases/ministry-migration-and-asylum-receives-administrative-fine-and-gdpr>
- The Memorandum of Cooperation between the Authority and Panteion University. See press release of 23/4/2024 available at <https://www.dpa.gr/el/enimerwtiko/deltia/mnimonio-synergasias-tis-arhis-prostasias-dedomenon-me-panteio-panepistimio> (in Greek)
- Imposing a fine and ordering compliance on an MEP and the Ministry of the Interior following a leak of an expatriate personal data file. See press release of 27/5/2024 available at <https://www.dpa.gr/en/enimerwtiko/press->

[releases/fine-and-order-compliance-mep-and-ministry-interior-following-leak](#)

- Completion of the international conference on the results of the "byDefault" project. See press release of 9/7/2024 available at <https://www.dpa.gr/en/enimerwtiko/press-releases/online-conference-wednesday-july-24th-bydefault-project-outcomes>
- The investigation into the alleged sending of unsolicited electronic communication. See press release of 16/09/2024 available at <https://www.dpa.gr/el/enimerwtiko/deltia/ereyna-gia-ti-feromeni-apostoli-anepithymitis-ilektronikis-epikoinonias> (in Greek)
- The working meeting of the President of the Authority with the Minister of Education. See press release of 10/12/2024 available at <https://www.dpa.gr/el/enimerwtiko/deltia/synantisi-ergasias-toy-proedroy-tis-arhis-prostasias-dedomenon-me-ton-ypoyrgo> (in Greek)
- The meeting of the President of the Authority K. Menoudakos with the Committee of Data Protection Officers of the Public Sector. See press release of 17/12/2024 available at <https://www.dpa.gr/el/enimerwtiko/deltia/synantisi-toy-proedroy-tis-arhis-me-tin-epitropi-ypd-toy-dimosioy> (in Greek)

Finally, it is noted that articles of the President, members and the scientific staff were published on scientific journals.



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