

PRIVACY NOTICE

PROGRAM “VOICES: Voicing Opposition to Domestic, Sexual, Cyber Violence & Harmful Practices”

This notice (hereinafter the "**Notice**") concerns the way in which personal data are processed in the context of the "VOICES: Voicing Opposition to Domestic, Sexual, Cyber Violence & Harmful Practices" programme (hereinafter the "**Program**").

The Notice is categorized and includes the following information in accordance with Articles 13 and 14 of the General Data Protection Regulation ((EU) 2016/679, "GDPR"):

- 1) The data controllers, i.e. the persons/entities that determine the purposes and means of the processing of personal data.
- 2) The purpose and legal basis of the processing of personal data.
- 3) The categories of personal data processed and the persons to whom they relate ("Data Subjects").
- 4) The sources of the personal data.
- 5) The time for which the personal data are kept.
- 6) The categories of persons/entities to whom the personal data are made accessible ("Data Recipients").
- 7) The countries in which the personal data are processed/transferred.
- 8) Your rights.
- 9) The contact details of the persons to whom Data Subjects can address any issue relating to the processing of their personal data and to exercise their rights.

1. Data Controller

Data Controllers are:

- a. The Public Benefit Foundation under the name "**BODOSAKI FOUNDATION**", located in Athens, 14 Mourouzi Street (Tax ID 090061942 - Tax Procedures and Service Provision Center (KE.FO.D.E.) of Attica), e-mail address: legal@bodossaki.gr
- b. The association with the name "**CENTRE FOR SUPPORT OF NON-GOVERNMENTAL ORGANISATIONS**", located in Nicosia, 12 Spartis Street, 1036, Nicosia (Registration Number 2129), e-mail address: info@ngo-sc.org.
- c. The Public Benefit Foundation under the name "**MARANGOPOULOS FOUNDATION FOR HUMAN RIGHTS**" located in Athens, 1C Lykavittou Street (Tax ID 090159331 -Tax Procedures and Service Provision Center (KE.FO.D.E.) of Attica), email address: info@mfhr.gr

The BODOSAKI FOUNDATION, the CENTRE FOR SUPPORT OF NON-GOVERNMENTAL ORGANIZATIONS and the MARANGOPOULOS FOUNDATION FOR HUMAN RIGHTS jointly determine the purposes and means of the processing of personal data under the Programme and, therefore, act as "joint controllers" in accordance with Article 26 of the GDPR.

2. Purpose and Legal Basis of Processing

In the context of the Program personal data are processed for the following purposes:

- 1) Selection of beneficiary Civil Society Organisations (CSOs): collection and evaluation of grant applications, communication of results.

- 2) Conclusion of contracts with the beneficiary CSOs.
- 3) Monitoring of the implemented projects, accountability.
- 4) Communication of the implemented projects and, in general, the activities of the Joint Controllers.
- 5) Providing capacity building services to the grantee CSOs: learning, professional support, and networking.
- 6) Reporting on the implementation of the Program.
- 7) Management of complaints.
- 8) Evaluation of the implementation and results of the Program, preparation of reports in relation to the progress of the implementation of the Program.

The processing of personal data for the fulfilment of the purposes set out in points 1, 2 and 5 above is carried out to take steps at the request of the data subject prior to entering into a contract as well as for the performance of a contract to which the Data Subject is a party [Article 6(1)(b) of the GDPR].

The legal basis of the processing operations carried out for the above purposes under 3, 4, 6 and 7 is the fulfilment of the legitimate interests of the (joint) Data Controllers [Article 6(1)(f) GDPR], which consist in the correct and effective implementation of the Program and its objectives.

In cases of data processing for the purpose of promotion and communication (above under 4), the legal basis is, where applicable, also the consent of the Data Subjects [Article 6(1)(a) GDPR], which is collected after provision of specific information to the Data Subjects regarding their rights etc.

3. Personal Data Processed and Data Subjects

The following Categories of Personal Data per category of Data Subjects are processed under the Program:

a. Selection of Beneficiary CSOs (Collection and Evaluation of Grant Applications)

Categories of Data Subjects	Categories of Personal Data
<p>A) Persons submitting the application on behalf of the CSO</p> <p>B) Legal representatives of the beneficiary CSOs</p> <p>C) Persons associated with the CSO who are to be employed on the project, representatives of the CSO, members of the CSO, partners of the CSO.</p>	<p>As regards category A:</p> <p>(a) first name, (b) surname, (c) username (to create an account on the application platform), (d) e-mail address, (e) telephone number, (f) the person's relationship with the CSO applying for funding.</p> <p>As regards category B:</p> <p>a) first name, (b) surname, (c) patronymic, (d) civil status, (e) professional status, (f) email address, (g) phone number, (h) home address, (i) passport - identity card details, (j) any data included by the subjects</p>

	<p>themselves in their CV, (k) data publicly available at the platform of the General Commercial Register.</p> <p>As regards category C:</p> <p>(a) first name, (b) surname, (c) patronymic, (d) civil status, (e) professional status, (f) position and duties in the project, (g) relationship with the CSO applying for funding; form of employment, (h) home address, (i) passport - identity card details, (j) any data included by the subjects themselves in their CV.</p>
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b. Conclusion of contracts (and modifications thereto) with CSOs

Categories of Data Subjects	Categories of Personal Data
<p>A) Person in charge of the project on behalf of the CSO (when different to the legal/signatory representative)</p> <p>B) Legal/signatory representatives of the beneficiary CSOs</p>	<p>(a) first name, (b) surname, (c) patronymic, (d) civil status, (e) professional status, (f) passport- identity card number, (g) phone number, (h) email address, (i) address</p>

c. Monitoring and accountability

Categories of Data Subjects	Categories of Personal Data
<p>A) Members of the project teams</p> <p>B) Legal representatives of the beneficiary CSOs and their partners (if any)</p> <p>C) Beneficiaries of the projects' actions</p>	<p>As regards category A: a) name, b) surname, c) patronymic, d) civil status, e) professional status, f) position and duties in the project, g) form of employment - relationship with the beneficiary CSO, h) other data that may be included in the detailed periodic declaration submitted by the beneficiary CSO, i) other data that may be included in submitted tax documents, h) other data resulting from any form of excuses (e.g. (h) any other data resulting from any kind of travel tickets, tax documents relating to accommodation, catering services, etc.); j) in general, any personal data</p>

	<p>included in the material collected and submitted as evidence of the actions implemented under the project (image data - photographs, audio-visual material).</p> <p>As regards category B: (a) name, (b) surname, (c) patronymic, (d) contact telephone number, (e) e-mail address, (f) passport – identity card number, (g) any other data included in the attestation of representation submitted by the beneficiary CSO.</p> <p>As regards category C: any personal data included in the material collected and submitted as evidence of the actions implemented under the project (image data - photographs, audio data - audiovisual material).</p>
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d. Communication of the implemented projects and, in general, the activities of the Joint Controllers

Categories of Data Subjects	Categories of Personal Data
<p>A) Members of the project teams</p> <p>B) Legal representatives of the beneficiary CSOs and their partners (if any)</p> <p>C) Beneficiaries of the projects' actions</p>	<p>a) Image data - photographs, audio data - audiovisual material, b) any personal data included in/following from the material.</p>

e. Capacity Building Services

Categories of Data Subjects	Categories of Personal Data
<p>Category A: Trainees - members/staff of the beneficiary CSO</p> <p>Category B: Instructors</p>	<p>As regards category A: a) full name, b) contact telephone number, c) status/position in the sponsored COS, d) video and audio data (if the training/support is provided online via a video conferencing platform), e) any data disclosed during the training/support (if the training/support is provided online via a video conferencing platform).</p> <p>As regards category B: (a) full name, (b) data resulting from the short CV, (c) image and audio data (if</p>

	the training/support is provided online via a videoconferencing platform)
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f. Management of Complaints

Categories of Data Subjects	Categories of Personal Data
<p>Category A: Complainants</p> <p>Category B: Complainees and other people involved</p>	<p>As regards category A: (a) full name, (b) email address, (c) any personal data included in the complaint.</p> <p>As regards category B: (a) full name, (b) any data included in/ following from the complaint or made available by the Data Subject for the purposes of the investigation of the complaint.</p>

In order to compile the required reports and to complete the project evaluation all the data under (a), (b), (c) and (d) above are processed. It should be noted, however, that the reports and evaluation results only include statistical and numerical data.

4. Sources of Personal Data

The data processed come from:

- a. the Data Subjects themselves,
- b. the contact persons designated by the applicant/grantee organisations and/or their legal representatives.
- c. the General Commercial Register.

5. Retention Period of Personal Data

Personal data are kept for a minimum of five (5) years from the approval of the completion of the Program by the European Commission and DG Just, unless further retention is necessary for the establishment, exercise or defence of legal claims or is based on lawful consent.

Moreover, personal data collected in the context of complaints management are retained for 5 years after filing/resolution of each complaint, unless further retention is necessary towards compliance with any applicable – based on the nature of each incident reported – legislation.

6. Disclosure and Transfer of Personal Data

Personal data processed in the context of the Program are not disclosed to third parties, other than the provider of the platform through which applications are submitted.

Moreover, personal data are transferred/disclosed to the European Commission and DG Just, certified / public auditors (where applicable), EU control bodies/entities in the context of the Joint Controllers' accountability obligations.

Specifically, data collected for the purpose of communicating or promoting ongoing projects and, more generally, the activities of the Joint Controllers—where applicable, by collaborating professional photographers or videographers - are posted on the websites and social media accounts of the (Joint) Data Controllers with the consent of the Data Subjects (which is collected separately as part of a specific notification). For the sake of completeness, it should be noted that, in exceptional cases, relevant posts/publicity and communication initiatives may also be carried out by DG JUST or other institutions/bodies.

Lastly, personal data processed for the purpose of capacity building become available to the company under the name "Tools Ltd", supporting the Social Dynamo Website and, subsequently, the capacity building platform.

The above-mentioned platform providers act as Data Processors and are contractually bound to protect the personal data they process.

7. International Data Transfers

Personal data are processed inside the EEA. They are transferred/disclosed to DG Just and/or other EU institutions.

8. Your Rights

You can exercise the following rights by sending a request to the email address below (under 9):

- a. The right of access: you may request information on the processing of data, as well as copies of the data we hold.
- b. The right to rectification.
- c. The right to erasure: You may, under certain conditions provided for in the data protection legislation, request that your data be erased.
- d. The right to restrict processing: You may request that we restrict the processing of personal data in case of doubt about their accuracy, as well as in case the data is no longer necessary for the original purpose, but for legal reasons cannot yet be deleted.
- e. The right to object to processing. If, however, there are compelling legitimate grounds for the processing which override the rights and interests that you will invoke, we may refuse your objection, stating our reasons.
- f. The right to data portability. You have the right to request that we transfer the data you have given us to another entity or to give it to you in a commonly used and machine-readable format (i.e. XML, JSON, CSV, etc.).
- g. The right to withdraw consent: You may withdraw the consent you provided in a specific notice at any time, in accordance with the terms of that notice. Withdrawing your consent does not affect the lawfulness of processing that has already taken place.

If you are not satisfied with the response to your request or if you consider that the processing of your personal data violates the applicable regulatory framework, you have the right to lodge a complaint with the Personal Data Protection Authority (postal address: Avenue. Kifissia Street 1-3, P.C. 115 23, Athens, tel. 210 6475600, e-mail address: contact@dpa.gr) **or** to the Office of the Personal Data Protection Commissioner (Office address: Iasonos 1, 1082 Nicosia Postal address P.O.Box 23378, 1682 Nicosia Phone: +357 22818456 Fax: +357 22304565 Email:

commissioner@dataprotection.gov.cy) by submitting relevant documents available [here](#).

9. Contact Details

In order to exercise the rights provided for by the legislation (immediately above under 8), to raise questions or for any other reason regarding the processing of personal data described in the Notice, you may contact the Data Protection Officer of the Bodossaki Foundation, which, as the Program Coordinator, has been designated as the point of contact with the Data Subjects, via the following e-mail address: dpo@bodossaki.gr.

In any case, you may - in accordance with Article 26 of the GDPR - exercise your rights by addressing any of the (joint) Data Controllers.

***The hereby notice may be amended/updated from time to time.**

Last update: June 2026