

Athens College places utmost importance on the protection of personal data and the privacy of individuals, particularly as they pertain to students, their parents, and College alumni, as well as to donors, sponsors, volunteers and associates in general.

This Privacy Statement informs you about personal data that Athens College records and processes for development purposes. This includes data related to gifts or other activities in support of the College's mission and strategic goals aimed at supporting students and ensuring a world-class education.

The Statement went into effect February 19, 2019 and has been drawn up in accordance with the provisions of the EU's General Data Protection Regulation 2016/679 and Greek legislation. It may be updated in the future and any changes will be posted on the Athens College website www.athenscollege.edu.gr with the revision date.

You may view the College's full Privacy notice by clicking <u>here</u> and its website www.athenscollege.edu.gr policy <u>here</u>.

Personal data recorded

The Development Office records personal data that you provide to us as a College alumnus, parent, donor, volunteer or friend in order that we may communicate with you for the purposes stated above.

Personal data recorded includes one's name, contact information, relationship to the College, profession, employer/organization, job title, giving history, requisite tax information, bank transaction gift receipts and other information related to development activities. Data is obtained in the following ways from constituents: through verbal communication, electronic or printed mail, as well as through constituent interaction on the College website (for example, through the online gift form or through registration for events organized by the Annual Fund Drives).

Data processing compliance

The legal basis for the recording and processing of personal data for the purposes of communication and information about our activities is the legitimate interest of Athens College in receiving and managing gifts and other sources of philanthropic revenue for the purpose of awarding scholarships; supporting educational programs; and providing, on a regular basis, information to members of the College's community family about its activities.

The legal basis for the recording and processing of personal data of our volunteers – members that participate in the Fund Drives, is the completion of a form on the part of alumni, parents, alumni parents expressing interest to participate in the respective Fund Drive (either through elections or as a volunteer) and it aims to ensure that the Fund Drive in question runs smoothly and serves its mission.

The legal basis for the recording and processing of personal data for the purposes of special editions (eg annual Report on Giving or Digital Donor Wall or other) and special mentions to details or position of donors therein, is the specific consent requested and received by the donor.

Disclosure of personal data

Personal data is accessible by selected authorized College personnel and services, who are bound by a confidentiality agreement. Data processing is exclusively for the fulfillment of the aforementioned purposes. Without the express permission of the donor for inclusion in the Honor Roll of Donors, gift information is strictly limited to Development Office staff and the Finance Office, and is not disclosed to third parties.

Data may be disclosed to external collaborators (in the case of outsourcing) or to third parties (such as cloud services), including in cases of requests for the execution of payment processing (by affiliated banks) or for participation in activities/events which we organize in cooperation with third parties.

It should be noted that we may use and disclose personal data in instances where you have given us your explicit consent and when obliged to do so under applicable law, or when necessary for the purposes of our legitimate interests or in the performances of our services, always ensuring that your security and data protection guarantees are met.

Data retention period

Personal data collected by the College is stored for the time period specified for each activity or action dependent on its use, and in the case of claims, for as long as is required to irrevocably resolve the matter.

Data subject's rights

The College respects and complies with all provisions outlined in the EU General Data Protection Regulation (GDPR) regarding the rights of individuals. Specifically, individuals have the right to access information about the use of their personal data ("Access Rights") and may request and obtain further information ("Right to Information") about how that information is processed. Moreover, individuals may exercise the following rights outlined in General Data Regulation, under the proviso of the relevant articles: right to rectification and to have incomplete personal data completed; right to erasure (under specific terms for parents of students currently in School); right to restrict processing; right to data portability; right to object; right to withdraw consent in cases where personal data has been collected with their consent.

For more information, you can contact the Data Protection Officer (DPO) Mr Alexios Papastavrou at tel: +30 210 6798186, email: dpo@athenscollege.edu.gr.