Zenith Outdoor/Indoor Experience

May 2025 – April 2027 (24M)

Project 2024-1-CY01-KA220-ADU-000256958

D1.2 Ethical and legal issues

Authors	*AUTH*
Abstract	*The present deliverable "Ethical and Legal Issues" describes how the consortium partners will address the related issues in the context of ZOE project in order to define the procedures that will be implemented for data collection, sharing, storage, protection, retention and destruction.* *It also confirms that these processes comply with EU and national legislation in terms of data management and protection. Finally, the report specifies structured ethical procedures to ensure the proper and ethical treatment of all participants involved in ZOE activities and events.*

THE CONSORTIUM

No.	Abbreviation	Partner Name	Logo
1	**GEO**	Geoimaging ltd	
2	**AUTH**	Aristotle University of Thessaloniki	
3	**TUW**	Technischen Universität Wien	
4	**VIR**	Virtual Solutions	

DISCLAIMER

Funded by the European Union. Views and opinions expressed are however those of the author(s) only and do not necessarily reflect those of the European Union or the European Education and Culture Executive Agency (EACEA). Neither the European Union nor EACEA can be held responsible for them.

Co-funded by the European Union

CONTENTS

The consortium 2
Disclaimer 2
Contents 3
Glossary 3
1. Introduction 4
2. Data Related Activities 5
2.1 Storage, protection, retention and destruction 6
2.2 Data sharing protocol 7
2.3 Recruitment of participants 7
3. Ethics Management 8
3.1 Research Committee AUTH procedure 9
4. Conclusions 10
Annex 1: Informed Consent Form Template 11
Annex 2: AUTH Data Policy 19

GLOSSARY

GDPR	General Data Protection Regulation
AR	Augmented Reality
DPO	Data Protection Officer

1. INTRODUCTION

The current report was prepared under Task 1 "**Ethical and Legal Issues**" of the ZOE project. The project "ZOE-Zenith Outdoor/Indoor Experience for Cultural Tours with AR technology and 3D platform" which is funded by the Erasmus+ programme (KA220-ADU - Cooperation partnerships in adult education) aims to enhance cultural learning through outdoor AR tours, indoor 3D experiences and a customised navigator that leads the user through sites of interest, all in a gamified environment that keeps the users motivated and eager to engage.

The main goal of ZOE's Project is to achieve high quality, flexible, lifelong and innovative adult education learning for diverse audience, cultural appreciation through enriched experiences, and digital heritage preservation in an appealing interactive environment.

Project objectives include enhanced cultural learning through outdoor AR tours, indoor 3D experiences and a customized navigator that leads the user through sites of interest, all in a gamified environment that keeps the users motivated and engaged.

Given that one of ZOE's Project primary objectives is to employ a user-centred approach in the final product, it is imperative to interact with participants at every stage of implementation.

This report aims to raise the project partners' awareness of any legal and ethical issues related to the involvement of humans in project activities and events and the data exchange.

The current document is structured, as follows:

- Chapter 1 describes the purpose of the document.
- Chapter 2 presents the related activities, the overall approach for data collection, storage, protection, retention and destruction and provides guidance on data and ethics related issues regarding the recruitment of participants.
- Chapter 3 provides information on the ethics management within the project.
- Chapter 4 analyses the conclusions of the report
- Annex includes the templated for informed consent forms in English language.

2. DATA RELATED ACTIVITIES

ZOE's Project vision is to revolutionize cultural heritage exploration by combining **Augmented Reality (AR) outdoor tours** and **immersive 3D indoor experiences** within a gamified learning environment.

In this context, several activities are planned to achieve the overall and specific objectives of the project.

The successful implementation of these activities requires the collection, process and/or generation of a variety of data that will facilitate the production of evidence-based results and, therefore, raise the value of the project outcomes.

The key activities of ZOE that are set to collect, process and/or generate **user-centric data** are the following:

- **WP2 - User requirements, pilot testing and result evaluation**
  a) Pilot test procedure and feedback design (Activity A2.1)
  b) User requirements analysis (Activity A2.2)
  c) Field test of system mock-up (A2.3)
  d) Field test of 1st prototype (A2.6)
  e) Field test of 2nd prototype (A2.9)

- **WP5 - Dissemination, exploitation and sustainability**
  a) Multiplier Event 1
  b) Multiplier Event 2
  c) Multiplier Event 3

The abovementioned activities could collect various types of data from end-users, which could be quantitative, qualitative or represent a mixture of both types, and will be analysed using various methodological approaches. All data collection will be carried out following the General Data Protection Regulation (GDPR).

2.1 Storage, protection, retention and destruction

Each partner is responsible for the processing of its data and others will not have any access to it (unless completely anonymized).

In general, the project coordinator will be the overall responsible for the data management within the scope of ZOE project and will coordinate with the Work Package and Task Leaders the collection and storage of all data during the project's lifetime as well as which data and how will be open for re-use. Each organization is locally responsible for the local collection, anonymization and safe storage of its data.

ZOE project pays special attention to the data security and especially the protection of personal and sensitive data. Thus, the consortium aims to ensure that appropriate procedures, protocols and technologies will be applied to safeguard any data bridge or accidental loss and/or unauthorized manipulation.

Any personal data collected within ZOE will be closed until their anonymization. During and upon collection these data will be stored to the partners' servers and they should be backed up daily. Each partner will be responsible for data security when data is transmitted and stored under their premises. This includes the obligation to store them under encryption, to prevent unwarranted disclosure to third parties even within the same organization, to maintain the highest reasonable standard of protection and accountability, and lastly to report without undue delay to the coordinator, the national data protection authorities and the affected data subjects any data loss or bridge. This close data will be accessible only by authorized partners. In case the employment/work contract does not include a confidentiality clause, then confidentiality agreements should be signed between the researchers working in the project and having access to these data and their institution. In addition, partners must ensure that the form of any publication, including publication on the Internet, neither directly nor indirectly leads to a breach of agreed confidentiality and anonymity[1]. To increase data security, responsible **partners will destroy any raw personal and**

[1] https://ec.europa.eu/research/participants/data/ref/fp7/89867/social-sciences-humanities_en.pdf

sensitive data 3 months after their collection and keep only the anonymized data for the needs of the research activities.

Moreover, privacy policies will be developed to define how the ZOE website and platform will be processing and using personal data, which security procedures will be followed and what cookies policy will be employed as well as describe the users' rights.

2.2 Data sharing protocol

To ensure the effective management of data-sharing procedures, a data-sharing agreement will be established as needed. This agreement will regulate the relationship between the parties to ensure smooth and proper data transfer.

Until now, a data sharing agreement has been signed by AUTH and TUW, regulating the activity "User Requirements Analysis (Activity A2.2)."

AUTH provided the template for data sharing, which was reviewed by TUW. The legal department and Data Protection Officer (DPO) contact of each organization reviewed the documents. Then the documents were signed digitally by the legal representative of each organization.

2.3 Recruitment of participants

ZOE will engage representatives of all the stakeholders/end users that are involved in educational and tourism as end users (tourists, cultural enthusiasts, and educators from different backgrounds) and stakeholders (such as cultural institutions, tourism agencies, and local governments) to collect their insight.

The ZOE project activities include collection of data from the target groups of the project. The overall mechanism for the selection of stakeholders is based on the thematic end users' classification per type of ZOE activity and will leverage on existing networks (e.g. AUTH, TUW), contacts, initiatives and similar funded projects.

In the framework of the ZOE Project, we need to understand better the user requirements and preferences regarding cultural heritage applications and platforms. Participants will be involved in activities such as: focus groups, surveys, interviews, mock up and testing, pilot testing, and dissemination multiplier events.

Before the collection of data, **participants will be provided with an information sheet with details about the management of data and a consent form to sign** (online or provided by the partners during the events if takes place physical). To ensure compliance with all GDPR rules and that no ethical issues will be raised, ZOE project has developed appropriate informed consent procedures (ANNEX) as well as has deployed personal data protection processes.

ZOE engages in guaranteeing that participation in the project actions, evaluation and online communication implying data collection is based exclusively on volunteering and is only enabled once the user's consent is formally collected upon signing online the consent form or accepting the privacy policy of each organization.

All data collected during the project implementation will be treated according to procedures that will be anonymous; no personal data will be collected during the activities, pilot test, and events without permission. The sharing of information will be possible only with the permission of the person directly involved.

3. ETHICS MANAGEMENT

The ZOE project will not raise major ethical issues, but as data collection is necessary, **the consortium will guarantee that the EU and national legislations in place regarding data protection will be rigorously applied by the beneficiaries/partners**.

Indeed, all ethical issues that this project may be exposed to, will be managed by every partner and with the guidance of the Data Protection Officer of each organization.

All data collected during the project will be treated according to procedures that will guarantee to be anonymous; no personal data will be collected in the ZOE platform and during events and activities without permission. Other sensitive issues will be periodically verified.

In accordance with the established protocols of each organization, the requisite approval from the ethics committee will be obtained at each stage of the aforementioned activities.

Furthermore, all research protocols pertaining to the collection of personal data including, but not limited to, questionnaires, information sheets, and consent forms must be submitted for approval to the Ethics Committees of collaborating organizations.

In addition, all personal data collection research protocols (i.e. questionnaires, information sheet, consent forms) are submitted for approval to the Ethics Committees of the partners institutions that are responsible for the data collection of each activity. In particular, in the case of research conducted through questionnaires, the use of the LimeSurvey platform is acceptable for AUTH.

3.1 Research Committee AUTH procedure

This section details the procedure for obtaining ethics approval in AUTH. In accordance with the regulations of the Research Ethics and Deontology Committee of AUTH, the scientific coordinator of a project is responsible for applying for initial approval once the project has been granted. The scientific coordinator is responsible for describing the purpose and design of the research project, the objectives being pursued, and the anticipated benefits to be derived from the project. They also delineate the criteria for selecting participants, the methodology and tools used to collect data. After the review of the application, the Committee provides a decision, either approving or requesting additional information. The scientific coordinator, submitting with the following documents, which are available on Research Committee website[2] :

a. the application of Scientific investigator/coordinator

b. declaration that he was informed of the Regulation of Research Ethics and Deontology Committee (AUTH)

c. the research protocol

[2] https://ehde.auth.gr/en

d. the questionnaire - self-assessment report that was submitted

e. the letter to the Committee

f. the Grant Agreement and

g. the provisions of the Regulation of the Research Ethics and Deontology Committee of AUTH and the legislation

It is noted that the scientific coordinator of the research protocol is obliged to resubmit an application to the Committee, including the relevant questionnaires and the Informed Consent Forms, when these become available and, in any case, prior to the commencement of the corresponding research for validation and approval before their implementation.

In fact, in March 2025, the Ethics Committee of the Aristotle University of Thessaloniki approved the implementation of ZOE project. In July 2025, the appropriate documents for the Activity "User Requirements Analysis (Activity A2.2)" were submitted and the approval was obtained.

4. CONCLUSIONS

This deliverable provides a comprehensive overview of the data-related activities and procedures, ethics management framework, and implementation plan for the ZOE project. The documented work reflects the commitment of the consortium to ensure the quality, relevance, and impact of the project's outputs in the fields of digital heritage, adult education, and immersive learning technologies within the law and with respect to GDPR.

In the event of a controversy, the project consortium will resolve such issues by either seeking assistance from the legal department of each organization or contacting the DPO department. This approach ensures that disputes are handled with the necessary legal expertise, data privacy acumen, and regulatory compliance.

ANNEX 1: INFORMED CONSENT FORM TEMPLATE

<Logo of organization>

CONSENT AFTER INFORMATION Version 1.0, 4 November 2020

I. INFORMATION SHEET

Study title: [*XXXX*]

Principal Investigator: [*XXXXXXX*]

Funding Organisation: [*Name of the Funding Organisation***]**

Or The study is being conducted in the context of [Master/PhD/Education/Course/Activity]

Data Controller: Organization

Names of the coordinators of the research/scientific coordinator: [*Name CR1/SC1*]

[*Name CR2/SC2*]

Email : *XXXXXXX*

Tel : *XXXXXXX*

Address : *XXXXXXX*

Data Protection Officer (DPO): DPO contact

Important Information

You will be given information on the research conducted [*a short description of the content of the study]* and you will be invited to take part in the study. Your participation is voluntary.

You can talk about this study and the consent form with other people such as family/friends/or whoever you feel comfortable with. You do not have to decide right away. You can decide whether you want to take part in the study after you have thought/ discussed this.

There may be words you do not understand or some things you would like for me to explain to you in detail. You can stop anytime and ask questions.

Purpose: Why are we conducting this study?

[Define the purpose of the processing of the data]

[Define that if the data will be further processed, the data subjects will be notified accordingly]

Subject Selection: Why are we requesting your participation?

[Brief description of the selection criteria related to participants]

Your participation is voluntary: Do I have to do this?

You do not have to take part in the study if you don't want to. Even if you say "yes" now, you can change your mind later and pull out of the study at any time.

Participation cost: What will this cost me?

[Define weather there is any cost involved]

Procedure: What will happen if you take part in the study?

[Detailed description of what the participant will do and for how long]

Data: What kind of data will be collected?

[Detailed description of what is going to be recorded/collected and how]

[Define the period for which the personal data will be stored]

Who will receive or to whom maybe distributed the collected personal data?

[Define whether the data are distributed and to whom]

Personal data is intended *to be transferred/not to be transferred* to a third country or to an international organisation provided that in any case appropriate safeguards are taken.

Clarify that in case that personal data are transferred to third countries that are not subject to the GDPR, due to the potential absence of an adequacy decision and appropriate safeguards, the personal data provided might not to be treated according to the principles of the GDPR (EU Regulation 2016/679).

Risks: Is this bad or dangerous for me?

[Description of risks or explanation of why they do not exist]

Discomfort: Will it hurt?

[Description of possible pain that will be experienced]

Benefits: Will this be beneficial for me?

[Brief description of possible benefits for the participant]

Sharing the results: Will you inform me on the conclusions?

When the research is finished, I will be able to explain to you everything we have learned. An informational brochure will be available upon your request. Later on, we will inform other people about the research we have made and what we have found. This will be accomplished by writing articles and meeting with people that are interested in what we do.

Right to refuse or withdraw: I can choose not to be part of this study? Can I change my mind?

Your participation is not forced. You can stop the research at any time if you wish.

Consent is provided for *[XXXX months/years]* [the time period for which consent is given shall be in consistency with the time period that the personal data will be kept] until it is revoked by sending an e-mail to [*XXXXX]* or by sending the application form enclosed at the end of this document to the address of the coordinator of the research/scientific. The right to withdraw consent at any time does not affect the lawfulness of the processing based on the consent given before its withdrawal.

Data managing

The processing of your personal data is based on consent to this processing for specific purpose. Your personal data will be codified and saved at computers in accordance with appropriate technical and organisational measures. [define in a simple and clear way these technical and organisational measures that will be taken with the view of data protection].

You have the right to request from the Head of the Research access to or rectification or erasure of your personal data or restriction of processing concerning your data or to object to processing as well as the right to data portability. *[You can choose which of these rights are feasible to be conferred on]*. For any enquiry or guidance regarding your rights, you could send an email to *[XXXXX]* or phone at [*XXXXXX].* Any change in your personal data will take place within 30 days of your communication with Principal Investigator.

If you have any questions about your personal data and your relevant rights or if you believe that your rights are being violated, you can contact the Data Protection Officer of XXX organization.

For additional protection you have the right to lodge a complaint with the Hellenic Data Protection Authority (www.dpa.gr).

If you finally decide that you would like to take part in the study, you will receive a copy of this sheet.

<logo of organisation>

II. CONSENT

[RESEARCH NAME]

I the undersigned ……

[constitute the legal guardian of FULL NAME ……who is under 15 years of age],

I declare that:

- I have been adequately and comprehensively informed *by …… (name and position/area of responsibility of the researcher)* for the purposes of the research in which I will participate and which is part of the research project …… ……. *(Name of the research project) related to …… code (in case there is a relevant code).*
- I have been adequately and comprehensively informed about the method and sources of the research financing.
- I have been adequately and comprehensively informed about what my participation in this research entails. In particular, I have been informed of all the rights and obligations I will have as a participant in the research comprising the obligation of confidentiality (if the latter is required).
- I have been adequately and comprehensively informed about any positive or directly negative, short-term or long-term consequence my participation in this research is expected to have concerning me or in relation with third parties.
- I have been adequately and comprehensively informed about how my personal data related to this research is processed and protected.

- I have been adequately and comprehensively informed about the provision and proper use *of the medicines / devices / personal protective*

equipment /……/ (fill in accordingly) that I will use during my participation in this research.

- I am aware of the fact that my participation is voluntary and that I can withdraw my participation from the research at any time for any reason and without any impact on me (as well as of the fact that the same applies to the person I represent).

- I know the Head of the research to whom I can address to withdraw my participation from this research or to notify any potential problem that might arise during my participation or after the completion of this research.

.

- No pressure was exerted to me and I was given enough time to think and decide.

I consent to participate in the above research.

I consent that the Participant [Full Name] for whom I constitute the Legal Guardian takes part in the above research.

Participant's Signature: _____

Legal Guardian's signature:

Date: _____

day/month/year

<Logo of organization>

III. WITHDRAWAL OF CONSENT OF THE PARTICIPANT

[RESEARCH NAME]

I the undersigned ……

[constitute the legal guardian of FULL NAME ……who is under 15 years of age],

hereby withdraw my consent concerning my participation/the participation of my child/the participation of the person for whom I constitute the legal guardian in the research study XXXX [NAME OF THE RESEARCH STUDY], which I had given on _____/_____/_____

_____ Date:

Signature of the participant Signature of the legal guardian ____/____/____

day/month/year

_____

Full name

ANNEX 2: AUTH DATA POLICY

ARISTOTLE UNIVERSITY OF THESSALONIKI DATA PROTECTION POLICY IN ACCORDANCE WITH THE GENERAL DATA PROTECTION REGULATION (EU) 2016/679 & THE GREEK LAW 4624/2019.

In compliance with the current legal framework, which includes the General Data Protection Regulation (EU) 2016/679 (GDPR) & the Greek Law 4624/2019, the Aristotle University of Thessaloniki (AUTH) has set up this Data Protection Policy along with the adoption of the appropriate technical and organizational measures for the collection, use, storage, disclosure, transmission of personal data of all members of the academic community, faculty members, permanent and contractual staff with open-ended contracts, Laboratory Teaching Staff, Special Teaching Staff, Scientific Associates, Special Technical Laboratory Staff, teachers based on P.D. 407/80, forensic-doctor students and graduates of AUTH including those participating in internship programs (TEI, OAED, etc.), foreign students, primary and secondary school teachers participating in training programs, language teachers, scholarship holders, interns and PhD students, suppliers, enterprises, recipients of AUTH services (patients, external users of the library, high school students), external collaborators/ parties (lessors of residential property, donors), participants in events organised under the auspices of AUTH, contractors and sub-contractors and any third party who has access to electronic systems of AUTH (data subjects) in order to ensure their effective protection against unfair processing.

THE ROLE OF AUTH

According to GDPR, AUTH constitutes the controller being responsible for the processing of personal data of the academic community as well as for defining the personal data to be under processing, the procedures, the means and the purpose of the processing in accordance with the requirements of the GDPR and the Greek law 4624/2019.

Contact Information: ARISTOTLE UNIVERSITY Address: University Campus, PC 54124, Thessaloniki Telephone: 2310 996000

In accordance with the current legal framework, AUTH takes all the appropriate technical and organizational measures to ensure the lawful and fair processing as well as the appropriate level of security against the risks of unfair processing.

PURPOSE OF PERSONAL DATA PROCESSING & LAWFULNESS OF PROCESSING

The lawfulness of processing personal data is primarily carried out in the public interest, as defined in article 16 (5) of the Greek Constitution within the framework regarding the provision of higher education.

Additionally, in accordance with the General Data Protection Regulation and based on the purpose of processing, the lawfulness of personal data processing by AUTH may also be based on:

a) compliance with a legal obligation

b) the pursuance and protection of the legitimate interests of AUTH

c) the obligation to safeguard the vital interests of data subjects or other natural persons

d) the performance of a contract to which the data subject is a party or in order to take steps at the request of the data subject prior to entering into a contract;

e) consent to the processing of personal data given by data subjects for one or more specific purposes

HOW AUTH COLLECTS PERSONAL DATA

For the fulfilment of the above-mentioned personal data processing purposes, the collection of personal data is conducted by the staff of AUTH, who in this case constitute the controller based on their respective duties. The collection takes place during the process of submitting applications or student

registration statements, as well as during the signing of a contract or the conclusion of another legal relationship. Collection of personal data can also take place through:

• The use of the website or the electronic platforms or other electronic programs and means of communication of AUTH.

• Correspondence and/or e-mail

• The completion of any research to improve the services of AUTH

• Participation in a research project

• Participation in events under the auspices of AUTH.

PERSONAL DATA COLLECTED BY AUTH.

• Identity Data (User ID, Name, Father and Mother Name, Photo, ID or Passport Number, Issuing Authority, Date of Issue)

• Marital status data (existence of marriage, number & ages of children, existence of student status)

• Contact details (postal address, landline and mobile phones, e-mail address).

• Grade performance of students

• Data related to the qualification of administrative, academic, research staff financial situation data (Tax Identification Number, Tax Office, IBAN, loans, seizures in the hands of AUTH as a third party)

• Asset data (registration number of a car entering the Campus)

• Demographic data (Gender, Nationality, Citizenship, Date of Birth, Place of Birth, Country of Birth)

• Health Data (A.M.K.A., insurance fund registration number) as well as medical history, medical opinions, medical certificates only in special cases and in order to provide special privileges and / or safeguard the vital interest of the data subjects or other natural persons

• Data from the use of electronic services (such as cookies, google analytics, internet protocol (IP) addresses, etc. and electronic identification data)

• Curricula vitae of students and graduates

RECIPIENTS OF PERSONAL DATA

AUTH discloses the personal data of the data subjects, where required for the performance of its duty in the public interest, as well as to public, private bodies and independent authorities, in case that this is obligatory to AUTH as a Controller or in order to serve its legitimate interests. AUTH. discloses personal data to private entities or companies for the purpose of lawful promotion (Presidential Decree 206/2005, Government Gazette 251/11- 10-2005, vol.A.') of its students and graduates into the labor market and internships. Any further transfer of personal data to third countries and international organizations takes place in accordance with the relevant provisions of the GDPR or the consent of the data subjects in case it is required.

AUTh is entitled to entrust to natural or legal persons the provision of services, which entail the processing of your personal data on behalf of AUTH. In this case, these persons constitute the Processors committed to the protection of personal data that are entitled to carry out only the specific processing assigned to them under a contract or other legal act.

DATA RETENTION

AUTH processes the personal data taking the appropriate technical and organizational measures, which ensure the level of protection set by the GDPR.

AUTH maintains your personal data as long as it is required for the fulfillment of the respective lawful purposes and in any case for the entire period required by law (P.D. 768/1980, P.D. 87/1981 & P. D. 480/1985 and any other amendment thereof or other relevant provision of law).

The processing of personal data for the purposes of archiving in the public interest or for the purposes of scientific or historical research or for statistical purposes may entail derogations from data subjects rights as long as they are in accordance with the guidelines of the GDPR and necessary for the fulfilment of the above mentioned purposes.

DATA SUBJECTS RIGHTS

According to GDPR data subjects have the following rights:

a) The right to be informed about their personal data that are collected and processed as well as for any further processing thereof

b) Right of access to their personal data maintained by AUTH

c) Right to rectify their inaccurate or incomplete personal data

d) Right to delete the data based on the GDPR and the Greek law 4624/2019 Right to restrict processing when specific conditions apply

e) Right to data portability to another organization. This right does not apply when data processing is conducted for public interest purposes

f) Right to object in accordance with the provisions of the GDPR if permitted by law

g) Right to file a complaint to the Personal Data Protection Authority (www.dpa.gr), which is the competent supervisory authority for the protection of the fundamental rights and freedoms of natural persons against the processing of their personal data provided that the data subjects consider that their rights are being violated in any way

h) Right to revoke their consent at any time by sending an e-mail or written message to the competent unit for the processing of personal data. The withdrawal of the consent does not affect the lawfulness of the processing of personal data that was based on this consent and took place beforehand.

AUTH constituting the controller is obliged to respond to the relevant requests entailed at the exercise of the above-mentioned data subject rights as soon as possible and definitely within one month from their submission. However, in case the relevant requests are conspicuously unfounded, excessive or repeated, AUTH may either impose a reasonable fee or refuse to respond or comply with them.

DATA PROTECTION OFFICER – CONTACT DETAILS

In case there are questions about the processing, protection of personal data and the data subject rights they entail, any data subject can contact the Data Protection Officer: i) by phone at: +302310996200, or ii) by email at: data.protection@auth.gr, or

iii) by sending a written message to the following address: Aristotle University of Thessaloniki, University Campus, P.C. 54124, Thessaloniki.

UPDATE – MODIFICATION OF PERSONAL DATA PROTECTION POLICY

AUTH may update/supplement this Personal Data Protection Policy, in accordance with the relevant legislative and regulatory framework. In this case the new version of the Personal Data Protection Policy will be posted and will be available at AUTH's website.