



PERSONAL DATA PROTECTION POLICY

Initiative for Child Mental Health, non-profit civil partnership

The present Policy intends to provide you with information on how the “Initiative for the Child Mental Health, the non-profit civil partnership” (from now on the “Initiative” or “we”) processes your data when you use any of our services or our website www.camhi.gr (from now on the “website”).

The Initiative is the local implementing partner in support of the first five (5) years of the program Child and Adolescent Mental Health Initiative (hereinafter the “CAMHI” or the “Program”). The CAMHI is a five-year program that aims to enhance child and adolescent mental health care capacity and help strengthen the infrastructure for the prevention, assessment, and treatment of mental health struggles faced by children and adolescents across Greece. The Program is supported and implemented under the Stavros Niarchos Foundation (SNF) Global Health Initiative (GHI), in partnership with the non-for-profit organization Child Mind Institute, Inc. (hereinafter the “CMI”), and providers on the front lines of the public health system – in collaboration with the Hellenic Ministry of Health.

For any processing of personal data carried out when you use any of our services or our website, the Data Controller is the Initiative, which is based in Athens, at 77 Vasilissis Sofias Ave., P.C. 11 521. Below you may find details for the person you may contact regarding any questions related to the processing of your data.

The processing of your data is governed by these terms, by the relevant provisions of the applicable legislation on personal data, especially the General Data Protection Regulation 679/2016/EE (GDPR), and by the relevant decisions, instructions, and regulatory acts of the Hellenic Data Protection Authority (from now on the “HDPA”).

1. Personal data we process, purposes and legal basis of processing

We are committed to collecting only the essential personal data that is relevant, transparent, and aligned with its intended purposes. Your personal data will not undergo any additional processing that is incompatible with the original purposes for which it was collected. Indicatively we collect and process your personal data for the following purposes:

| Type of data | Purpose | Legal basis |
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| Training courses on the Basic Principles of Mental Health & Child Protection | | |
| <u>Personal data of the trainer</u> Identity data: name, age, city of residence, occupation (workplace and role) Contact data: phone number, email address | Participation as a trainer in the courses | Consent (GDPR 6.1a) |
| | Evaluation of the effects and quality of the courses | Consent (GDPR 6.1a) & Legitimate Interest (GDPR 6.1f) |
| <u>Personal data of the trainee</u> Identity data: name, age, city of residence, occupation (workplace and role) Contact data: phone number, email address. Technical data: Cookie ID, IP address, location data* | Registration and participation as a trainee in the courses (*Processing of technical data is applicable only for trainees enrolled in the training courses delivered through the CAMHI online learning system platform) | Consent (GDPR 6.1a) |
| | Evaluation of the effects and quality of the courses | Consent (GDPR 6.1a) & Legitimate Interest (GDPR 6.1f) |
| Training Courses on Advanced Psychotherapeutic Interventions | | |
| <u>Personal data of the supervisor</u> Identity data: name, city of residence, occupation (workplace and role) Contact data: phone number, email address | Participation as a supervisor in the courses | Consent (GDPR 6.1a) |
| | Evaluation of the effects of the courses and the quality of the mental health treatment delivered to children, adolescents, and their families | Consent (GDPR 6.1a) & Legitimate Interest (GDPR 6.1f) |
| <u>Personal data of the trainee</u> Identity data: name, city of residence, occupation (workplace and role) Contact data: phone number, email address Technical data: Cookie ID, IP address, location data* | Registration and participation as a trainee in the courses (*Processing of technical data is applicable only for trainees enrolled in the training courses delivered through the CAMHI online learning system platform) | Consent (GDPR 6.1a) |

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| | Evaluation of the effects of the courses and the quality of the mental health treatment delivered to the target audience | Consent (GDPR 6.1a) & Legitimate Interest (GDPR 6.1f) |
| <u>Personal data of the children/adolescents' caregivers [i.e. parent(s)/guardian(s)]</u> Identity data: name, city of residence Contact data: phone number, email address Child's identity data: name, age | Registration and participation as the receiver, and authorization of your child as the receiver of the Initiative's mental health treatment / Evaluation of the effects and quality of the mental health treatment delivered to the target audience | Consent (GDPR 9.2a) |
| | Completion of questionnaires | |
| <u>Personal data of the children/adolescents</u> Identity data: name, age, gender, school grade, city of residence Caregivers' identity data: name Health data (emotional and behavioral information related to mental health and mental health symptoms) | Registration and participation as the receiver of the Initiative's mental health treatment | Consent (GDPR 9.2a) |
| | Evaluation of the effects and the quality of the mental health treatment delivered to the target audience | |
| Youth Engagement Scheme (YES) | | |
| <u>Personal data of the children/adolescents' caregivers [i.e. parent(s)/guardian(s)]</u> Identity data: name, city of residence Contact data: phone number, email address Child's identity data: name, age, gender, school grade, city of residence, image | Registration and participation as a member of the Youth Advisory Boards of the Youth Engagement Scheme | Consent (GDPR 6.1a) |
| | Authorization of their child to participate in the Youth Advisory Board's communications on organization, outreach actions, activities | Consent (GDPR 6.1a) |
| <u>Personal data of the children/adolescents</u> | Registration and participation as a member of the Youth Advisory Boards of the Youth Engagement Scheme | Consent (GDPR 6.1a) |

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| Identity data: name, age, gender, school grade, city of residence, caregivers' identity Image (photos during YES meetings) | Participation in the Youth Advisory Board's communications on organization, outreach actions, and activities | Consent (GDPR 6.1a) |
| <u>Personal data of educators</u> Identity data: name, age, city of residence, occupation (workplace and role) Contact data: phone number, email address Image: photos during YES meetings | Registration and participation as Educational Associates in the Youth Advisory Boards of the Youth Engagement Scheme | Consent (GDPR 6.1a) |
| Events | | |
| Identity data: name, residence, occupation (workplace and role) Contact data: phone number, email address | Registration and participation in any CAMHI event <i>The Initiative may take photos or videos from such events. This material, as such or embedded into other audiovisual materials, will be posted on the Initiative's website and social media account and its social media account for the purpose of promoting the CAMHI.</i> | Consent (GDPR 6.1a) |
| Newsletter | | |
| Identity data: name Contact data: email address | Subscription to CAMHI's newsletter and communications <i>By subscribing to the list of our newsletter recipients, you consent to receive newsletters and other additional informational material regarding the Initiative's activities. If you expressly consent to receive updates as described above, your personal data will be retained for indefinite term, until you withdraw your consent and request the cessation of receiving updates and</i> | Consent (GDPR 6.1a) |

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| | <i>processing of your personal data by selecting the “unsubscribe” link, available on each update you receive.</i> | |
| Contact | | |
| Identity data: name Contact data: email address Any additional information you may include in the message | Contacting the team through CAMHI contact us outlets asking for information or sharing feedback | Consent (GDPR 6.1a) |

Legal basis of consent: Children aged fifteen (15) and above are considered to be able to give their consent. For children under the age of fifteen (15), the Initiative requests consent from the child’s legal guardian or parent. In this case, we make reasonable efforts to check that the person consenting on behalf of the child has parental responsibility.

2. Retention period

We ensure that the personal data we collect is processed for no longer than is required for the fulfillment of the purpose of processing, always in conjunction with the applicable legislation. The basic criteria that we consider when determining the retention period for your personal data are the time limitation of claims determined by law and the time limits within which a public authority may require us to provide them with information that we hold in our records.

3. Disclosure of personal data

The Initiative may disclose your personal data to CMI and child psychiatric clinics and community centers at public hospitals in the five (5) hub locations of the Network on Child and Adolescent Mental Health in

the context of the Program implementation. Your personal data may also be shared with third-party service providers of the Initiative, who process your personal data solely for the fulfillment of their obligations towards the Initiative and not for their benefit. In this case, the third parties act as Data Processors on behalf of the Initiative and are contractually bound to keep confidentiality, to not share data with third parties without the Initiative's consent or to use them for their benefit, to implement adequate technical and organizational security measures, and to comply with the legal framework for the protection of personal data and especially the GDPR provisions and the applicable legislation.

Your personal data may be transferred outside the European Economic Area (EEA). In this case, we will ensure that the transfer is lawful and has the appropriate safeguards as set out in the GDPR.

Also, the Initiative may disclose your personal information in the following cases: (a) When it has your explicit consent to publish your data in any way, (b) if such disclosure is required to exercise the Initiative's rights, or (c) if it is required by law, a court order or any other government or regulatory authority.

Your personal data may be further shared with scientists for statistical or research purposes only upon their anonymization in such a manner that the data subject is not or no longer identifiable.

4. Security

The security of your personal data is important to us, and we strive to implement and maintain security procedures and protocols and practices appropriate to the nature of the information we store to protect it from unauthorized access, destruction, use, modification, or disclosure.

Especially for the processing of special categories of personal data, we have put in place data protection safeguards, such as technical and organizational measures, and we keep a record of the reasons for processing an individual's special categories of personal data, of the risks that this may entail, as well as of the measures we have put in place to mitigate those risks.

However, regardless of the measures and efforts we have taken, we cannot guarantee the absolute protection and security of your personal data.

5. Your rights

- i. Right of access: You have the right to request, at any time, information about the processing of your data by the Initiative or even copies of your personal data that we keep.
- ii. Right to rectification: You have the right to ask us at any time to correct the information you consider to be inaccurate. You may also have the right to ask for the information you consider to be incomplete.
- iii. Right to erasure: You have the right to ask us to erase your personal data if one of the reasons provided by the applicable legislation is in force.
- iv. Right to data portability: In the event the processing is based on your consent, is automated, or is required to execute a contract with you, you have the right to ask us to give to you, in a readable form, the data you have given us, or ask us to forward it to another entity.
- v. Right to limit processing: You have the right to ask us to limit the processing of your personal data, if a reason provided by the applicable legislation is in force.

- vi. Right to object to processing: You have the right to oppose the processing of your personal data and we will stop processing your personal data unless other compelling and legitimate reasons prevail over your right. If you have consented to the collection, processing, and use of your personal data, you may revoke your consent at any time with future effect.
- vii. Right to complain with HDPa: If you believe that we are in breach of the applicable law for the protection of your personal data, you have the right to file a complaint with the HDPa, registered in 1-3 Kifissias Ave., P.C. 115 23, Athens, Greece.

6. Contact

To access your personal data, to exercise these rights, as well as for any other reason regarding the processing of your personal data carried out by the Initiative and included in the present Personal Data Protection Policy, please contact our contact person: Panagiota Balikou, Phone number: +30 210-7755930, email: data@camhi.gr , address: 77 Vasilissis Sofias Ave., P.C. 11 521 Athens, Greece.

7. Modification of this Policy

The Initiative monitors the policies and procedures for the collection and processing of your personal data that it implements and may at any time make any modifications to ensure the most effective protection of your personal data and the adoption of new practices. For this reason, please visit this page regularly for any changes.

The Personal Data Protection Policy was last updated on March 12th, 2024.