

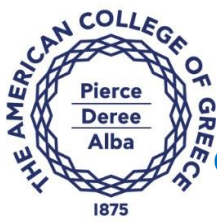


Office of Administration

THE AMERICAN COLLEGE OF GREECE

Data Retention Policy

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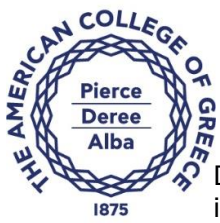
1. Purpose

The Data Retention Policy of the American College of Greece [henceforth, “**ACG**”] constitutes an integral part of ACG’s Privacy Policy and aims to define the framework, in terms of time, responsibilities and mechanism, for the retention of data collected, processed and stored by ACG as well as the minimum standards and processes applied when destroying certain information.

2. Scope

ACG founded in 1875, is the oldest and largest US accredited college or university in Europe. ACG is an independent, not for profit, nonsectarian, co-educational academic institution. In the context of pursuing its mission to offer transformative education ACG processes personal data of various data subjects in accordance with ACG’s Privacy Policy and retains records of data, which are necessary to support its business functions and to comply with its legal and regulatory obligations.

This Policy sets the framework for the retention of the above data and applies to all ACG officers, directors, employees, contractors, consultants or service providers who collect, process, store or have access to personal data. It is the responsibility of all of the above to familiarize themselves with this Policy and ensure compliance with it. The Data Protection Officer can provide support and advice with regard to managing records, however, the main responsibility rests with ACG’s departments to manage and retain their records as set forth in this Policy.



Any suspicion of breach of this Policy must be reported immediately to the Data Protection Officer. All instances of suspected breaches of the Policy shall be investigated and action taken as appropriate.

Failure to comply with this Policy may result in adverse consequences for ACG, including, but not limited to, loss of customer confidence, litigation and loss of competitive advantage, financial loss and damage to ACG's reputation. Non-compliance with this Policy by permanent, temporary or contract employees, or any third parties, who have been granted access to ACG'S premises or information, may therefore result in disciplinary proceedings, termination of their employment or the relevant contractual relationship, as the case may be, and/or legal action against them.

3. General Principles and Regulatory Framework

ACG collects processes and stores data of students, alumni, parents/legal guardians, staff, as well as other individuals associated with ACG, including, without limitation, participants in various events etc. [henceforth collectively referred to as "**Data Subjects**"], in accordance with the Regulation (EU) 2016/679 of the European Parliament and of the Council [henceforth, "**General Data Protection Regulation**" or "**GDPR**"] and the Greek Law 4624/2019 regarding the protection of personal data, as in effect from time to time [henceforth collectively referred to as the "**Data Protection Legislation**"].

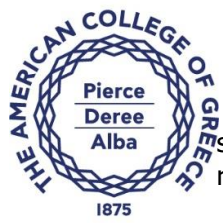
The said personal data, which are collected directly from Data Subjects or from third parties, including Partner Universities, in accordance with the Data Protection Legislation, are grouped in either electronic or paper records and access thereto is restricted mainly to authorized ACG personnel, on a need-to-know basis, while some records may be accessible and processed, within the framework of their responsibilities, by authorized external associates of ACG for the fulfillment of defined purposes and objectives, e.g. IT solution providers. All external processors are selected based on whether they fulfill the same austere data protection standards as ACG. More information can be found at <https://www.acg.edu/personal-data-protection-policy/>.

Records of personal data processed and stored by ACG must be consistent across ACG and must be kept in a form which permits identification of Data Subjects for no longer than is necessary for the purposes for which personal data are processed [henceforth, "**storage limitation**"]. Following the expiry of the relevant time period, and provided that there is no other legal basis for ACG to continue processing, ACG proceeds to the deletion/destruction of the relevant personal data.

4. Retention Periods

ACG processes and maintains records for definite as well as for indefinite periods in accordance with the Data Protection Legislation and subject to the requirements stipulated thereby, in order to perform its organizational and business functions and other legitimate interests, to serve its students' needs, to carry out its obligations undertaken in the context of its contractual relationships with Data Subjects, to comply with its legal or regulatory obligations (including towards public authorities), or on the basis of the Data Subject's consent.

The retention periods applicable to different categories of personal data are examined by the Data Protection Officer, on a case-by-case basis, and in cooperation with the competent ACG department and/or officials. Records that cannot be assigned definite retention periods (e.g. due to the fact that it is impossible to determine in advance for how long they need to be processed and



stored by ACG) should be reviewed on a regular basis in order for a decision to be reached as regards their further retention or destruction.

Detailed information on the data processed by ACG and the applicable retention periods can be found at ACG's Record of Processing Activities held by the Data Protection Officer, which is under constant review, given that its maintenance is an ongoing task. For illustration purposes, an indicative list of the retention periods applicable to personal data gathered for specific categories of Data Subjects is set forth below:

4.1. Personal Data of Students and Alumni

Retention periods of personal data which refer to students and alumni vary depending on the processing purposes and the legal basis of their processing by ACG. By way of indication:

- **Contract:** In case the processing of personal data is necessary for the performance of ACG's contractual relations with its students or in order for ACG to take steps at their request prior to entering into such contracts (art 6(1) (b) of GDPR), personal data are kept and processed for specific periods of time. By way of example, names and contact details of prospective students are kept for a specific period of time following the end of the registration period in case such prospective students do not enroll at ACG,
- **Legal Obligation:** In case the processing of personal data is necessary for purposes of compliance with a legal or regulatory obligation to which ACG is subject (art 6(1)(c) of GDPR), personal data are also generally kept and processed for a specific period of time or, in some cases, indefinitely. By way of example, the Registry Book of High School Students is kept for an indefinite time period, as stipulated by the relevant Greek Educational legislation,
- **Legitimate Interest:** In case the processing of personal data is necessary for the purposes of legitimate interests pursued by ACG (art. 6(1) (f) of GDPR), the relevant personal data are kept and processed for specific periods of time or for life, e.g. data provided by CCTV System of ACG are kept for 15 days for the purpose of protection of the campus; Hard copies of educational records are kept for one year after graduation (unless studies were discontinued, in which case the relevant hard copies are kept for 10 years); ACG's list of students and electronic records required to reproduce the students' transcripts are retained permanently in order to accommodate student requests for the provision of such transcripts and to allow ACG to confirm the validity and safeguard the value and lawfulness of the degrees it awards,
- **Consent:** In case a student or their parent/legal guardian or an alumnus has given their consent to the processing of personal data (art 6(1)(a) of GDPR), the relevant personal data are kept and processed for the time period provided in the said consent or until the withdrawal of the consent by the Data Subject or their parent/legal guardian, e.g. student's photos from ACG's events are kept for a time period of five years as stipulated in the relevant consent forms,
- **Special Categories of Data:** Regarding special categories of data, such as health data or data revealing religious beliefs, in case a student or their parent/legal guardian or an alumnus has given their consent to the processing (art. 9(2)(a) of GDPR), the relevant personal data are kept and processed for the time period provided in the consent or until the withdrawal of the consent by the Data Subject; in



case the processing is necessary for reasons of public interest in the area of public health or if the processing is necessary for the purposes of preventive or occupational medicine or for reasons of substantial public interest (art. 9(2)(g), (h) and (i) of GDPR), personal data are kept and processed for a certain period of time, e.g. health data included in copies of daily care are deleted at the end of every academic year,

- **Student Data Related to OU Validated Students:** Especially as regards the Data of OU Validated Students, ACG follows the retention periods set by the Open University and analytically:
 - Records documenting OU Validated student academic and non-academic misconduct and disciplinary records are kept as follows:

<i>Records documenting OU Validated student academic misconduct and disciplinary records where student was cleared</i>	Last action +1 year. - Operational
<i>Records documenting OU Validated student academic misconduct and disciplinary records with a disciplinary outcome</i>	Closure of case/result issued +25 years. - Contractual/legal
<i>Records documenting OU Validated student disciplinary cases where the outcome is permanent expulsion</i>	Student date of birth +120 years. Core record to ensure evidence of permanent exclusion, in case student tries to re-register.
<i>Records documenting all OU Validated student non-academic misconduct and disciplinary cases where no further action was taken against the student</i>	Closure of case +3years. - Operational

- Records documenting the handling of complaints by individual OU Validated students are kept as follows:

<i>Records documenting the handling of complaints by individual OU Validated students where the formal complaints procedure is not initiated</i>	Last action on complaint + 3 years
<i>Records documenting the handling of formal complaints made by individual OU Validated students against the institution</i>	Last action on case + 6 years



- The core record of an OU Validated student as a learner, including transcript information, is kept for 120 years since the students' date of birth as follows:

<p>The core record of a student as a learner (student's Full Name, gender, date of birth, and contact details. Information required to reproduce the student transcript/diploma supplement including: Programme of study, name of award, date of award, classification of award, breakdown of modules completed with credits and marks).</p>	<p>Student date of birth + 120 years</p>
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More info regarding the processing of Students' and Alumni personal data can be found in ACG's Student Privacy Policy and ACG's Alumni Policy respectively.

4.2. Personal Data of Employees

Retention periods of employees' data (including Faculty members) vary depending on the processing purposes and the legal basis of their processing by ACG. By way of indication:

- **Contract:** In case the processing of personal data is necessary for the performance of an employment contract or in order to take steps at the prospective employee's request prior to entering into an employment contract (art 6(1) (b) of GDPR), personal data are kept and processed for a certain period of time, e.g. CV's of prospective employees/job applicants are held for 2 years,
- **Legal Obligation:** In case the processing of personal data is necessary for purposes of compliance with legal obligations (art 6(1) (c) of GDPR), personal data are kept and processed for a certain period of time provided by law, e.g. there is a legal obligation for ACG to collect employees' financial (social security) data, disclose them to tax authorities and keep them for 20 years,
- **Legitimate Interest:** In case the processing of personal data is necessary for the purposes of legitimate interests pursued by ACG or by a third party (art. 6(1) (f) of GDPR), except where such interests are overridden by the interests of an employee, personal data are kept and processed for a certain period of time e.g. employees' appraisal records are held for 5 years following termination of employment,
- **Consent:** In case an employee has given their consent to the processing of their personal data (art 6(1)(a) of GDPR), personal data are kept and processed for the time period referred in the consent or until the withdrawal thereof by the employee,
- **Special Categories of Data:** In case the processing of employee's special categories of personal data is necessary for the purposes of carrying out obligations and exercising specific rights of the employee or ACG in the field of employment and social security and social protection law (art. 9(2) (b) of GDPR), personal data are kept and processed for specific periods of time, e.g. employees' health data are kept for as long as employment lasts.



More information can be found in ACG's Staff Privacy Policy.

4.3. Personal Data of Parents/Legal Guardians

Retention periods of parents'/legal guardians' data vary depending on the processing purposes and the legal basis of their processing by ACG. By way of indication:

- **Contract:** In case the processing of personal data is necessary for the performance of a contract or in order to take steps at the data subject's request prior to entering into a contract (art 6(1) (b) of GDPR), personal data are kept and processed for specific periods of time, e.g. names of parents are kept throughout the course of their children's studies at ACG,
- **Legal Obligation:** In case the processing of personal data is necessary for purposes of compliance with legal obligations (art 6(1)(c) of GDPR), data are kept and processed for specific periods of time, e.g. certain financial data of parents are kept and processed for purposes of disclosure to tax authorities for as long as it is provided by law,
- **Legitimate Interest:** In case the processing of personal data is necessary for the purposes of legitimate interests pursued by ACG or by a third party (art. 6(1)(f) of GDPR), except where such interests are overridden by the interests of the parent/legal guardian, personal data are kept and processed for specific periods of time e.g. contact details of parents/ legal guardians are kept and processed throughout the course of the students' study for purposes of communicating with them regarding issues which concern the students,
- **Consent:** In case the parent/legal guardian has given their consent to the processing of personal data (art 6(1) (a) of GDPR), personal data are kept and processed for the time period stipulated in the relevant consent form or until the withdrawal of the consent, e.g. contact details are kept for up to 10 years following the receipt of consent,
- **Special Categories of Data:** Regarding special categories of data including health data, in case the parent/legal guardian has given their consent to the processing (art. 9(2)(a) of GDPR), personal data are kept and processed for the time period stipulated in the relevant consent form or until the withdrawal of the consent; in case processing is necessary for reasons of public interest in the area of public health or processing is necessary for the purposes of or occupational medicine or for reasons of substantial public interest (art. 9(2) (g) or (h) or (i) of GDPR), personal data are kept and processed for specific periods of time, e.g. health data of parents/legal guardians are kept and processed for five years in case an application for financial assistance is submitted which is based on social and income criteria.

4.4. Personal Data of other Individuals Related to ACG

Retention periods for data of other individuals related to ACG, e.g. people using the Fitness Facilities, participants in events etc., vary depending on the processing purposes and the legal basis of their processing by ACG. By way of indication:

- **Contract:** In case the processing of personal data is necessary for the performance of a contract or in order to take steps at the data subject's request prior to entering into a contract (art. 6(1) (b) of GDPR), personal data are kept and processed for specific periods of time or indefinitely, e.g. contact details of persons using the Fitness



Facilities are kept and processed throughout the duration of the relevant contract,

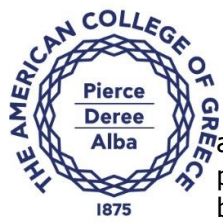
- **Legal Obligation:** In case the processing of personal data is necessary for purposes of compliance with legal obligations of ACG (art. 6(1) (c) of GDPR), personal data are kept and processed for specific periods of time provided by law, e.g. financial data of persons using the Fitness Facilities are kept and processed for purposes of disclosure to tax authorities for as long as it is provided by law,
- **Legitimate Interest:** In case the processing of personal data is necessary for the purposes of legitimate interests pursued by ACG or by a third party (art. 6(1) (f) of GDPR), except where such interests are overridden by the interests of the third party, personal data are kept and processed for specific periods of time or for an indefinite period, e.g. certain data are kept permanently for ACG's archives. The data transferred to the archives help preserve the history of the institution,
- **Consent:** In case the relevant individual has given their consent to the processing of personal data (art. 6(1)(a) of GDPR), personal data are kept and processed for the time period stipulated in the relevant consent form or until the withdrawal of the consent, e.g. photographs taken at ACG's events are kept and processed for 5 years,
- **Special Categories of Data:** Regarding special categories of data including health data, in case the relevant individual has given their consent to the processing (art. 9(2)(a) of GDPR), personal data are kept and processed for the time period stipulated in the consent or until the withdrawal of the consent; in case processing is necessary for reasons of public interest in the area of public health or the processing is necessary for the purposes of occupational medicine or for reasons of substantial public interest (art. 9(2)(g) or (h) or (i) of GDPR), personal data are kept and processed for specific periods of time, e.g. health data of persons using the Fitness Facilities are kept and processed for a time period of one year.

4.5. Defense of Legal Claims - Suspension of Disposal/Destruction of Personal Data

Notwithstanding the above, ACG keeps and processes the relevant personal data for as long as it is required in order to defend itself against potential legal claims. In this context, in case of legal action, the relevant retention periods are suspended and ACG is entitled to keep and process the relevant personal data relating until the final resolution of the claim or for as long as litigation proceedings last.

5. Safe Storage of Data during the Applicable Retention Periods

To ensure data security throughout the applicable retention periods, ACG has put in place organizational and technical security measures, it continuously updates its privacy policies, regularly trains its Faculty members and staff on data protection issues, supports the Data Subjects when they wish to exercise their rights in accordance with the Data Protection Legislation and as per ACG's Subject Access Request Policy and takes all reasonable steps to ensure that its partners and vendors who process personal data are also compliant with the Data Protection Legislation. All members of ACG staff are bound by confidentiality undertakings vis-à-vis ACG and they are aware of how to handle personal data in a secure manner. In addition, all members of ACG staff and users of information



across ACG are required to familiarize themselves with, and follow at all times the procedures set out in, the Data Breach Policy in the event of a personal data breach. A GDPR Governance Model has also been put in place which involves all departments in the structure created to maintain and safeguard ACG's compliance with the Data Protection Legislation.

Personal Data records are maintained and processed by all departments in accordance with the principles set forth in the Data Protection Legislation, including, without limitation, the principles of lawfulness, fairness and transparency, accuracy, data minimization, purpose and storage limitation, integrity and confidentiality. Furthermore:

- Data stored in **hard - copy form** are guarded in special places and appropriate technical measures have been taken in order to ensure that only authorized personnel who have been charged with maintaining and/or processing personal data have access to those areas,
- Appropriate security measures have also been taken with regard to data maintained in **electronic form**. The relevant data are stored in specific computers which block entry to anyone who does not have a password. Only authorized employees have access thereto.

6. Destruction of Data

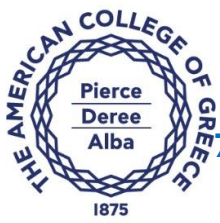
ACG and its staff should, on a regular basis, review all data, whether held electronically or in paper form, to examine whether to destroy or delete any data once the purpose for which those documents were created is no longer relevant.

The destruction of personal data kept by ACG after the completion of the processing and/or the fulfillment of the purposes served by keeping it, is carried out in accordance with the Guidelines of the Hellenic Data Protection Authority (currently, Guideline number 1/2005 for the safe destruction of personal data following the period required for the fulfillment of the purpose for processing), and, where applicable, under the supervision of a designated person - representative of the data processor. The destruction of certain data is carried out following a specific procedure, if so provided by law, e.g. students' essays are destroyed following a written act by the Director, as provided by Greek law.

Specifically, data maintained in hard - copy form and designated for destruction are selected, gathered and guarded in a specially allocated and safe place to which only authorized personnel has access. Such data are either shredded and pulped and recycled, or burnt. A record of destruction is made when the above action takes place (see Protocol of Destruction, Blackboard). The record of destruction states the date of destruction and describes the data destroyed, the method of destruction and, if applicable, the full name of the employee of the data processor appointed as responsible for the destruction. The destruction of data stored in electronic form is carried out by overwriting it with the assistance of programs designed specifically for that purpose (indicatively, but not limited to, file eraser and file shredders). Following that, all back - ups of the said data are also destroyed. The same type of record of destruction is made in this case as in the case of destruction of hard - copy data.

6.1. Routine Destruction

There are many documents that can be routinely destroyed as part of normal business practice. These may include documents which only have a short - term value or contain unimportant/duplicate information, such as, but not limited to: convenience copies, notices of meetings, trivial emails, draft letters, out-of-date reference material, obsolete publications, manuals, directories.



7. Right to Erasure

In specific circumstances, Data Subjects have the right to request that their personal data is erased. Data Subjects only have a right to have personal data erased and to prevent processing if one of the below conditions applies:

- Where the personal data is no longer necessary in relation to the purpose for which it was originally collected/processed,
- When a Data Subject withdraws their consent,
- When a Data Subject objects to the processing and there is no overriding legitimate interest for continuing the processing,
- Where personal data was unlawfully processed,
- Where personal data must be erased in order to comply with a legal obligation,
- Where personal data is processed in relation to the offer of information society services to a child.

Where one of the above conditions applies and ACG receives a request to erase personal data, first it ensures that no other legal obligation or legitimate interest applies. If it is certain, without a reasonable doubt, that the Data Subject has the right to have their data erased, this is carried out under the instructions of the Data Protection Officer in conjunction with the department manager and the IRM team to ensure that all data relating to that Data Subject has been erased.

These measures enable ACG to comply with a Data Subject's right to erasure, where there is no compelling reason for its continued processing. Whilst our standard procedures already remove data that is no longer necessary, we still follow a dedicated process for erasure requests to ensure that all rights are complied with and that no data has been retained for longer than is needed.

If for any reason, we are unable to act in response to a request for erasure, we always provide a written explanation to the individual and inform them of their right to complain to the Hellenic Data Protection Authority.

8. Amendment

This Policy constitutes an integral part of ACG's Privacy Policy. It may be amended from time to time at ACG's discretion in order to reflect best practices and/or changes in the relevant legislation.