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DIRECTORATE GENERAL GROWTH,  
MINISTRY OF FINANCE

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## Privacy Policy

May 2022

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## 1. Personal Data Security Policy

This policy defines the terms and conditions, which are observed by the Directorate General Growth, for the protection of the personal data collected. This policy includes the rules, based on which the General Directorate proceeds with any collection and processing of personal data and ensures their integrity and confidentiality.

This Policy includes the following:

- Legal Framework for Personal Data Protection
- Regulation Definitions
- Purpose of personal data processing
- Security measures
- Method of collection and retention time of personal data
- Disclosure of data to third parties
- Storage of Personal Data
- Privacy
- Access to Personal Data
- Period of keeping records containing Personal Data
- Exercise of the subjects' rights
- Applicable law
- Data Subject Communication with the Department

## 2. Legal Framework for Personal Data Protection

From May 25, 2018, it is in force, the no. 2016/679, General Data Protection Regulation (GDPR) of the European Parliament and of the Council for the protection of natural persons against the personal data processing and for the free data **distribution** circulation.

### 3. Definitions – Abbreviations

- Personal Data is any information relating to an identified or identifiable living natural person. An identifiable natural person is one whose identity can be ascertained, directly or indirectly through information such as: Name, ID card number, telephone number, passport number, social security number, residential address, e-mail, driver's license, No. of bank account, picture, white criminal record and other data.
- Data Controller is any natural or legal person, public authority, agency or other entity that, alone or jointly with others, determines the purposes and manner of processing personal data.
- Processor, is any natural or legal person, public authority, agency or other entity that processes personal data on behalf of and on behalf of the controller.
- Data subject, is the natural person to whom the data refer and whose identity is known or can be ascertained, directly or indirectly, based on an identity number or based on specific elements that characterize his condition, from a physical, biological, mental, economic, cultural, political or social.
- Processing is any action or sequence of actions performed automatically by computer or not, on Personal Data of natural persons. Such actions may be collection, recording, organization, structuring, storage, adaptation / alteration, retrieval, information retrieval, use, transmission, dissemination / disposal, association / combination, restriction, the deletion / destruction of Personal Data Consent of the Data Subject is the free, specific, explicit and fully aware declaration / acceptance of the data subject, with which he agrees as the Directorate General Growth processes his personal data.

## 4. Description of purpose and scope

This policy concerns the processing of Personal Data (Personal Data) by the Directorate General Growth, which is under the Ministry of Finance. It was established as Planning Bureau in 1961 by a Decision of the Council of Ministers (Decision Number 854 and date 15 June 1961) and was renamed the General Directorate of European Programs, Coordination and Development (DG EPSA) on 1 November 2013 (Law 127(l)/447). After the optimization and finalization of the responsibilities of the General Directorate of European Programs, Coordination and Development (DG EPSA) and the focus on the undertaking of development issues, based on the Cabinet's Resolution no. 90.126 and date 7/10/2020, the General Directorate for European Programmes, Coordination and Development (DG EPSA) was renamed as the General Directorate for Development. With the new name of the General Directorate, the development nature of the issues now undertaken by the General Directorate of EPSA, which is the main state body responsible for the global approach to the Government's development issues and the formulation and promotion of a single sustainable strategy, is fully reflected development with a long-term horizon.

The Directorate General Growth faithfully applies the provisions of the National Legislation, as amended from time to time, as well as of the European Regulation (EU) 2016/679 of April 27, 2016, for the protection of natural persons, against the processing of their personal data for the free circulation of such data (hereinafter "the Regulation"). Compliance with this Policy applies to all staff of the Directorate General Growth.

## 5. Basic principles of personal data processing

Based on the provisions of article 5(1) of the Regulation, which concern the principles governing the processing, the Directorate General Growth as the Processing Manager must, like the personal data:

- a) They are processed lawfully and legitimately in a transparent manner ("legality, objectivity and transparency").
- b) They are collected for specified, explicit and legal purposes and are not subjected to further processing incompatible with these purposes. Further processing is permitted for archiving purposes in the public interest or for scientific or historical research or statistical purposes ("purpose limitation").
- c) They are appropriate, relevant and limited to what is necessary for the purposes for which they are processed ("data minimization").
- d) They are accurate and, when necessary, updated. The Directorate General Growth must take all reasonable measures for the immediate deletion or correction which are inaccurate, in relation to the purposes of the processing ("accuracy").
- e) They are kept in a form that allows the identification of employees/former employees only for the period required for the purposes of the specific processing. Personal data may be stored for longer periods for archiving purposes in the public interest, for scientific or historical research purposes or for statistical purposes and as long as appropriate technical and organizational measures are applied to safeguard the rights and freedoms of the data subjects ("restriction of the storage period").
- f) They are processed in a way that guarantees the appropriate security of personal data, including their protection against unauthorized or illegal processing and accidental loss, destruction or damage, using appropriate technical or organizational measures ("integrity and confidentiality").
- g) The Directorate General Growth bears the responsibility and is able to demonstrate compliance with the above principles a - f ("accountability").

## 6. Subjects of Personal Data

The Directorate General Growth processes personal data of natural persons as described in the categories below

- I. Staff of the Directorate General Growth
- II. Involved Officials of the Fiscal Commissioning Authority in the Public Contract Awarding Process
- III. Members of the Evaluation Teams of the Implementing Agencies for the inclusion of Projects regarding the SAA Grant Plans
- IV. Contract signatories: officials from the Contracting Authority (CA)
- V. Applicants for candidate positions
- VI. Public and wider public sector entities
- VII. Controllers
- VIII. Bidders/ Consultants
- IX. Project Contractors
- X. Grantees
- XI. Advisors

## 7. Framework and method of collection and processing of personal data

### Processing

The Department may process personal data, as prescribed by law, as long as the processing is necessary for at least one of the following legal bases:

- in order to comply with a legal obligation or
- for the purposes of the Department's interests, or
- to safeguard the vital interests of the Republic in particular, when it comes to providing information to authorities responsible for dealing with emergency situations, or prosecuting authorities, or
- for the fulfillment of a duty performed by the Department, or
- when the consent of the data subject has been given or
- when the processing purposes are connected to the provision of services to other public authorities, as provided by the current legislation, as well as
- for other purposes that fall within the competences of the Department.

### Notification to third parties

The Directorate General Growth does not share, transfer or trade the personal data it processes to any third party, other than the Public Authorities on the basis of Legislation or Regulations or Decrees.

When the General Directorate entrusts its collaborators with carrying out specific processing activities on its behalf, the same obligations regarding data protection are imposed on the authorized collaborators, through a contract or other legal act in accordance with national or Union law, in order to provide sufficient assurances for the implementation of appropriate technical and organizational measures, so that the processing meets the requirements of the General Data Protection Regulation (GDPR).

The General Directorate may disclose personal information when this is required by law, or when this is necessary, in order to protect or defend the interests of the Republic of Cyprus.

### How Secure is Personal Data?

The Directorate General Growth has taken the appropriate technical and organizational measures to ensure the protection of personal data and the

maintenance of its quality. To this end, it makes every reasonable effort and takes all necessary security measures in order to keep personal data safe and protected from unauthorized access, use, or alteration and illegal destruction.

These measures concern the way and methods of processing the personal data collected, in order to ensure the protection of this data, as well as the rights that can be exercised in relation to this data. Personal data is collected and further processed only to the extent necessary to handle any requests or for service purposes. In addition, it applies strict Policies and Procedures according to which those who process personal data act and all the necessary measures have been provided to apply the applicable legal and regulatory framework.

### **Methods of storage**

To carry out the processing of Personal Data, official computers are used, to which only the staff of the Directorate General Growth, who have a unique user code and password, have access.

Personal data is also stored in paper form, in the official files maintained by the General Directorate and which are kept in accordance with the relevant regulations and circulars, both of the Department of Public Administration and Personnel and of the National Security Authority and/or, in electronic form, on office computers.

### **Storage Period**

The Directorate General Growth is obliged to keep documents or electronic records only for the period for which this data is necessary, for the purpose for which it was collected or until its deletion is requested (if this happens earlier), unless we continue to observe them according to the provisions of the current legislation.

However, in the case of appeals, they are further observed if, after the end of the appeal, there is a pending request to resolve the dispute or a complaint before a competent administrative, public or judicial authority. The Directorate General Growth must keep said data until the final resolution of the dispute.

### **Personal data protection measures**

The Directorate General Growth faithfully applies the provisions of Regulation (EU) 2016/679 and takes all appropriate technical, organizational and administrative measures to ensure the protection of the personal data it processes, from accidental or unlawful destruction, accidental loss, alteration, prohibited dissemination or access or any other form of unfair processing.

The processing of personal data is confidential and is carried out exclusively and only by authorized persons who are under the control of the Directorate General Growth, who have been informed, trained and bound by signing a relevant confidentiality form.

## 8. Rights of personal data subjects

The Directorate General Growth must inform data subjects of their rights, which are based on the Regulation as follows:

### **a. Right to Information (Article 12)**

It is the right of the data subject to a concise, transparent, comprehensible and easily accessible update to his personal data without delay and in any case a response within one month of receipt of the request. This information is provided free of charge, unless the requests are unfounded or excessive.

### **b. Right to information when obtaining Consent (Articles 13 & 14)**

The Directorate General Growth upon obtaining consent, where required under the Regulation, informs the data subject of the purposes of the collection of his personal data, the period of processing, his rights as well as exactly which personal data is being processed.

### **c. Right of access (Article 15)**

The data subject has the right to obtain a copy of information containing his personal data and to be fully informed about his personal data, the purposes of the processing, the categories of the data, the time of their storage and the criteria of the storage time, in which have been shared as well as their origin.

### **d. Right of rectification/amendment (Article 16)**

The data subject has the right to request the correction/completion of inaccurate personal data and to have his request communicated by the Council without undue delay.

### **e. Right to erasure - "Right to be forgotten" (Article 17)**

The data subject has the right to request deletion of his data and his request to be satisfied without delay unless there is an obligation arising from Law or Regulation or public interest in the field of health, or when exercising legal claims before a Court.

### **g. Right to restriction of processing (Article 18)**

The data subject has the right to request restriction of processing when the accuracy of the data is disputed or the processing is unlawful or no longer necessary.

### **h. Right of disclosure (Article 19)**

The Data Controller informs any correction or deletion of data or restriction of processing to each recipient to whom their personal data was lawfully disclosed and informs the data subject accordingly.

**i. Right to data portability (Article 20)**

The data subject has the right to receive his data in digital form and transmit them to another organization or to directly request their transmission to another organization.

**j. Right to object (Article 21)**

The Data Subject has the right to object to the processing of his personal data. In this case, the processing of his personal data stops, unless:

(a) the processing is carried out for the purposes of the public interest or exercise of public authority of the Council, or when

(b) the processing is carried out to serve the legitimate interest of the Processor or a third party

**k. Right to object to automated processing decision including profiling (Article 22)**

Automated decision-making occurs when an electronic system processes personal data to make a decision without human intervention. The data subject has the right not to be subject to a decision taken solely on the basis of automated processing, including profiling, which produces legal effects concerning or significantly affecting him: e.g. the data subject has the right to object to automated processing for the evaluation of personal aspects such as health, reliability, personal preferences, performance at work.

The right cannot be exercised when the decision:

(a) is necessary for the performance of a contract (e.g. employment contract, contract for the provision of services by a provider),

(b) permitted by Law;

(c) is based on simple data consent.

**l. Right of termination (Article 77)**

The Data Subject has the right to complain to the Personal Data Protection Commissioner at any time if he believes that any of his rights have been violated.

**m. Right to compensation (Article 82)**

The Data Subject has the right to compensation if a natural person or organization caused him damage due to the mishandling of the information concerning him.

**n. Right to withdraw consent (Article 7)**

The Data Subject has the right to withdraw his declaration of consent, where it is required for the processing of personal data, at any time by any means of

communication. The withdrawal of consent applies when it does not affect the legality of the processing based on it before its withdrawal.

## 9. How to handle leaks

The General Directorate for Development as Data Controller reports in detail any leaks and/or breaches to the Personal Data Protection Commissioner within 72 hours of becoming aware of the leak/breach.

The Data Controller informs the Data Subject (natural person) when there is a high risk to his rights and freedoms.

## 10. Data Protection Officer of the Directorate General Growth

In accordance with Regulation 2016/679, the General Directorate for Development has appointed a Data Protection Officer (DPO), who participates properly and in a timely manner in all matters related to the protection of personal data.

Data subjects can contact the Data Protection Officer of the Directorate General Growth for any issue related to the processing of their personal data and the exercise of their rights, in accordance with the Regulation.

You can contact the Ministry of Foreign Affairs at:

Directorate General Growth Data Protection Officer

29 Vyronos Avenue, 1096 Nicosia

or at the e-mail address [kpapalexandrou@papd.mof.gov.cy](mailto:kpapalexandrou@papd.mof.gov.cy)

## 11. Corrections and Changes to the Privacy Policy

The Directorate General Growth reserves the right to revise this Personal Data Protection Policy when deemed necessary. You are therefore encouraged to consult it at regular intervals.

The latest version of this Policy is always posted on the website of the Directorate General Growth at [www.dggrowth.mof.gov.cy](http://www.dggrowth.mof.gov.cy).

This Privacy Policy was drafted on May 13, 2022.