



CONTROLLER/PROCESSOR/BODY REQUEST FORM

Exclusively for requests submitted by controllers, processors or other bodies (e.g. professional associations) regarding matters for which the HDPA is competent.

Fill in this form using capital letters. The fields with an asterisk () are mandatory.*

1. Controller's / Processor's / Body's contact details

Legal name of entity/name *:			
Title:			
VAT number *:		General Electronic Commercial Registry (G.E.MI.) number:	
Address*	Street:		Number:
	Postcode:	City:	
	Country:		
	E-mail:		
Contact phone number/s:			
DPO announcement registration number (if applicable):			

2. Controller's / Processor's representative contact details¹

Legal name of entity/name *:			
Address*	Street:		Number:
	Postcode:	City:	
	Country:		
	E-mail:		
Contact phone number/s:			

3. Contact person's contact details²

Name :
Capacity:
E-mail:
Contact phone number/s:

¹ To be filled only by controllers or processors not established in the Union who are obliged under Art. 27 GDPR to designate a representative.

² The HDPA will use this information in case it needs clarifications regarding your request. If you have a Data Protection Officer, please specify here their contact details and/or state the registration number of the DPO announcement to the HDPA.

4. Category of request* *(Select)*

<input type="checkbox"/>	Approve a draft code of conduct (Art. 40(5))
<input type="checkbox"/>	Accredit a body monitoring compliance with a code of conduct (Art. 41(1))
<input type="checkbox"/>	Approve certification criteria (Art. 42(5))
<input type="checkbox"/>	Apply for authorisation to transfer personal data to countries outside the EU (Art. 46(3))
<input type="checkbox"/>	Apply for approval of binding corporate rules (BCR – Art. 47)
<input type="checkbox"/>	Inform the HDPAs on the transfer of data to countries outside the EU by way of derogation (Art. 49(1)(last subparagraph))
<input type="checkbox"/>	Provide advice on preparing legislative and/or administrative measures (Art. 57(1)(c))
<input type="checkbox"/>	Other (state under which provision for which the HDPAs is competent you are submitting the request)

5. Subject-matter of the request* *(Describe your request – if there is not enough space please attach your request to a separate document).*

Before submitting your request, make sure that the HDPAs has the competence to examine it. Please refer to the provisions of Regulation (EU) 2016/679 (GDPR), in particular those mentioned in section 4 of this form.

It should be noted that the HDPAs does not have the obligation to respond to queries and requests made by controllers, data subjects or third parties for which the HDPAs is not competent under the GDPR provisions. For instance, the HDPAs will not issue an opinion concerning the lawfulness of processing at the request of a processor.

6. Relevant documents / evidence *(Please number the attached documents)*

1
2
3
4
5
6
7
8

7. Information notes

- Third party access to the documents of the case compiled following your request is subject to the Greek legislation regulating access to public documents.
- If deemed necessary for the performance of its competence, especially in cases of cross-border processing, the HDPa may forward the case file to competent authorities and organizations within the EU. In this case, third party access to the case file is subject to the legislation on the access to public documents of the member state.
- Information included in the case file is kept in the HDPa's records for a period of 5 years after the case has been resolved, except for the administrative acts of the HDPa.
- For exercising the data subject's rights (access, rectification and restriction) according to Art. 15, 16 and 18 of the GDPR, in relation to data the HDPa is processing during the examination of your request, and data that have been collected by the HDPa in the course of the examination, you may send an e-mail to contact@dpa.gr.
- For any issue concerning the processing of personal data by the HDPa as a controller and assistance regarding the exercise of the aforementioned rights, please contact the DPO of the HDPa at dpo@dpa.gr.

Date	Signature

Please fill in all the fields above, after you consult the instructions for completing the form.

INSTRUCTIONS FOR COMPLETING THE CONTROLLER/PROCESSOR/BODY REQUEST FORM

Which cases does this specific form cover?

This form is for general use and is intended for requests submitted to the HDPa by **controllers, processors, associations** or other **bodies** in relation to the performance of the tasks described in Art. 57(1) GDPR, in particular subparagraphs: c), l), m), n), p), q), r) and s).

Which cases does this specific form not cover?

Use the special forms on our website in case you wish to:

- a) announce the Data Protection Officer's contact details to the HDPa, or
- b) notify a personal data breach

It should be repeated that the HDPa does not have the obligation to respond to queries and requests made by controllers, data subjects or third parties for which the HDPa is not competent under the GDPR provisions. For instance, the HDPa will not issue an opinion concerning the lawfulness of processing at the request of a processor. As a result, if you ask the HDPa to issue an opinion, your request will immediately be archived.

When can I expect a reply from the Hellenic DPA?

The HDPa is trying to respond to its obligations as quickly as possible, but due to the amount of cases it is handling it is not always possible to respond immediately. The GDPR explicitly states the period of time within which the HDPa must provide written advice to the controller in case of prior consultation, under Art. 36. It should also be noted that on several occasions, especially where the HDPa must cooperate with supervisory authorities in other member states, it takes considerable time to provide a comprehensive response to a request.

Extensive guidelines on specific fields of the form

1. Controller's / Processor's / Body's contact details

Please fill in the contact details of the controller or the processor or the body submitting the request.

The field "DPO announcement registration number" is to be filled in if you have appointed a Data Protection Officer (DPO). In this case, fill in the registration number you received from the HDPa when you announced the DPO's contact details.

2. Controller's / Processor's representative contact details

Where a controller or processor is not established in the Union, they are obliged, under Art. 27 GDPR, to designate in writing a representative in the Union. In this case, fill in the contact details of the designated representative and attach a copy of the document of appointment.

3. Contact person's contact details

To examine your request, the HDPa may need clarifications or further information. Fill in the contact details of the natural person (e.g. your employee representative) who is responsible for facilitating communication with the HDPa. In case you have appointed a DPO all communication should be through the DPO.

4. Category of request

In this field specify under which GDPR provision the HDPa must examine your request. You have the following options (in brief):

a) Prior consultation (Art. 36)

It concerns *controllers* who consult the HDPa prior to processing *after they have carried out* a data protection impact assessment (under Art. 35 GDPR) which indicates that *the residual risks* stemming from processing are *high*, even after they have implemented measures to mitigate them.

b) Approve a draft code of conduct (Art. 40(5))

It concerns only associations and other bodies representing categories of controllers or processors who:

- a) have prepared codes of conduct, or amend or extend an existing code,
- b) submit the draft code to the HDPa so that it gives its opinion.

The HDPa provides an opinion on whether the draft code provided furthers compliance with the GDPR and may approve it if it finds that the code provides appropriate safeguards.

c) Accredit a body monitoring compliance with a code of conduct (Art. 41(1))

It concerns requests for accrediting a body monitoring compliance with an approved code of conduct, based on the accreditation requirements issued by the HDPa and provided they have been issued.

d) Approve certification criteria (Art. 42(5))

It concerns requests for approving certification criteria under Art. 58(3) GDPR.

e) Apply for authorisation to transfer personal data to countries outside the EU (Art. 46(3))

It concerns requests for granting authorisation to transfer personal data to countries outside the EU by providing appropriate safeguards.

f) Apply for approval of binding corporate rules (BCR – Art. 47)

It concerns requests for approving binding corporate rules for a group of undertakings. In this case, the GDPR consistency mechanism is applied. Before submitting your request, make sure that the HDPa is the lead supervisory authority under Art. 56 of the Regulation.

g) Inform the HDPa on the transfer of data to countries outside the EU by way of derogation (Art. 49(1)(last subparagraph))

It concerns informing the HDPa on the transfer of data to countries outside the EU by way of derogation under Art. 49(1)(last subparagraph). In this case, a response from the HDPa is not required; the HDPa, however, has the discretion to further examine the transfer in question.

h) Provide advice on preparing legislative and/or administrative measures (Art. 57(1)(c))

It concerns only the national parliament, the government, and other institutions and bodies who wish to consult the HDPa on designing and establishing legislative and/or administrative measures relating to the protection of natural persons' rights and freedoms with regard to processing.

i) Other

Justify under which provision for which the HDPa is competent you are submitting the request. Requests submitted without justification will immediately be archived.

5. Subject of the request

In this field you should outline as precisely as possible your request, providing the relevant evidence.

6. Relevant documents/evidence

Fill in this field if, in order to have your request examined, you must submit documents/evidence that substantiate/s it. The supporting documents should be submitted in copies and not originals. The HDPa shall not give you back the documents.

You should only submit documents that are directly related to your request. If the dispatch of a big number of documents, or pages of a document, is necessary, please underline the points that are directly related to your request.

If you have submitted a large number of attached files that are not directly related to your request, the HDPa may return the documents and ask you to send only the relevant evidence. In case of multipaged documents, we recommend that you send them by e-mail.