

DATA PROTECTION

TOOLKITS

GDPR COMPLIANCE PLAN

**SOCIAL MEDIA
PRIVACY POLICY**

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Introduction

The GDPR is mandatory from 25/5/2018 onwards in all EU countries. All private companies and public bodies are obliged to comply with it.

Under the Accountability principle, legal entities are required to demonstrate their compliance with the requirements of the GDPR. In order for the legal entities to facilitate the fulfillment of this obligation, they organize Data Management Systems.

Reminder

Illegal management of personal data may result in:

- the imposition of heavy administrative fines
- criminal sanctions
- causing material or moral damage to natural persons (and consequently the obligation to pay compensation)
- damaging the reputation of your business.

Disclaimer

The documents provided by Trust Pl@n were created on the basis of general and acceptable practices and processing conditions for SMEs and on the level of legal and technical knowledge available at the time of delivery.

In any case the following apply:

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Specifically about Social Media Privacy Policy

Every business that has a Social Media page that is used for its professional needs, should have a Social Media Privacy Policy. Personal data are processed through Social Media, both by your business and by the company to which each medium belongs, ie there is a joint relationship of process managers.

Processing data through Social Media, such as messages for communicating with the customer, posts containing customer or profile data, photo / video posts and more is more complex and requires more attention from the business.

By Social Media we basically mean pages with the brand names: facebook, Instagram, twitter, YouTube or similar.

In the table below we list the links to the privacy policies of specific social media that you must complete in the Privacy Policy, which follows.

Table of Privacy Policies & Terms of Use for Social Media	
Page	Privacy Policy and Terms of Use
Facebook/ Instagram	https://www.facebook.com/privacy/explanation https://www.facebook.com/legal/terms/update (company name Facebook Inc.)
Twitter	https://twitter.com/en/privacy https://twitter.com/en/tos (company name Twitter Inc.)
Youtube	https://policies.google.com/privacy?hl=el (Google company) https://www.youtube.com/t/terms (company name Google Ireland Limited)

Instructions for use - application

In case your business has a Social Media page which is used for its professional needs and does not have a Social Media Privacy Policy or a Social Media Privacy Policy that is not up to date you should follow the steps listed:

1) You must complete this Social Media Privacy Policy with the required information.

2) You should check the document of the Social Media Privacy Policy for any required adjustments to the specific processing on the Social Media page / pages of your business and make the appropriate additions and / or modifications if necessary.

3) Then you need to post the Social Media Privacy Policy on your business website.

SOCIAL MEDIA PRIVACY POLICY

This document is part of the privacy policy of **the company under the name**

in its role as data controller (hereinafter personal data or data). In this document you will find information about how the processing of personal data on this page is carried out.

Data controller (and joint data controller)

Webpage

is a creation of **the company under the name**

(hereinafter the company / controller).

Our company has the following details, which you can use to contact us:

ADDRESS

TELEPHONE NUMBER

EMAIL

For the present processing (ie on the specific page of the specific social networking medium) and solely for this we inform you that we are jointly responsible for processing with the **company**

which manages the specific social networking medium.

Purpose of processing

Our company processes data through this page in order to:

- a) inform you about our activities
- b) provide you with an additional means of communication
- c) present and promote the quality of the services provided by it, ie to advertise its services

Page content

The content we post on this page (but also in general on every page we manage) consists mainly of posting posts about our activities, photos and videos. When the content of the posts contains data, we make sure that it is a product of legal processing. If the posted content is considered to be violating your rights or the rights of third parties, please contact us directly.

The following data processing takes place on our page:

- 1) Processing (usually view) of photos we have received from our customers or processing of our customers' comments about our services
- 2) Data processing of third party visitors of our page
- 3) Data processing for communication purposes
- 4) Data processing for the purpose of promoting services

Legal basis for processing

The legal basis of all the above processing is your consent.

That is:

a) either the posted data will be the product of prior written consent of our customers (eg for the use of their photos on our page). Withdrawal of this consent is achieved via email or letter to our company.

b) or with actions such as "like" and "follow", you declare your consent for the processing of the user name and possibly your photo as well as for receiving updates, communication and monitoring of our services. Withdrawal of this consent is achieved in the same way but in reverse (unlike, unfollow).

In case you solely browse our page without taking such actions (ie without "like" or "follow"), we declare that we do not process your data. However, we draw your attention to the fact that the same does not apply for the **company**

as analyzed below.

What data do we collect through the webpage?

Through **webpage**

we collect and process certain data, such as your name and your profile photo as well as any comments or messages.

In addition, this page allows us to collect anonymous / statistical data about visits to it.

However, we inform you that the **company**

probably performs other processing by collecting your other data (ip, browsing history, etc.), the number and extent of which we do not control and cannot influence. Please consult the Terms of Use and the Privacy Policy listed below.

How is data collection / processing of done?

The collection and general processing (preservation, etc.) on this page is done only if you perform an action, such as like or follow.

However, we inform you that the **company**

possibly collects / processes your other data in other ways, the number and extent of which we do not control and cannot influence. Please consult the Terms of Use and the Privacy Policy listed below.

Time-Place of data retention

Your data is stored in accordance with the Terms of Use and the Privacy Policy of the **company**

which manages this particular social media.

We retain your data exclusively for the period of time necessary for the above processing purposes. In each case every 3 years we review the data that we have processed and we delete them on a case by case basis.

Contact Form

Through this page you can send us a contact message. We urge you not to send us messages that contain sensitive information about you or others. In case you send us such a message, we declare that we will delete it immediately and we will not proceed with further processing or reply.

As this social networking site does not provide the technical capability to give us your consent, we declare that the legal basis for this processing (ie for sending a message) is the legitimate interest of our company and in particular the provision of a means of communication of third parties with it.

Comments

You have the opportunity to comment on our related posts. However, we urge you not to take advantage of this opportunity publishing us or disclosing yours or third party data in general. If we perceive such action or comment that contains illegal, immoral, offensive material or that endangers our company or third party rights, we will delete them without notice.

Rights

You have the right to access, correct, delete, restrict, oppose the specific processing, revoke the consent without prejudice to the legality of the previous processing. In addition, in case the present processing is considered to violate the relevant protection legislation, for example, you have the right to complain to the Personal Data Protection Authority.

Clarification: the exercise of the above rights may be technically limited, due to the options and terms of use of the **company**

Security

The staff of our company that manages the webpage is covered by an explicit obligation of confidentiality and the compliance with certain security measures during the process of managing the account of the specific page.

However, we inform you that the **company**

possibly collects / processes other data of yours in other ways as well, the extent of which we do not control and cannot influence. Please consult the Terms of Use and the Privacy Policy listed below.

Data transfer

We would like to inform you that transfer (transmission) of the personal data that we post on this page of our company probably takes place. For more information consult the **Terms of Use**

and the **Privacy Policy**

of the above company.

Notice - Disclaimer

We recommend that, before giving any consent and performing any action on this page, you consult the Terms of Use and Privacy Policy of this social media, as set out

above. In the event that of your own accord you upload photos of yourself or others or additional personal data to our page in the above media, you are responsible for this processing yourself. Due to the particular ease of sharing photos and other personal data on social media, we recommend that you use them taking into consideration the potential risks arising from their publication.

In any case, we declare that we do not know and are not responsible for whether these social media further process personal data, if they collect additional categories of data (browsing history, IP, etc.), if they have additional processing purposes, if they use processors and sub-processors, if they perform profiling, if they follow the published privacy policies and the way they carry out the processing of personal data as a whole. For this reason, we refer to the Terms of Use and the Privacy Policy of the specific social networking medium, we invite you to consult them before any action you may perform and we inform you that taking into account the above, we proceed to their very prudent use, being aware of the potential risks.