



Online self-assistance compliance tool

Deliverable D2.3

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Table of Contents

1	INTRODUCTION	3
1.1	Purpose of the document	3
1.2	Relations to other activities in the project	3
1.3	Structure of the document	3
2	PURPOSE OF THE ONLINE TOOL	5
2.1	Sample good practice material	5
2.2	Questionnaire	9
3	REQUIREMENTS	14
4	SYSTEM DESIGN	16
4.1	System overview	16
4.2	Database schema	18
4.3	Technologies used	20
5	USER INTERFACES	22
5.1	User interface for administration of the questionnaire	22
5.1.1	Defining the languages associated with a questionnaire	23
5.1.2	General Information Tab	24
5.1.3	Questions Tab	25
5.1.4	Variables Tab	32
5.1.5	Outlines Tab	33
5.1.6	Languages Tab	40
5.1.7	Metrics Tab	41
5.2	User interface for questionnaire respondents	42
6	CONCLUSIONS	51
7	APPENDIX	52
7.1	Template example	52
7.2	Enhanced template example	57

1 Introduction

The byDesign project aims to provide assistance to SMEs and other relevant stakeholders, through developing appropriate compliance kits and training programmes, with respect to addressing the challenges stemming from the effective implementation of the GDPR. In this context, one of the main pillars of the project is the development of a compliance kit for SMEs, facilitating self-assistance with a set of context-aware templates of essential documents and online tools. To this end, the aim of Task 2.3 is to develop the compliance kit for SMEs; the tool is offered as a web application, implemented using state-of-the-art web technologies and software, in order to present in a meaningful and user friendly way the different kinds of guidance material accumulated throughout Task 2.2. In that respect, an online wizard for SME respondents has been implemented, allowing for the context-aware generation of customised instances of good practice documents, along with the corresponding administration user interface for the Data Protection Authority, in order to manage and customise questionnaires and material to be rendered through the online wizard to SME end users.

1.1 Purpose of the document

This document aims to present all aspects of the specification and implementation of the self-assistance compliance tool. In that respect, it leverages the findings of Task 2.2 for requirements elicitation, and it proceeds with the system specification, providing an overview of the system architecture and the information model of the system reflected by the database schema; moreover, it provides further details regarding system implementation by outlining the technologies used. However, the main contribution of the document is that it can stand as a user guide for both the administration and wizard user interfaces, describing in detail the functionalities offered by means of the corresponding screenshots.

1.2 Relations to other activities in the project

Task 2.3 uses as a basis the findings of Task 2.2, whose goal was twofold; defining the topics addressed by the online compliance tool and assembling the material reflecting broadly identified good practices in these topics. Specifically, the online tool developed in the context of Task 2.3 is established upon the result of Task 2.2, i.e., the contextual framework providing SMEs with suitable sample documents based on their characteristics, thus significantly facilitating their compliance process.

Subsequently, Task 2.4 concerns the operation and maintenance of the online tool during the course of the project. The work in this regard will concern the deployment of the platform, followed by continuous monitoring and updates as required. During the pilot phase, assessment and evaluation of the tool in production environment will take place before its general release. Feedback received as part of this process will also be exploited in the context of Task 2.3 during the overlapping time period. The pilot phase will give the token to the full production phase, which will last until the end of the project, whereas it is expected to continue its operation long after the project concludes. During this phase, the tool will be fully maintained and will be subject to adaptation in order to keep pace with new needs identified.

1.3 Structure of the document

Section 2 constitutes the problem statement; it describes the purpose of the compliance tool, outlining the main findings of the Task 2.2 serving as “inputs” and “outputs” of the compliance tool.

D2.3 — Online self-assistance compliance tool

Section 3 presents the requirements that have been identified for designing the online self-assistance compliance tool, taking into consideration common best practices for implementing an online survey system, as well as requirements stemming from byDesign itself.

Section 4 provides an overview of the system specification and implementation. Specifically, it presents the system architecture, the information model of the system reflected by the database schema, and the technologies used for the system implementation.

Section 5 describes in detail the functionalities offered by the developed user interfaces by means of the corresponding screenshots; in that respect, it constitutes a short user guide of the compliance tool.

Section 6 concludes the document, while pointing out possible future enhancements and extensions.

Finally, Section 7 (Appendix) presents examples of template documents before and after byDesign.

2 Purpose of the online tool

By means of the online tool, byDesign expects to provide practical assistance and guidance to SMEs, as regards the implementation of GDPR main requirements. Essentially, the online tool constitutes a compliance kit particularly tailored for SMEs, that provides for self-assistance compliance along with a set of context-aware templates of essential documents; through a few simple steps, an SME will be able to generate fundamental documents, such as data protection policies, data subjects' rights exercise templates, model clauses for subcontractors, model records of processing activities, etc., depending on the characteristics of the SME.

Self-assistance compliance is implemented as an online wizard in the form of a questionnaire, which requires as input the business sector to which the respondent SME belongs (namely Commerce, Tourism and Hospitality, Education, Health and other sectors), the typical activities of the SME, and optionally identity and contact data of the SME. The wizard provides as output sample good practice material for SMEs, i.e., adaptable document templates, notices that can be integrated into websites, educational material, guidelines and simplified texts/FAQs. Sample good practice documents are listed in Section 2.1, while the questionnaire of the online wizard is presented in Section 2.2.

2.1 Sample good practice material

The topics addressed by the online tool focus on the following major areas, each one elaborated in types of guidance to be offered:

A. Lawfulness and transparency

1. The Provision of Information from SMEs to Data Subjects
2. Consent
3. Data protection rights and data subject request handling procedures
4. Destruction of personal data

B. Accountability

1. Records of processing activities
2. Security measures
3. Data breach handling
4. Assignment of data processing to contractors/processors

C. Business activities entailing data processing

1. Website
2. Direct marketing through electronic means
3. Video surveillance
4. Employee records

The documents comprising the sample good practice material are presented in Table 1.

Table 1. Sample good practice guidance documents

Table 1. Sample good practice guidance documents		
A. Transparency and lawfulness		
A1	Transparency	1. Frequently Asked Questions for the provision of information to data subjects – transparency
A2	Templates for the provision of information from SMEs to data subjects (based on the relevant processing operation)	<ol style="list-style-type: none"> 1. Template for the provision of information to customers/clients – Health sector 2. Template for the provision of information to customers/clients – Education sector 3. Template for the provision of information to customers/clients – Tourism-Hospitality sector 4. Template for the provision of information to customers/clients – Commerce sector 5. Template for the provision of information to customers/clients – Other sector 6. Template for the provision of information to potential customers (for all sectors) 7. Template for the provision of information to suppliers-natural persons (for all sectors) 8. Template for the provision of information to employees (for all sectors) 9. Template for the provision of information to prospective/candidate employees (for all sectors) 10. Template for the provision of information to individuals in case of a personal data breach (for all sectors) 11. Template for the provision of information on video surveillance (for all sectors) 12. Template for the provision of first level (A-level) information on video surveillance (for all sectors) 13. Template for the provision of second level (B-level information) on video surveillance (for all sectors) 14. Table matching the data processing purposes for each processing operation with the relevant legal bases and data subjects’ rights
A3	Consent	<ol style="list-style-type: none"> 1. Frequently Asked Questions about consent as a legal basis for personal data processing 2. Template of a customer’s declaration of consent for photography and video recording of a private school event 3. Template of an employee’s declaration of consent on the collection of material from social events and/or promotional activities 4. Template of an employee’s declaration of consent on optional benefit

		5. Template of a prospective employee’s declaration of consent
A4	Data protection rights and data subject request handling procedures	<ol style="list-style-type: none"> 1. General information (in the form of FAQs) about the exercise of the data subjects’ rights 2. Request form for the exercise of right of access (article 15 GDPR) 3. Specific information and how to exercise the right of access (in FAQ form) 4. Request form for the exercise of right to rectification (article 16 GDPR) 5. Specific information and how to exercise the right to rectification (in FAQ form) 6. Request form for the exercise of right to erasure (article 17 GDPR) 7. Specific information and how to exercise the right to erasure (in FAQ form) 8. Request form for the exercise of right to restriction (article 18 GDPR) 9. Specific information and how to exercise the right to restriction (in FAQ form) 10. Request form for the exercise of right to data portability (article 20 GDPR) 11. Specific information and how to exercise the right of portability (in FAQ form) 12. Request form for the exercise of right to object (article 21 GDPR) 13. Specific information and how to exercise the right to object (in FAQ form) 14. Request form for the exercise of the right not to be subject to automated individual decision-making/profiling (article 22 GDPR) 15. Specific information and how to exercise the right not to be subject to automated individual decision-making/profiling (in FAQ form)
A5	Destruction of personal data	<ol style="list-style-type: none"> 1. Frequently Asked Questions about the destruction of a personal data file 2. Sample template of a File Destruction Policy 3. Sample template of a File Destruction Protocol
B. Accountability		
B1	Records of processing activities	<ol style="list-style-type: none"> 1. Model records of processing activities 2. Frequently Asked Questions for the records of processing activities
B2	Security measures	<ol style="list-style-type: none"> 1. List of basic organizational and technical security measures for the SMEs

D2.3 — Online self-assistance compliance tool

B3	Data Breach handling	<ol style="list-style-type: none"> 1. Information and procedures for the SME on how to identify and handle personal data breaches a) internally in the SME, b) towards the data subjects affected, and c) towards the Data Protection Authority 2. Employee awareness leaflet on personal data breaches
B4	Assignment of data processing to contractors/processors	<ol style="list-style-type: none"> 1. Frequently Asked Questions for processors 2. General template Appendix regarding data processing to a signed contract between the SME, as controller, and the company acting as processor 3. Specific template Appendix to a signed contract for processors that provide services of promoting products and services (marketing) 4. Specific template Appendix to a signed contract for processors that are cloud service providers
C. Business activities entailing data processing		
C1	Website requirements in terms of transparency, basic security measures and compliance with cookies	<ol style="list-style-type: none"> 1. Checklist of clear requirements for a business website regarding transparency 2. Checklist of clear requirements for a business website regarding the security measures 3. Checklist of clear requirements for a business website regarding compliance with cookies
C2	Direct marketing through electronic means	<ol style="list-style-type: none"> 1. Frequently Asked Questions for electronic direct marketing 2. Instructions for sending e-newsletters combined with a model information text and template e-mails
C3	Video surveillance	<ol style="list-style-type: none"> 1. Frequently Asked Questions on video surveillance systems 2. Checklist of clear requirements for installing and operating a video surveillance system
C4	Management of employees records and prospective employees records	<ol style="list-style-type: none"> 1. Frequently Asked Questions on the processing of employees' data 2. Frequently Asked Questions for processing of prospective employees' data 3. A template of a Use of Electronic Media Policy by employees 4. A template Appendix to the employment contract with basic terms regarding the processing of personal data of and by employees

Template document A2.1 “Template for the provision of information to customers/clients – Health sector” is presented in Section 7.1, with indications regarding conditional rendering of text depending on given respondents’ answers, conditional and unconditional links to other template documents and inclusion of text provided by the respondents themselves (if provided).

2.2 Questionnaire

In this section, the questionnaire to be provided to the SMEs is presented, established upon the methodological framework defined in task T2.2. The order of the questions reflect the navigation flow, while conditions in green colour define whether a question will be included in the questionnaire based on a previous answer. Red colour was used for the definition of conditions for providing specific documents of Table 1 to the respondents upon completing the questionnaire. Finally, blue colour was used for cases when respondents should provide an “Other” option themselves.

1) Select the sector to which your Company belongs:

- a) Health
- b) Education
- c) Tourism - Hospitality
- d) Commerce (physical / electronic)
- e) Other

[For ANY answer to question 1]: provide the following good practice guidance documents: B2.1

2) Do you collect and process personal data about your Company’s **customers**?

- a) YES
- b) NO

[If reply to question 2 is YES]: provide the following good practice guidance documents:

- i) **[If reply to question 1 is Health]:** A2.1, A4.2-15
- ii) **[If reply to question 1 is Education]:** A2.2, A4.2-15
- iii) **[If reply to question 1 is Tourism - Hospitality]:** A2.3, A4.2-15
- iv) **[If reply to question 1 is Commerce (physical / electronic)]:** A2.4, A4.2-15
- v) **[If reply to question 1 is Other]:** A2.5, A4.2-15

2.1 **[If reply to question 2 is YES]** Do you **directly promote products and services** through electronic means (direct marketing by sending email and/or SMS) to your Company’s **customers**?

- a) YES
- b) NO

3) Does your Company collect and process personal data to **reach potential customers**?

- a) YES
- b) NO

[If reply to (question 2.1 OR question 3) is YES]: provide the following good practice guidance documents: C2.1

[If reply to question 3 is YES]: provide the following good practice guidance documents: A2.6

4) Does your Company have natural persons as **suppliers**?

D2.3 — Online self-assistance compliance tool

- a) YES
- b) NO

[If reply to question 4 is YES]: provide the following good practice guidance documents: A2.7

- 5) Does your Company employ **employees** (under any employment relationship or work contract or independent service contract):
- a) YES
 - b) NO

[If reply to question 5 is YES]: provide the following good practice guidance documents: A2.8, C4.1

- 5.1 **[If reply to question 5 is YES]** Do your Company's employees use **electronic means** in the context of their employment?
- a) YES
 - b) NO

[If reply to question 5.1 is YES]: provide the following good practice guidance documents: C4.3

- 5.2 **[If reply to question 5 is YES]** Is your Company interested in a **model template annex to the contract** with your employees for the processing of their personal data?
- a) YES
 - b) NO

[If reply to question 5.2 is YES]: provide the following good practice guidance documents: C4.4

- 5.3 **[If reply to question 5 is YES]** Is your Company interested in an **awareness-raising brochure for your employees** about personal data breach incidents?
- a) YES
 - b) NO

[If reply to question 5.3 is YES]: provide the following good practice guidance documents: B3.2

- 6) Does your Company collect and process personal data about **prospective employees**?
- a) YES
 - b) NO

[If reply to question 6 is YES]: provide the following good practice guidance documents: A2.9, C4.2

- 7) Have you installed a **video surveillance system** in your Company?
- a) YES
 - b) NO

[If reply to question 7 is YES]: provide the following good practice guidance documents: A2.11, A2.12, A2.13, C3.1, C3.2

[If reply to (question 2 OR question 3 OR question 4 OR question 5 OR question 6 OR question 7) is YES]: provide the following good practice guidance documents: A1.1, A2.10, A2.14, A4.1, A4.2, A4.3, A4.4, A4.5, A4.8, A4.9, B1.1, B1.2

- 8) Does your Company **use contractors/processors** (natural or legal persons) for the processing of personal data on your Company's behalf?
- a) YES
 - b) NO

[If reply to question 8 is YES]: provide the following good practice guidance documents: B4.1

- 8.1 **[If reply to question 8 is YES]** Choose which **service or services** are provided to your Company by the contractor/processor:
- i) Accounting services
 - ii) Support services for IT systems
 - iii) Hosting services, cloud provider
 - iv) Product and service promotion services
 - v) Physical security services
 - vi) Other

[If reply to question 8.1 is Other]: allow respondent to provide an alternative answer

[If reply to question 8 is YES]: provide the following good practice guidance documents:

- i) **[If reply to question 8.1 include Accounting services]:** B4.2
- ii) **[If reply to question 8.1 include Support services for IT systems]:** B4.2
- iii) **[If reply to question 8.1 include Hosting services, cloud provider]:** B4.4
- iv) **[If reply to question 8.1 include Product and service promotion services]:** B4.3
- v) **[If reply to question 8.1 include Physical security services]:** B4.2
- vi) **[If reply to question 8.1 include Other]:** B4.2

- 9) Does your Company have a **website**?
- a) YES
 - b) NO

[If reply to question 9 is YES]: provide the following good practice guidance documents: C1.1, C1.2

- 9.1 **[If reply to question 9 is YES]** Can a natural person register through your website in order to receive your Company's **e-newsletter**?
- a) YES
 - b) NO

[If reply to question 9 is YES]: provide the following good practice guidance documents: C2.2

- 9.2 **[If reply to question 9 is YES]** Do you **measure and analyse the use** of your Company's website by **visitors/users**?
- a) YES
 - b) NO

9.3 **[If reply to question 9 is YES]** Do you display **advertisements** on your Company's website based on the users' behaviour?

- a) YES
- b) NO

9.4 **[If reply to question 9 is YES]** Do you offer the possibility to share the pages of your Company's **website (share buttons)** on social media?

- a) YES
- b) NO

9.5 **[If reply to question 9 is YES]** Does a **cookie banner** appear on your Company's website to inform and obtain consent for optional cookies?

- a) YES
- b) NO

[If reply to (question 9.2 OR question 9.3 OR question 9.4 OR question 9.5) is YES]: provide the following good practice guidance documents: C1.3

10) Is your Company interested in information on the use of **consent** as a legal basis for the processing of personal data?

- a) YES
- b) NO

[If reply to question 10 is YES]: provide the following good practice guidance documents: A3.1

10.1 **[If reply to question 10 is YES]** Select the templates for declaration of consent:

- a) Customer
- b) Employee
- c) Prospective employee

[If reply to question 10 is YES]: provide the following good practice guidance documents:

- i) **[If reply to question 10.1 include Customer]:** A3.2
- ii) **[If reply to question 10.1 include Employee]:** A3.3, A3.4
- iii) **[If reply to question 10.1 include Prospective/candidate employee]:** A3.5

11) Is your Company interested in a template of a **personal data file destruction policy and a destruction protocol:**

- a) YES
- b) NO

[If reply to question 11 is YES]: provide the following good practice guidance documents: A5.1, A5.2, A5.3

12) Is your company interested in information and procedures for detecting and **managing personal data breaches?**

- a) YES

D2.3 — Online self-assistance compliance tool

b) NO

[If reply to question 12 is YES]: provide the following good practice guidance documents: B3.1

13) Optionally, you can fill in your Company's details to be included in the generated documents (this information is not stored or kept by the application):

- a) Legal name
- b) Distinctive title
- c) Address
 - i) Street
 - ii) Number
 - iii) Zip Code
 - iv) Area
 - v) City
- d) Telephone number
- e) E-mail address
- f) If you have designated a Data Protection Officer (DPO) please fill in the contact details with the DPO
 - i) Telephone
 - ii) Email

3 Requirements

Various requirements have been identified for designing the online self-assistance compliance tool, taking into consideration common best practices for implementing an online survey system, as well as requirements stemming from byDesign itself, i.e., the specific questionnaire of Section 2.2 and templates of documents to be provided to the end users:

- 1) **User-friendliness:** In order to be user-friendly, the system should offer, on the one hand, intuitive navigation for end users through the questionnaire, while, on the other, intuitive administration of questionnaires on the side of the entity conducting the surveys, i.e., Hellenic Data Protection Authority (HDP A) in byDesign project. Screens displaying the questionnaire should be easy to understand, while questions per screen should be limited in order to help users taking the survey not spend time scrolling the page up and down. Components that are hard to manage on mobile screens, such as long dropdown panels and large textboxes should be avoided. Questions that must be answered in order for the respondents to proceed with the rest of the questionnaire should be marked as required.
- 2) **User experience** is of high importance. An online survey that looks good and is well presented will have a higher response rate than one that looks like it has been thrown together quickly. The online tool should be available for both desktop and mobile users; in that respect, various aspects of desktop and mobile environments should be taken into consideration, including responsive design, accessibility, etc.
- 3) **Administration of the questionnaire:** the system should provide the functionalities for creating, updating and deleting a questionnaire and all associated entities, i.e., questions, answers, etc.
- 4) **Administration of the best practices material:** the system should provide functionalities for uploading and downloading best practices documents, as well as creating/updating/deleting categories into which the documents fall. Moreover, the system should be able to support import of different types of documents¹.
- 5) **Multilingual questionnaire distribution:** the questionnaire should be distributed to the participants in multiple languages. Respondents should be able to change the questionnaire language and answer the questionnaire in their preferred language. Upon creation of the questionnaire, system languages should be defined, along with a default language, so that all questions, answers, branching and display logic and best practice documents are specified to at least one language. The administration panel should offer an intuitive way to translate everything in other system languages. All questions and answers should be in exactly the same order in all languages. Generated best practice material should be provided as well in the selected language.
- 6) **Questionnaire should be divided in thematic areas:** related questions should be grouped together in sections in order to keep the questionnaire logical and focused. Page breaks, page titles, and instructions help people understand what they are being asked and why.
- 7) **Skip Logic** should be supported by the system, allowing to direct respondents through different paths across the questionnaire based on one or multiple conditions; subject to the answers, respondents get the next questions. Moreover, it should be possible to show and hide certain questions depending upon previous answers given by the respondents. The system should allow for question skip logic, section skip logic and advanced branching.
- 8) **Contextual generation of best practices documents:** based on single or multiple answers reflecting particular features of an SME data controller respondent, the system should provide a mechanism for the context-aware generation of customised instances of best practice material.

¹ However, in the specific questionnaire of Section 2.1, all template documents are Microsoft Office Word documents.

- 9) **Contextual rendering of text within the provided best practices documents:** the system should provide for conditional rendering of text within the provided documents and incorporation of information provided by the respondents themselves, such as company information, address, etc.
- 10) **Customisability and configurability:** the system should be extendable to a reasonable extent. Extendibility primarily concern two aspects: first, as regards the document types and content; second, as regards the framework for the context-aware generation of the documents so that they fit each SME data controller's needs.
- 11) The system should provide the functionalities for **customising the behaviour of the questionnaire and its output**, i.e., for defining custom variables, for defining conditions upon the respondents' answers and upon variables, and for specifying rules for the contextual generation of tailored for the respondent sample good practice material.
- 12) **Support various types of questions:** Depending on whether a question should be answered by exactly one or by more answers, by means of a short or a long text, at least the following question types should be offered:
 - a) Single selection, implemented e.g., by means of radio buttons or dropdown menus.
 - b) Multiple selection, implemented e.g., by means of checkboxes or multi-select dropdown menus.
 - c) Single liner, by adding a single textbox for respondents to write in a short text or numerical answer. The system may also allow to specify answer length, require and validate numeric values, date format, or email address.
 - d) Long text: For long subjective answers possibly with more than one sentence.
- 13) **Support various types of answers:** Answers should be divided into at least two categories: predefined by the questionnaire administrator and provided by the respondents as short or long text. The latter also serves cases when none of the predefined answers applies for a question and the respondents should provide an "Other" option themselves.
- 14) **The questionnaire should be anonymous:** Information provided by the respondents regarding the company should not be stored in the system database; they are only incorporated in the generated documents which are available only to the questionnaire respondents.
- 15) **Authentication:** The system should provide the mechanism for authenticating the users administering the questionnaire.

4 System design

This section provides an overview of the system specification and implementation. Specifically, it presents the system architecture, the information model of the system reflected by the database schema, and the technologies used for the system implementation.

4.1 System overview

In this section the byDesign online toolkit software architecture is presented. A short description of the software modules follows.

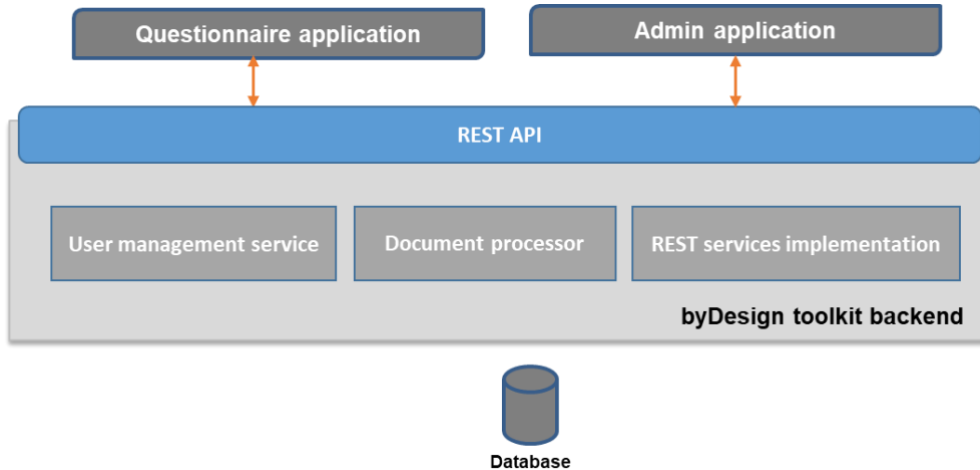


Figure 1 Online toolkit software architecture

byDesign online toolkit provides an end-user interface and a data protection authority administration interface. These interfaces are exposed by two frontend web applications, questionnaire application and admin application, respectively. Both applications provide responsive web interfaces for easily questionnaire filling and administration and they are developed as full JavaScript applications.

The two frontend applications utilize the REST API provided by the byDesign online toolkit backend. The toolkit backend is consisted of three modules; REST services implementation, user management service and document processor. REST services implementation is the mediator between the external applications and the underlying database and provides all the CRUD based functionality. The user management service supports all the common user management operations, like user creation and password change, hiding the underlying identity and authentication logic. The document processor is used for parsing Microsoft Word documents (in .docx format) by replacing variable values and conditionally rendering text. In order to provide this functionality, the Word documents should be annotated with the following expressions/tags (cf., Section 7.2 for examples):

- **`#{variable_name}`** If a value for the variable named “variable_name” is provided during document creation, then this tag will be replaced by this value, otherwise this tag will be just deleted.
- **`#{variable_name|default_value}`** If a value for the variable named “variable_name” is provided during document creation, then this tag will be replaced by this value, otherwise this tag will be replaced by the “default_value” value
- **`#{if condition}formatted_text#{endif}`** The formatted text inside the tags will be displayed only in case the “condition” is true. For the condition the Java condition syntax is used and a variable with name variable_name is represented inside the condition as **`#{variable_name}`**.

D2.3 — Online self-assistance compliance tool

- **`{rowIf condition}...{rowEndif}`** The row(s) between the starting and ending tags is included into the output document only in case the “condition” is true. The syntax of the condition is the same as in the if-endif tags.

Figure 2 presents the REST API resources while Figure 3 shows the operations of the Questionnaire resource, as an example of API logic. The resources follows the database schema presented in Section 4.2.

The screenshot displays the Swagger UI for the 'abovoForms API' (version 0.0.1 OAS3). At the top, there is a 'Select a definition' dropdown menu set to 'default'. Below the header, a search bar labeled 'Filter by tag' is present. The main content is a list of 20 REST API resources, each with a name, a description, and a dropdown arrow on the right. The resources are:

- account-resource (Account Resource)
- answer-resource (Answer Resource)
- language-resource (Language Resource)
- localized-answer-resource (Localized Answer Resource)
- localized-outline-category-resource (Localized Outline Category Resource)
- localized-outline-resource (Localized Outline Resource)
- localized-question-resource (Localized Question Resource)
- localized-questionnaire-resource (Localized Questionnaire Resource)
- localized-section-resource (Localized Section Resource)
- logical-relation-resource (Logical Relation Resource)
- outline-category-resource (Outline Category Resource)
- outline-resource (Outline Resource)
- public-user-resource (Public User Resource)
- question-resource (Question Resource)
- questionnaire-resource (Questionnaire Resource)
- section-resource (Section Resource)
- type-of-answer-resource (Type Of Answer Resource)
- type-of-question-resource (Type Of Question Resource)
- user-jwt-controller (User JWT Controller)
- user-resource (User Resource)
- variable-resource (Variable Resource)

Figure 2 REST API resources

questionnaire-resource <small>Questionnaire Resource</small>	
GET	/api/questionnaires <small>getAllQuestionnaires</small>
POST	/api/questionnaires <small>createQuestionnaire</small>
GET	/api/questionnaires/complete <small>getAllCompleteQuestionnaires</small>
POST	/api/questionnaires/complete <small>createCompleteQuestionnaire</small>
GET	/api/questionnaires/complete/count <small>countCompleteQuestionnaires</small>
GET	/api/questionnaires/complete/{id} <small>getCompleteQuestionnaire</small>
PUT	/api/questionnaires/complete/{id} <small>updateCompleteQuestionnaire</small>
GET	/api/questionnaires/count <small>countQuestionnaires</small>
GET	/api/questionnaires/{id} <small>getQuestionnaire</small>
PUT	/api/questionnaires/{id} <small>updateQuestionnaire</small>
DELETE	/api/questionnaires/{id} <small>deleteQuestionnaire</small>
PATCH	/api/questionnaires/{id} <small>partialUpdateQuestionnaire</small>
GET	/api/questionnaires/{uuid}/{locale} <small>getQuestionnaireLocalizedByUUID</small>

Figure 3 Questionnaire REST resource operations

4.2 Database schema

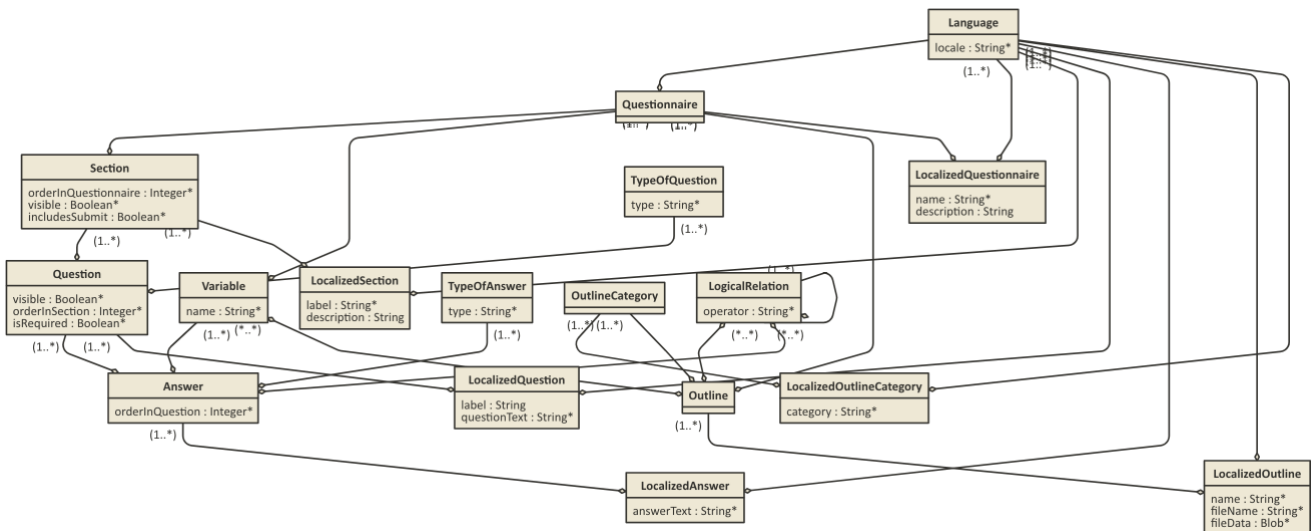


Figure 4 Database schema

Figure 4 depicts the database schema; it comprises the following entities:

- `Questionnaire` constitutes the central entity of the application, leveraged for the definition of questionnaires to be provided to end users, e.g., in the context of surveys. A questionnaire may consist of several sections, is associated with variables and outlines to be generated upon its completion, is

translated to various languages by means of `LocalizedQuestionnaire` instances, while it is associated with a default language².

- The `Language` table comprises the languages used in the system.
- `LocalizedQuestionnaire` allows for the translation of name and description of the questionnaire into various languages; e.g., in case a questionnaire should be provided in Greek and English, two `LocalizedQuestionnaire` instances associated with the corresponding languages should be assigned to the questionnaire.
- `Variable` instances reflect placeholders in documents to be filled in line with answers provided in the context of the questionnaire, while text within the document may be rendered or not depending on conditions defined upon these variables. For this purpose, variables are defined by means of a name and associated with answers and outlines.
- The `OutlineCategory` table comprises the categories into which the outlines fall, allowing for their grouping into the corresponding folders upon the generation of the tailored for the company sample good practice material.
- `LocalizedOutlineCategory` allows for translating the category property into the associated language.
- `Outline` instances reflect templates of the documents to be generated as a result of the questionnaire completion. An outline falls into a specific outline category, contains variables and is translated into various languages by means of localized outlines, while it may be included in the generated sample good practice material on the basis of logically related given answers.
- `LocalizedOutline` instances incorporate all information regarding a document template in a given language, i.e., the name of the outline, the filename, content and content type of the document itself, while association of a `LocalizedOutline` instance with a specific language allows for the definition of different documents and document types per language.
- A questionnaire is divided in `Section` instances corresponding to groups of questions; this way, different thematic areas may be defined, e.g., questions regarding customers or employees of a company.
- `LocalizedSection` allows for translating the label and description properties of a section into the associated language; label corresponds to the name of the section in the questionnaire, while optionally a description may be given.
- `Question` instances are associated, as aforementioned, with sections they belong to, as well as with their potential answers. They are defined as visible or not visible, allowing for their contextual rendering within the questionnaire, depending on previously given answers to other questions; in this context, questions are again associated with answers for toggling their visibility. The `isRequired` property denotes whether answering the question is mandatory for proceeding to a following question, while the order that the question appears in the section is denoted by means of the `orderInSection` property. A question is further characterised by a type (a `TypeOfQuestion` instance) and is associated with `LocalizedQuestion` instances for its representation in various languages.
- `LocalizedQuestion` allows for translating the label and `questionText` properties into the associated language. These two properties are actually the representation of a question in the questionnaire; label

² Declaring a default language for a questionnaire allows for validating required fields of entities that should be provided at least in one language.

is an optional field, allowing for different question numbering schemes, while `questionText` corresponds to the actual question to be rendered in the questionnaire.

- `Answer` instances are characterized by the order of their appearance in the context of a question, as well as by a type (a `TypeOfAnswer` instance). As aforementioned, they are related to questions by means of two relations, i.e., for rendering them visible and for denoting their potential answers. Furthermore, they may be associated with `Variable` instances for setting their values, with other answers by means of `LogicalRelation` instances for contextual rendering of outline documents and with `LocalizedAnswer` instances for their representation in various languages.
- `LocalizedAnswer` allows for translating the `answerText` property into the associated language; essentially, `answerText` constitutes the actual representation of an answer to be rendered in the questionnaire for a given language.
- The `TypeOfQuestion` table includes the possible question types to select from when defining a questionnaire:
 - *single selection*, meaning that the question can have only one answer,
 - *multiple selection*, when more than one answers may be selected,
 - *text*, in cases when users should provide the answer themselves,
 - *structured*, for supporting nested questions where users should type the answers themselves; e.g., a question about the address of the company is comprised of several sub-questions regarding street name, street number, area, city, zip code, etc.
- The `TypeOfAnswer` table includes the possible answer types to select from when defining a questionnaire. Essentially, what needs to be defined is whether an answer has to be provided by the end user (like e.g. the “Other” option) or not, as well as the size of the text in the former case. In these context, the system supports three types of answers: *other_short* and *other_long* for the cases when the end user should type an answer and *no_other* for the rest cases.
- As aforementioned, `LogicalRelation` instances relate potential answers by means of AND/OR operators, so that positive evaluation of a logical relation upon submission of the questionnaire leads to the inclusion of the associated outline documents in the generated good practice material.

It should be noted that the requirement for a multilingual questionnaire is addressed by means of the `Localized*` tables; introducing different tables for localisation instead of extra columns, e.g., `name_el`, `name_en`, etc., in the `Questionnaire` table itself, may be introducing extra complexity in the design of the database, however, this design choice allows for better administration of the database and less effort in case a new language has to be included in the system. Finally, at least one `Localized*` instance corresponding to the default language must be associated with the corresponding entity (e.g., at least one `LocalizedQuestion` instance with a `Question` one).

4.3 Technologies used

Concerning the technologies used for the development of the online toolkit they can be separated into frontend and backend technologies.

The two frontend applications have been developed as Angular 12³ applications. Angular is a web application framework that provides component logic for building applications. Each component is consisting of a

³ Angular, <https://angular.io>

D2.3 — Online self-assistance compliance tool

component class that handles data and functionality, an HTML template that determines the user interface and component-specific styles that define the look and feel. For the user interface development, the PrimeNG⁴ Angular UI component library has also been used. PrimeNG provided a rich set of native Angular components for user interface development, like dialogs, form components, tooltips, menus and panels. In addition, Bootstrap 5⁵ has been used for supporting the responsiveness of the applications.

The backend Java application has been built with Spring Boot⁶. Spring Boot is an open-source Java-based framework that helps in creating Spring-powered, production-grade applications. RESTful web services are implemented as a set of services that utilise a set of Data Transfer Objects (DTOs). These objects are mapped to the objects used by the entity layer using the MapStruct⁷ code generator. MapStruct simplifies the implementation of mappings between Java bean types based on a convention over configuration approach. For the Word document parsing the open-source Apache POI⁸ Java library has been used. Apache POI provides a pure Java approach for reading and writing Microsoft Office formats. For the needs of the byDesign self-assistance compliance tool the Word .docx format is supported. In order to evaluate conditions in annotated documents the MVEL⁹ Java library has been used.

For deployment and running of applications the Docker¹⁰ container technology has been utilised. Applications are packed together with all their dependencies, ready to run in every environment. Docker is supported by many operating systems, hence more than one application can run on top of the same single OS instance. Finally, isolation and throttling allow the application to run in a safe mode also inside companies' infrastructure.

⁴ PrimeNG, <https://www.primefaces.org/primeng/>

⁵ Bootstrap, <https://getbootstrap.com>

⁶ Spring Boot, <https://spring.io>

⁷ MapStruct, <https://mapstruct.org/>

⁸ Apache POI, <https://poi.apache.org/>

⁹ MVEL, <https://github.com/mvel/mvel>

¹⁰ Docker, <https://www.docker.com/>

5 User interfaces

This section presents the user interfaces developed for system administrators and for questionnaire respondents, respectively, constituting a short user guide for the online tool. The online toolkit (for respondents) is available [here](#).

5.1 User interface for administration of the questionnaire

In order to enter the administration panel, a user should first get authenticated by means of his/her credentials, as shown in Figure 5.

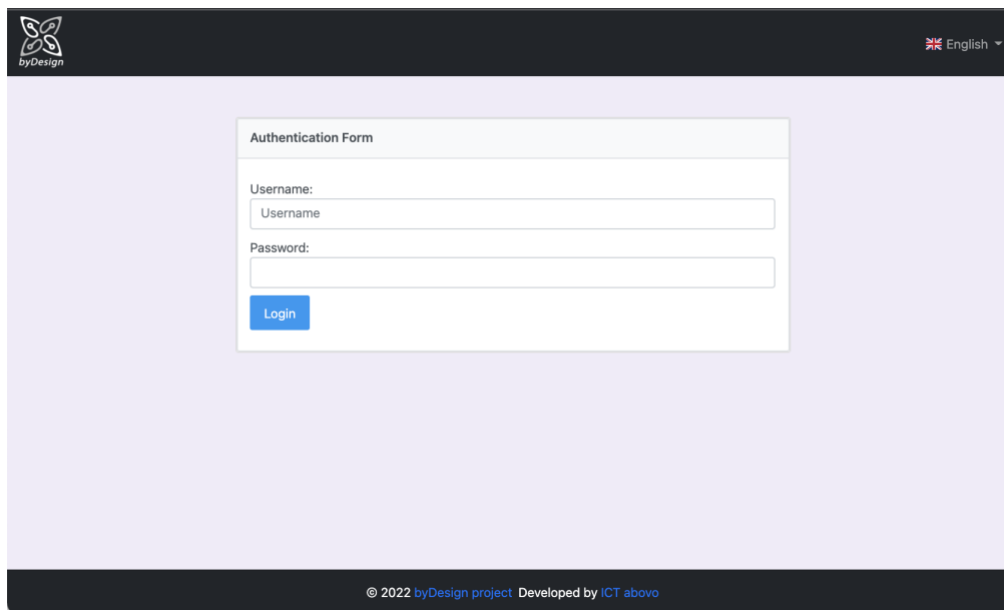







Figure 5 Administrator login page

Once authenticated, the administrator is navigated to the screen of Figure 6, displaying existing questionnaires, if any, and offering the following functionalities:

- Create a new questionnaire, by pressing the  button
- Modify existing questionnaires, by clicking on the image of the questionnaire to be modified.
- Delete existing questionnaires, by pressing the trash  icon.
- Preview existing questionnaires; clicking on the eye  icon, the selected questionnaire is displayed in a new tab in the browser, as it will be presented to respondents.
- View metrics related to the access to and use of the questionnaire, by pressing the metrics  icon.
- Share the link to an existing questionnaire, by pressing the share  icon.
- Log out of the application

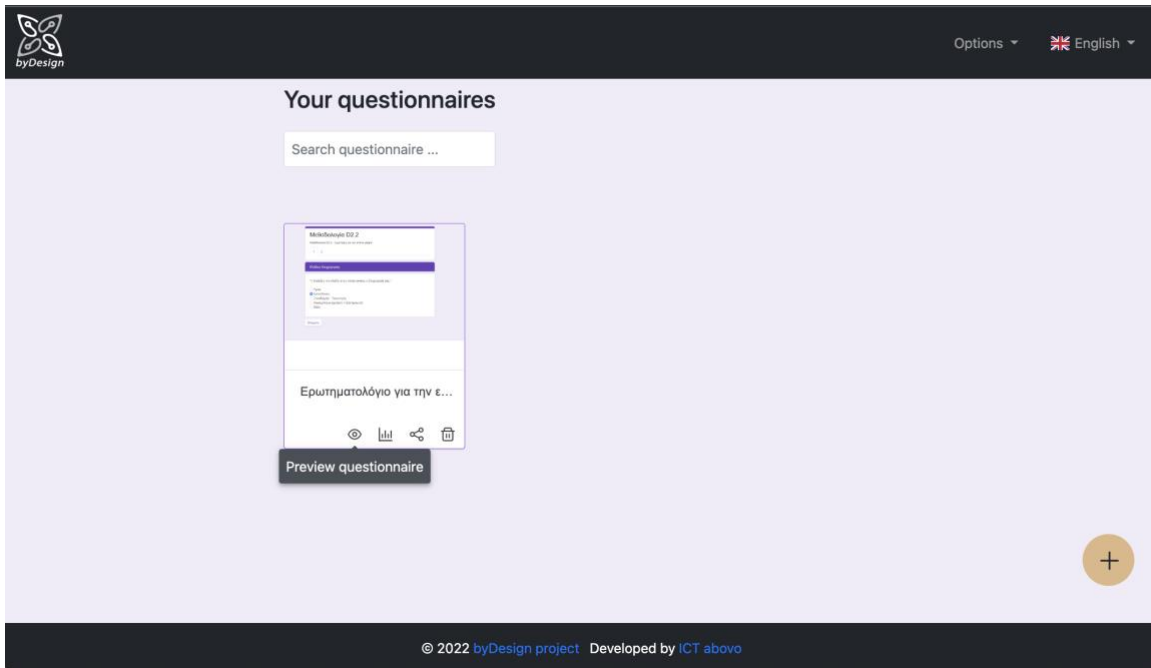



Figure 6 Administration of questionnaires

5.1.1 Defining the languages associated with a questionnaire

The first step for creating a questionnaire (after pressing the  button of Figure 6) consists in defining the languages in which the questionnaire will be rendered to respondents, along with the default language in which all questions, answers, generated documents and any other questionnaire related information should be defined (Figure 7).

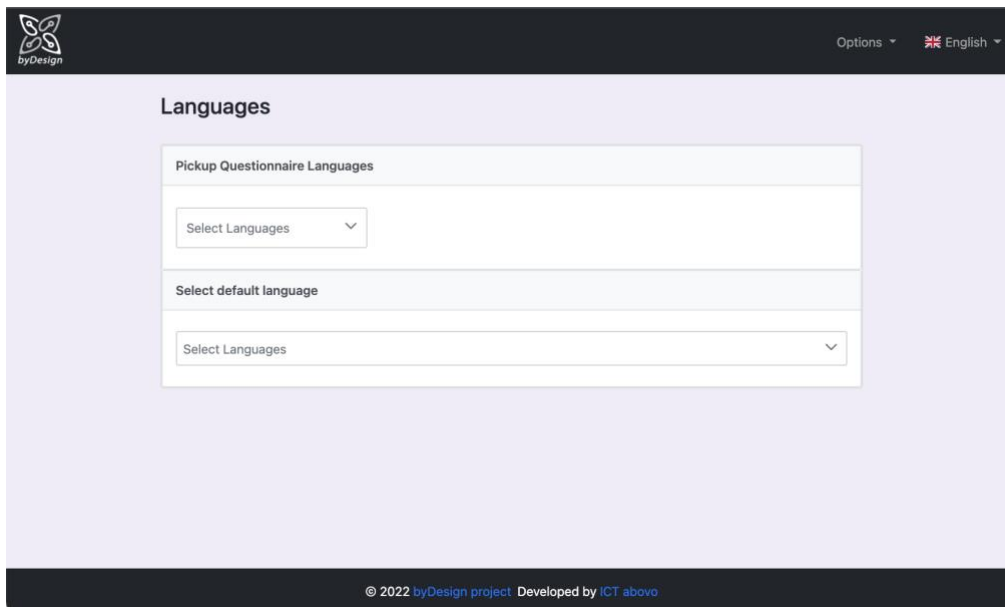


Figure 7 Definition of questionnaire languages

In that respect, the administrator, in the Select Questionnaire Languages dropdown menu can select the preferred languages among the ones defined in the system, while he/she must select one default language in

the next dropdown menu. For example, in Figure 8, the administrator has defined that the questionnaire may be rendered in Greek and English, while everything should be defined at least in English.

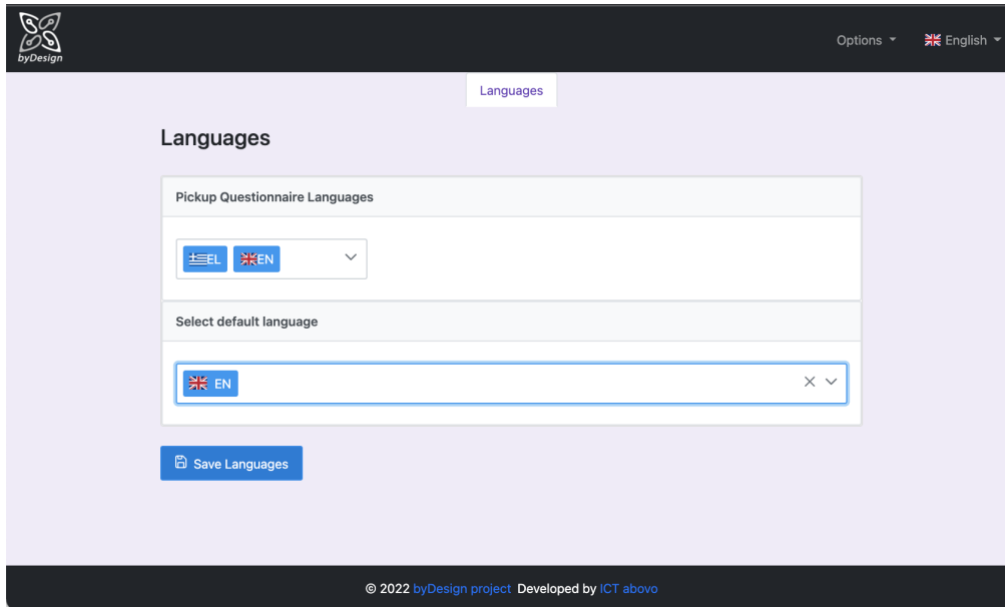


Figure 8 Questionnaire supported languages and default language defined

After the definition of languages, the administrator is navigated to the screen of Figure 9 for proceeding with the definition of the other aspects of the questionnaire. In that respect, and as reflected by the tabs in Figure 9, specification of a questionnaire involves providing some general information regarding the questionnaire (General Information tab), specifying questions, grouped in sections, along with their answers (Questions tab), defining variables associated with answers (Variables tab), management of the outlines representing the template documents associated with the questionnaire (Outlines tab) and management of questionnaire languages (Languages tab).

5.1.2 General Information Tab

In case the administrator wants to create or modify a questionnaire, he/she is navigated to the screen of Figure 9 (after defining the associated languages in the case of a new questionnaire, as mentioned in Section 5.1.1).

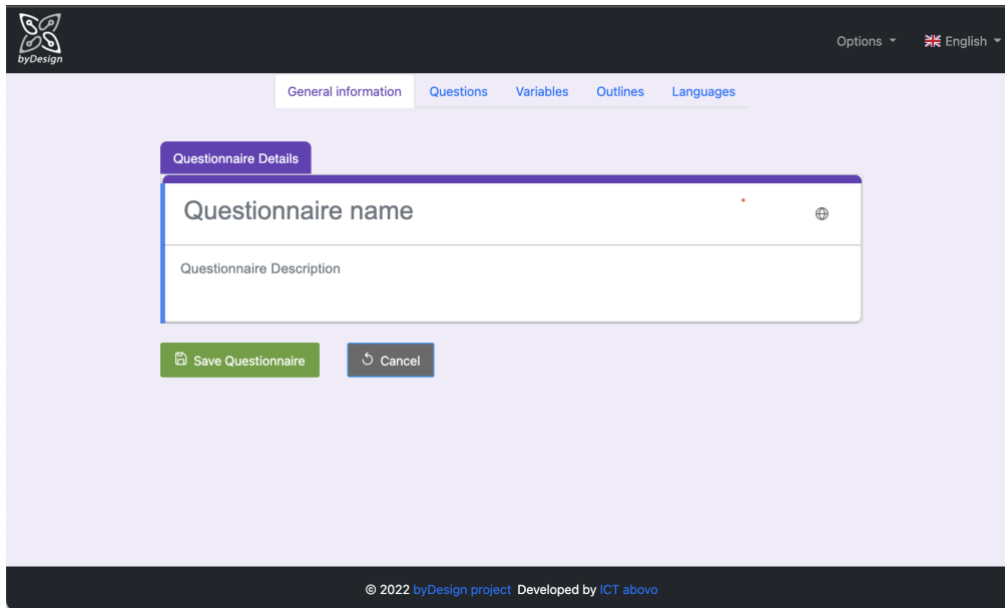





Figure 9 Questionnaire general information

In General Information tab, the administrator has to provide a name for the questionnaire and optionally a description. It should be noticed that mandatory fields (such as the name of the questionnaire) throughout the application are marked with the * symbol, while the system guides the user regarding required missing values by means of the corresponding validation messages.

 for new questionnaires,  for existing questionnaires and  buttons are common for all tabs.

5.1.3 Questions Tab

In Questions tab, the administrator can specify everything related to questions, i.e., questions themselves, sections to which questions belong and associated answers, among others.

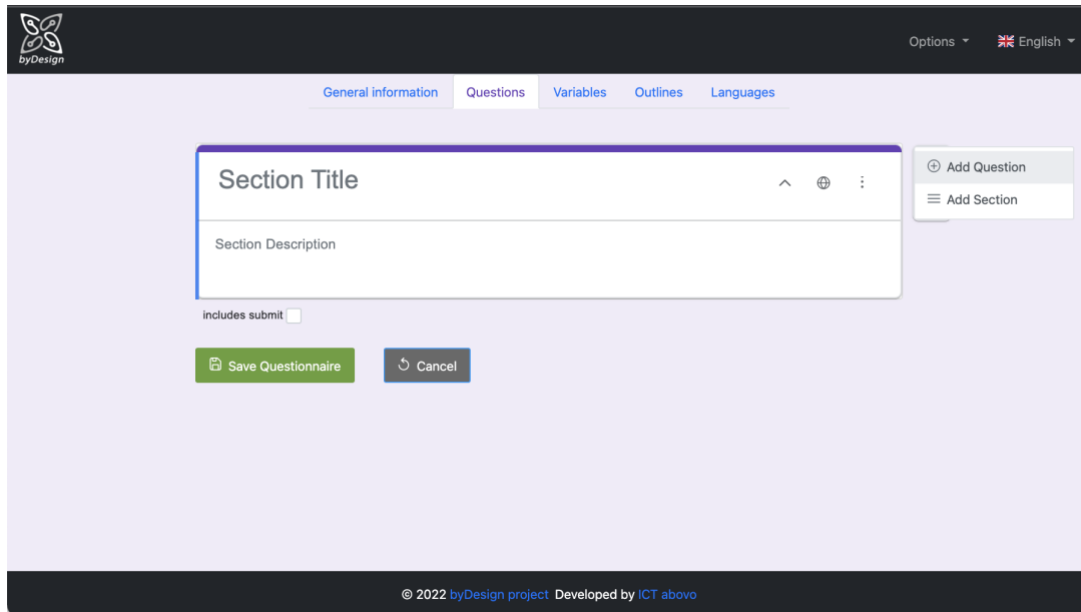


Figure 10 Questions tab

As shown in Figure 10, the administrator has to define a section under which one or more questions fall, by providing a section title and optionally a description. Questions can be added to the section by pressing “Add Question”, while other sections can be added next to the selected one by pressing “Add Section”. The “Includes submit” checkbox denotes whether in the questionnaire rendered to the respondents the specific section will or not include a submit button for submitting the questionnaire.

Figure 11 displays other possible actions related to sections. In that respect, a section can be cloned and deleted along with all associated questions and answers, moved upwards or downwards, while “Move sections” provides for reordering all sections included in the questionnaire by pressing the corresponding arrow, as shown in Figure 12. When a section includes more than one questions, they can be reordered within the section via the reordering menu of Figure 13, rendered by pressing the move \oplus icon. Finally, translations of section title and description can be managed by pressing the translation \oplus icon (Figure 14). It should be noted that translations can be inserted for the languages defined through the process described in Section 5.1.1, required fields must be inserted at least in the default language, while missing translations in languages other than the default will be populated upon save with the corresponding values in the default language.

D2.3 — Online self-assistance compliance tool

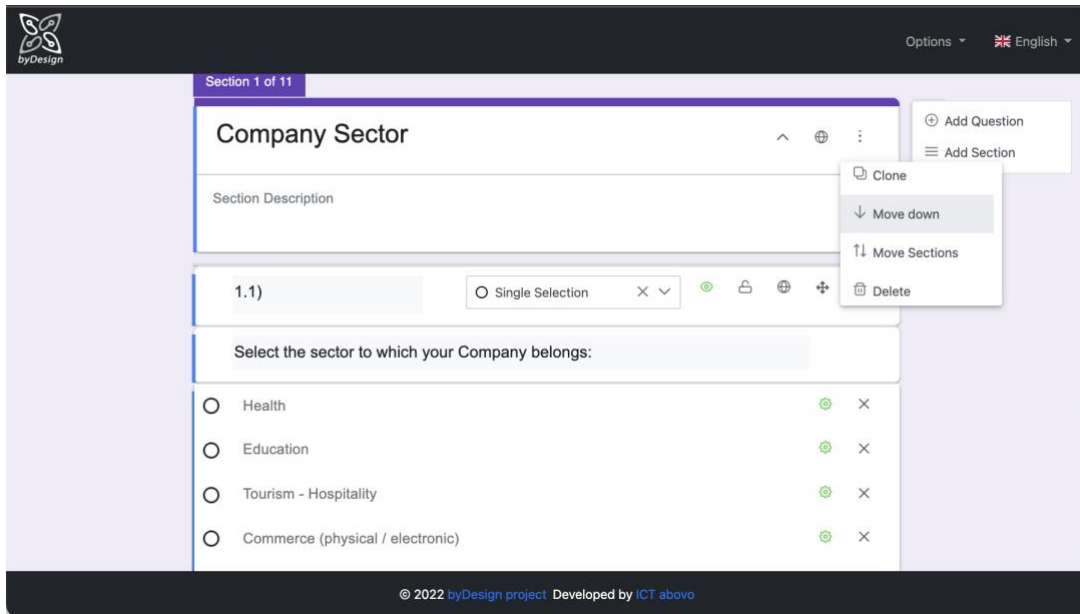


Figure 11 Section actions

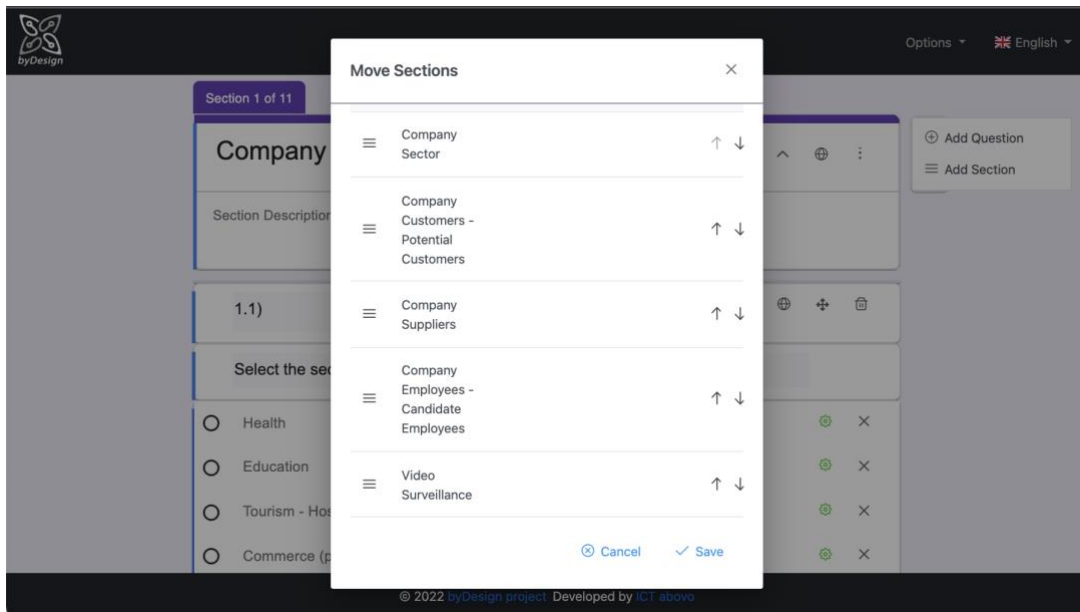


Figure 12 Reorder sections

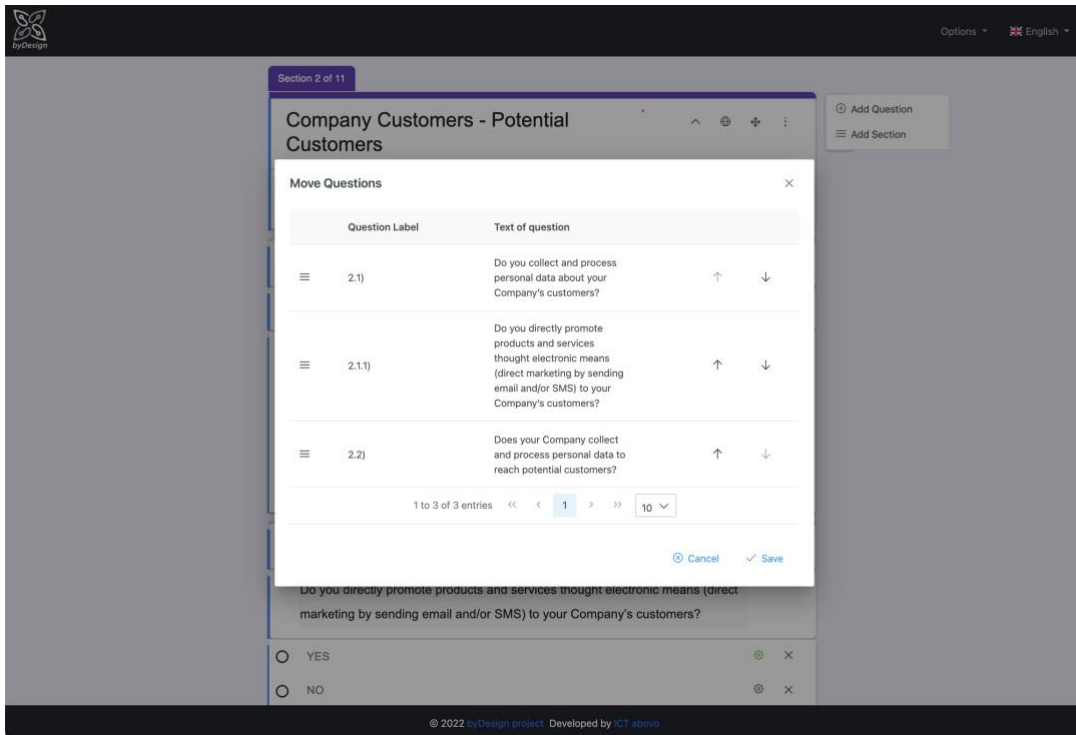


Figure 13 Reorder questions

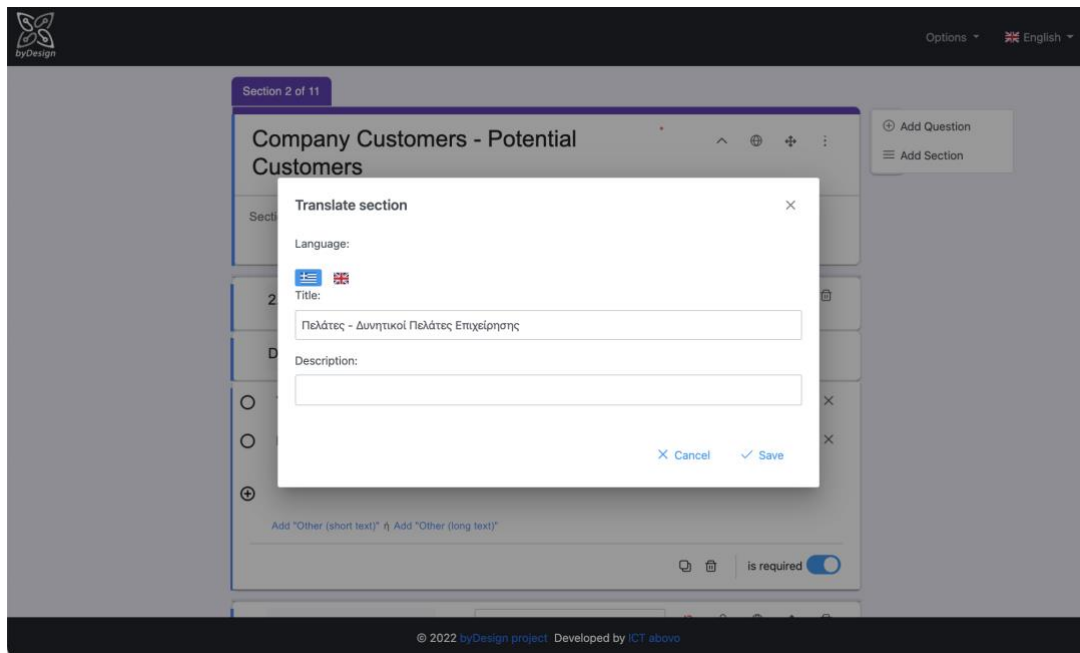


Figure 14 Translating section information

After inserting a new question via “Add Question”, information related to a question can be specified as shown in Figure 15. “Question Text” represents the actual question rendered in the questionnaire, “Question Label” may be leveraged e.g., for defining a numbering scheme, while one “Question Type” must be selected from the dropdown menu. As afore-mentioned in Section 4.2, there are four types of questions, i.e., single selection, multiple selection, text and structured.

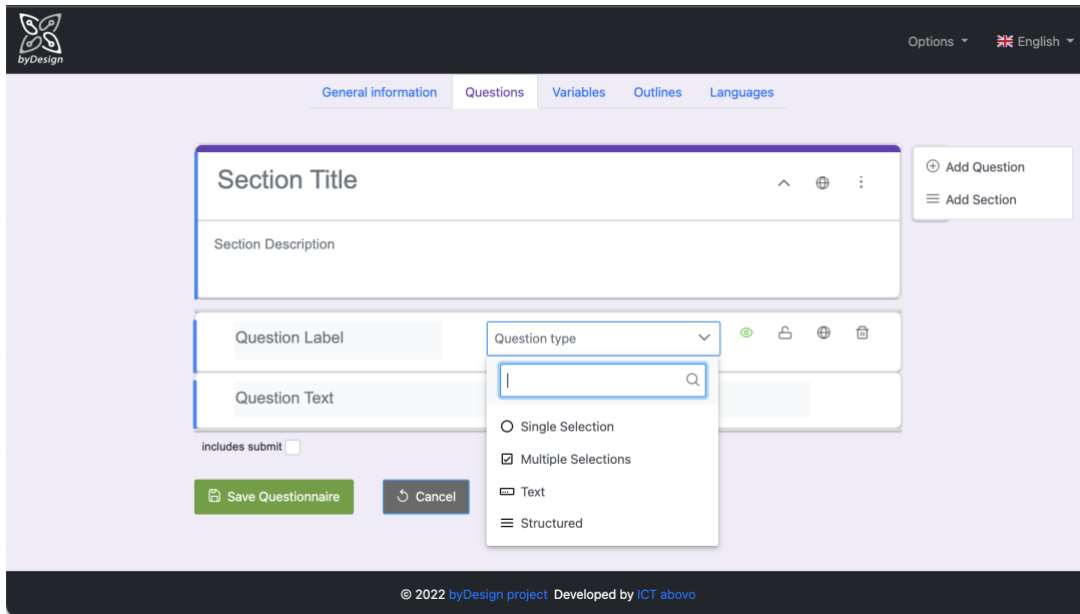


Figure 15 Available question types

Figure 16 displays an example of a single selection question. Upon defining the type, an answer (Option 1) is added automatically (same for multiple selection questions). In case the administrator wants to define an answer of type “Other” with the respondents having to provide an alternative answer themselves, he/she should press “Other(short text)” for a short answer or “Other (long text)” for an extended one. The On/Off button “is required” serves for defining whether answering the question is required for proceeding with the next question in the questionnaire.

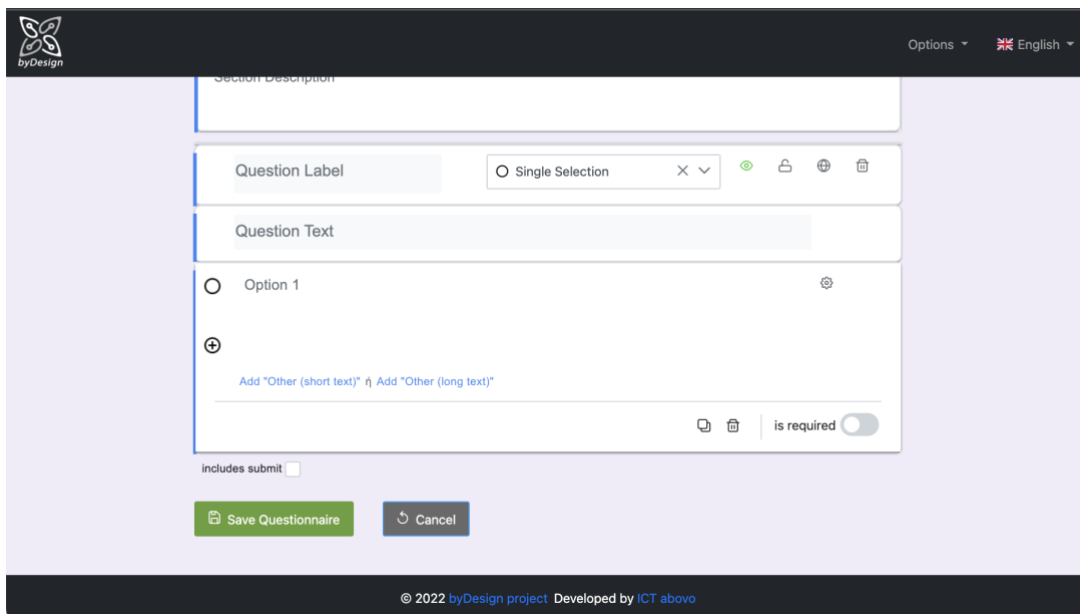



Figure 16 Question actions

Translations of question information along with the associated answers can be managed by pressing the translation  icon (Figure 17), for the languages defined through the process described in Section 5.1.1. As afore-mentioned, required fields must be inserted at least in the default language, while missing translations in

D2.3 — Online self-assistance compliance tool

languages other than the default will be populated upon save with the corresponding values in the default language.

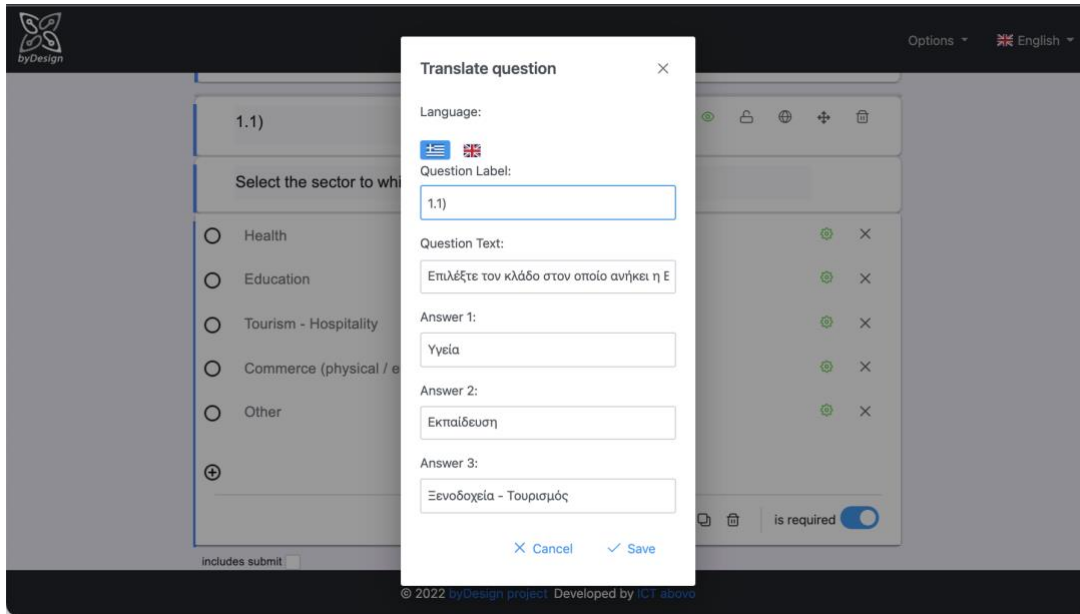



Figure 17 Translating a question and its answers

Answers may be associated with variables (cf. Section 5.1.4), in order for a given answer to be propagated to the template documents referencing it (cf. Sections 5.1.5 and 7.2); the menu for setting the variable is rendered by pressing the  icon next to answer text as shown in Figure 18. White colour of the icon denotes that no variable has been set for the given answer, while green colour denotes that a variable has been set.

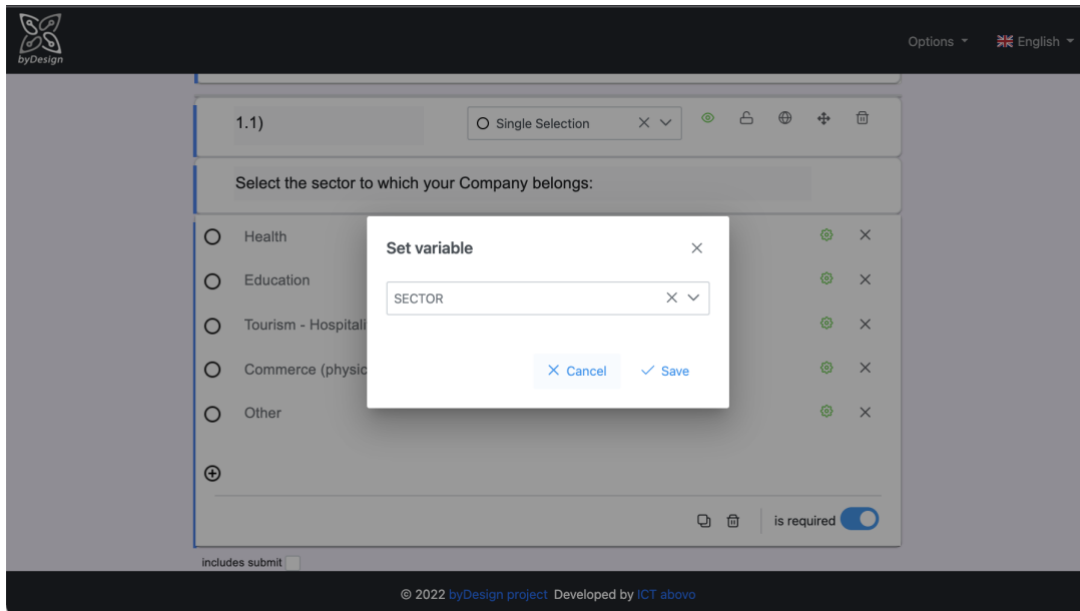




Figure 18 Variable set by an answer

The green eye icon  next to the question type denotes that by default a question is visible, i.e., it will be rendered in the questionnaire, while the red eye icon  denotes that a question by default will not be rendered

D2.3 — Online self-assistance compliance tool

in the questionnaire. When creating a new question, it is marked as visible by default; its visibility status can be changed by pressing the eye icon. An invisible question is displayed in Figure 19.

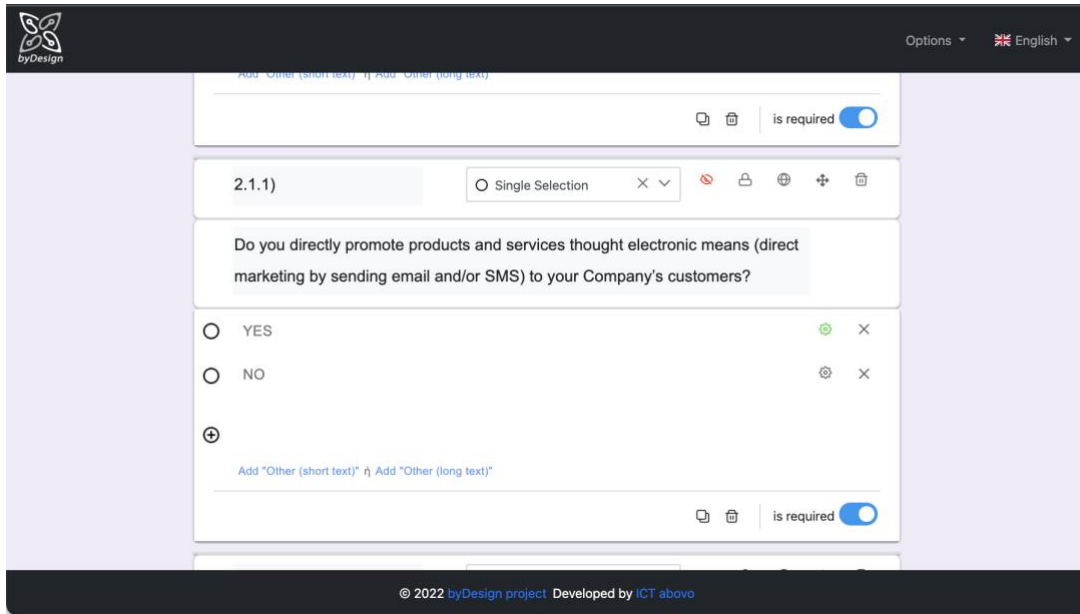



Figure 19 Invisible question

In fact, the question of Figure 19 “Do you directly promote products and services through electronic means (direct marketing by sending email and/or SMS) to your Company’s customers?” is by default invisible, but it may be rendered in the questionnaire under certain conditions, specifically if the answer in question “Do you collect and process personal data about your Company’s **customers**?” is YES. In order to define such conditions that “toggle” the visibility status of a question, the “Toggled by answer” menu of Figure 20 is used, which is rendered by pressing the lock icon , next to the eye icon; in the rendered window, the available answers to choose from can be found in the left side, with questions and answers displayed in tree form, while selected answers are displayed in the right side of the window.

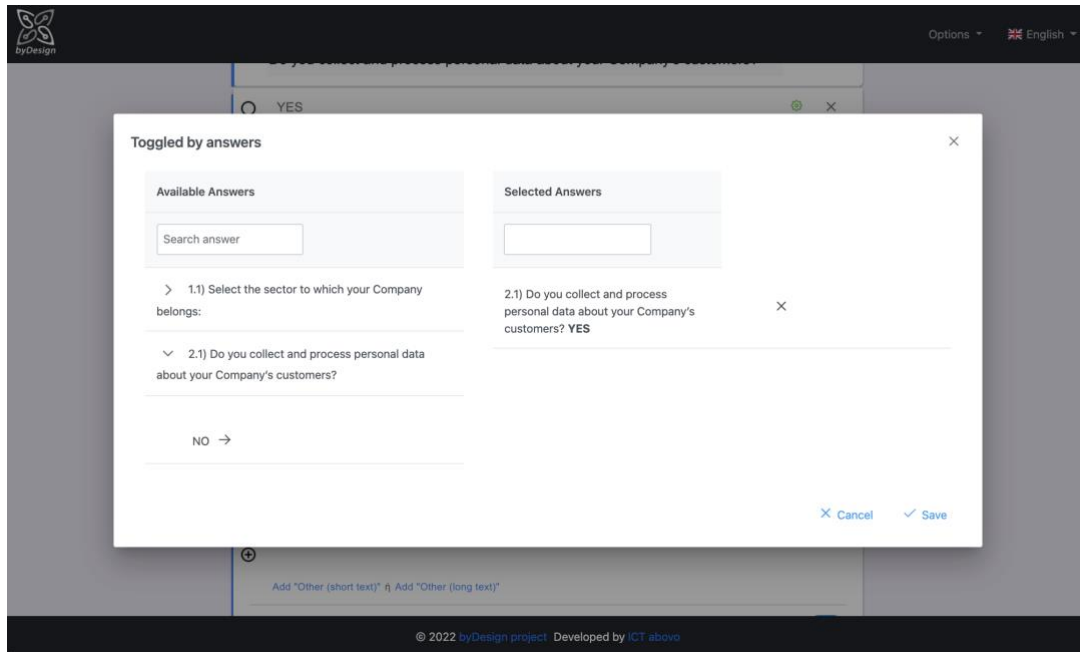




Figure 20 Setting conditional visibility of question based on a provided answer

5.1.4 Variables Tab

Variables tab serves for the management of variables corresponding to specific answers to questions. Already defined variables are displayed in the table of Figure 21 and can be modified by pressing the pencil icon  and deleted by pressing the trash icon . A new variable can be added by pressing “Add new variable”, as shown in Figure 22.

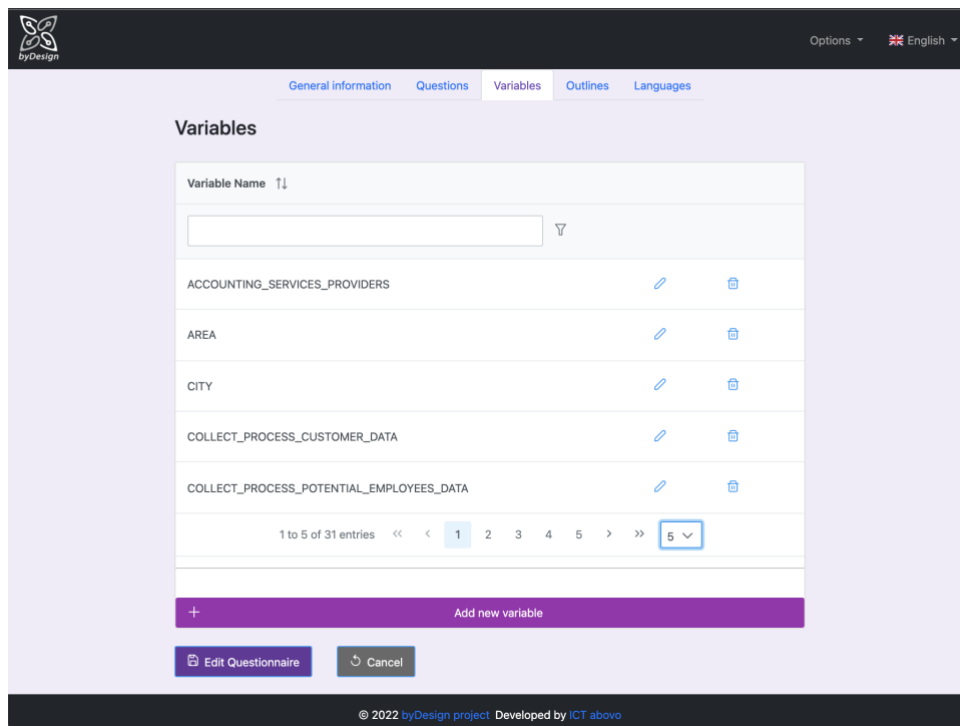



Figure 21 Variables tab

D2.3 — Online self-assistance compliance tool

It should be noted that in tables like the one of Figure 21, results can be filtered while typing on the textbox, by means of various operators (selected by pressing the filter )

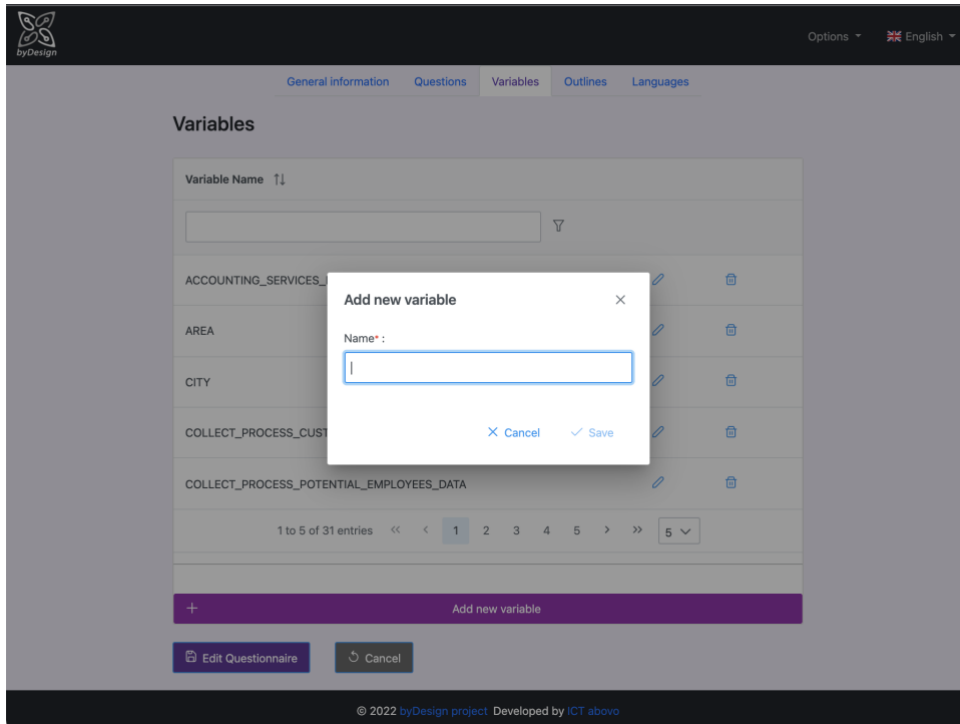


Figure 22 Add new variable

5.1.5 Outlines Tab

Outlines tab offers all the functionality required to define upon which conditions, i.e., for which combinations of given answers, which outlines will be generated for respondents. In that respect, as shown in Figure 23, the tab is divided in three more tabs; Outline Categories, Management and Logical Relations.

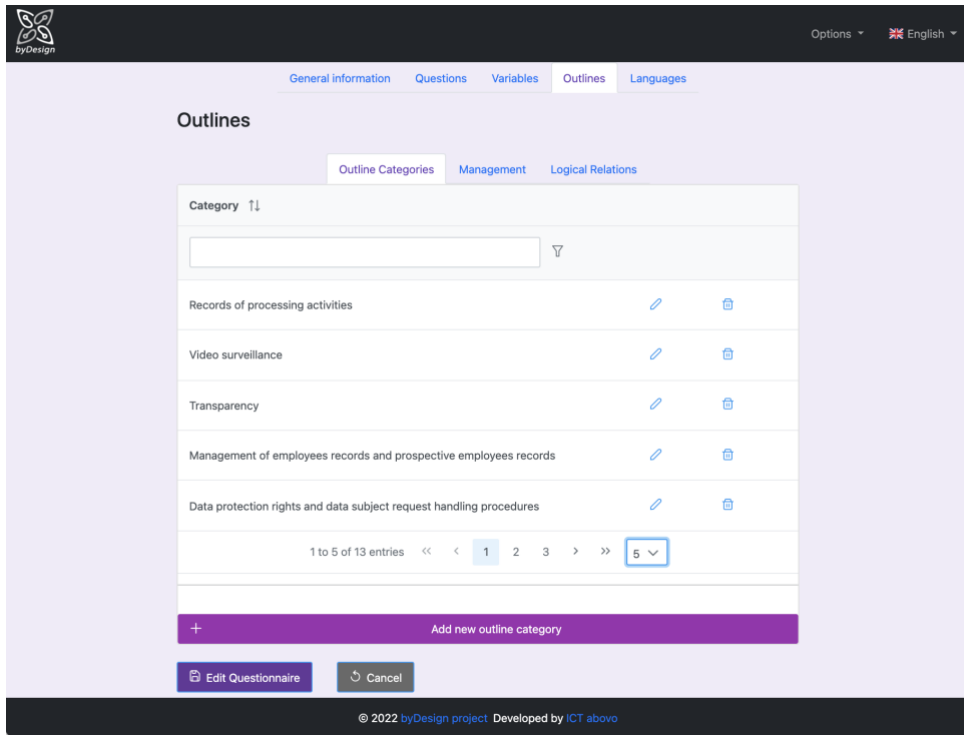


Figure 23 Outlines tab

Outlines Categories tab allows for the management of the categories under which the outlines fall. Already defined categories are displayed in the table of Figure 23 and can be modified by pressing the pencil icon and deleted by pressing the trash icon . A new category can be added by pressing “Add new outline category”; for both creating and updating a category, the menu of Figure 24 is rendered.

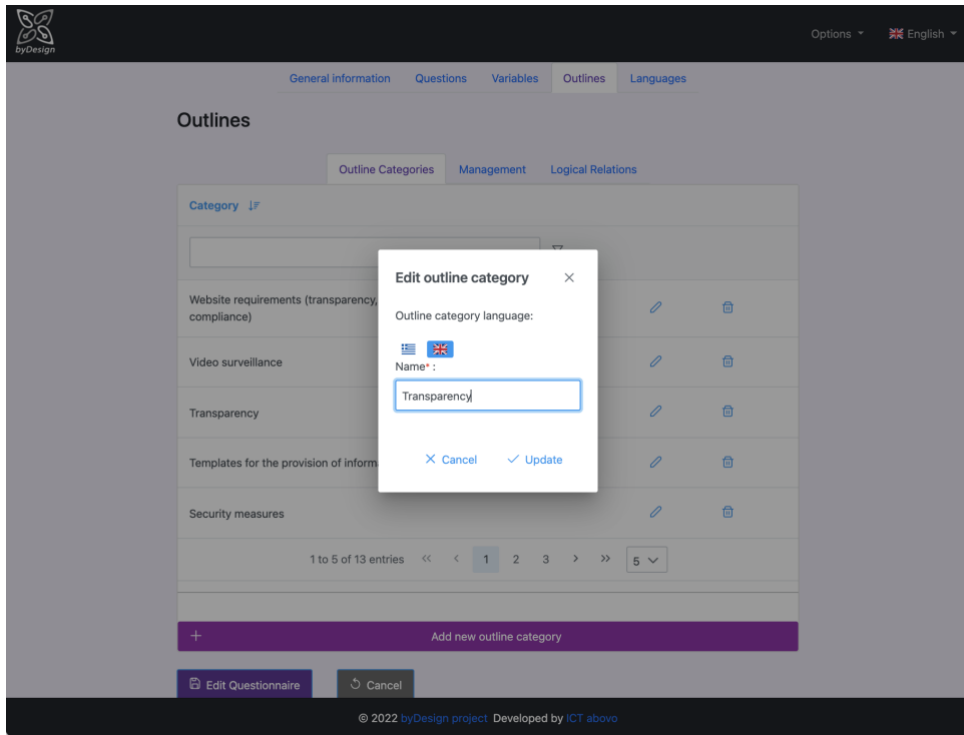




Figure 24 Outline categories management

Management tab serves for the management of the outlines documents. It allows for creating, updating and deleting an outline. Already defined categories are displayed in the table of Figure 25 and can be modified by pressing the pencil icon  and deleted by pressing the trash icon . A new outline can be added by pressing “Add new outline”.

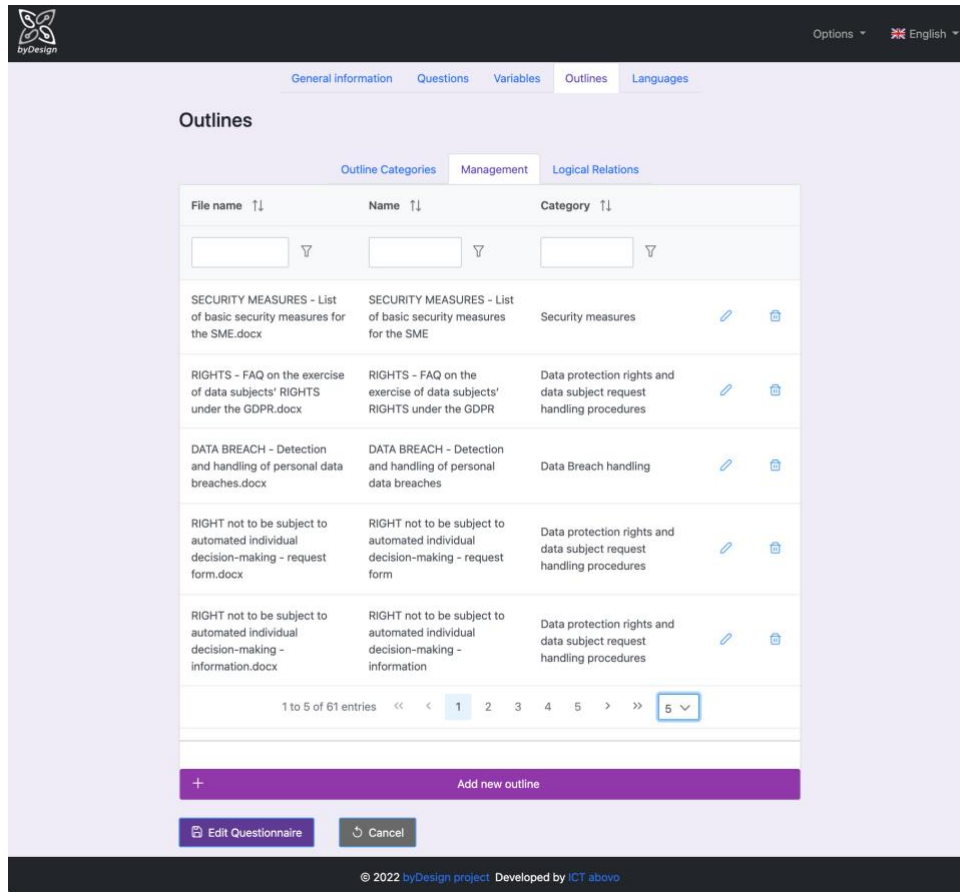




Figure 25 Documents management

Figure 26 displays the menu rendered for creating/updating an outline. As indicated by the flags on top of the window, all related information may be inserted separately for each system language, while in order to insert a new outline, all related information must be provided in the default language. Essentially, an outline encapsulates the template document itself and annotates it with a name that can be different than the file name, the category it belongs to and the variables that it includes. The template document may be uploaded by pressing the “Choose” button and the file name is filled in automatically with the name of the uploaded file; in the current system version, only .docx documents are supported¹¹. An already uploaded file can be viewed by pressing the  icon and deleted by pressing the  icon. One or more variables associated with the outline may be selected by expanding the Variables dropdown menu.

¹¹ Following system requirements; however, the system can be easily extended for allowing other types of files.

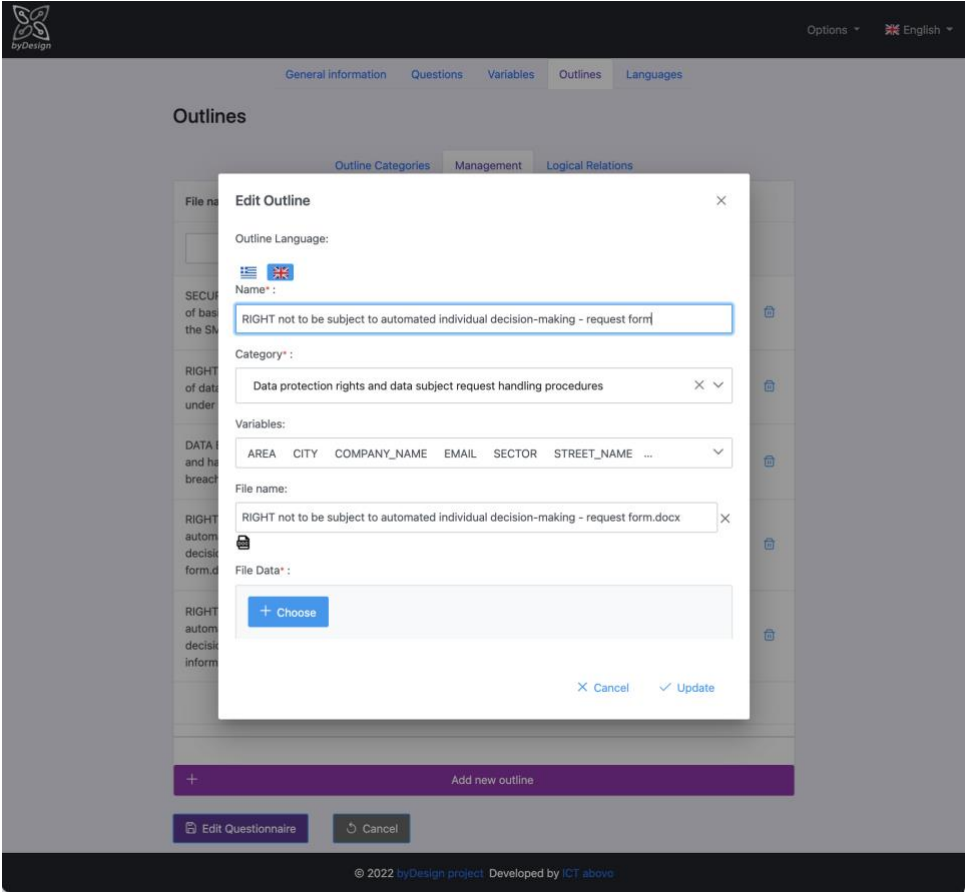


Figure 26 Providing template document information

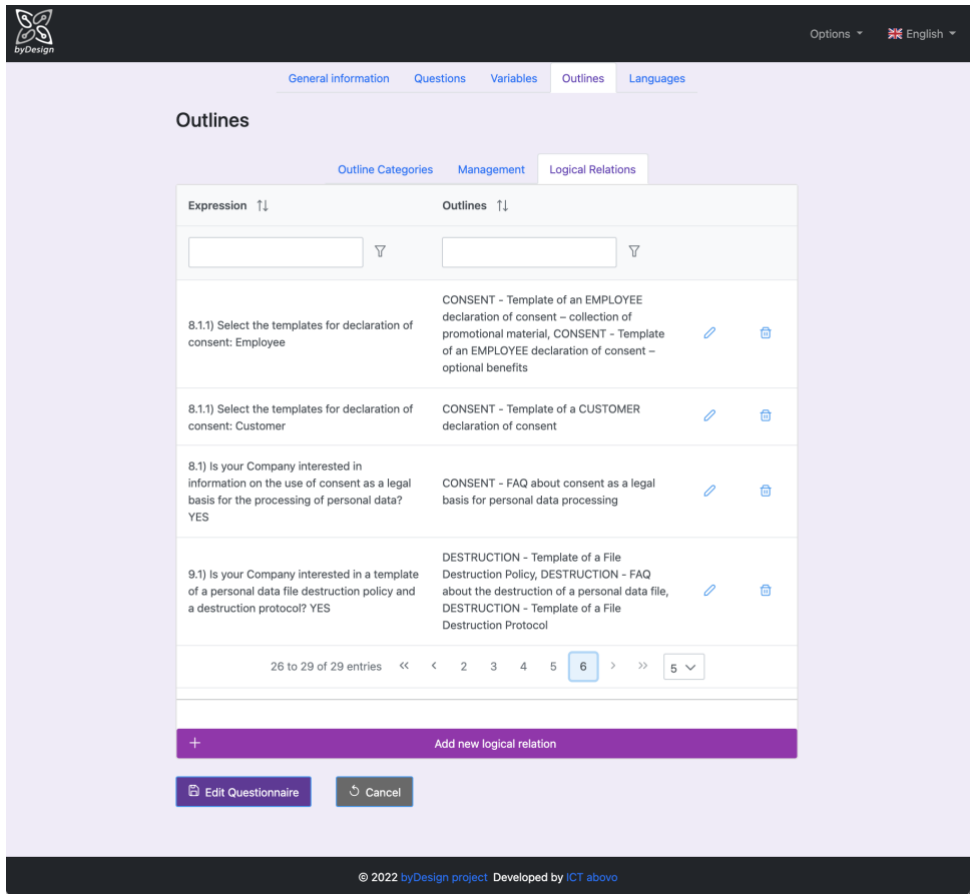




Figure 27 Logical relations tab

Logical Relations tab serves for the definition of the conditions under which one or more outlines will be provided to the respondent. It allows for creating, updating and deleting a logical relation. Already defined relations are displayed in the table of Figure 27 and can be modified by pressing the pencil icon  and deleted by pressing the trash icon . A new logical relation can be added by pressing “Add new logical relation”, by means of the menu shown in Figure 28.

This menu is divided in two tabs; one for defining logical expressions of answers and one for selecting one or more outlines to be generated if the logical expression of the first tab evaluates true upon questionnaire submission.

In the Logical Expression tab, the available answers to choose from can be found in the left side, with questions and answers displayed in tree form, while selected answers are displayed in the right side of the window. The logical operator, i.e., the type of the logical expression is selected by means of the dropdown menu in the middle of the rendered window.

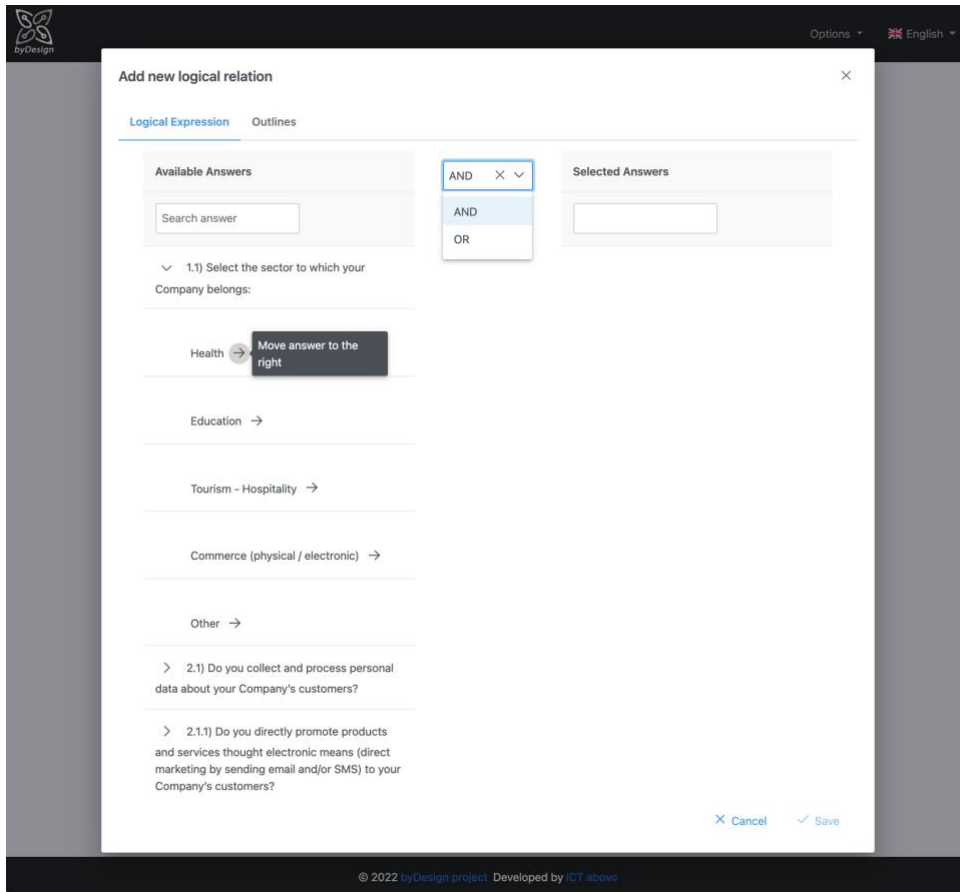


Figure 28 Definition of logical expression

In the Outlines tab, the available outlines to choose from are found in the left side, while selected outlines are displayed in the right side of the window. Selected outlines can be moved back to the available outlines and vice versa by pressing the arrow buttons. Files associated with the outlines can be viewed by pressing the 📄 icon.

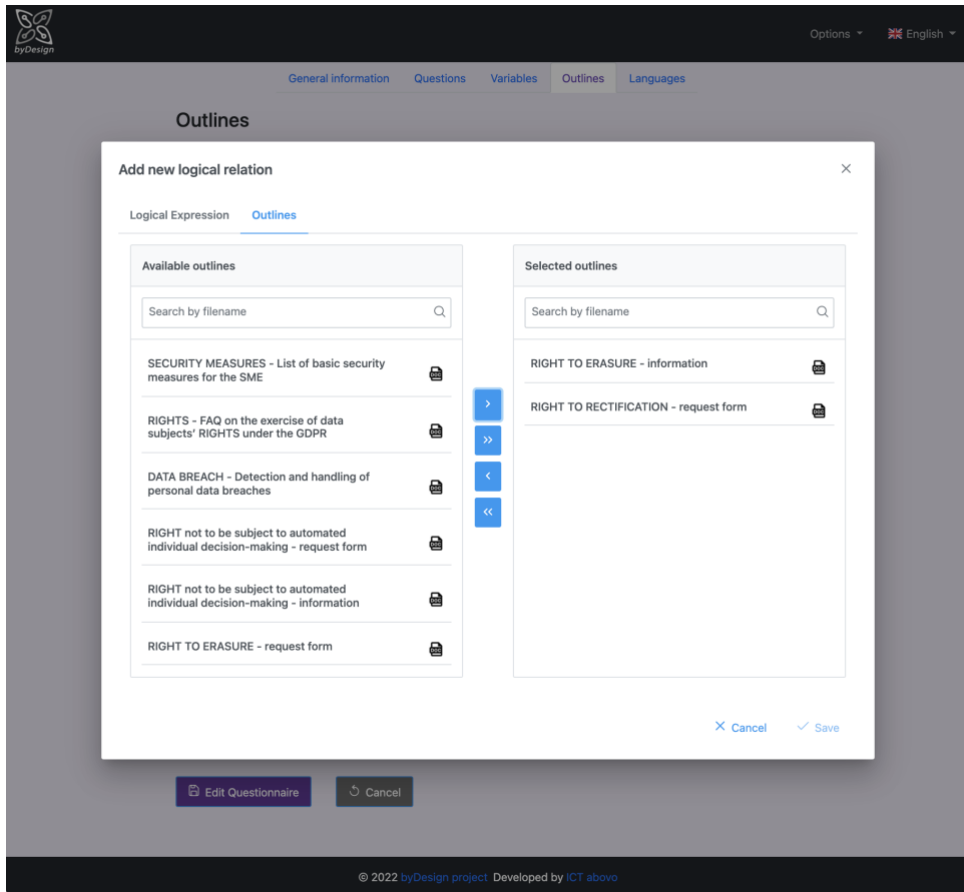


Figure 29 Select templates to be generated if logical expression evaluates true

5.1.6 Languages Tab

Languages tab allows the administrator to revisit the choices made in the step described in Section 5.1.1.

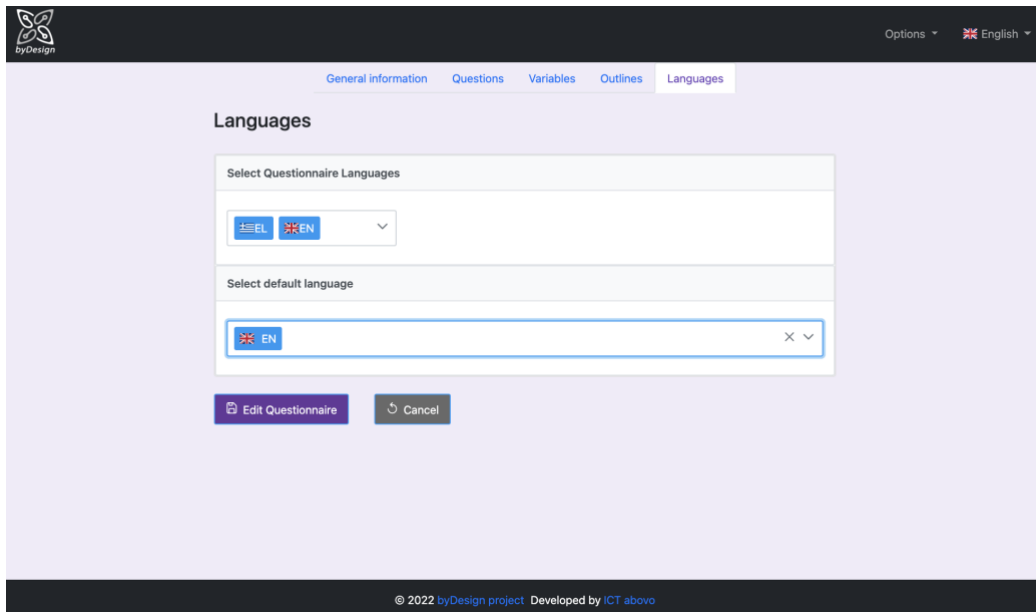


Figure 30 Languages tab

5.1.7 Metrics Tab

Metrics tab provides information on the actual use of the tool. Results can be narrowed down for a specific range of dates, while access logs and good practice material creation logs are presented both cumulatively and separately for the Greek and English version, respectively.

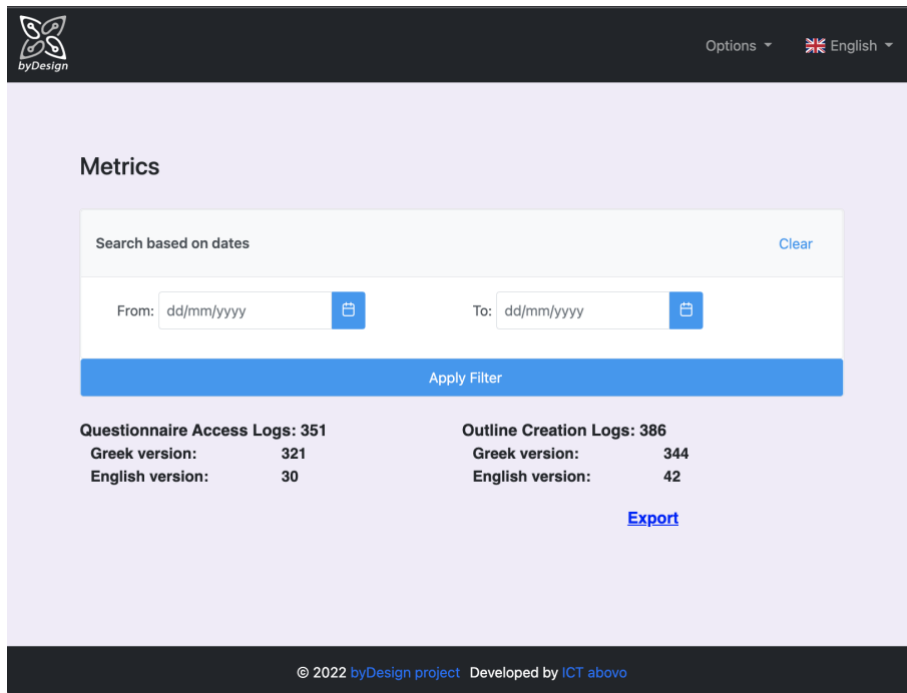


Figure 31 Metrics tab

The Export link allows for exporting raw data (in CSV format) related to the generation of the good practice material reflecting the actual use of the tool that can be leveraged for further analysis and presentation of the results, e.g., in the HDPa site. As illustrated in Figure 32, every time a respondent completes the questionnaire and downloads the zip file a log is created with an identifier, a creation date, the selected language (i.e., Greek or English) and a UUID. This UUID is associated with a browser instance, so that if the same user generates the zip file more than once in the same browser instance/private window, the same UUID will be logged, allowing for extracting information about unique users.

It is noted that the metrics tab has been incorporated as a new functionality during the pilot phase in order to facilitate assessment of the tool's usage providing the corresponding statistics.

ID	Zip	creation date	Language	Client	UUID
132	2022-08-23	12:30:39	EL	03c23935-	
133	2022-08-23	12:31:29	EN	03c23935-	GUID GUIDE GUIDO DRUID
134	2022-08-23	14:37:22	EL	5ce23332-7a71-4f0c-aa95-488cc830df1e	
135	2022-08-24	05:53:47	EN	a31701bc-9a91-474c-8da4-079573a1817f	
136	2022-08-24	05:55:08	EN	a31701bc-9a91-474c-8da4-079573a1817f	
137	2022-08-25	06:11:23	EL	d1125058-0029-417f-b99b-cb245a063de8	
138	2022-08-25	11:36:01	EL	ac665983-de62-4f7a-8cd2-fd1308542440	
139	2022-08-26	10:03:53	EL	07173f5d-0357-47dd-bb18-6f64acd2cd00	
140	2022-08-26	11:08:12	EL	f82f975f-ed72-4d9e-b7a2-d617d0feae1e4	
141	2022-08-26	12:16:35	EL	d76f879e-c283-48b4-bb7c-d948274f7db7	
142	2022-08-26	13:46:34	EL	d76f879e-c283-48b4-bb7c-d948274f7db7	
143	2022-08-26	15:46:01	EL	12985906-6556-4fb0-b97d-8e3224679b4b	
144	2022-08-26	17:21:20	EL	cdf65d20-6597-49a1-b1d5-2d6b49855de7	
145	2022-08-27	19:52:58	EL	8ab726c0-11cd-48e3-8a24-eae8f355c06e	
146	2022-08-29	06:42:06	EL	f0b73b88-0272-4f32-94d0-7d39f372956c	
147	2022-08-29	13:05:52	EL	d76f879e-c283-48b4-bb7c-d948274f7db7	
148	2022-08-30	07:34:00	EL	636b950e-60f0-49e1-a0db-c6d34af5afe8	
149	2022-08-30	08:35:57	EL	e1d1bc5b-1773-49cc-a9d5-ed11e6e249b5	
150	2022-08-30	14:18:16	EL	12985906-6556-4fb0-b97d-8e3224679b4b	
151	2022-09-01	09:43:24	EL	8b294d37-f4ed-4774-9352-0e66eb03ccd8	
152	2022-09-01	14:33:15	EL	01dd2588-3e46-425a-96dc-bd9c16ebf909	
153	2022-09-02	12:18:41	EL	7c606fa5-1762-4025-b197-e2bbc31f9be7	
154	2022-09-03	08:22:34	EL	477653c5-a5bf-453d-9c37-43cfb3d3b0a6	
155	2022-09-04	13:31:20	EL	9f966fe4-adfd-48f5-8bc2-9d60af92eb95	
156	2022-09-05	09:31:05	EL	83699159-6a30-4e77-990e-a662a99077ea	
157	2022-09-05	11:42:16	EL	b2d2a7bc-312f-4971-9117-d18a0bc72c5	
158	2022-09-05	12:57:09	EL	f50c5248-0a1b-41f2-b047-e267baadc3c5	
159	2022-09-05	18:38:34	EL	32b78cf6-e293-4c3c-b17c-e02b354a1a5a	
160	2022-09-06	14:54:20	EN	1f5b0f7d-3fdc-447b-bbdd-4e06af1904b8	

Figure 32 Metrics export

5.2 User interface for questionnaire respondents

This section constitutes a short user guide through the questionnaire wizard application offering self-assistance compliance to respondents. Essentially, the wizard implements the questionnaire of Section 2.2, divided in thematic areas reflected by different sections.

byDesign English

Questionnaire for generating good practice material for your Company

1

Company Sector

1.1) Select the sector to which your Company belongs: *

- Health
- Education
- Tourism - Hospitality
- Commerce (physical / electronic)
- Other

Next

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Figure 33 Entering the wizard application

As afore mentioned in Section 5.1, the wizard becomes accessible to administrator users by means of the Preview functionality and to respondents end users by means of the Share functionality. The questionnaire is rendered in the questionnaire default language (Figure 33), while by changing the language the whole questionnaire wizard, i.e., questions, menus and buttons, is rendered in the preferred language (Figure 34); in case no translations of the questionnaire are found, the questionnaire is being rendered in the default language

and only the menus and the buttons in the preferred language. It should be noted that language can be changed at any time in the course of the wizard, however respondents will be navigated back to the first question.

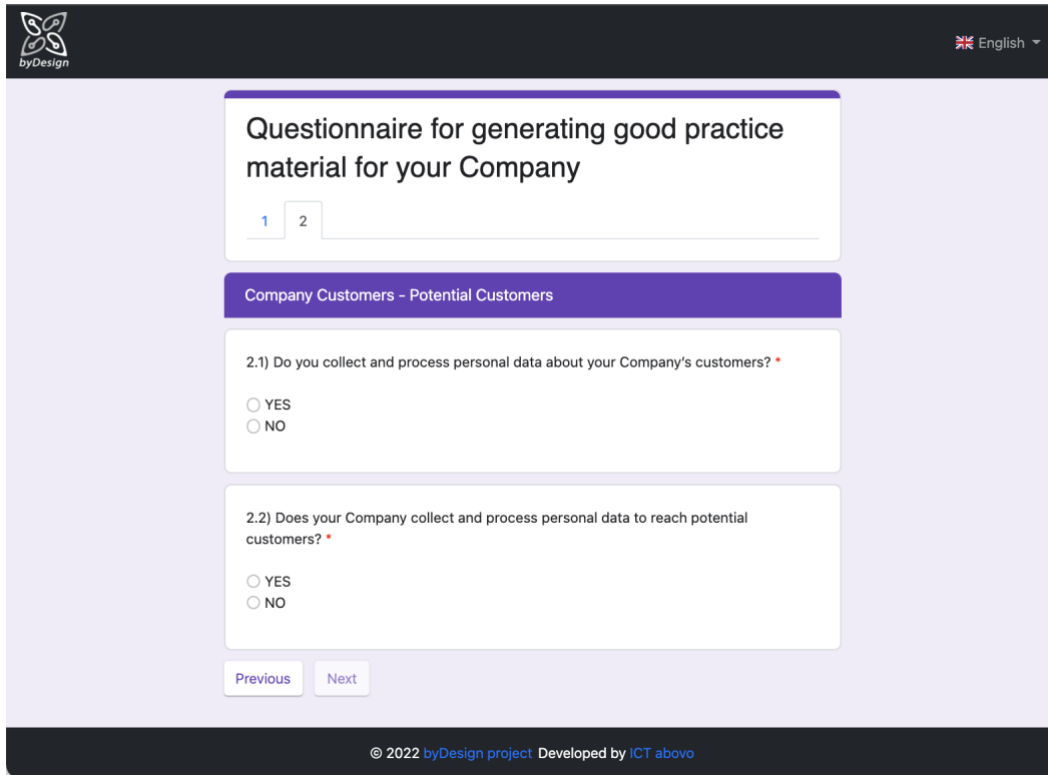
The screenshot shows a web interface for a survey. At the top left is the 'byDesign' logo. At the top right, there is a language selection menu showing 'Ελληνικά' with a dropdown arrow. The main content area has a title 'Ερωτηματολόγιο για την εξαγωγή καλών πρακτικών για την Επιχείρησή σας' and a tab indicator '1'. Below this is a section header 'Κλάδος Επιχείρησης'. The question text is '1.1) Επιλέξτε τον κλάδο στον οποίο ανήκει η Επιχείρησή σας: *'. There are five radio button options: 'Υγεία', 'Εκπαίδευση', 'Ξενοδοχεία - Τουρισμός', 'Λιανεμπόριο (φυσικό / ηλεκτρονικό)', and 'Άλλο'. At the bottom of the question area is a button labeled 'Επόμενο'. The footer contains the text '© 2022 byDesign project. Developed by ICT above'.

Figure 34 Change of language

As depicted in Figure 33, the wizard begins with the “Company Sector” section; the number of the tab indicates the order of the section in the wizard. The first question of the wizard is a single selection one; radio buttons are leveraged for this type of questions. Moreover, next to the question text, the “*” symbol denotes that answer to the question is required for proceeding with the next question; in fact, Next button remains disabled until an answer is provided.

D2.3 — Online self-assistance compliance tool

Figure 35 and Figure 36 reflect the conditional rendering of a question based on an answer to a previous one; in that respect question 2.1.1 becomes visible only in the case a positive answer has been given in question 2.1.



The screenshot displays a web-based questionnaire interface. At the top left is the 'byDesign' logo, and at the top right is a language selector set to 'English'. The main heading is 'Questionnaire for generating good practice material for your Company'. Below this is a progress indicator with two steps, '1' and '2', where '2' is currently active. A purple bar below the progress indicator reads 'Company Customers - Potential Customers'. The first question, '2.1) Do you collect and process personal data about your Company's customers? *', has two radio button options: 'YES' and 'NO'. The second question, '2.2) Does your Company collect and process personal data to reach potential customers? *', also has two radio button options: 'YES' and 'NO'. At the bottom of the questionnaire area are 'Previous' and 'Next' buttons. The footer contains the copyright notice: '© 2022 byDesign project. Developed by ICT above'.

Figure 35 Visible questions

The screenshot displays a web-based questionnaire interface. At the top left is the 'byDesign' logo, and at the top right is a language selector set to 'English'. The main heading is 'Questionnaire for generating good practice material for your Company'. Below this is a progress indicator showing '1' and '2' in boxes. A purple header bar reads 'Company Customers - Potential Customers'. The first question is '2.1) Do you collect and process personal data about your Company's customers? *' with 'YES' selected. The second question is '2.1.1) Do you directly promote products and services through electronic means (direct marketing by sending email and/or SMS) to your Company's customers? *' with 'NO' selected. The third question is '2.2) Does your Company collect and process personal data to reach potential customers? *' with 'NO' selected. At the bottom are 'Previous' and 'Next' buttons. A footer contains the text '© 2022 byDesign project Developed by ICT above'.

Figure 36 Conditionally rendered question

It should be noted that, while Next button becomes enabled only when all questions marked as required have been answered, respondents can navigate backwards to previous questions at any time by means of the Previous button. However, if they choose to change one of the already given answers, they will have to answer again the next questions, as the navigation flow should be re-initialized; in such a case, respondents are warned by means of a confirmation dialog.

The screenshot shows a web interface for a questionnaire. At the top left is the 'byDesign' logo, and at the top right is a language selector set to 'English'. The main heading is 'Questionnaire for generating good practice material for your Company'. Below this is a progress indicator with numbers 1 through 6, where 6 is highlighted. The section title is 'Assignment of Data Processing to Contractors-Processors'. Question 6.1 asks: 'Does your Company use contractors/processors (natural or legal persons) for the processing of personal data on your Company's behalf?'. It has two radio button options: 'YES' (selected) and 'NO'. Question 6.1.1 asks: 'Choose which service or services are provided to your Company by the contractor/processor?'. It has five checkbox options: 'Accounting services' (checked), 'Support services for IT systems', 'Hosting services, cloud provider', 'Product and service promotion services', and 'Physical security services'. The 'Other' option is also checked, and a text input field is visible below it. A red validation message states: 'This question must be answered, please add a value'. At the bottom of the question area are 'Previous' and 'Next' buttons. The footer contains the copyright information: '© 2022 byDesign project Developed by ICT above'.

Figure 37 Multiple selection example

Figure 37 presents an example of a question of Multiple Selection type (question 6.1.1); checkboxes are leveraged for this type of questions. As shown in the figure, in case the respondent selects the “Other” option, a textbox appears requesting the insertion of an alternative answer by the respondent, along with the corresponding validation message.

Figure 38 displays the screen where respondents may optionally provide information related to their company; in that respect, no question is marked as required. Finally, the questionnaire can be submitted by pressing the Submit button, as shown in Figure 39. After the successful submission of the questionnaire (Figure 40), in case templates of good practice documents have been generated based on respondents’ answers, the corresponding zip file is automatically downloaded, while respondents can also download the said zip file manually. Figure 41 shows folders and documents contained in the generated zip file for a Health sector scenario, while in Figure 42, an excerpt from the A2.1 template document “Template for the provision of information to customers/clients – Health sector” is presented, with placeholders replaced by company information provided by the respondent in Figure 38.

byDesign English ▾

Questionnaire for generating good practice material for your Company

1 2 3 4 5 6 7 8 9 10 11

Company Information

Optionally, you can fill in your Company's details to be included in the generated documents (this information is not stored or kept by the application)

11.1) Legal name

11.2) Distinctive title

11.3) Address

Street:

Number:

Zip Code:

Area:

City:

11.4) Telephone number

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Figure 38 Company information screen

The screenshot displays a web interface for a compliance questionnaire. At the top left is the 'byDesign' logo, and at the top right is a language selector set to 'English'. The main content area is a form with several sections:

- 11.3) Address:** Fields for Street (Iridanou), Number (20), Zip Code (11528), Area (Ilisia), and City (Athens).
- 11.4) Telephone number:** An empty input field.
- 11.5) E-mail address:** A field containing 'info@ict-abovo.gr'.
- 11.6) DPO Contact Details:** Fields for Telephone number and E-mail address (dpo@ict-abovo.gr).

A 'Confirmation' dialog box is overlaid on the form, asking 'Submit questionnaire?' with 'No' and 'Yes' buttons. At the bottom of the form are 'Previous' and 'Submit' buttons. The footer contains the text: '© 2022 byDesign project. Developed by ICT abovo'.

Figure 39 Submit questionnaire

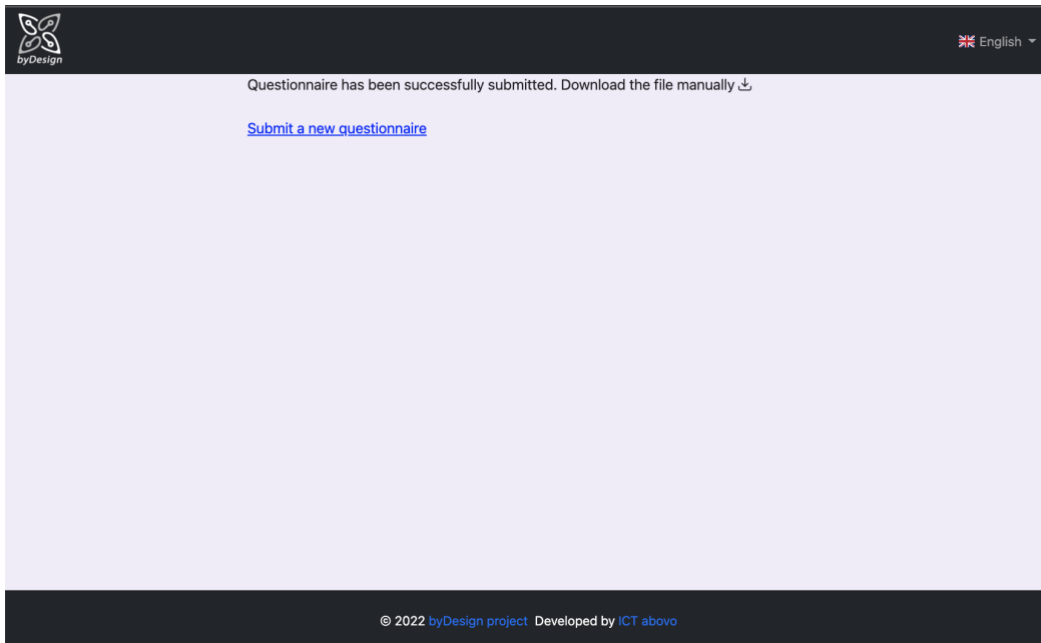


Figure 40 Successful submission of questionnaire

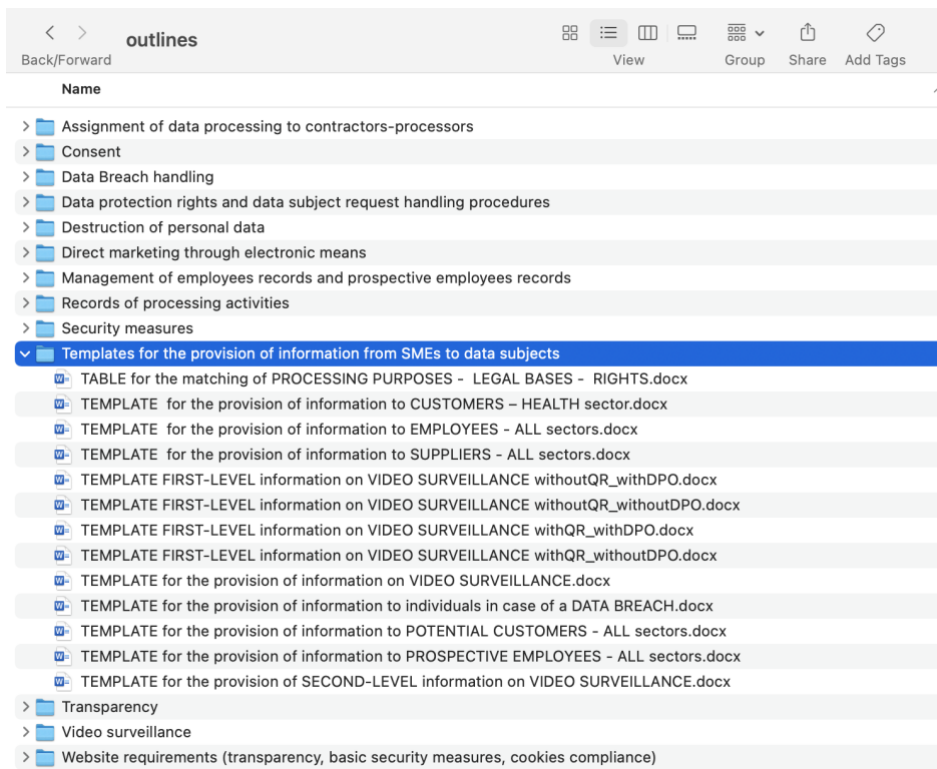


Figure 41 Unzipping the generated good practice material zip

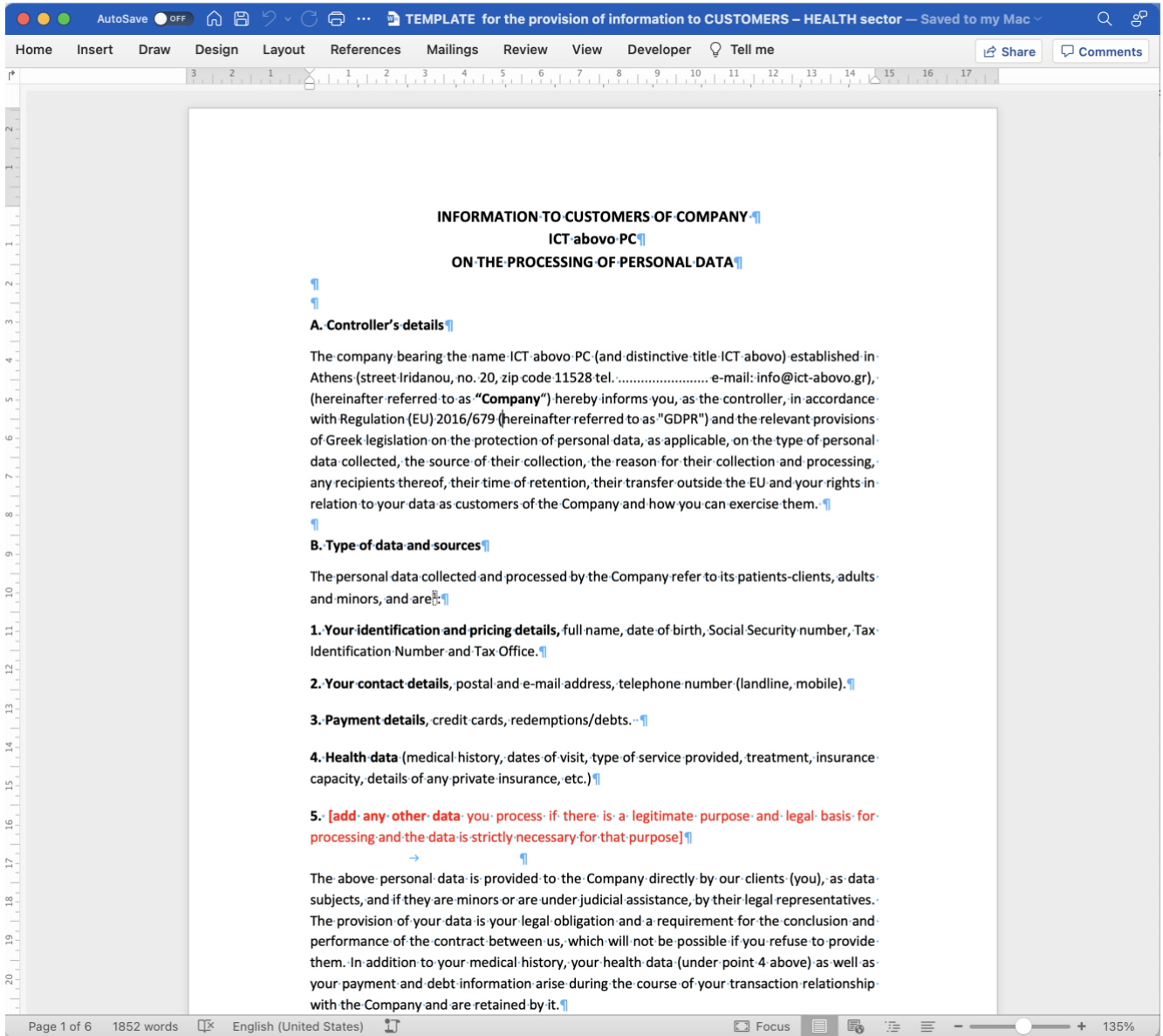


Figure 42 Template placeholders replaced by provided company information

6 Conclusions

This document presents the byDesign online self-assistance compliance tool. The tool is offered as a web application, implemented using state-of-the-art web technologies and software, available [here](#). It aims to present in a meaningful and user-friendly way the different kinds of material accumulated throughout Task 2.2, along with the realisation of the mechanism for the context-aware generation of customised instances of this material, on the basis of particular features of an SME data controller. The deliverable presents the different stages of tool implementation; namely, requirements elicitation, architecture design and development. Furthermore, it mainly serves as a user guide for the tool, describing in detail the functionalities offered by the developed interfaces, guiding the users through the application by means of the corresponding screenshots.

Special focus has been put on the customisability and configurability of the platform to a reasonable extent, with a view to making it relatively easy to extend, even after the end of the project, as per new requirements that may arise in the course of HDPa business. Extendibility of the tool primarily concerns two aspects: first, as regards the document types and content; second, as regards the framework for the context-aware generation of the documents so that they fit each SME data controller's needs. The existence of a comprehensive administration user interface significantly fosters extendibility, allowing for modifying all aspects of the questionnaire rendered to SMEs respondents, the content (set of documents and content of documents) generated and even the conditions under which specific documents will be generated. Regarding the supported document types, current implementation is tailored for the needs of the byDesign questionnaire; however, it can be easily extended for supporting also other types of documents apart from Microsoft Office Word documents, such as Microsoft Excel and PowerPoint documents.

Finally, the assessment and evaluation of the compliance online toolkit during the pilot and full production phases has provided valuable input for possible enhancements and extensions. In this context, it should be noted that a new functionality for metrics extraction has been incorporated in the toolkit during the production phase, thus facilitating the assessment of the toolkit (cf., Section 5.1.7). Overall, the feedback received by the end users has been very positive, as reflected by their answers in the respective online questionnaire surveys and the Virtual Conference (cf., Deliverable D2.4 "Final SME compliance toolkit report"). The users consider the online toolkit as user-friendly and easy-to-use covering the basic processing operations and needs of their businesses as well as the important GDPR compliance issues. No technical problems have been faced, neither in the pilot nor in the production phase of the system. Conclusively, the online self-assistance compliance toolkit is a very useful and adaptable tool that both SME's and other relevant stakeholders can use to facilitate the effective GDPR compliance.

7 Appendix

7.1 Template example

INFORMATION TO CUSTOMERS OF COMPANY
[reply to question 13)a), if provided]
ON THE PROCESSING OF PERSONAL DATA

A. Controller's details

The company bearing the name¹² **[reply to question 13)a), if provided]** (and distinctive title¹³ **[reply to question 13)b), if provided]**) established in **[reply to question 13)c)v), if provided]** (street **[reply to question 13)c)i), if provided]**, no. **[reply to question 13)c)ii), if provided]**, zip code **[reply to question 13)c)iii), if provided]**, tel. **[reply to question 13)d), if provided]** e-mail: **[reply to question 13)e), if provided]**), (hereinafter referred to as "Company") hereby informs you, as the controller, in accordance with Regulation (EU) 2016/679 (hereinafter referred to as "GDPR") and the relevant provisions of Greek legislation on the protection of personal data, as applicable, on the type of personal data collected, the source of their collection, the reason for their collection and processing, any recipients thereof, their time of retention, their transfer outside the EU and your rights in relation to your data as customers of the Company and how you can exercise them.

B. Type of data and sources

The personal data collected and processed by the Company refer to its patients-clients, adults and minors, and are¹⁴:

1. **Your identification and pricing details**, full name, date of birth, Social Security number, Tax Identification Number and Tax Office.
2. **Your contact details**, postal and e-mail address, telephone number (landline, mobile).
3. **Payment details**, credit cards, redemptions/debts.
4. **Health data** (medical history, dates of visit, type of service provided, treatment, insurance capacity, details of any private insurance, etc.)
5. **[add any other data you process if there is a legitimate purpose and legal basis for processing and the data is strictly necessary for that purpose]**

The above personal data is provided to the Company directly by our clients (you), as data subjects, and if they are minors or are under judicial assistance, by their legal representatives. The provision of your data is your legal obligation and a requirement for the conclusion and performance of the contract between us, which will not be

¹² Complete full legal name or first and last name in case of sole proprietorship.

¹³ Fill in the distinguishing title (commercial name) of the undertaking, if any.

¹⁴ The information mentioned is indicative and each Controller should check what is applicable to his/her case.

possible if you refuse to provide them. In addition to your medical history, your health data (under point 4 above) as well as your payment and debt information arise during the course of your transaction relationship with the Company and are retained by it.

C. Purposes and legal basis for processing

The Company collects and processes the aforementioned personal data concerning you for the following purposes and legal bases:

1) Provision of health services

The aforementioned personal data are processed for the purpose of providing health services¹⁵ to you, including your identification, communication with you, etc. and the legal basis for their processing is the performance of the contract between us, in accordance with Article 6(1)(b) GDPR. As regards your health data under point 4 of Section B., the legal basis for the processing is that of Article 9(2)(h) GDPR, i.e. the fact that the processing is necessary for the purposes of preventive or occupational medicine, medical diagnosis, health or social care or treatment under a contract with a health professional, who is subject to the obligation of professional secrecy¹⁶.

2) Invoicing of services

The data under points 1, 2 and 3 above of Section B. relating to your payments as appropriate are further processed for the purpose of invoicing the Company's services and the legal basis for their processing is the fulfilment of the Company's legal obligations under tax law, in accordance with Article 6(1)(c) GDPR.

3) Direct promotion by electronic means¹⁷

Your electronic contact details are used for the purpose of promoting similar services by electronic means (e-mail/sms), based on the overriding legitimate interest of our company in the direct marketing of its services (art. 6(1)(f) GDPR and 11(3) of Law 3471/2006).

[insert any other legitimate purposes with an indication of the appropriate legal basis. Attention to special categories of data (art. 9-10 GDPR).]

D. Transfer of data – Recipients

In order for the Company to fulfil the above mentioned functions and its related obligations, it communicates the personal data of its customers to categories of persons or bodies (recipients). The recipients have access only to those of your Personal Data that are strictly necessary for the performance of the tasks or the provision of the services they have undertaken to the Company. These categories are as follows:

1. Processors: the Company shall cooperate with the following processors on its behalf in order to assist it in the performance of its legal or contractual obligations, which are
 - **[if answer 8)8.1)i) is selected, show text** accounting service providers: company.....¹⁸,]

¹⁵ Where appropriate specialisation (e.g. based on Business Activity Code Number).

¹⁶ It can be specified according to the sector, by which provision the HR is bound by (e.g. a Code of Conduct).

¹⁷ If you advertise by electronic means to customers, keep what is applicable.

¹⁸ If you wish to indicate only the categories of recipients, the information should be as specific as possible.

D2.3 — Online self-assistance compliance tool

- **[if answer 8)8.1)ii) is selected, show text** providers of IT support services: company.....,]
- **[if answer 8)8.1)iii) is selected, show text** providers of hosting services, cloud providers: company.....,]
- **[if answer 8)8.1)iv) is selected, show text** providers of product and service promotion services: company.....,]
- **[if answer 8)8.1)v) is selected, show text** physical security service providers: company.....,]
- **[if answer 8)8.1)vi) is selected, show text** service providers: **[show “other” option text, if provided],]**
- **[insert any other category of providers]**

subject to the confidentiality of your data.

2. Financial institutions, to the extent necessary for the execution of the transaction
3. Insurance companies, to cover the insurance case
4. Social security institutions and tax authorities, in accordance with the applicable insurance and tax legislation respectively
5. Lawyers, in so far as this is necessary for the exercise of the rights of the Company and the protection of its legitimate interests
6. Bailiffs, notaries, judicial, prosecutorial and police authorities, as well as supervisory authorities, where required by legislative provisions or judicial decisions or at their legal request in the performance of their duties.
7. **[insert any other legitimate addressees]**

E. Data retention time

Option A [specify a specific time interval]:

Your data is kept by the Company for **[specify period]** on the basis of **[specify the specific provision of law]**¹⁹

Option B [if option A is not possible, please specify the criteria determining the time period for compliance]:

Your data is kept by the Company throughout the period of the provision of its services to you and until **[specify the criteria that determine the period of compliance such as the expiry of the limitation period of the claims concerned]** ²⁰

¹⁹ For example, ten (10) years since your last visit, in accordance with the Code of Medical Ethics. To be completed on a case-by-case basis by data category, based on any specific legislation (insurance, tax, etc.)

²⁰ The maximum period of compliance can be considered as the 20-year limitation period for civil claims between the parties under Article 937 CC.

D2.3 — Online self-assistance compliance tool

If, by the end of the above periods, judicial proceedings are ongoing, in which the Company is involved and directly or indirectly concern you, the time for keeping your data shall be extended until a final judgment is issued.

After the expiry of the above time intervals, your personal data will be erased/destroyed **[if answer 11)a) is selected, show text** on the basis of the destruction policy of the operation].

F. Transfer of data outside the EU

The Company does not transfer your personal data to third countries outside the EU.

[If a transfer occurs then the purposes and addressees must be indicated as follows:]

The Company transfers to..... **[insert company details and the country in which it is established]** to fulfil its purpose..... **[insert specific purpose of transmission]**, with legal basis.....**[insert specific legal basis]** and if one of the following conditions is met at the same time **[the Company should maintain the applicable condition and delete the one that does not apply]**:

1) According to a decision of the European Commission, an adequate level of protection of personal data is ensured by the third country, from a territory or from one or more specified sectors in that third country;

2) In the absence of a decision as referred to in the preceding paragraph:

– the Company has provided appropriate safeguards for the transfer of personal data to third countries, in accordance with Article 46 GDPR; or

– you have given the Company your explicit consent to that effect, or

– the transfer is necessary for the performance of your employment contract, or

– the transfer is necessary for important reasons of public interest, i.e. the establishment, exercise or defense of rights and/or legal claims of the undertaking, or

– the transfer is necessary for the establishment, exercise or defense of rights and/or legal claims of the Company.

[The Controller is obliged to inform accordingly of any further transfer]

G. What rights do you have in relation to your data and how to exercise them















As clients of the Company you have a number of rights, in accordance with the provisions of Articles 15-22 of the GDPR, in relation to your personal data, which are processed by the Company.

The table below lists your rights per processing purpose and corresponding legal basis. In this table you will find detailed information (concept, method and time limits) and request form for the exercise of each right. General information on the exercise of your rights is available **[insert link to document A4.1 here]**.

D2.3 — Online self-assistance compliance tool

If you wish to exercise a right, please fill in the corresponding form and send it to the email address [\[insert e-mail of the Company\]](#) or in writing [\[insert the Company's postal address\]](#). It is noted that in case there are reasonable doubts concerning the identity of the data subject, we might request the provision of additional information necessary to confirm the identity.

[\[insert links to respective documents of category A4 in the RIGHTS columns\]](#)

		RIGHTS						
		Access (15)	Rectification (16)	Erasure (17)	Restriction (18)	Portability (20)	Objection (21)	Objection and human intervention in automated decision (22)
PURPOSE	LEGAL BASIS	 	 	 	 	 	 	 
Provision of health services (identification and communication details)	Performance of a contract (Article 6.1b GDPR)	X	X	X	X	X		
Provision of health services (health data)	Contract with a health professional bound by secrecy (9.2h)	X	X	X	X	X		
Pricing of services	Compliance with legal obligation (6.1c) + tax legislation	X	X		X			
Promotion of services to customers by electronic means ²¹	Overriding legitimate interest (6.1f + Law 3471/2006 11.3)	X	X	X	X		X	X

Please note that the Company has the right in any event to partially or fully refuse to comply with your request to restrict the processing or erasure of your data, if the processing or retention of your personal data is necessary for the establishment, exercise or support of its legitimate rights or the fulfilment of its legal obligations.

The Company must reply to your request within one month of receipt. This time limit may be extended by a further two months, if necessary at the discretion of the Company, taking into account the complexity of the request and the number of requests, in which case the Company will inform you within one month of receipt of the extension in question and of the reasons for the delay.

²¹ As long as you advertise by electronic means to customers.

If the Company does not act on your request in the exercise of the above rights or following its reply, you consider that the aforementioned rights have been infringed, you have the possibility to lodge a complaint with the Personal Data Protection Authority, 1-3 Kifissias Avenue, 115 23, Athens, <https://www.dpa.gr/>, tel. 2106475600.

For any matter relating to the protection of your personal data, please contact the Data Protection Officer²² of our Company, at: Tel. **[reply to question 13)f)i, if provided]**, Email **[reply to question 13)f)ii, if provided]**

7.2 Enhanced template example

INFORMATION TO CUSTOMERS OF COMPANY \${COMPANY_NAME|.....} ON THE PROCESSING OF PERSONAL DATA

A. Controller's details

The company bearing the name \${COMPANY_NAME|.....²³} (and distinctive title \${TITLE|.....²⁴}) established in \${CITY|.....} (street \${STREET_NAME|.....}, no. \${STREET_NUMBER|.....}, zip code \${ZIP_CODE|.....} tel. \${TELEPHONE_NUMBER|.....} e-mail: \${EMAIL|.....}), (hereinafter referred to as "**Company**") hereby informs you, as the controller, in accordance with Regulation (EU) 2016/679 (hereinafter referred to as "GDPR") and the relevant provisions of Greek legislation on the protection of personal data, as applicable, on the type of personal data collected, the source of their collection, the reason for their collection and processing, any recipients thereof, their time of retention, their transfer outside the EU and your rights in relation to your data as customers of the Company and how you can exercise them.

B. Type of data and sources

The personal data collected and processed by the Company refer to its patients-clients, adults and minors, and are²⁵:

- 1. Your identification and pricing details**, full name, date of birth, Social Security number, Tax Identification Number and Tax Office.
- 2. Your contact details**, postal and e-mail address, telephone number (landline, mobile).
- 3. Payment details**, credit cards, redemptions/debts.

²²If there is a DPO.

²³ Complete full legal name or first and last name in case of sole proprietorship.

²⁴ Fill in the distinguishing title (commercial name) of the company, if any.

²⁵ The information mentioned is indicative and each Controller should check what is applicable to his/her case.

4. Health data (medical history, dates of visit, type of service provided, treatment, insurance capacity, details of any private insurance, etc.)

5. [add any other data you process if there is a legitimate purpose and legal basis for processing and the data is strictly necessary for that purpose]

The above personal data is provided to the Company directly by our clients (you), as data subjects, and if they are minors or are under judicial assistance, by their legal representatives. The provision of your data is your legal obligation and a requirement for the conclusion and performance of the contract between us, which will not be possible if you refuse to provide them. In addition to your medical history, your health data (under point 4 above) as well as your payment and debt information arise during the course of your transaction relationship with the Company and are retained by it.

C. Purposes and legal basis for processing

The Company collects and processes the aforementioned personal data concerning you for the following purposes and legal bases:

4) Provision of health services

The aforementioned personal data are processed for the purpose of providing health services²⁶ to you, including your identification, communication with you, etc. and the legal basis for their processing is the performance of the contract between us, in accordance with Article 6(1)(b) GDPR. As regards your health data under point 4 of Section B., the legal basis for the processing is that of Article 9(2)(h) GDPR, i.e. the fact that the processing is necessary for the purposes of preventive or occupational medicine, medical diagnosis, health or social care or treatment under a contract with a health professional, who is subject to the obligation of professional secrecy²⁷.

5) Invoicing of services

The data under points 1, 2 and 3 above of Section B. relating to your payments as appropriate are further processed for the purpose of invoicing the Company's services and the legal basis for their processing is the fulfilment of the Company's legal obligations under tax law, in accordance with Article 6(1)(c) GDPR.

6) Direct promotion by electronic means²⁸

Your electronic contact details are used for the purpose of promoting similar services by electronic means (e-mail/sms), based on the overriding legitimate interest of our company in the direct marketing of its services (art. 6(1)(f) GDPR and 11(3) of Law 3471/2006).

[insert any other legitimate purposes with an indication of the appropriate legal basis. Attention to special categories of data (art. 9-10 GDPR).]

D. Transfer of data – Recipients

²⁶ Where appropriate specialisation (e.g. based on Business Activity Code Number).

²⁷ It can be specified according to the sector, by which provision the HR is bound by (e.g. a Code of Conduct).

²⁸ If you advertise by electronic means to customers, keep what is applicable.

In order for the Company to fulfil the above mentioned functions and its related obligations, it communicates the personal data of its customers to categories of persons or bodies (recipients). The recipients have access only to those of your Personal Data that are strictly necessary for the performance of the tasks or the provision of the services they have undertaken to the Company. These categories are as follows:

8. Processors: the Company shall cooperate with the following processors on its behalf in order to assist it in the performance of its legal or contractual obligations, which are
 - ``${if $ACCOUNTING_SERVICES_PROVIDERS!=}`accounting service providers: company.....29,`
 - ``${endif}``${if $IT_SERVICES_SUPPORT_PROVIDERS!=}`providers of IT support services: company.....,`
 - ``${endif}``${if $HOSTING_CLOUD_PROVIDERS!=}`providers of hosting services, cloud providers: company.....,`
 - ``${endif}``${if $PROMOTION_SERVICES_PROVIDERS!=}`providers of product and service promotion services: company.....,`
 - ``${endif}``${if $PHYSICAL_SECURITY_SERVICES_PROVIDERS!=}`physical security service providers: company.....,`
 - ``${endif}``${if $OTHER_SERVICES_PROVIDERS!=}`service providers: `${OTHER_SERVICES_PROVIDERS|.....},`
 - ``${endif}`[insert any other category of providers]`

subject to the confidentiality of your data.

9. Financial institutions, to the extent necessary for the execution of the transaction
10. Insurance companies, to cover the insurance case
11. Social security institutions and tax authorities, in accordance with the applicable insurance and tax legislation respectively
12. Lawyers, in so far as this is necessary for the exercise of the rights of the Company and the protection of its legitimate interests
13. Bailiffs, notaries, judicial, prosecutorial and police authorities, as well as supervisory authorities, where required by legislative provisions or judicial decisions or at their legal request in the performance of their duties.
14. [insert any other legitimate addressees]

E. Data retention time

²⁹ If you wish to indicate only the categories of recipients, the information should be as specific as possible.

Option A [specify a specific time interval]:

Your data is kept by the Company for [specify period] on the basis of [specify the specific provision of law]³⁰

Option B [if option A is not possible, please specify the criteria determining the time period for compliance]:

Your data is kept by the Company throughout the period of the provision of its services to you and until [specify the criteria that determine the period of compliance such as the expiry of the limitation period of the claims concerned]³¹

If, by the end of the above periods, judicial proceedings are ongoing, in which the Company is involved and directly or indirectly concern you, the time for keeping your data shall be extended until a final judgment is issued.

After the expiry of the above time intervals, your personal data will be erased/destroyed\${if \$PERSONAL_DATA_DESTRUCTION_POLICY!=""} [on the basis of the destruction policy of the operation](#)\${endif}.

F. Transfer of data outside the EU

The Company does not transfer your personal data to third countries outside the EU.

[If a transfer occurs then the purposes and addressees must be indicated as follows:]

The Company transfers to..... [insert company details and the country in which it is established] to fulfil its purpose..... [insert specific purpose of transmission], with legal basis.....[insert specific legal basis] and if one of the following conditions is met at the same time [the Company should maintain the applicable condition and delete the one that does not apply]:

- 1) According to a decision of the European Commission, an adequate level of protection of personal data is ensured by the third country, from a territory or from one or more specified sectors in that third country;
- 2) In the absence of a decision as referred to in the preceding paragraph:
 - the Company has provided appropriate safeguards for the transfer of personal data to third countries, in accordance with Article 46 GDPR; or
 - you have given the Company your explicit consent to that effect, or
 - the transfer is necessary for the performance of your employment contract, or
 - the transfer is necessary for important reasons of public interest, i.e. the establishment, exercise or defense of rights and/or legal claims of the undertaking, or

³⁰ For example, ten (10) years since your last visit, in accordance with the Code of Medical Ethics. To be completed on a case-by-case basis by data category, based on any specific legislation (insurance, tax, etc.)

³¹ The maximum period of compliance can be considered as the 20-year limitation period for civil claims between the parties under Article 937 CC.

D2.3 — Online self-assistance compliance tool

– the transfer is necessary for the establishment, exercise or defense of rights and/or legal claims of the Company.















[The Controller is obliged to inform accordingly of any further transfer]

G. What rights do you have in relation to your data and how to exercise them

As clients of the Company you have a number of rights, in accordance with the provisions of Articles 15-22 of the GDPR, in relation to your personal data, which are processed by the Company.

The table below lists your rights per processing purpose and corresponding legal basis. In this table you will find detailed information (concept, method and time limits) and request form for the exercise of each right. General information on the exercise of your rights is available [here](#).

If you wish to exercise a right, please fill in the corresponding form and send it to the email address [insert e-mail of the Company] or in writing [insert the Company's postal address]. It is noted that in case there are reasonable doubts concerning the identity of the data subject, we might request the provision of additional information necessary to confirm the identity.

		RIGHTS						
		Access (15)	Rectification (16)	Erasure (17)	Restriction (18)	Portability (20)	Objection (21)	Objection and human intervention in automated decision (22)
PURPOSE	LEGAL BASIS	 	 	 	 	 	 	 
Provision of health services (identification and communication details)	Performance of a contract (Article 6.1b GDPR)	X	X	X	X	X		
Provision of health services (health data)	Contract with a health professional bound by secrecy (9.2h)	X	X	X	X	X		
Pricing of services	Compliance with legal obligation (6.1c) + tax legislation	X	X		X			

D2.3 — Online self-assistance compliance tool

Promotion of services to customers by electronic means ³²	Overriding legitimate interest (6.1f + Law 3471/2006 11.3)	X	X	X	X		X	X
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Please note that the Company has the right in any event to partially or fully refuse to comply with your request to restrict the processing or erasure of your data, if the processing or retention of your personal data is necessary for the establishment, exercise or support of its legitimate rights or the fulfilment of its legal obligations.

The Company must reply to your request within one month of receipt. This time limit may be extended by a further two months, if necessary at the discretion of the Company, taking into account the complexity of the request and the number of requests, in which case the Company will inform you within one month of receipt of the extension in question and of the reasons for the delay.

If the Company does not act on your request in the exercise of the above rights or following its reply, you consider that the aforementioned rights have been infringed, you have the possibility to lodge a complaint with the Personal Data Protection Authority, 1-3 Kifissias Avenue, 115 23, Athens, <https://www.dpa.gr/>, tel. 2106475600.

For any matter relating to the protection of your personal data, please contact the Data Protection Officer³³ of our company, at: Tel. \${DPO_PHONE_NUMBER |} e-mail: \${DPO_EMAIL |}

³² As long as you advertise by electronic means to customers.

³³ If there is a DPO.