



# Final SME compliance toolkit report

## Deliverable D2.4

### **Editors**

Efrosini Siougla (HDPa)  
Kalliopi Karveli (HDPa)  
Eugenia Papagiannakopoulou (ABOVO)  
Nikolaos Deltas (ABOVO)

### **Contributors**

### **Reviewers**

George Rousopoulos (HDPa)  
George Lioudakis (ABOVO)

### **Date**

31<sup>st</sup> October 2022  
28<sup>th</sup> February 2023 (revised)

### **Classification**

Public



## Table of Contents

<b>1</b>	<b>INTRODUCTION</b>	<b>4</b>
1.1	Purpose of the document	4
1.2	Relations to other activities in the project	4
1.3	Structure of the document	5
<b>2</b>	<b>PURPOSE OF THE ONLINE TOOL</b>	<b>6</b>
2.1	Sample good practice material	6
2.2	Questionnaire	10
<b>3</b>	<b>REQUIREMENTS</b>	<b>15</b>
<b>4</b>	<b>SYSTEM DESIGN</b>	<b>17</b>
4.1	System overview	17
4.2	Database schema	19
4.3	Technologies used	21
<b>5</b>	<b>USER INTERFACES</b>	<b>23</b>
5.1	User interface for administration of the questionnaire	23
5.1.1	Defining the languages associated with a questionnaire	24
5.1.2	General Information Tab	25
5.1.3	Questions Tab	26
5.1.4	Variables Tab	33
5.1.5	Outlines Tab	34
5.1.6	Languages Tab	41
5.1.7	Metrics Tab	42
5.2	User interface for questionnaire respondents	43
<b>6</b>	<b>TOOL OPERATION</b>	<b>52</b>
6.1	Pilot phase	52
6.2	Production phase	53
6.3	Assessment and evaluation	55
<b>7</b>	<b>CONCLUSIONS</b>	<b>58</b>
<b>8</b>	<b>APPENDIX</b>	<b>60</b>
8.1	Template example	60
8.2	Enhanced template example	65
8.3	Template invitation to the pilot evaluation	70

<b>8.4</b>	<b>Template toolkit evaluation questionnaire survey</b>	<b>71</b>
<b>8.5</b>	<b>Template for launch of full production phase</b>	<b>73</b>

## 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. To this end, after the development of a self-assistance compliance online toolkit platform and its initial deployment, which was one of the main pillars of the project and the aim of Task 2.3, Task 2.4 concerns the operation and maintenance of the toolkit during the course of the project as well as its evaluation and assessment through its pilot and full production phases. More specifically, a pilot phase took place aiming at the assessment and evaluation of the offering in production environment before its general release. The pilot phase gave the token to the full production phase that lasted until the end of the project. During the pilot phase the self-assistance online toolkit was available to the enlisted pilot users while during the full production phase the toolkit was available to all visitors of the HDPA portal in both the Greek and the English language versions. The evaluation of the online toolkit during the pilot and full production phases was conducted by means of a common online questionnaire survey and the results of the questionnaires from the two phases showed that the online toolkit meets the associated objectives. After these two phases and its assessments and enhancements based on the evaluation feedback, the self-assistance online toolkit became available to the public for future use.

### 1.1 Purpose of the document

This report incorporates the final self-assistance online toolkit after its assessment, in terms of both its reception by the end-users and operational aspects encountered throughout its pilot and production phases.

In that respect, it initially presents the requirements that have been identified for designing the online self-assistance compliance tool 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 and it can be used as a user guide for both the administration and wizard user interfaces, describing in detail the functionalities offered by means of the corresponding screenshots. The report also describes the tool's operation in both its pilot and production phases and the tool's assessment and evaluation by the end-users, thus offering valuable feedback for its future use.

More specifically, the document includes: i) the purpose of the online toolkit by presenting both the sample good practice material and the questionnaire, ii) the requirements assessed, iii) the system design, iv) the user interface for administration of the questionnaire and for questionnaire respondents, v) the tool operation both in the pilot and production phases and its evaluation, vi) the final conclusions on the utility of the tool and vii) an appendix which includes examples of template documents.

### 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 outcome 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 concerns 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 has taken place before its general release. Feedback received as part of this process was also exploited in the context of Task 2.3. The pilot phase gave the token to the full production phase, which lasted until the end of the project, whereas the online toolkit is expected to continue its operation long after the project concludes. During the full production phase, the tool was fully maintained and was subject to adaption in order to keep pace with new needs identified. The final evaluation of the provided services was based on a follow-up survey conducted primarily by means of online questionnaires. Eventually, evaluation questionnaires were compiled in a comprehensive evaluation report showing whether and how the tool developed meets associated objectives. This will comprise valuable information for the tool operation after the end of the project.

### 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.

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 describes the tool operation in the pilot and the production phases.

Section 7 includes the conclusions regarding the application and usefulness of the tool.

Finally, Section 8 (Appendix) presents examples of template documents. More specifically, appendix 8.1 presents a template document of the sample good practice material while appendix 8.2 presents the same document in its enhanced form. In addition, appendix 8.3 presents the template invitation to the pilot phase, appendix 8.4 presents the template evaluation questionnaire survey and appendix 8.5 presents the template for the launch of the full production phase.

## 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 for GDPR 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. Each document in this material includes simple instructions and FAQ, on how the SME can adapt the documents to its specific case. 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 data protection 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

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

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



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

Template document A2.1 “Template for the provision of information to customers/clients – Health sector” is presented in Section 8.1, 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 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**?

- 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

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 (HDPa) 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 documents<sup>1</sup>.
- 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.

---

<sup>1</sup> However, in the specific questionnaire of Section 2.2, 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. Extendability 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.

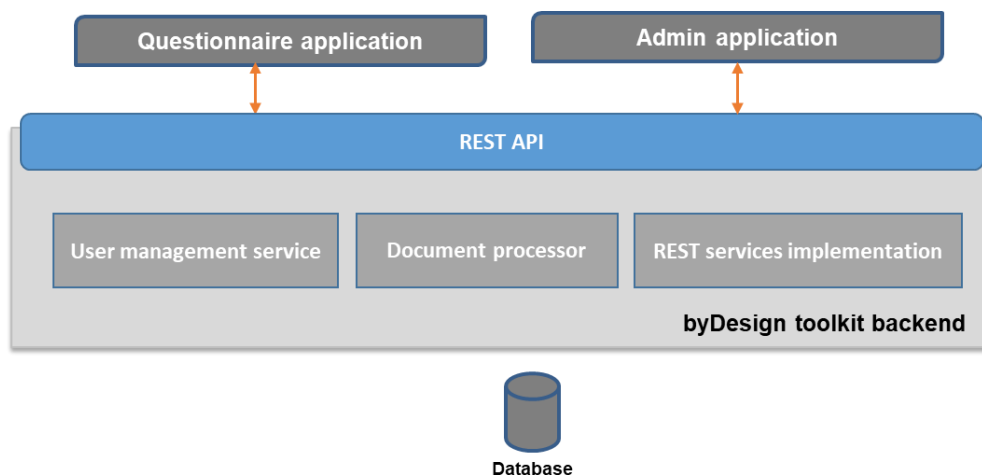


Figure 1 Online toolkit software architecture

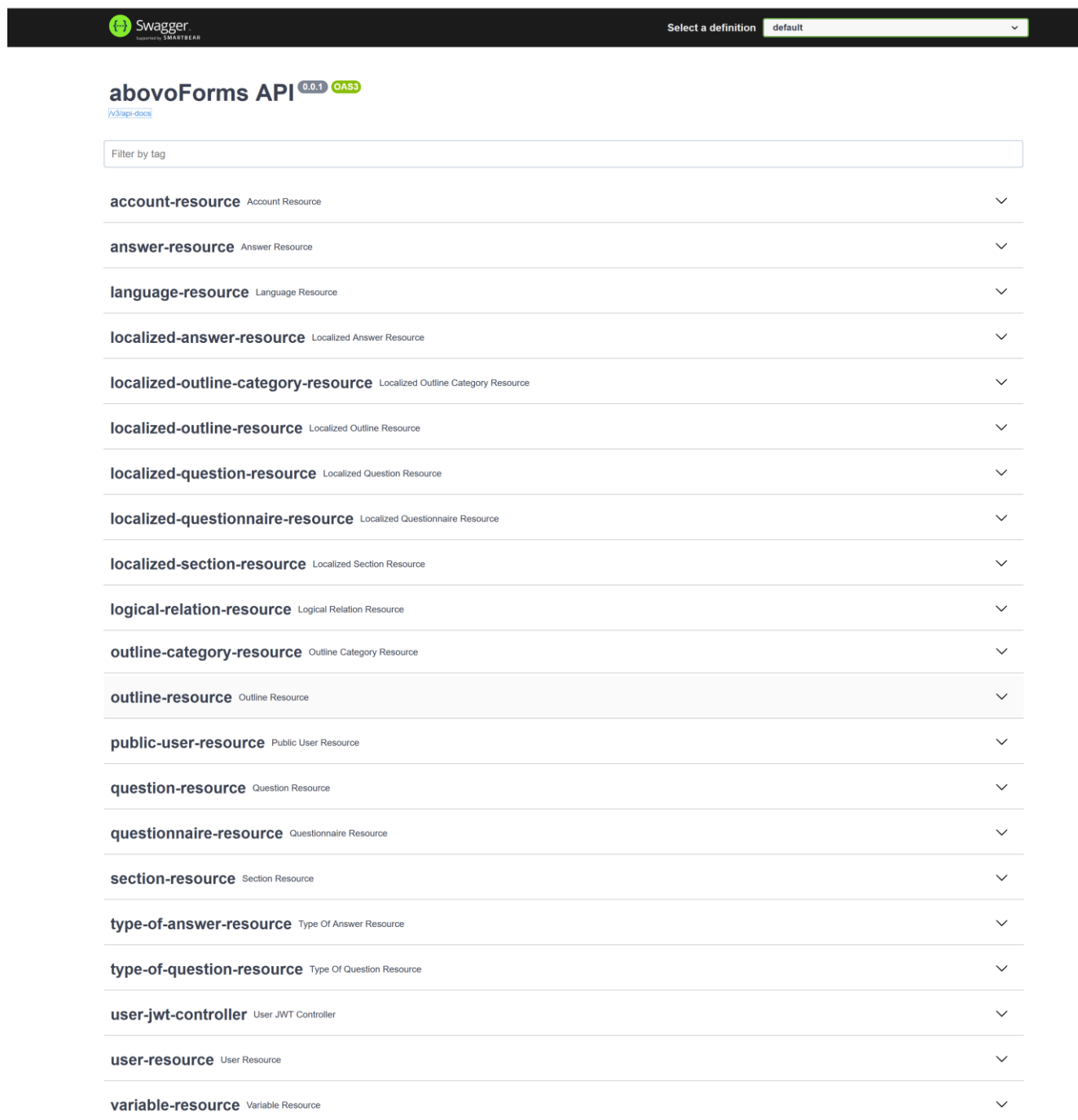
byDesign online toolkit provides an end-user interface and an administration interface devised for the Data Protection Authority. These interfaces are exposed by two frontend web applications, questionnaire application and admin application, respectively. Both applications provide responsive web interfaces 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 8.2 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`**.

- **`${rowIf condition}...${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 image shows the Swagger UI for the 'abovoForms API'. At the top, there's a Swagger logo and a 'Select a definition' dropdown set to 'default'. Below the header, the API title 'abovoForms API' is displayed with version '0.0.1' and a 'OAS3' tag. A 'Filter by tag' input field is present. The main content is a list of API resources, each with a name, a description, and a dropdown arrow. The 'outline-resource' is highlighted in grey.

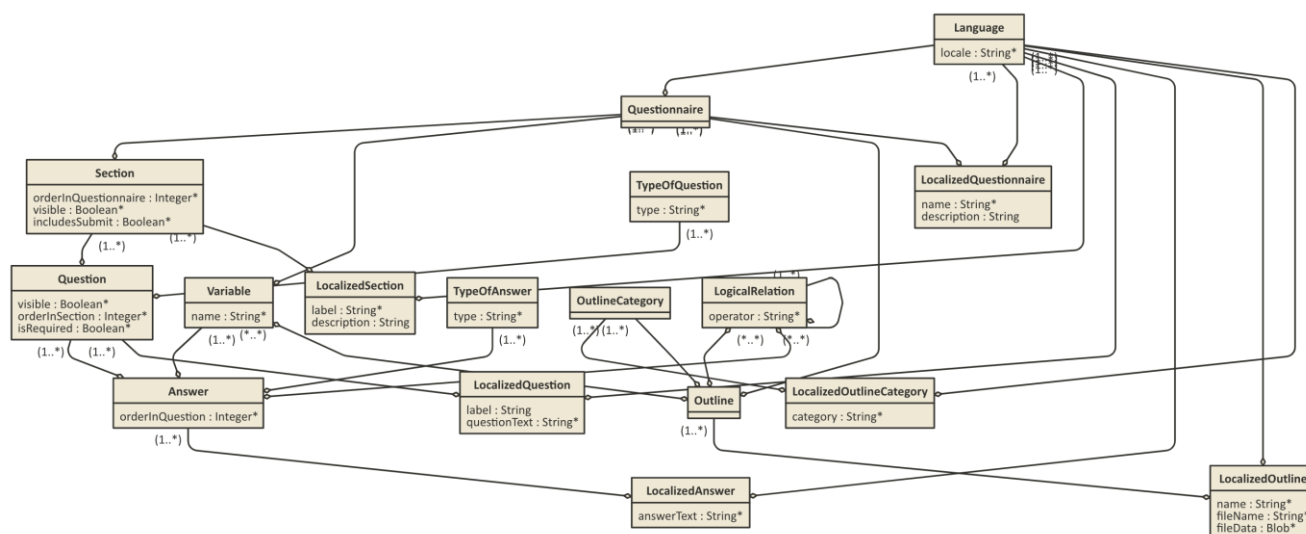
Resource Name	Description
account-resource	Account Resource
answer-resource	Answer Resource
language-resource	Language Resource
localized-answer-resource	Localized Answer Resource
localized-outline-category-resource	Localized Outline Category Resource
localized-outline-resource	Localized Outline Resource
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		Questionnaire Resource
GET	/api/questionnaires	getAllQuestionnaires
POST	/api/questionnaires	createQuestionnaire
GET	/api/questionnaires/complete	getAllCompleteQuestionnaires
POST	/api/questionnaires/complete	createCompleteQuestionnaire
GET	/api/questionnaires/complete/count	countCompleteQuestionnaires
GET	/api/questionnaires/complete/{id}	getCompleteQuestionnaire
PUT	/api/questionnaires/complete/{id}	updateCompleteQuestionnaire
GET	/api/questionnaires/count	countQuestionnaires
GET	/api/questionnaires/{id}	getQuestionnaire
PUT	/api/questionnaires/{id}	updateQuestionnaire
DELETE	/api/questionnaires/{id}	deleteQuestionnaire
PATCH	/api/questionnaires/{id}	partialUpdateQuestionnaire
GET	/api/questionnaires/{uuid}/{locale}	getQuestionnaireLocalizedByUUID

### 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 language<sup>2</sup>.

- 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

---

<sup>2</sup> 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 12<sup>3</sup> applications. Angular is a web application framework that provides component logic for building applications. Each component is consisting of a

---

<sup>3</sup> Angular, <https://angular.io>

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 PrimeNG<sup>4</sup> 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 5<sup>5</sup> has been used for supporting the responsiveness of the applications.

The backend Java application has been built with Spring Boot<sup>6</sup>. 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 MapStruct<sup>7</sup> 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 POI<sup>8</sup> 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 MVEL<sup>9</sup> Java library has been used.

For deployment and running of applications the Docker<sup>10</sup> 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.

---

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

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

<sup>6</sup> Spring Boot, <https://spring.io>

<sup>7</sup> MapStruct, <https://mapstruct.org/>

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

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

<sup>10</sup> 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 is available [here](#).

### 5.1 User interface for administration of the questionnaire

In order to enter the administration panel, users should first get authenticated by means of their credentials, as shown in Figure 5.

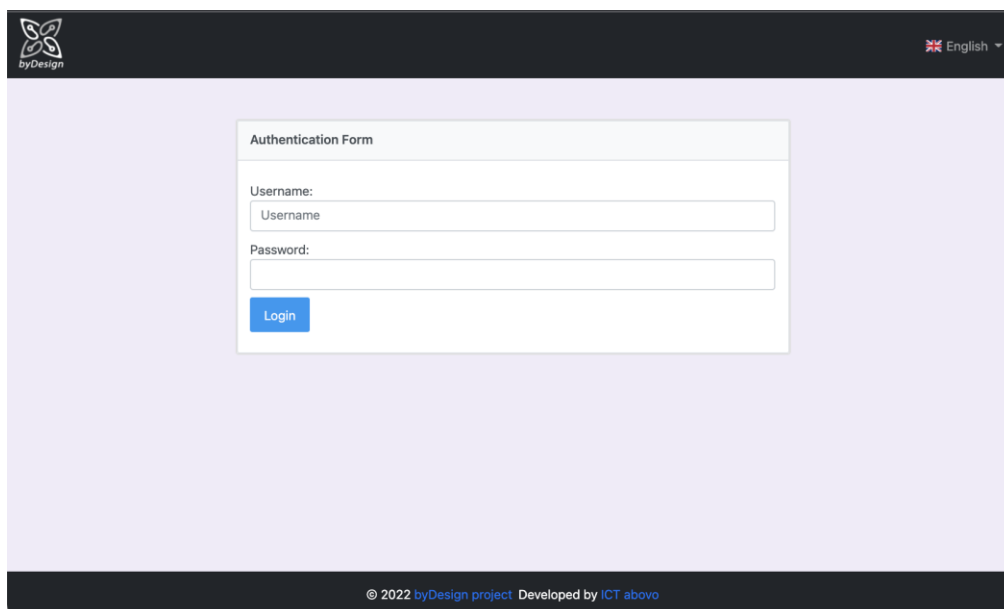







Figure 5 Administrator login page

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

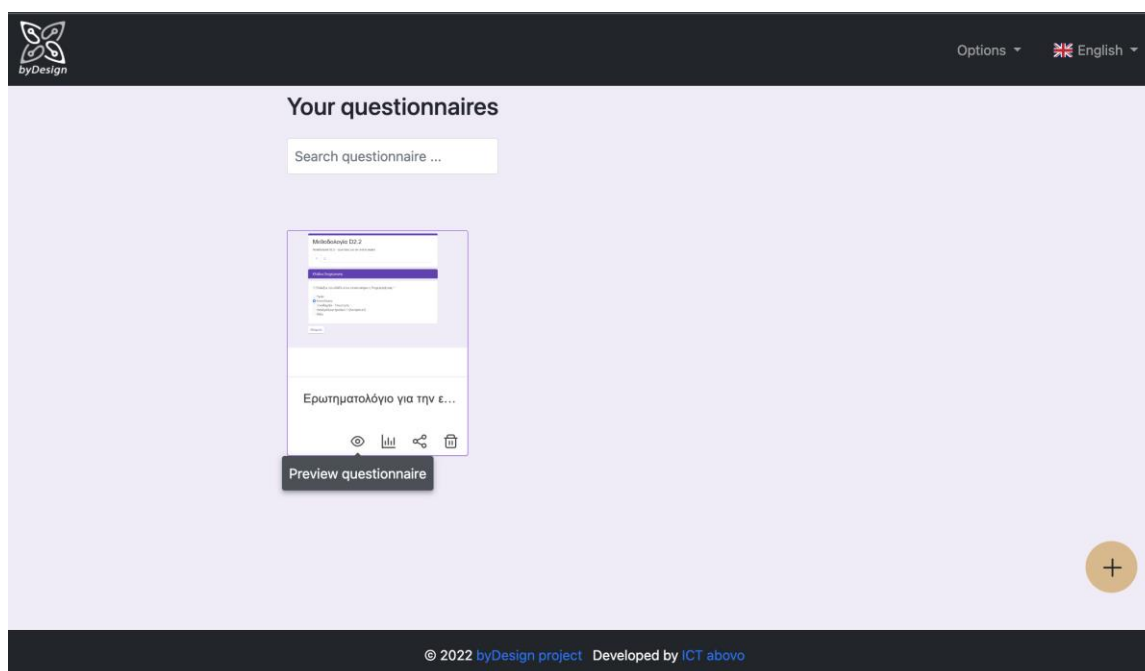



Figure 6 Administration of questionnaires

### 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).

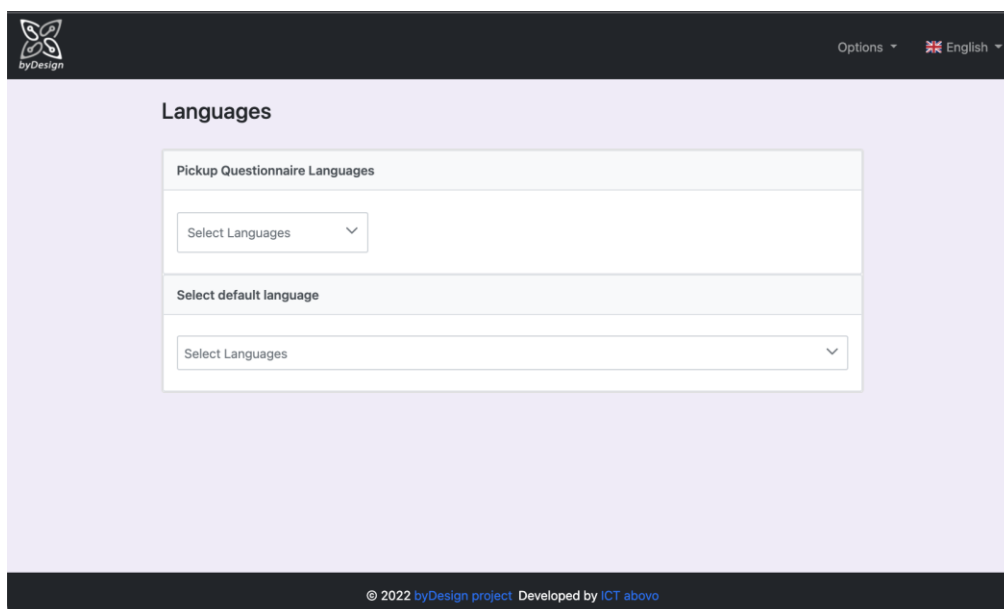


Figure 7 Definition of questionnaire languages

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.

The screenshot shows the 'Languages' configuration interface. At the top, there's a header with the 'byDesign' logo and a language selector set to 'English'. Below the header, a 'Languages' tab is active. The main content area is titled 'Languages' and contains two sections: 'Pickup Questionnaire Languages' and 'Select default language'. The 'Pickup Questionnaire Languages' section has a dropdown menu showing 'EL' and 'EN'. The 'Select default language' section has a dropdown menu showing 'EN'. At the bottom of the form is a 'Save Languages' button. The footer of the page reads '© 2022 byDesign project Developed by ICT above'.

**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.

The screenshot displays the 'Questions' tab of the byDesign toolkit. At the top, there is a navigation bar with tabs for 'General information', 'Questions', 'Variables', 'Outlines', and 'Languages'. The 'Questions' tab is currently active. Below the navigation bar, there is a form for creating a new section. The form has two main input fields: 'Section Title' and 'Section Description'. To the right of these fields, there are two buttons: 'Add Question' and 'Add Section'. Below the input fields, there is a checkbox labeled 'includes submit'. At the bottom of the form, there are two buttons: 'Save Questionnaire' and 'Cancel'. The footer of the interface shows the copyright notice: '© 2022 byDesign project Developed by ICT above'.

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 will 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  icon. Finally, translations of section title and description can be managed by pressing the translation  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.

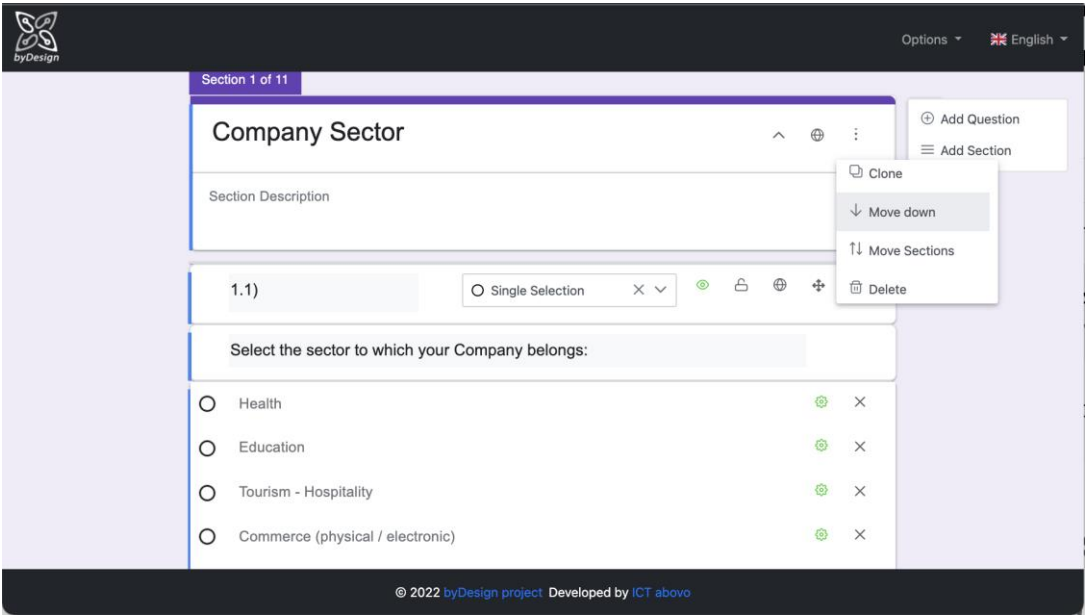


Figure 11 Section actions

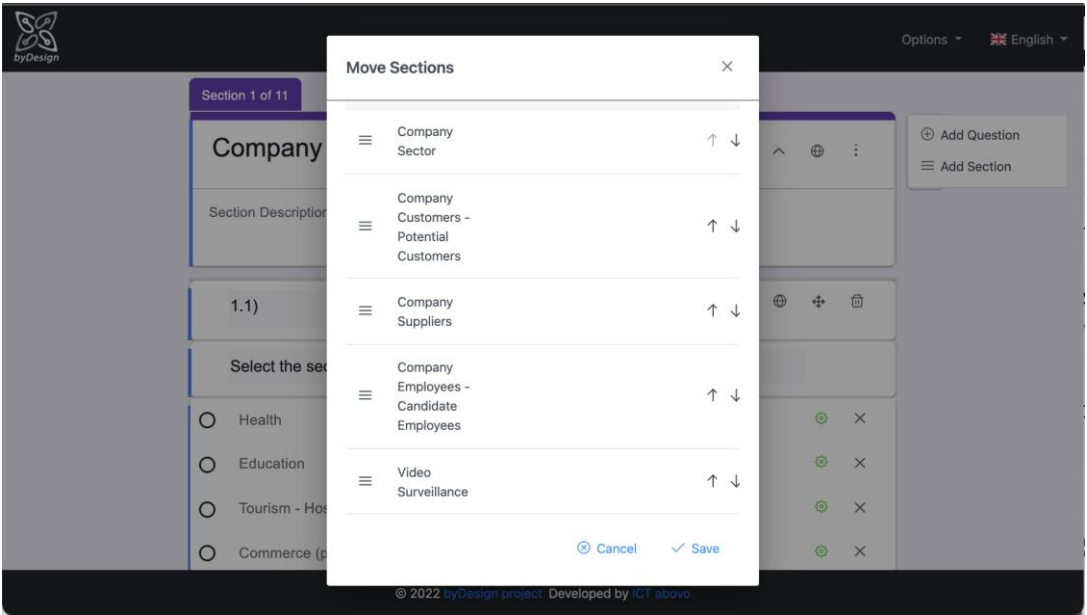


Figure 12 Reorder sections

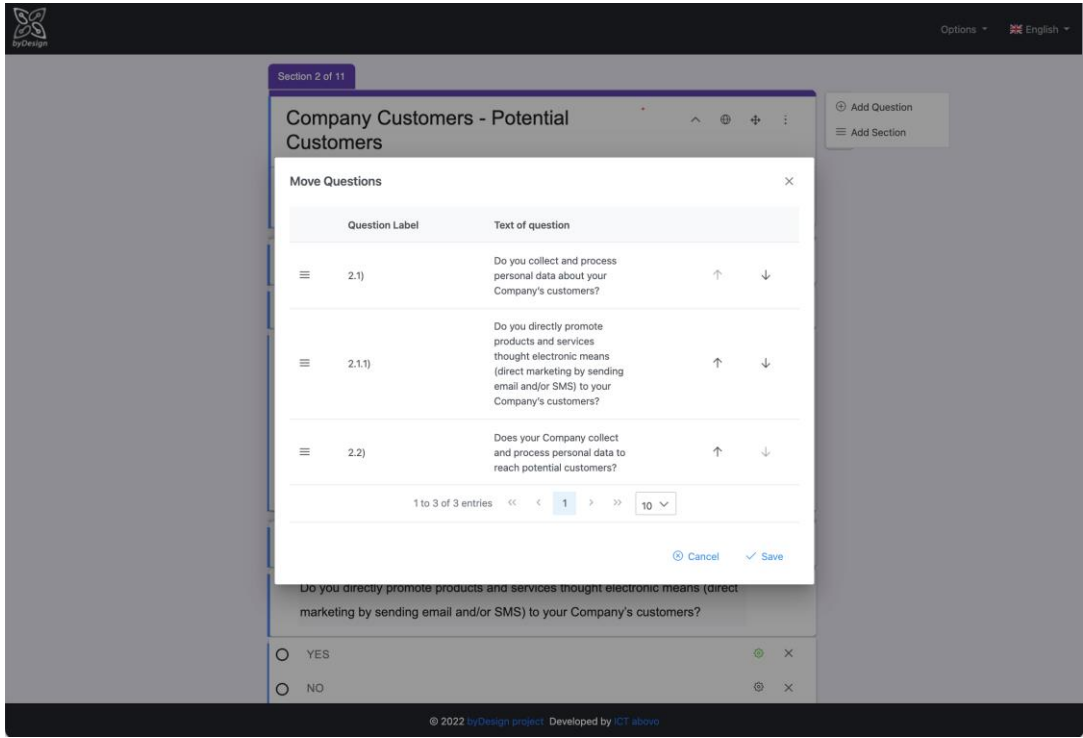


Figure 13 Reorder questions

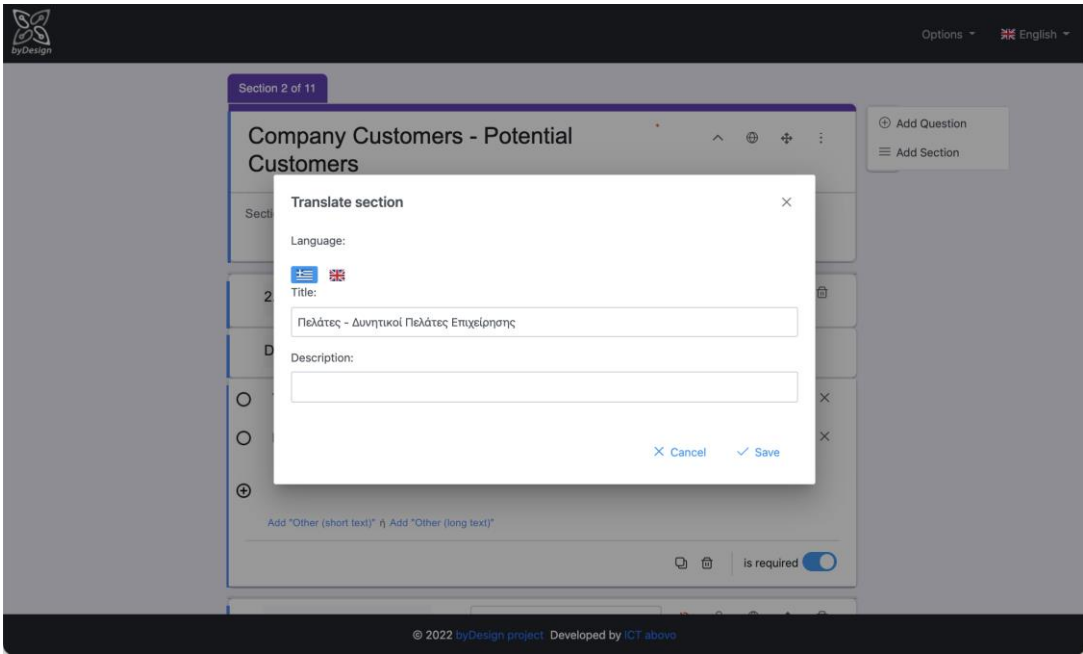


Figure 14 Translating section information

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.

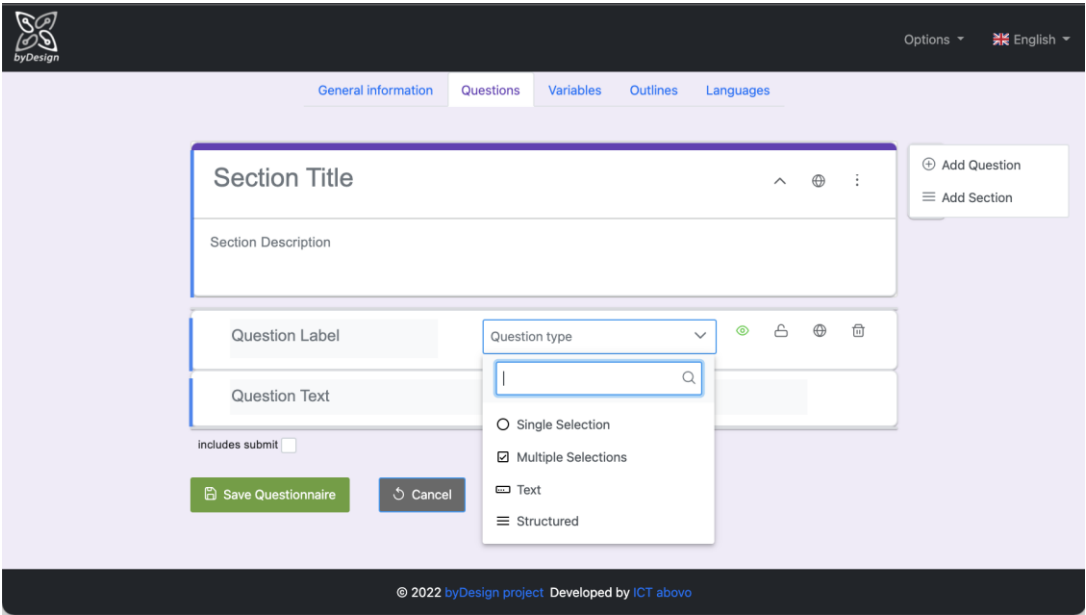


Figure 15 Available question types

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.

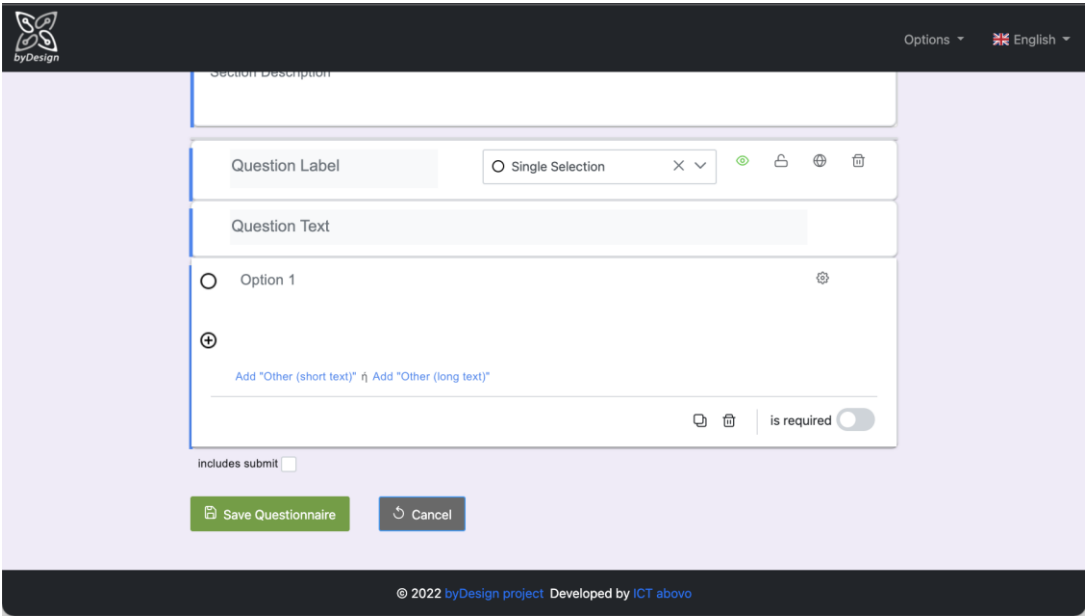



Figure 16 Question actions

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

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

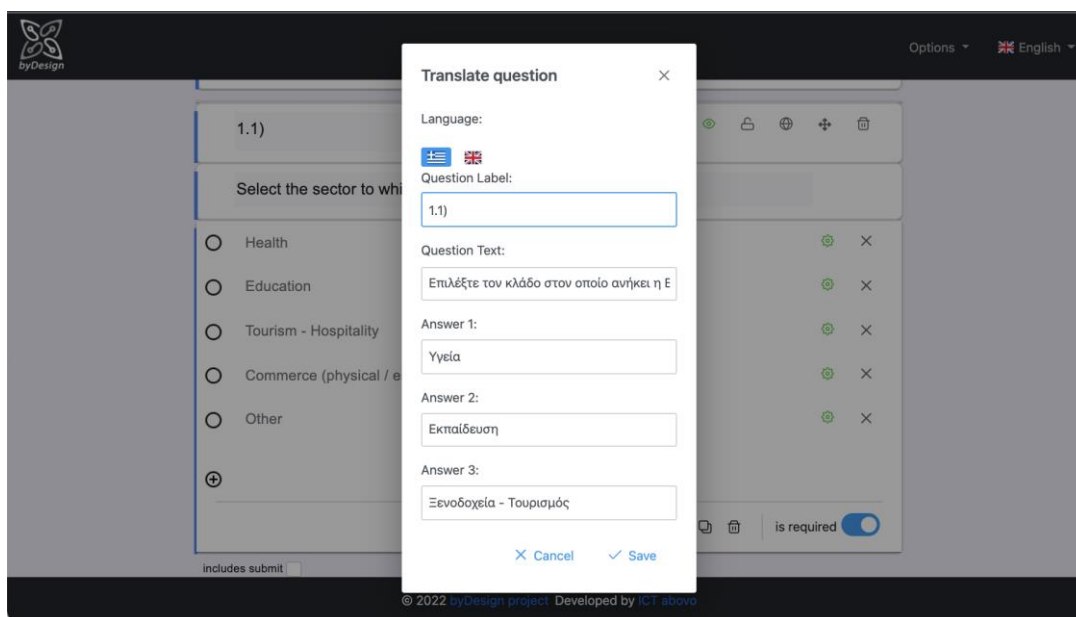



Figure 17 Translating a question and its answers

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 8.2); 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.

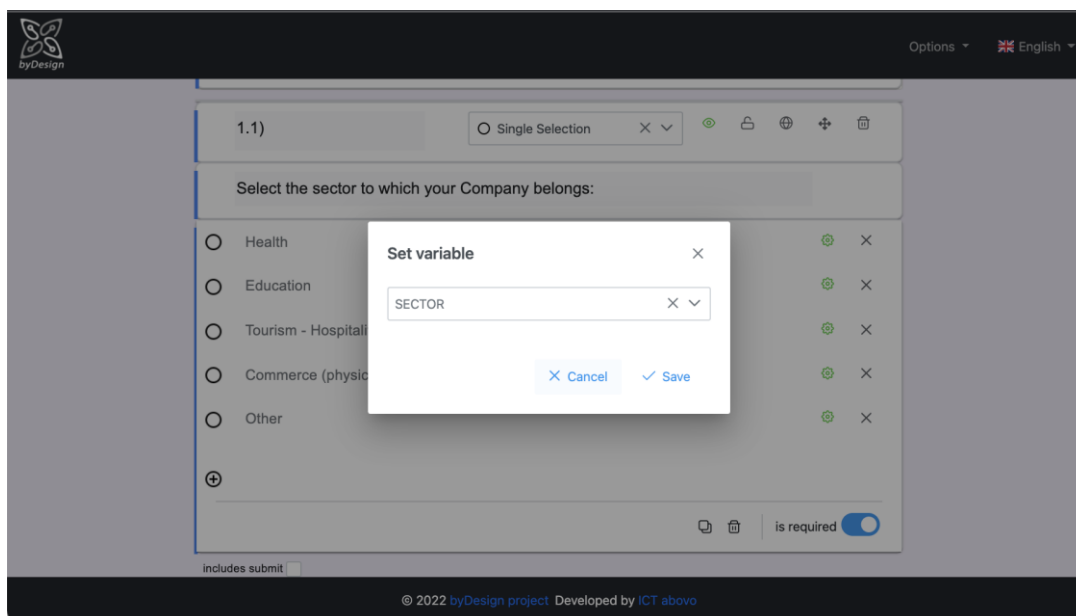





Figure 18 Variable set by an answer

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

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.

The screenshot displays the byDesign questionnaire editor. At the top, there is a header with the byDesign logo and a language dropdown set to 'English'. Below the header, a question is being edited. The question ID is '2.1.1'. The question text is 'Do you directly promote products and services through electronic means (direct marketing by sending email and/or SMS) to your Company's customers?'. The question type is 'Single Selection'. Below the question text, there are two radio button options: 'YES' and 'NO'. The 'YES' option is selected. To the right of each option, there are icons for visibility (an eye icon) and a lock icon. The 'YES' option has a green checkmark next to its visibility icon, indicating it is visible. The 'NO' option has a greyed-out visibility icon, indicating it is invisible. At the bottom of the question editor, there are fields for 'Add Other (short text)' and 'Add Other (long text)', both of which are currently empty. The footer of the editor shows the copyright notice: '© 2022 byDesign project. Developed by ICT above'.

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.



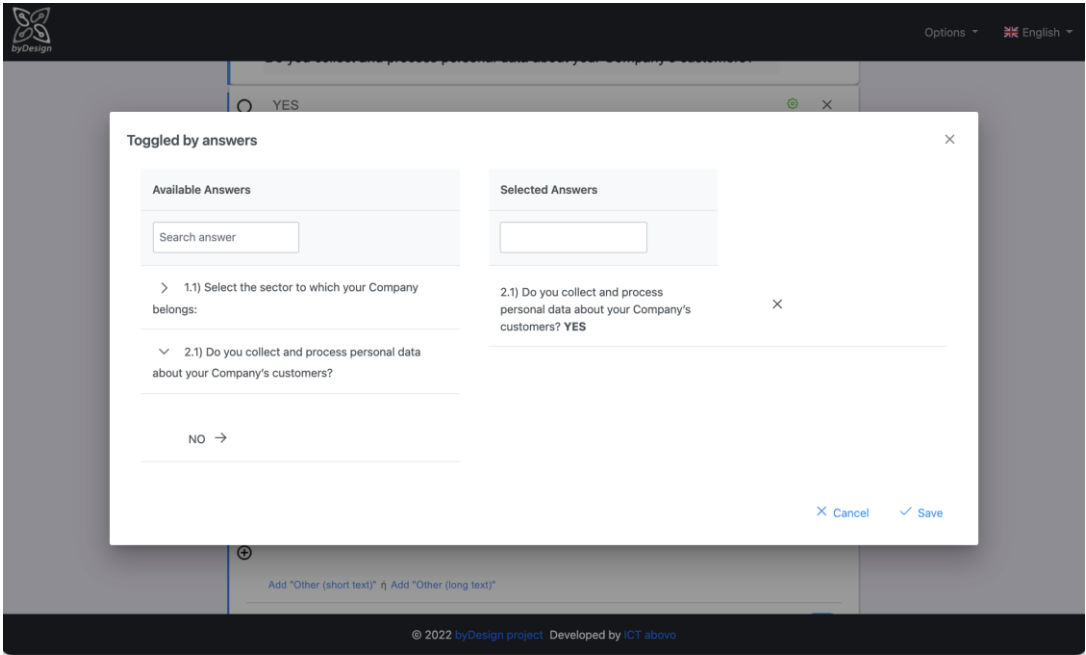




Figure 20 Setting conditional visibility of question based on a provided answer

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.

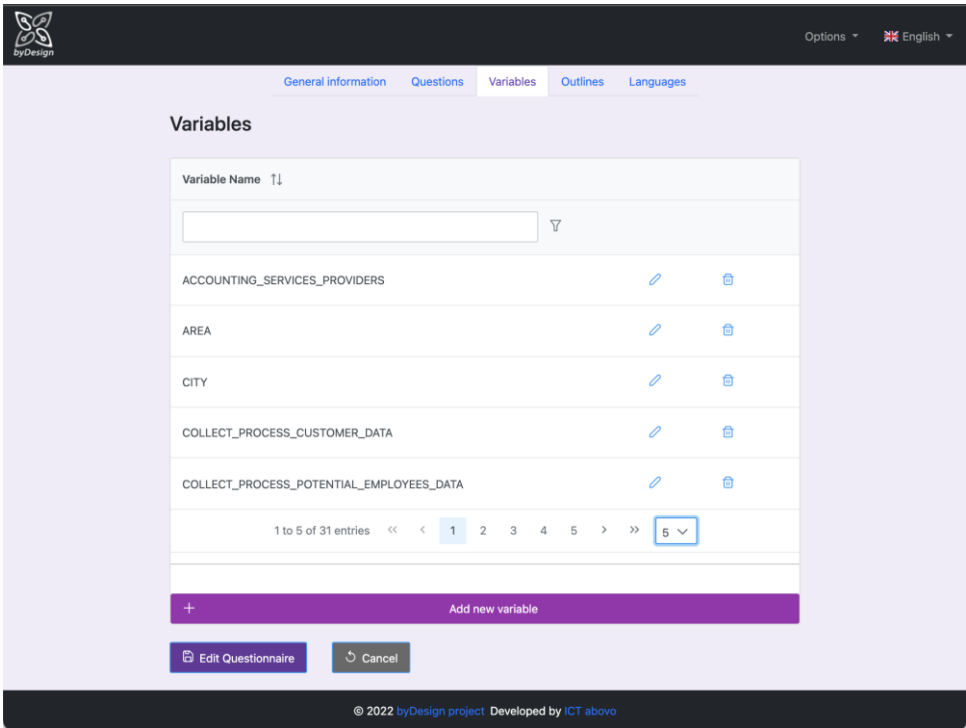



Figure 21 Variables tab

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  icon)

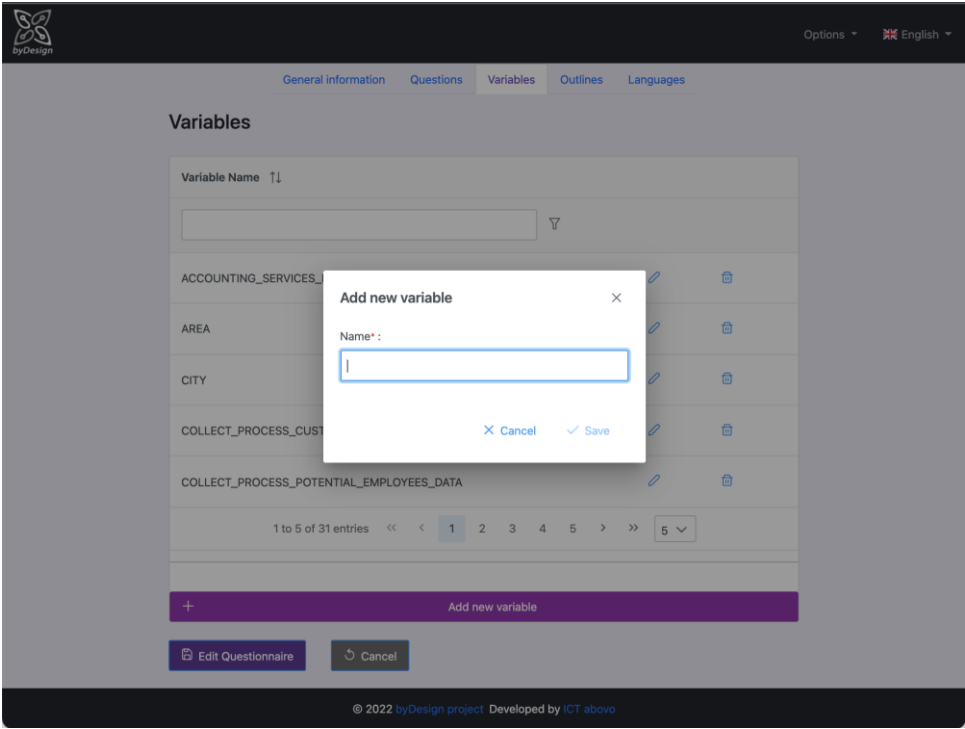


Figure 22 Add new variable

### 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.

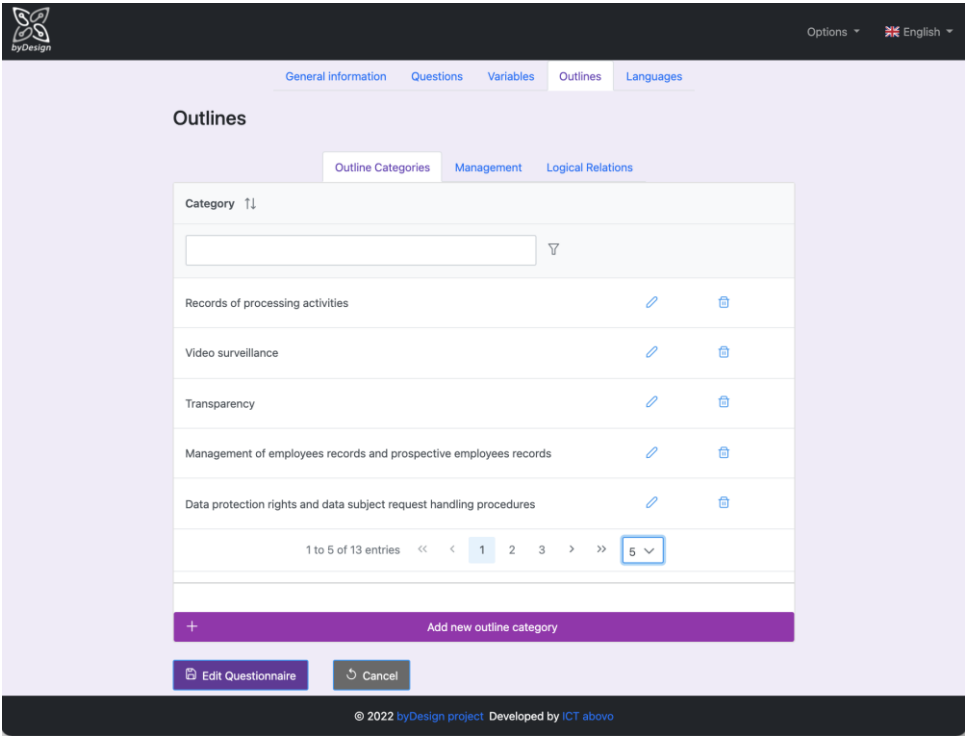




Figure 23 Outlines tab

**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.

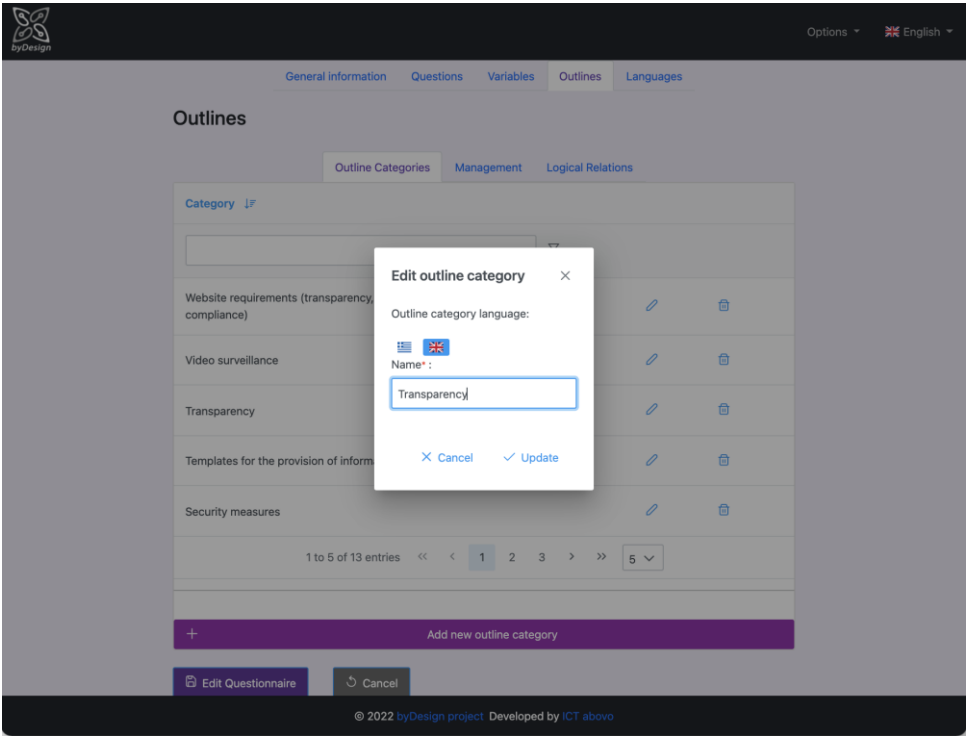




Figure 24 Outline categories management

**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”.

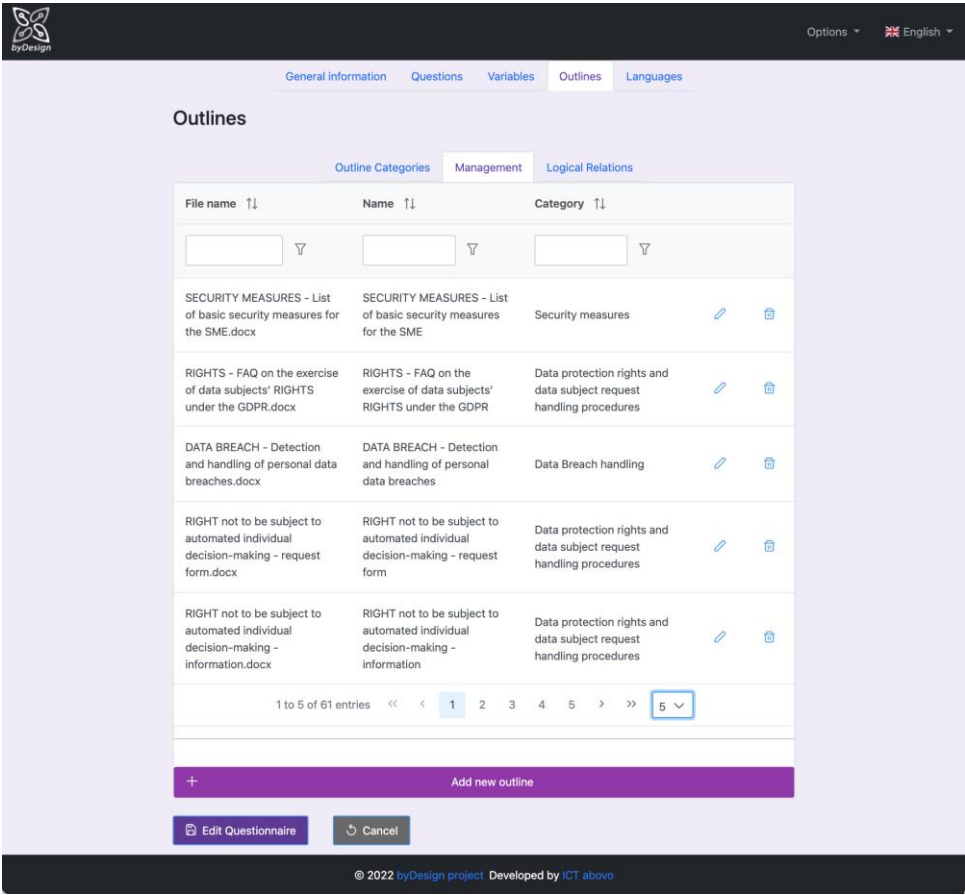




Figure 25 Documents management

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 supported<sup>11</sup>. 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.

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

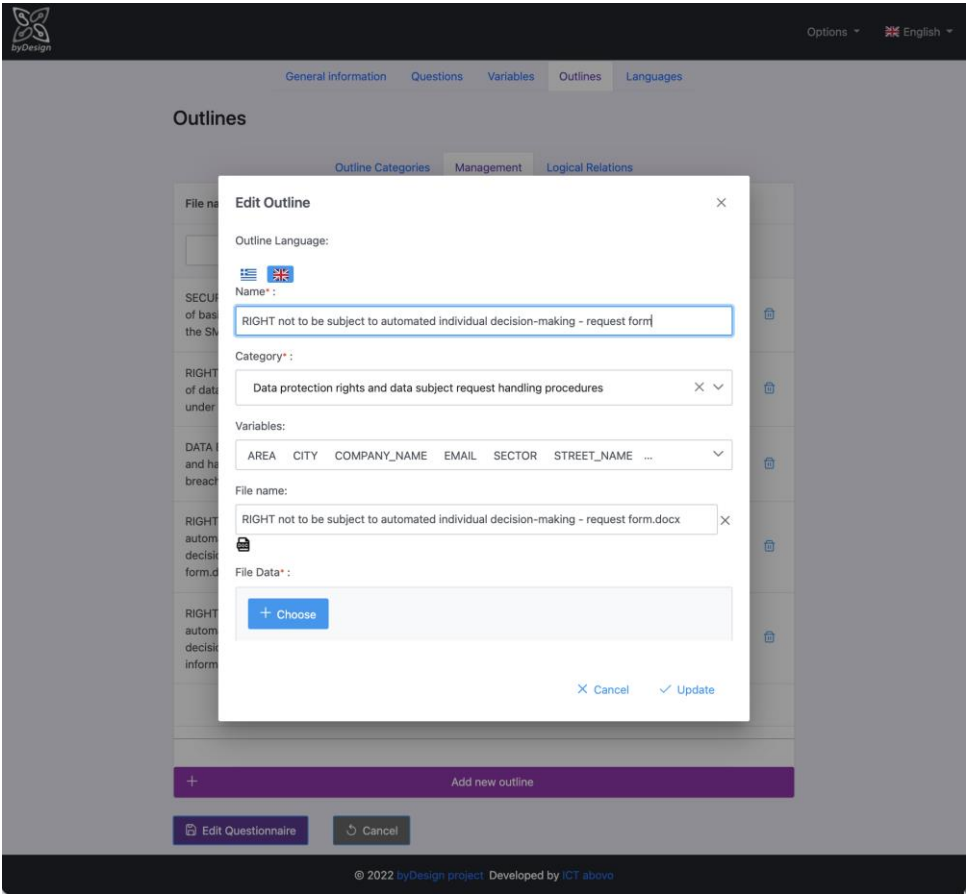


Figure 26 Providing template document information

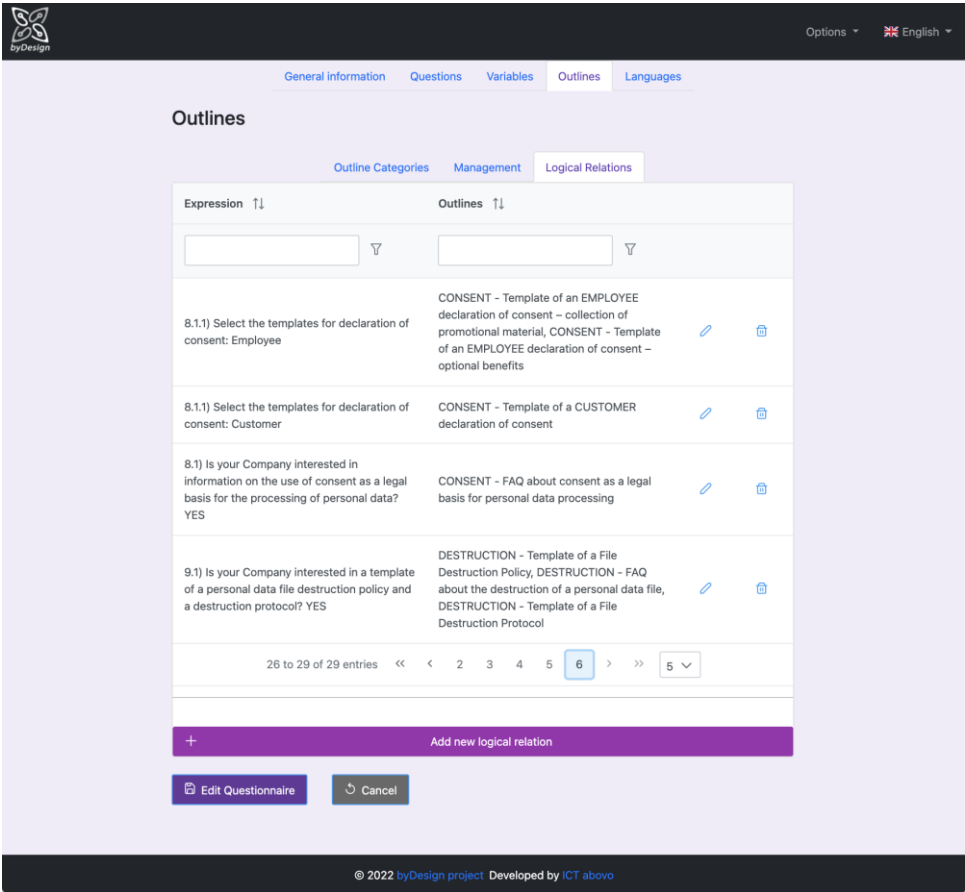




Figure 27 Logical relations tab

**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.

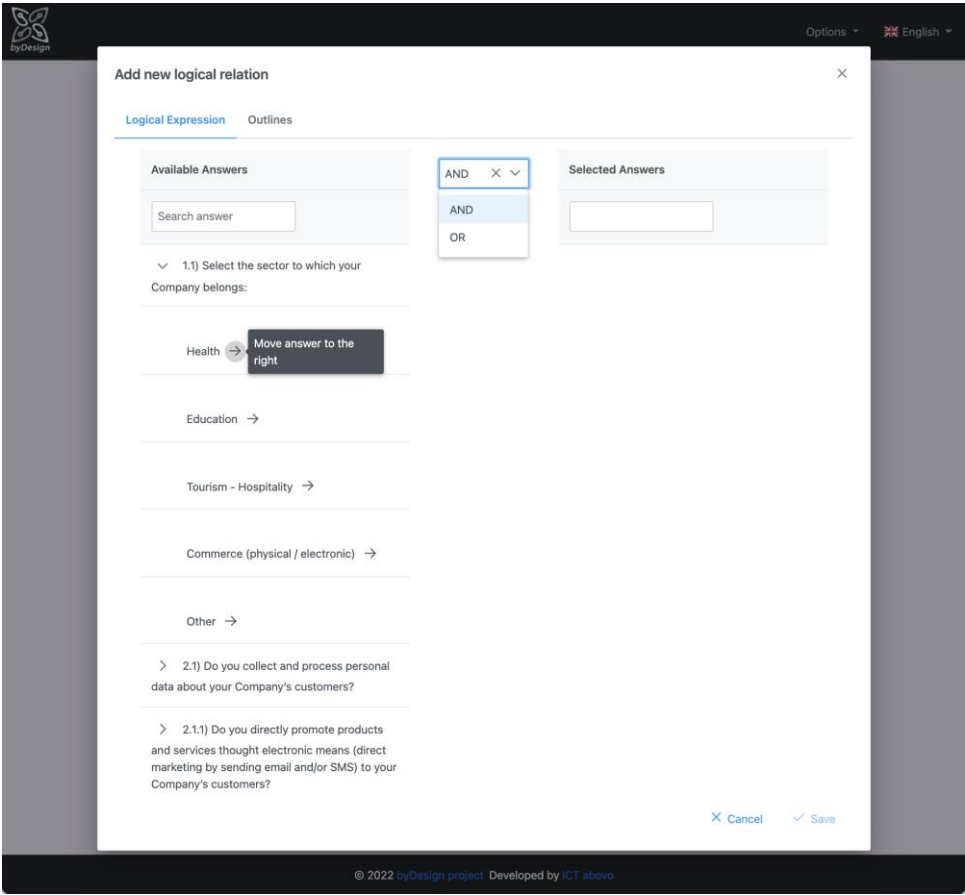



Figure 28 Definition of logical expression

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.



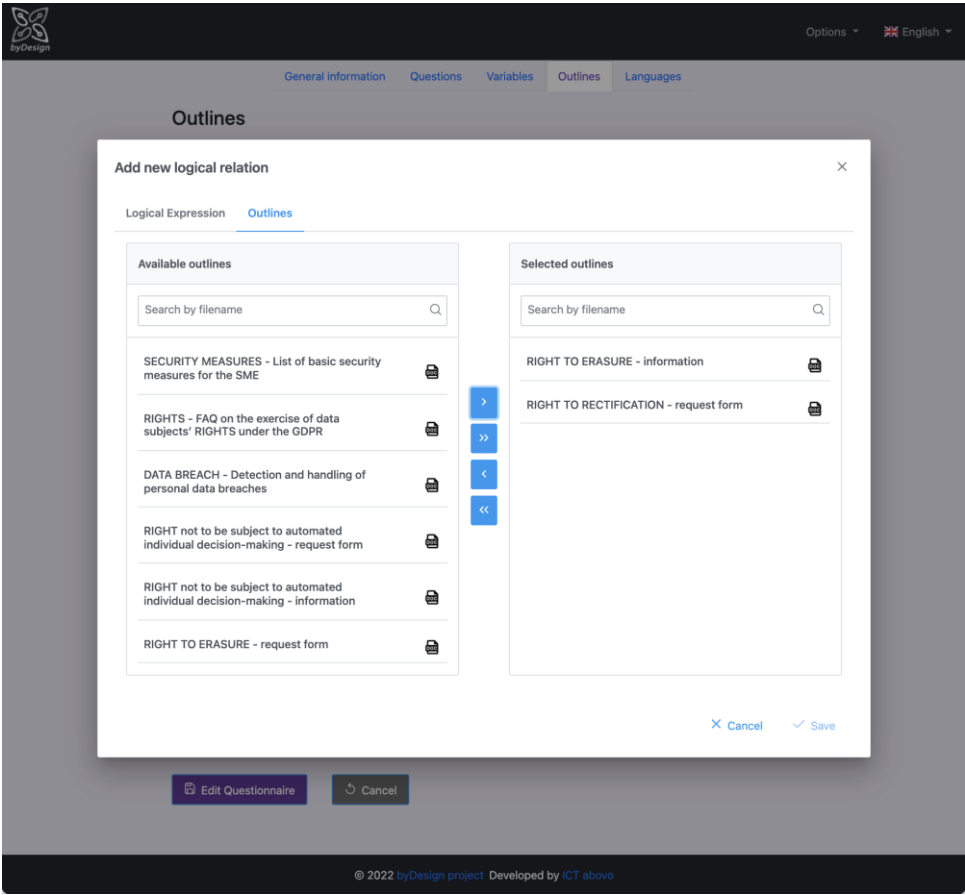


Figure 29 Select templates to be generated if logical expression evaluates true

5.1.6 Languages Tab

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

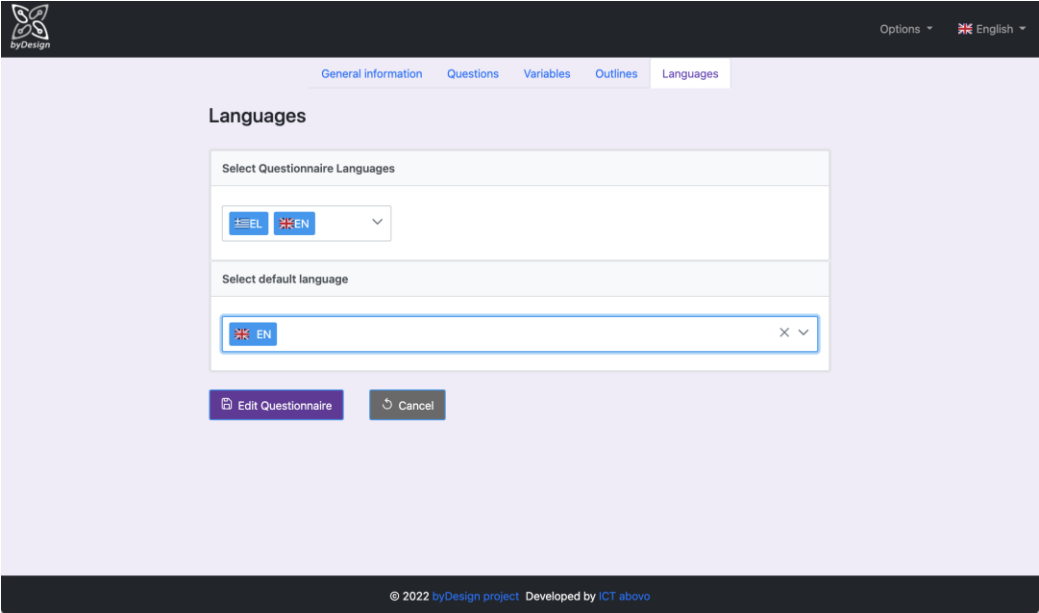


Figure 30 Languages tab

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.

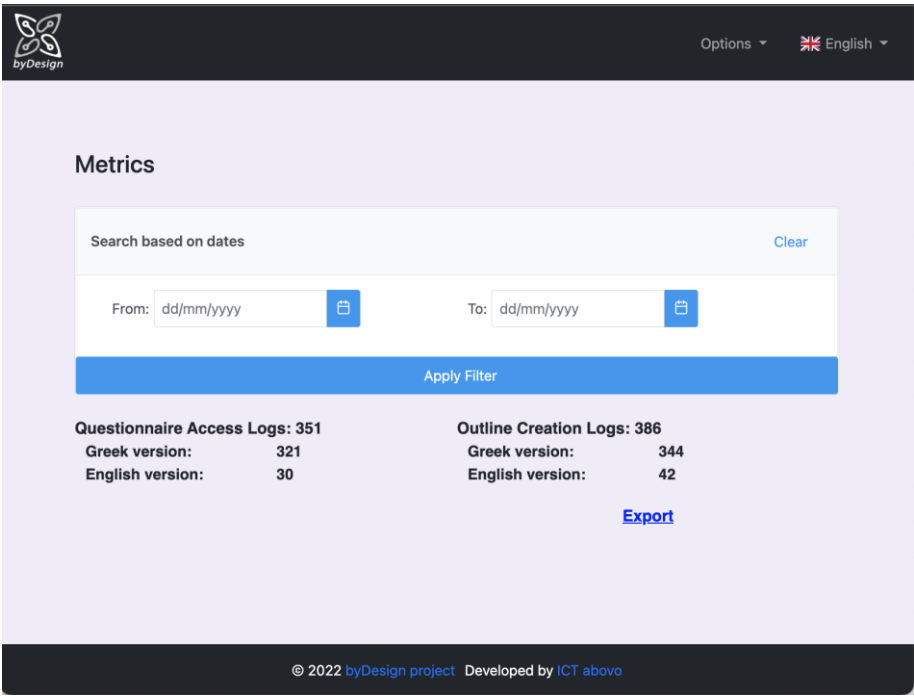



Figure 31 Metrics tab

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 should be noted that the metrics extraction functionality has been incorporated during the pilot phase, in order to address the need for assessing the usage of the SME compliance toolkit.



ID	Zip	creation date	Language	Client	UUID	GUID	GUIDO	DRUID
132	2022-08-23	12:30:39	EL	03c23935				
133	2022-08-23	12:31:29	EN	03c23935				
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-de62-477a-8cd2-fd1308542440				
139	2022-08-26	10:03:53	EL	07173f5d-0357-47dd-b188-6f64acd2cd00				
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-d18a0bcc72c5				
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.

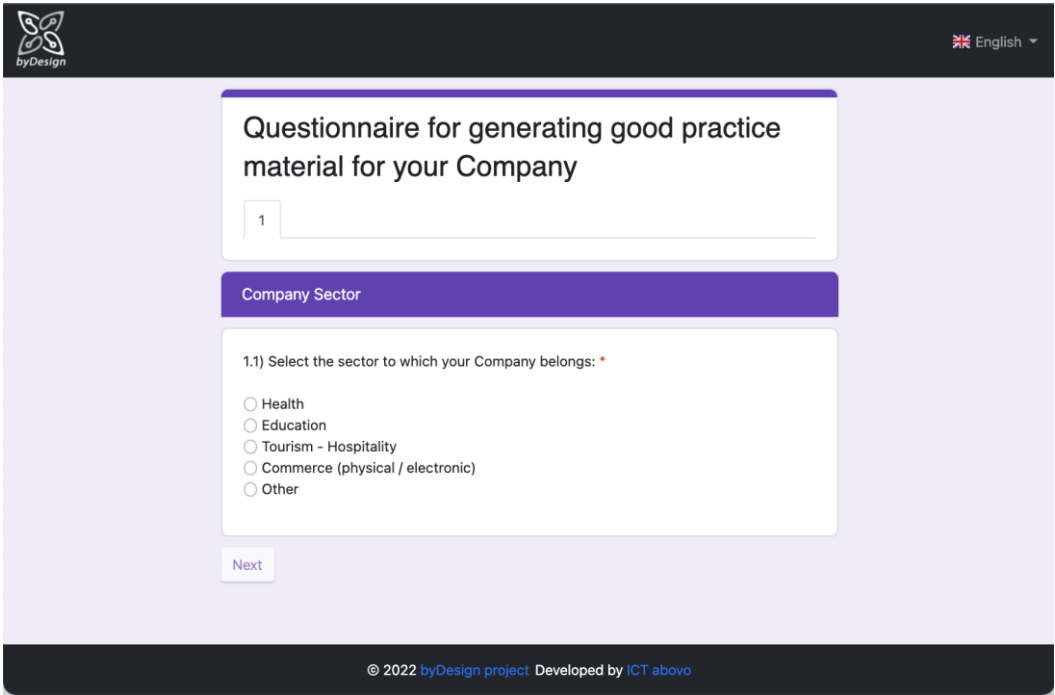


Figure 33 Entering the wizard application

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.

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.

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 titled "Questionnaire for generating good practice material for your Company". At the top left is the "byDesign" logo, and at the top right is a language selector set to "English". Below the title, there are two tabs labeled "1" and "2", with tab "2" being the active one. A purple header bar reads "Company Customers - Potential Customers". The main content area contains two questions, each with "YES" and "NO" radio button options:

- 2.1) Do you collect and process personal data about your Company's customers? \*
- 2.2) Does your Company collect and process personal data to reach potential customers? \*

At the bottom of the questionnaire, there are "Previous" and "Next" buttons. The footer of the page states "© 2022 byDesign project Developed by ICT above".

Figure 35 Visible questions

byDesign

English

### Questionnaire for generating good practice material for your Company

1 2

#### Company Customers - Potential Customers

2.1) Do you collect and process personal data about your Company's customers? \*

☒ YES  
☐ NO

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? \*

☐ YES  
☐ NO

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

☐ YES  
☐ NO

Previous Next

© 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.

byDesign

English

## Questionnaire for generating good practice material for your Company

1 2 3 4 5 6

### Assignment of Data Processing to Contractors-Processors

6.1) Does your Company use contractors/processors (natural or legal persons) for the processing of personal data on your Company's behalf? \*

☒ YES  
☐ NO

6.1.1) Choose which service or services are provided to your Company by the contractor/processor: \*

☒ Accounting services  
☐ Support services for IT systems  
☐ Hosting services, cloud provider  
☐ Product and service promotion services  
☐ Physical security services  
☒ Other

This question must be answered, please add a value


Previous Next

© 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.



English

Questionnaire for generating good practice material for your Company

1234567891011

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

ICT abovo IKE

11.2) Distinctive title

ICT abovo

11.3) Address

Street:

Iridanou

Number:

20

Zip Code:

11528

Area:

Ilisia

City:


Athens

11.4) Telephone number

© 2022 byDesign project Developed by ICT abovo

Figure 38 Company information screen





English

11.3) Address

Street:

Iridanou

Number:

20

Zip Code:

11528

Area:

Ilisia

City:

Athens

11.4) Telephone number

11.5) E-mail address

info@ict-abovo.gr

11.6) If you have designated a Data Protection Officer (DPO), please fill in the contact details with the DPO

Telephone number:

E-mail address:

dpo@ict-abovo.gr

Previous

Submit

Confirmation

Submit questionnaire?

No

Yes

© 2022 byDesign project

Developed by ICT abovo

Figure 39 Submit questionnaire

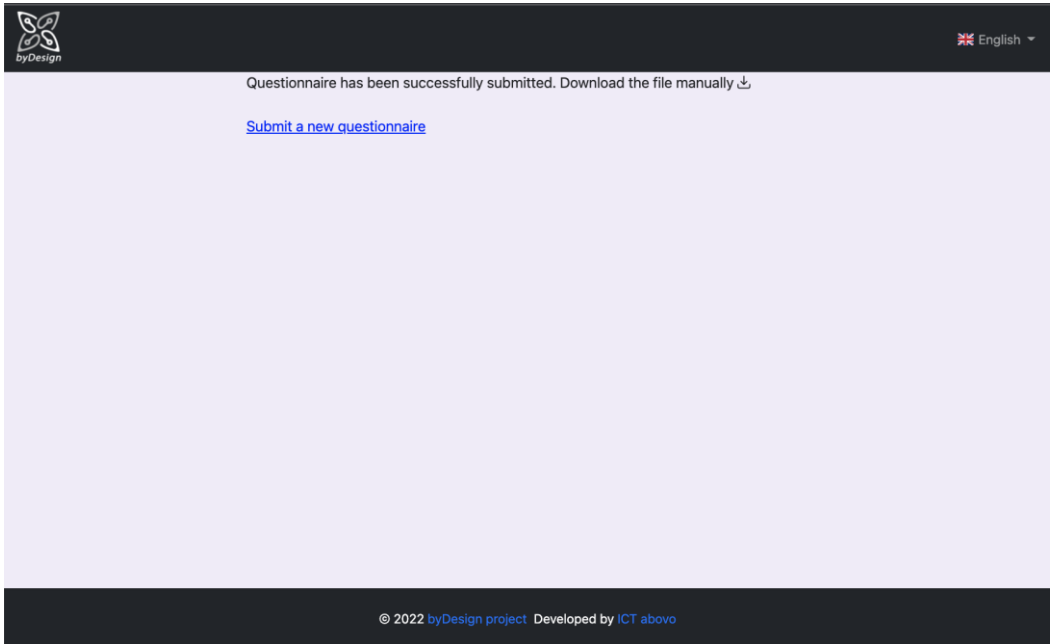


Figure 40 Successful submission of questionnaire

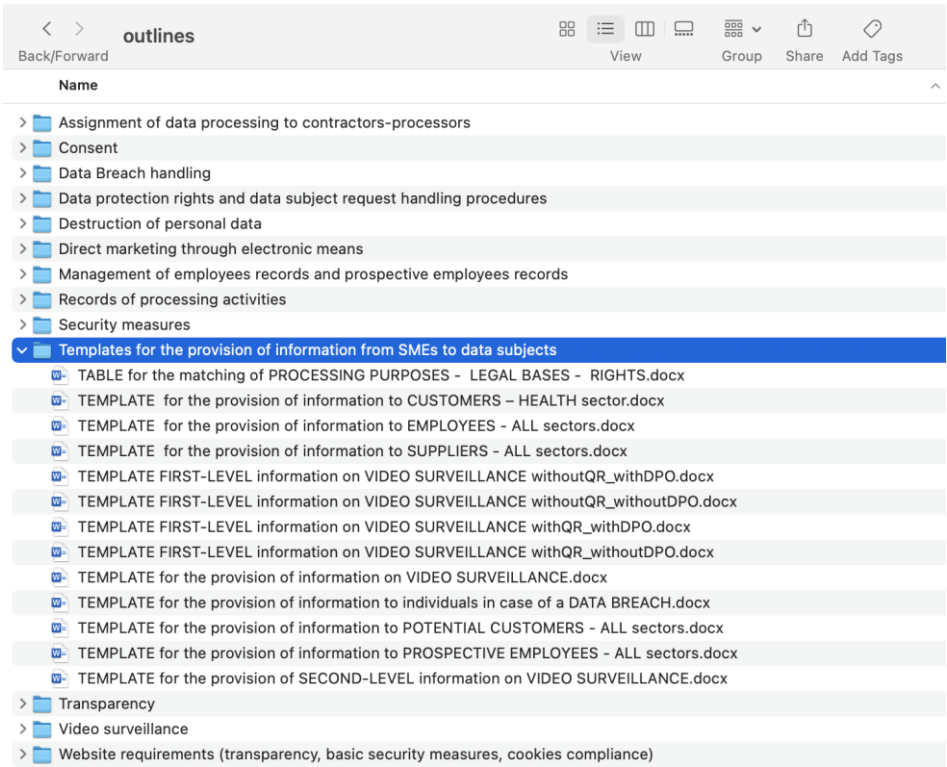


Figure 41 Unzipping the generated good practice material zip

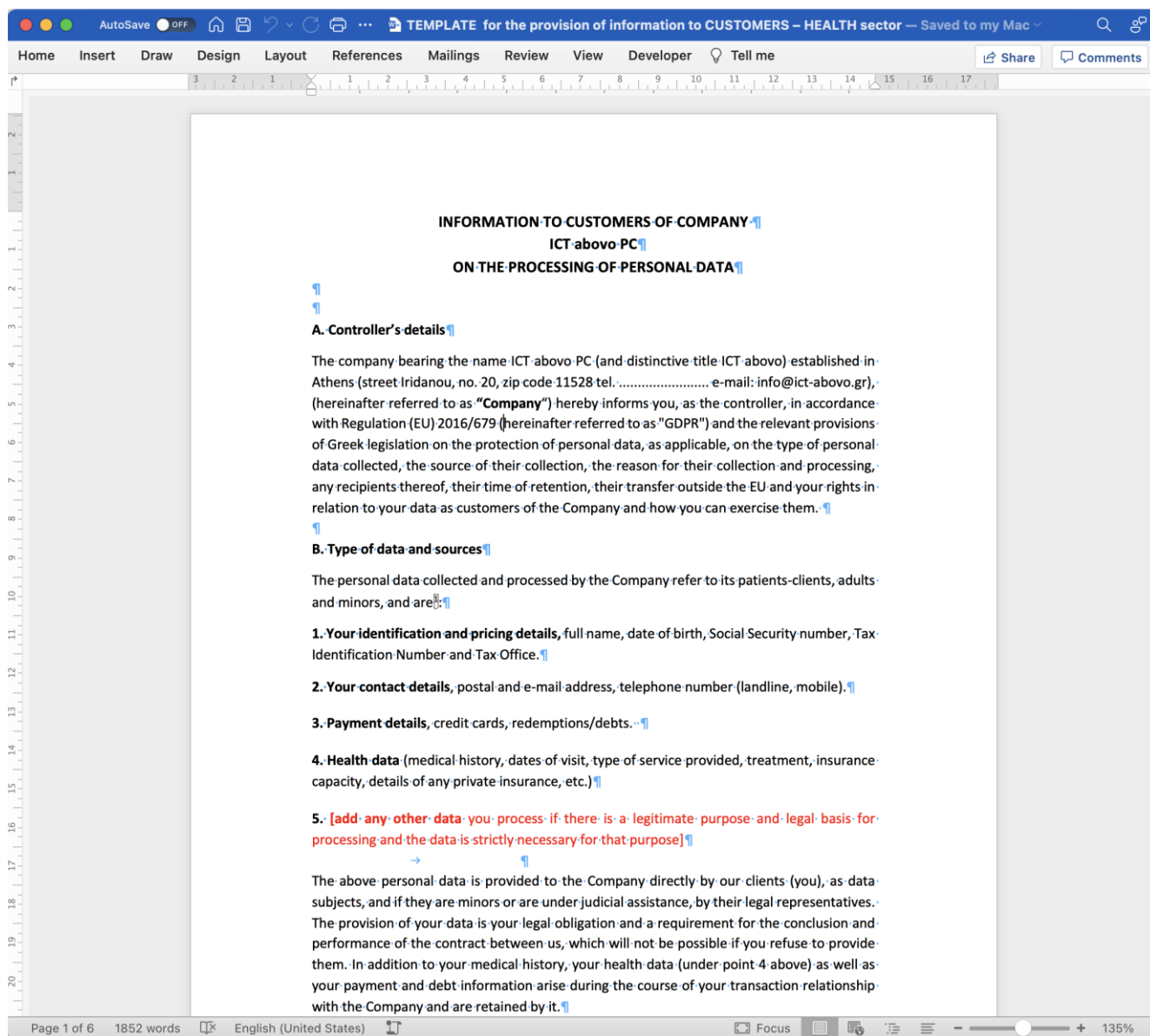


Figure 42 Template placeholders replaced by provided company information

## 6 Tool operation

### 6.1 Pilot phase

Following the development of the self-assistance compliance online toolkit platform and its initial deployment, a pilot phase took place aiming at the assessment and evaluation of the offering in production environment before its general release.

In order for the pilot phase to yield effective evaluation results for the online toolkit, it was deemed necessary to enlist as pilot users a representative set of enterprises. To this end, the primary role was afforded to the SMEs that have participated in the needs' assessment phase, as fulfilled through Task 2.1, due to their significant contribution and input provided for the elicitation of the needs and requirements of the SMEs on GDPR guidance and their prior familiarization with the scope and goals of the byDesign project.

Therefore, two sets of invitations were sent by email on the 13<sup>th</sup> April 2022 to all the participants of the workshops that took place on the 18<sup>th</sup> February 2021 and the 19<sup>th</sup> February 2021 respectively. The invitation attached to each of the above emails invited their recipients to use and assess the online toolkit by the 7<sup>th</sup> May 2022 through a survey conducted by means of an online questionnaire. The invitation contained the following information with the link to the evaluation questionnaire survey:

- the title of the byDesign project,
- the purpose of the self-assistance online toolkit as developed in the context of the byDesign project,
- the reasons for the selection of the pilot users due to their participation in the abovementioned workshops and their familiarization with the scope of the byDesign project,
- the link through which the pilot evaluation survey would become available, with a note explaining that during the pilot phase evaluation, the online toolkit is intended for use only by the recipient of the email,
- the user-friendliness of the online toolkit containing a set of ten (10) simple questions allowing the user to produce guidance documents (in the form of a zip file with separate folders per thematic section) tailored to the characteristics of the SME,
- the existence of a user instructions manual for the online toolkit,
- the existence of a short and very useful evaluation available upon the completion of the online toolkit,
- the significance of pilot users' evaluation and feedback to be considered for the full functionality of the online toolkit and
- the availability for any questions and clarifications via email to the address 'byDesign\_online-toolkit@dpa.gr' or by phone to the number 210-6475655.

The actual content and the exact form of the invitation sent to the pilot users is available in appendix 8.3.

The questionnaire evaluation survey of the online toolkit was available to the pilot users through the link contained in the above invitation sent through email. The functionality of the EUSurvey was used for the formulation and presentation of the questions intended for the evaluation of the toolkit (please see appendix 8.4 for the survey questionnaire template). Nine (9) simple and comprehensive questions were addressed to the pilot users, two (2) of which (with numbers 3 and 9) were 'open type' questions asking the users to express their views on the respective questions and the rest were 'close type' questions asking the users to indicate their opinion through a five-point Likert scale with values ranging from 'strongly disagree' to 'strongly agree'. These nine (9) questions comprising the online toolkit evaluation questionnaire survey are the following:

- “1. Do you evaluate the online Toolkit as friendly and easy to use?”*
- 2. Does the online Toolkit cover the basic processing operations and needs of your business?”*
- 3. Is there an area that has not been adequately covered by the online Toolkit and you need further information on this?”*
- 4. Do you evaluate the questions of the online Toolkit as understandable and useful?”*
- 5. Do you consider that the questions of the online Toolkit cover all the important GDPR compliance issues?”*
- 6. Is the structure of the folders contained in the output (zip file) easy to use?”*
- 7. Is the result produced by the online Toolkit useful in its implementation by your business?”*
- 8. Do you consider that the online Toolkit is useful and effective as a guide for your business to comply with the GDPR?”*
- 9. Have you found any bugs while using the online Toolkit? What would you suggest for its improvement?”*

### 6.2 Production phase

The pilot phase gave the token to the full production phase that lasted until the end of the project. During the full production phase the self-assistance online toolkit was available to all visitors of the HDPa portal in both the Greek and the English language versions.

The launch of the full production phase was published on the 28<sup>th</sup> July 2022 at both language versions of the HDPa’s portal and especially in the “News” and “Press Releases” (cf., Figure 43) sections as well as the footer of the home page (cf., Figure 44). The launch of the full production phase was also published in the byDesign portal (<https://bydesign-project.eu/press-material/>). The content and form of the announcement regarding the launch of the full production phase is available on appendix 8.5.

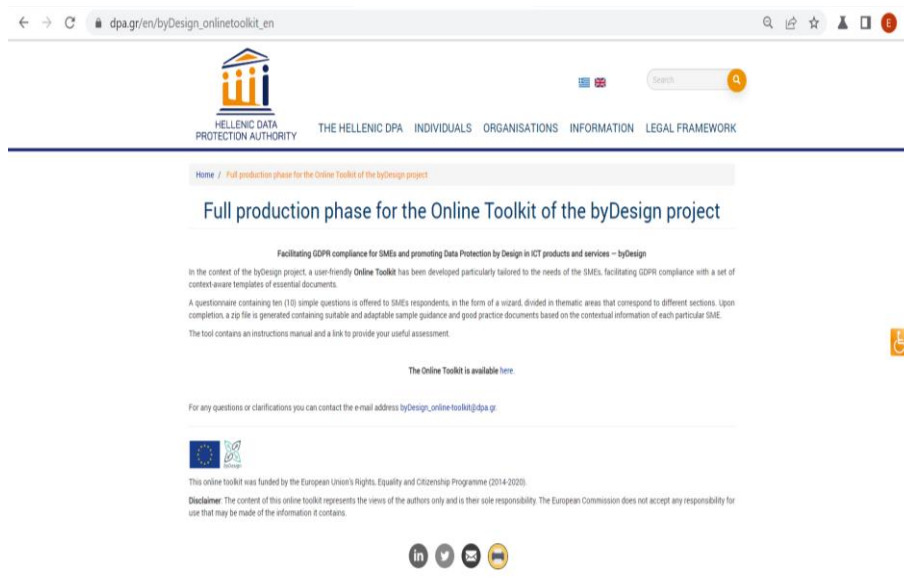


Figure 43 Full production phase of the online toolkit in the HDPa portal

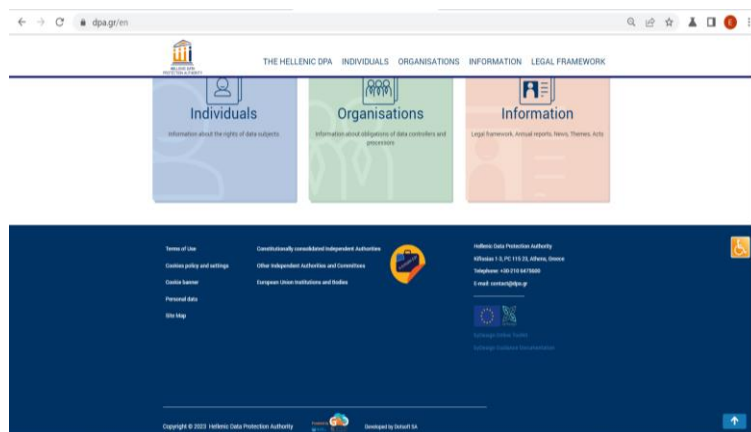


Figure 44 Link to the online toolkit in the footer of the HDPa portal

Users are informed that a comprehensive and user-friendly online toolkit facilitating GDPR compliance is available for use and evaluation. More specifically, upon completion of the online toolkit a link is available allowing the useful evaluation of the toolkit by means of an online survey questionnaire. The exact information provided upon the completion of the toolkit is the following:

*“The questionnaire was completed successfully. The output file contains the good practice material for the assistance of SMEs in complying with the requirements of the GDPR. You can download the file manually.*

*Start a new questionnaire*

*You can make a brief assessment of the online Toolkit by clicking [here](#).”*

The functionality of the EUSurvey was used for the formulation and presentation of the questions intended for the full production phase evaluation of the self-assistance compliance online toolkit (please see appendix 8.3 for the structure of the survey). The survey questionnaire comprises nine (9) simple and comprehensive questions about the online toolkit, two (2) of which (with numbers 3 and 9) are ‘open type’ questions asking the users to express their views on the respective questions and the rest are ‘close type’ questions asking the users to indicate their opinion through a five-point Likert scale with values ranging from ‘strongly disagree’ to ‘strongly agree’. The questions provided to each user upon which the evaluation of the online toolkit in its full production phase is based are the following:

1. Do you evaluate the online Toolkit as friendly and easy to use?
2. Does the online Toolkit cover the basic processing operations and needs of your business?
3. Is there an area that has not been adequately covered by the online Toolkit and you need further information on this?
4. Do you evaluate the questions of the online Toolkit as understandable and useful?
5. Do you consider that the questions of the online Toolkit cover all the important GDPR compliance issues?
6. Is the structure of the folders contained in the output (zip file) easy to use?

*7. Is the result produced by the online Toolkit useful in its implementation by your business?*

*8. Do you consider that the online Toolkit is useful and effective as a guide for your business to comply with the GDPR?*

*9. Have you found any bugs while using the online Toolkit? What would you suggest for its improvement?*

### 6.3 Assessment and evaluation

As afore mentioned, the byDesign self-assistance compliance toolkit has been evaluated by carefully selected end-user participants during the pilot phase, while since the production phase the tool has been accessible by all visitors of the HDPA site; evidently, byDesign end users are very motivated as regards compliance with GDPR and tools that facilitate the compliance process. The feedback in both cases was collected via EU survey (see sections 6.1 and 6.2 as well as appendix 8.4), while equally important has been the discussion that took place during the Virtual Conference, particularly during the demo session; in fact, discussion revealed several issues that were not documented in the EU survey.

Overall, the feedback received by the end users has been very positive, as reflected by their answers in the survey. In more detail, all respondents consider that the tool is user friendly and easy to use, giving a score of 5/5 regarding user friendliness and user experience. Further, the vast majority of respondents considers that the online toolkit covers the basic processing operations and needs of their businesses (score 4,9/5). As regards the questions of the questionnaire themselves, all respondents evaluated them as understandable and useful, giving a score of 5/5 to the related question of the survey, while the vast majority (score 4,9/5) believe that the questions of the online toolkit cover all the important GDPR compliance issues. However, limited concerns have been expressed regarding areas that have not been adequately covered by the online toolkit and for which further information would be necessary; such cases concern, for instance, extra material that should be available related to Data Protection Impact Assessment (DPIA), questions about the IT infrastructure (email accounts, servers, etc.) that could have been included in the wizard, and concerns stemming from the interaction between employees and customers/suppliers, as well as from the new reality of remote work.

Regarding the output of the self-assistance compliance tool, the structure of the folders contained in the zip file has been evaluated as easy to use (score 4,9/5), while the good practice material produced by the online Toolkit achieved the same score regarding its usefulness in its implementation by the respondents' businesses. Finally, the respondents agreed that the online toolkit is useful and effective as a guide for their businesses to comply with the GDPR, with a score of 4,9/5.

Feedback collected during the Virtual Conference has been equally interesting. Potential end users recognized as well the usefulness and effectiveness of the online toolkit. However, some participants expressed their concerns related to the adaptability of the toolkit to other member states legal framework; the toolkit allows for complying with all related aspects of GDPR, while the fact that the system, apart from being multilingual, has been designed as highly customizable and configurable allows for adaptations on the generated material or the questions of the wizard themselves through the administration interface, in case such adaptations are deemed necessary. An important issue emerged regarding access to the tool from abroad, as respondents from abroad were not able to access the tool due to a constraint of the Geoprotection policy in place; respective constraint has been recalled and the problem has been solved. A few participants noted that they faced difficulties in locating the online toolkit URL in the HDPA site and that the toolkit should be highlighted across the HDPA site,

while other participants recommended that the EU Survey link should be made available also in the first page of the online wizard, in case a respondent wishes to evaluate the tool “asynchronously” after having completed the questionnaire wizard and closed the respective browser tab/window. All comments will be taken into consideration where possible.

Finally, Figure provides information on the actual use of the online toolkit up to this date (12/10/2022) for both the Greek and English versions of the wizard and generated good practice material, which is evaluated as satisfactory given the short period since the system has entered its production phase; obviously the majority of respondents have been interested in generating the good practice material in Greek language. Figure offers an updated view on the usage of the online compliance toolkit. It should be noted that no technical problems have been faced, neither in the pilot nor in the production phase of the system.

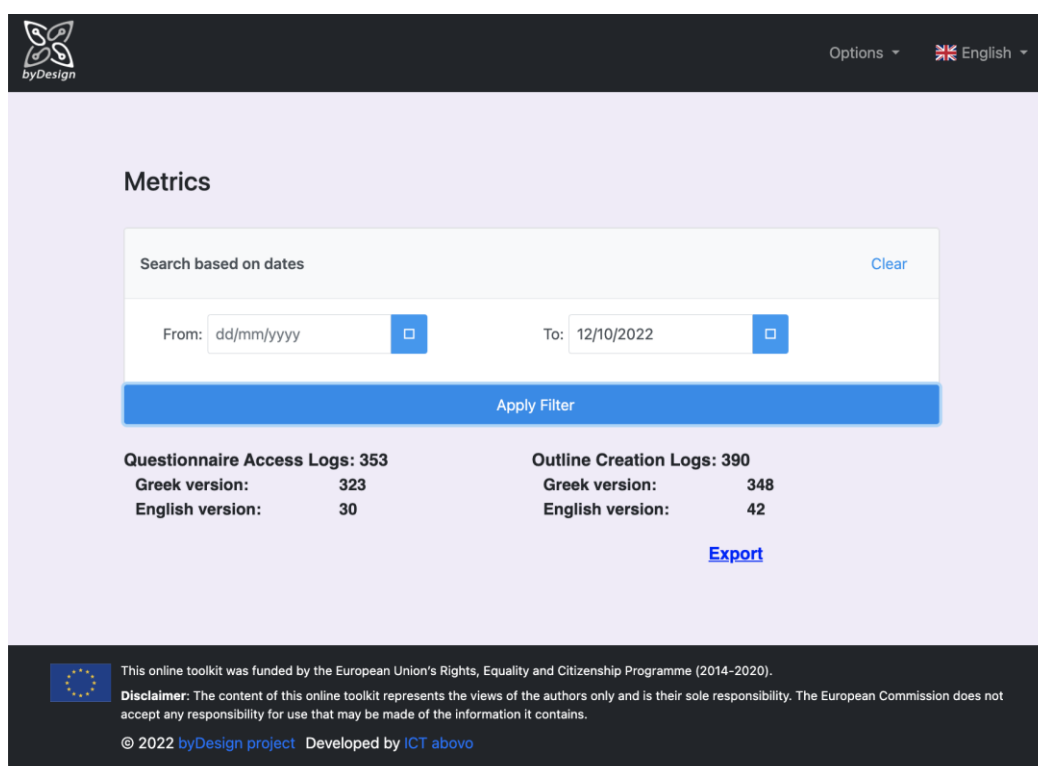


Figure 45 Metrics (12/10/22)



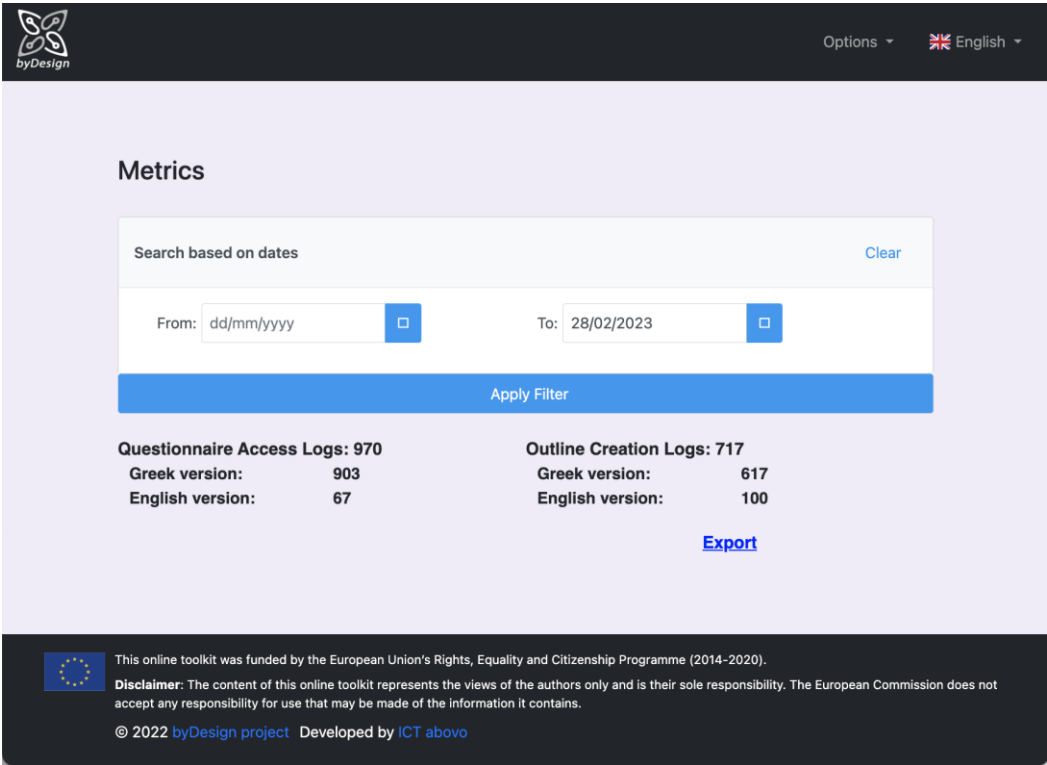


Figure 46 Metrics (28/02/23)

## 7 Conclusions

This document presents the operation of the byDesign online self-assistance compliance toolkit and its final evaluation through the pilot and the full production operation phases. After assessment and enhancements based on the evaluation feedback, the toolkit is available to the public as a web application, implemented using state-of-the-art technologies and receiving great interest from the public in generating the good practice GDPR compliance material. The online toolkit is available [here](#).

The deliverable presents the different stages of tool implementation and operation; namely, requirements elicitation, architecture design, development, deployment, pilot operation phase and full production operation phase. Furthermore, it 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.

More specifically, the sample good practice material stemming from the wizard focuses on three major data protection areas: 1) Lawfulness and transparency, 2) Accountability and 3) Business activities entailing data processing. Moreover, 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. 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.

During these two phases, a comprehensive and thorough evaluation of the online toolkit was conducted. Firstly, the evaluation feedback in both cases was collected via the suitable and easy-to-use EU survey functionality, comprising a set of simple and substantive questions (cf., section 8.4 for the content of the EU survey questionnaire). Secondly, the evaluation was performed during the pilot phase by a carefully selected set of knowledgeable pilot users from the SMEs that have participated in the need's assessment phase (cf., section 6.1 for the process followed at the pilot phase) while at the full production phase the online toolkit has been accessible by all visitors of the HDPA site (cf., section 6.2). Thirdly, the dedicated invitation sent to the pilot users as well as the press release for the launch of the full production phase contained sufficient information explaining the purpose and characteristics of the online toolkit as well as the importance of its evaluation (cf., sections 8.3 and 8.5 respectively).

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. 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 (cf., section 6.3).

No technical problems have been faced, neither in the pilot nor in the production phase of the system. 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). Two metrics extractions with a four month interval showed that the usage of the online toolkit tripled (cf., section 6.3) indicating that the operation of the toolkit continues after the end of the project.

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.

## 8 Appendix

### 8.1 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 name<sup>12</sup> [reply to question 13)a), if provided] (and distinctive title<sup>13</sup> [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 are<sup>14</sup>:

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

---

<sup>12</sup> Complete full legal name or first and last name in case of sole proprietorship.

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

<sup>14</sup> 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 services<sup>15</sup> 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 secrecy<sup>16</sup>.

#### 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 means<sup>17</sup>

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.....<sup>18</sup>,]

<sup>15</sup> Where appropriate specialisation (e.g. based on Business Activity Code Number).

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

<sup>17</sup> If you advertise by electronic means to customers, keep what is applicable.

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

- **[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]**<sup>19</sup>

### **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]** <sup>20</sup>

---

<sup>19</sup> 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.)

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

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]**.

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 <sup>21</sup>	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.

<sup>21</sup> 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 Officer<sup>22</sup> of our Company, at: Tel. **[reply to question 13)f)i, if provided]**, Email **[reply to question 13)f)ii, if provided]**

## 8.2 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|.....<sup>23</sup>} (and distinctive title \${TITLE|.....<sup>24</sup>}) 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 are<sup>25</sup>:

- 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.

---

<sup>22</sup>If there is a DPO.

<sup>23</sup> Complete full legal name or first and last name in case of sole proprietorship.

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

<sup>25</sup> 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 services<sup>26</sup> 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 secrecy<sup>27</sup>.

#### **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 means<sup>28</sup>**

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**

---

<sup>26</sup> Where appropriate specialisation (e.g. based on Business Activity Code Number).

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

<sup>28</sup> 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.....<sup>29</sup>,
  - `{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

---

<sup>29</sup> 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]<sup>30</sup>

**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]<sup>31</sup>

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

---

<sup>30</sup> 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.)

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

– 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			

Promotion of services to customers by electronic means <sup>32</sup>	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.

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 Officer<sup>33</sup> of our company, at: Tel. \${DPO\_PHONE\_NUMBER} | .....} e-mail: \${DPO\_EMAIL} | .....

### 8.3 Template invitation to the pilot evaluation

## Invitation to Pilot Evaluation of the Online Toolkit in the Context of the byDesign Project

**‘Facilitating GDPR compliance for SMEs and promoting Data Protection by Design in ICT products and services – byDesign’**

We would like to inform you that in the context of the byDesign project, an easy-to-use and adaptable **online tool (Online Toolkit)** was developed with the aim of facilitating the compliance of small and medium-sized enterprises (SMEs) with the General Data Protection Regulation (GDPR).

Following your participation in the 18/02/2021 workshop, which was organized in the context of the above project and contributed significantly to the definition of the requirements of SMEs, as well as your familiarization with the scope of the project, **we invite you to proceed to a short evaluation of the Online Toolkit until 07/05/2022.**

Please Select **Online Toolkit Evaluation** (until 07/05/2022)

<sup>32</sup> As long as you advertise by electronic means to customers.

<sup>33</sup> If there is a DPO.

**(Note:** During the pilot phase evaluation, the Online Toolkit is intended for use only by the recipient of this email

The Online Toolkit consists of a user friendly guide of ten (10) simple questions with the aim of tailoring the produced material (zip file with separate folders per thematic section) to the needs of each SME. It contains a user instructions manual and upon completion a link is provided for its short but extremely useful evaluation.

**Your evaluation is extremely important** and your feedback will be considered for the full functionality of the Online Toolkit upon completion of the byDesign project.

For any question or clarification you can contact the e-mail address [byDesign\\_online-toolkit@dpa.gr](mailto:byDesign_online-toolkit@dpa.gr) or phone 210-6475655.

### 8.4 Template toolkit evaluation questionnaire survey

#### Assessment of the compliance online Toolkit for the SMEs

We invite you to provide us your comments on the Online Toolkit which was developed by the Hellenic Data Protection Authority and ICT ABOVO in order to facilitate GDPR compliance for small and medium enterprises (SMEs), within the scope of the project Facilitating GDPR Compliance for SMEs and Promoting Data Protection By Design in ICT Products and Services (<https://bydesign-project.eu/>).

##### 1. Do you evaluate the online Toolkit as friendly and easy to use?

- ☐ Strongly disagree
- ☐ Disagree
- ☐ Neutral (neither agree nor disagree)
- ☐ Agree
- ☐ Strongly agree

##### 2. Does the online Toolkit cover the basic processing operations and needs of your business?

- ☐ Strongly disagree
- ☐ Disagree
- ☐ Neutral (neither agree nor disagree)
- ☐ Agree
- ☐ Strongly agree

##### 3. Is there an area that has not been adequately covered by the online Toolkit and you need further information on this?

Please explain

##### 4. Do you evaluate the questions of the online Toolkit as understandable and useful?

## D2.4 — Final SME compliance toolkit report

- ☐ Strongly disagree
- ☐ Disagree
- ☐ Neutral (neither agree nor disagree)
- ☐ Agree
- ☐ Strongly agree

### 5. Do you consider that the questions of the online Toolkit cover all the important GDPR compliance issues?

- ☐ Strongly disagree
- ☐ Disagree
- ☐ Neutral (neither agree nor disagree)
- ☐ Agree
- ☐ Strongly agree

### 6. Is the structure of the folders contained in the output (zip file) easy to use?

- ☐ Strongly disagree
- ☐ Disagree
- ☐ Neutral (neither agree nor disagree)
- ☐ Agree
- ☐ Strongly agree

### 7. Is the result produced by the online Toolkit useful in its implementation by your business?

- ☐ Strongly disagree
- ☐ Disagree
- ☐ Neutral (neither agree nor disagree)
- ☐ Agree
- ☐ Strongly agree

### 8. Do you consider that the online Toolkit is useful and effective as a guide for your business to comply with the GDPR?

- ☐ Strongly disagree
- ☐ Disagree
- ☐ Neutral (neither agree nor disagree)
- ☐ Agree
- ☐ Strongly agree

### 9. Have you found any bugs while using the online Toolkit? What would you suggest for its improvement?

Please explain





## 8.5 Template for launch of full production phase

# Full production phase for the Online Toolkit of the byDesign project

**Category** Press release

**Date** 28/07/2022

**Protocol number** Gen/Ext/1932

### **Facilitating GDPR compliance for SMEs and promoting Data Protection by Design in ICT products and services — byDesign**

In the context of the byDesign project, a user-friendly **Online Toolkit** has been developed particularly tailored to the needs of the SMEs, facilitating GDPR compliance with a set of context-aware templates of essential documents.

A questionnaire containing ten (10) simple questions is offered to SMEs respondents, in the form of a wizard, divided in thematic areas that correspond to different sections. Upon completion, a zip file is generated containing suitable and adaptable sample guidance and good practice documents based on the contextual information of each particular SME.

The tool contains an instructions manual and a link to provide your useful assessment.

The **Online Toolkit** is available [here](#).

For any questions or clarifications you can contact the e-mail address [byDesign\\_online-toolkit@dpa.gr](mailto:byDesign_online-toolkit@dpa.gr)