



# STATISTICAL CONFIDENTIALITY POLICY

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Version no	Date	Details
1.0	24.04.2018	<ul style="list-style-type: none"><li>• Initial Edition</li></ul>
1.1	19.12.2019	<ul style="list-style-type: none"><li>• The National Documentation Center (EKT) becomes an independent organisation and is newly appointed as a National Authority and Agency (Government Gazette (FEK) 4671/19.12.2019 B')</li></ul>

The National Documentation Centre (EKT) as a National Authority and an Agency of the Hellenic Statistical System (ELSS), in the framework of ensuring and continuously improving the quality of its statistics, aims, inter alia, to safeguard the trust of statistical units that provide their confidential data for the production of statistics. On the basis of the above confidence, EKT protects in all the stages of statistical production, the secrecy of personal data collected from the statistical units.

The present policy includes the rules and principles implemented by EKT for the observance of statistical confidentiality. These rules and principles have been developed on the basis of the national and European legislation in force, and the existing European and international principles on statistical confidentiality.

## 1. Definitions

‘Statistical confidentiality’ means the protection of confidential data related to single statistical units which are obtained directly for statistical purposes or indirectly from administrative or other sources and implying the prohibition of use for non-statistical purposes of the data obtained and of their unlawful disclosure.

‘Statistical unit’ means the basic unit of observation, i.e. natural person, household, economic operator and other enterprises, to which the data refer.

‘Secret data’ means the data which allow the direct identification of statistical units concerned.

‘Confidential data’ means the data which only allow the indirect identification of statistical units concerned. In order to define whether a statistical unit is identifiable or not, all relevant means are taken into consideration which can be reasonably used by third parties to identify the statistical units. Confidential data also include anonymised survey microdata, in the event that these allow the indirect identification of statistical units concerned.

‘Personal data’ means any information relating to an identified or identifiable natural person (‘data subject’); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.

‘Use for statistical purposes’ means the use for the development and production of statistics.

‘Direct identification’ means the identification of a statistical unit from its name or address, or from a publicly accessible identification number.

‘Indirect identification’ means the identification of a statistical unit by any other means than by way of direct identification.

## 2. Legislative framework

The Statistical Confidentiality Policy of EKT is based on and takes into account:

- the provisions on statistical confidentiality of the Greek statistical law (Law 3832/2010, as amended and in force), as further specified in the Regulation on the Statistical Obligations of the Agencies of the Hellenic Statistical System (ELSS), and the Regulation on the Operation and Administration of ELSTAT, as in force.
- the provisions on statistical confidentiality of Regulation (EC) No 223/2009 of the European Parliament and of the European Council, as amended by Regulation No 2015/759, as well as the provisions of the European Commission Regulation (EU) No 557/2013, as regards access to confidential data for scientific purposes.
- the European Statistics Code of Practice (principle 5 and its indicators), the UN Fundamental Principles of Official Statistics (principle 6) and the Declaration of the International Statistical Institute (ISI) on Professional Ethics (professional value 1 and ethical principle 6).
- the Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (General Data Protection Regulation - GDPR).
- the Law 4624/2019 (Government Gazette A'137 / 29.08.2019) "Hellenic Data Protection Authority, measures implementing Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 for the protection of natural persons with regard to the processing of personal data and transposition (into national law) Directive (EU) 2016/680 of the European Parliament and of the Council of 27 April 2016 and other provisions".

### 3. Rules and Principles of the Statistical Confidentiality Policy

1. Personal data of statistical units collected, in paper or electronic form, by EKT for statistical processing are strictly confidential and used exclusively for statistical purposes. They are not published or disseminated to third parties.
2. EKT personnel handling primary data at the level of statistical unit, in paper or electronic form, takes the necessary measures, as appropriate, with full responsibility, so that these data are not accessible to third parties. When the above data are no longer necessary to EKT for the production of statistics, they are destroyed or deleted, as appropriate, by its staff, with full responsibility, so as to make impossible the recovery of all or part of the data by any third party using any reasonable means. Both during and after the performance of their official duties, in perpetuity, EKT's staff do not publish, or otherwise disseminate, the results of the statistical survey/work to which these data refer and which may lead, directly or indirectly, to the disclosure of personal data.
3. EKT takes appropriate regulatory, administrative, technical and organisational measures to ensure the physical and logical protection of secret and confidential data. It also implements measures to safeguard the security and integrity of statistical databases.
4. Statistics compiled by EKT, on the basis of the collected primary data, are published in such a way so as to prevent the direct or indirect identification of the surveyed statistical units which provided the data or to which the data relate.
5. In the context of the co-operation with the Hellenic Statistical Authority and the relevant Memoranda of Co-operation, EKT provides the Hellenic Statistical Authority with secret and/or confidential data concerning RDI statistics for the compilation of National Accounts or other statistics for which they are necessary.
6. Statistical data of any statistical survey/work of EKT, before its completion and publication of its results, are treated as confidential and are not disseminated to third parties. The only exception is the Hellenic Statistical Authority, to which the results of European statistics are presented within a reasonable period of time prior to their submission to Eurostat.
7. In order to make further use of the statistics produced for research purposes, EKT seeks to increase the accessibility of researchers to anonymized survey microdata. The granting researchers access to confidential data for scientific purposes takes place under the terms and conditions that are mentioned in the Greek Statistical Law and further specified in the

Regulation on the Statistical Obligations of the ELSS Agencies, as in force, without, in any case, compromising the high level of protection of these data.<sup>1</sup>.

8. EKT personnel are informed on their obligations with regard to the observance of statistical confidentiality in the various stages of statistical production, from the collection of primary data to the dissemination of statistics, as well as to the envisaged sanctions in case of breach of statistical confidentiality, as these are mentioned in the Greek Statistical Law and further specified in the Regulation on the Statistical Obligations of the ELSS Agencies, as in force.
9. EKT personnel are bound by a Statement of Confidentiality to comply with statistical confidentiality at the various stages of the production of statistics, from the collection of primary data to the dissemination of statistics, as well as for the penalties provided in the event of breach of statistics privacy.
10. The individual collaborators and the statistical correspondents used for the collection of primary data in EKT surveys are selected by ELSTAT through the relevant registry which it maintains, and are, therefore, committed to the observance of the statistical confidentiality of the data to which they have access or handle and sign a Statistical Privacy Statement.
11. In all the questionnaires of the statistical surveys conducted by EKT, the confidentiality of the data collected and their use exclusively for statistical purposes is clearly indicated, with reference to the relevant regulations.
12. EKT fully complies with the General Data protection Regulation (GDPR) 679/2016 and the relevant national legislation as in force. To exercise their rights, users can contact EKT at the following email address [privacy@ekt.gr](mailto:privacy@ekt.gr).

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<sup>1</sup> Survey micro-data are currently sent and made available through the European Statistical Authority (Eurostat).





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