1. INTRODUCTION

FORTH-ICS, and in particular the laboratories of “Information Systems – Center for Cultural Informatics” and “Human-Computer Interaction”, have developed an online system (hereafter “Methinks” or “System”) where users may read comments, post comments, and respond to comments posted by other users.

In this context, the protection of your information and confidentiality and security is a priority for us. We pay specific attention to the protection, confidentiality and security of your data.

Methinks provides this Privacy Policy to inform you of our policies and procedures regarding the collection and processing of personal data. We collect and use the personal data of our users to the extent necessary to have a functional Methinks System as well as to offer our content and services. We process the data you provide in full respect and compliance with the EU 679/2016 General Data Protection Regulation (hereafter GDPR).

By using Methinks you understand, agree and accept the terms of the Methinks Privacy Policy. You further understand that Methinks is a public platform, and that we, or other users, may search for, see, use, or re-post any of your User Content posted through the System.

Methinks has been developed by the Foundation for Research and Technology – Hellas (FORTH) who is the Data Controller:

Foundation for Research and Technology – Hellas (FORTH)
100 Nikolaou Plastira str.,
Vassilika Vouton, Heraklion, Crete
GR-70013, Greece

Postal address:
P.O. Box 1385,
Heraklion, Crete
GR-71110, Greece

2. THE DATA WE COLLECT ABOUT YOU

In compliance with GDPR, we understand as Personal data any information that relates to an identified or identifiable living individual. Personal data that has been rendered anonymous in such a way that the individual is not or no longer identifiable is no longer considered personal data.
Before providing us with information, we recommend that you read this document describing our privacy protection policy.

We collect and process different kinds of personal data about you as follows:

- **Registration data.** To register in the system, you must provide a nickname (i.e., username), a password, and a valid e-mail address.
- **Profile data.** Optionally, registered users may additionally submit non-identifying profile data that includes year of birth, nationality, gender and traveller type (business, couple, solo, etc.).

Note that collection as above happens only for users registering in Methinks; no such data is collected for users who interact with the System without having registered or logged in. Registration itself is optional and is not necessary for comment reading, comment searching, and navigation in the web page, but is required for providing the services associated to comment authoring and reactions.

In any case, we do not collect or process any data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, genetic data, biometric data, data concerning health or data concerning a natural person’s sex life or sexual orientation. Nor do we collect any information about criminal convictions and offences.

Additionally, during your visit, we may collect (for all types of users):

- **Usage Data,** which includes information about how you use the System.
- **Technical Data,** which includes internet protocol (IP) address, unique Cookie ID, Device ID, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access the System.

### 3. WHY AND HOW WE COLLECT YOUR DATA

**Registration and profile data.** The personal data collected during registration are provided through direct interaction while creating an account. These data are required to enable your access and use of Methinks (publish of content such as posts and reviews) and manage your registration and account. The collection and processing of registration data helps associate comments with their authors. These data are also used for statistical purposes and analytics.

**Analytics.** We collect data provided when you write a comment. We use analytics over the comment and profile data to help users (including web site owners) identify and read comments, and to provide better comment searching and classification facilities through Methinks. The results of analytics are present through the Methinks dashboard to hotel site owners, and also through the Methinks drawer to comment readers.

**Collection of technical data and usage data.** As you use our System, we may collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies, server logs and other similar technologies. Usage
information is automatically reported by your browser each time you access a web page. When you use our System, our servers may record certain log file information. These server logs may collect Technical Data such as your IP address, browser type, and information about the number of clicks and how you interact with the System.

**Cookies.** A cookie is a small text file that a website saves on your computer or mobile device when you visit the site. It enables the website to remember your actions and preferences (such as login or display preferences) over a period of time, so you don’t have to keep re-entering them whenever you come back to the site or browse from one page to another. We may also use cookies to collect Technical Data. Cookies help you log in faster and enhance your navigation through the Methinks platform. Enabling cookies is not strictly necessary for Methinks to work but it will provide you with a better browsing experience. You can delete or block these cookies, but if you do that some features may not work as intended.

**4. LEGAL GROUNDS OF DATA PROCESSING AND DATA PROTECTION PRINCIPLES**

Methinks collects and uses your data only on the legal grounds specified by GDPR and other applicable laws. Specifically, we collect and use your data on the basis of your informed and freely given consent.

**You have the right to withdraw consent at any time** where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before this withdrawal. To withdraw your consent you have to contact privacy@methinks.com.

Methinks will also collect and process personal data if the processing is necessary:

- to fulfill a legal obligation to which we are subject
- to protect the vital interests either of you or of another natural person
- for the purposes of a legitimate interest of us or of a third party and only if said interest is not overridden by your interests, fundamental rights and freedoms.

We collect and process your personal data only for the purposes described in this Policy. We collect and process only data that is adequate, relevant and limited to what is necessary in relation to the purposes of offering the services of Methinks. We take all reasonable steps to ensure that the personal data we hold is accurate and up to date.

**Storage of data.** We will keep your personal data only for the period necessary for the purposes for which that data is processed. Data will be erased or blocked as soon as the purpose of storage ceases to exist, with the exemption of the case that we keep them in fulfillment of a legal obligation or in case that this data is necessary for the establishment, exercise or defense of legal claims.

We do not share your data with the website hosting Methinks, or with any other third party. Methinks is ad-free and will not share any personal data with third parties. Persons who may receive data for supporting Methinks to meet the purposes and functions of the platform are not regarded as third parties. These persons are bound with Methinks with a legal act setting out their confidentiality and other obligations.
Data may be disclosed or transmitted to third parties, if this is mandatory for fulfilling legal obligations, subject to the safeguards provided for by relevant legislation.

5. USERS’ RIGHTS

Subject to the conditions set by the GDPR users have the following rights:

- the right to be informed about any processing of their personal data, its purpose, as well as the disclosure/transmission to third parties and their identity (right of information and access) and have access to them;
- the right to request the correction of incorrect, incomplete or inaccurate data;
- the right to request the erasure of the data, when it is no longer needed or if processing it is unlawful;
- the right to object to the processing of your personal data for marketing purposes or on grounds relating to your particular situation;
- the right to request the restriction of the processing of your personal data in specific cases;
- the right to receive your personal data in a machine-readable format and send it to another controller (‘data portability’);
- the right to request that decisions based on automated processing concerning you or significantly affecting you and based on your personal data are made by natural persons, not only by computers.

To exercise these rights, users may contact privacy@methinks.com.

You may be asked to provide information to confirm your identity (such as, clicking a verification link, entering a username or password) in order to exercise your rights.

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). We will respond to your requests within one month. Occasionally, due to the complication of cases, it may take us longer than a month. In this case, we will notify you and keep you updated.

We acknowledge also that all users have the right to file a complaint to the national Data Protection Authority (Hellenic Data Protection Authority – www.dpa.gr).

6. SECURITY

The personal data we collect within the context of the operation of the Methinks platform are strictly confidential and are kept only for the needs of the operation of Methinks and its purposes, including communication with you. Access to these data is provided to very few officers of the organisation, who have been bound to keeping confidentiality.

Methinks uses common standard practices to preserve the integrity and security of all information collected through the System. To protect your privacy and security, we take reasonable steps (such as requesting a unique password) to verify your identity before granting you access to your account. You are responsible for maintaining the secrecy of
your unique password and account information, and for controlling access to your email communications from the System.

7. INTERNATIONAL DATA TRANSFERS

Methinks shall not transmit the personal data collected hereunder to third countries (non-EU/EEA countries) or international organizations. Trans-border transmission shall in any case be subject to the terms, conditions and warranties set out in Articles 44 to 49 of the GDPR.

8. GENERAL

Contact. If you have any questions about this Privacy Policy, please email us at privacy@methinks.com.

Changes to Privacy Policy. Methinks may, in its sole discretion, modify or update this Privacy Policy from time to time, and so you should review this document periodically. When we change the policy, we will update the ‘last modified’ date at the top of this document. Your continued use of the System following the posting of any changes to this policy means you accept such changes.