



Data Management
procedures, security
and application of
the General Data
Protection
Regulation

ITS perspective





Nea Odos

Kentriki Odos

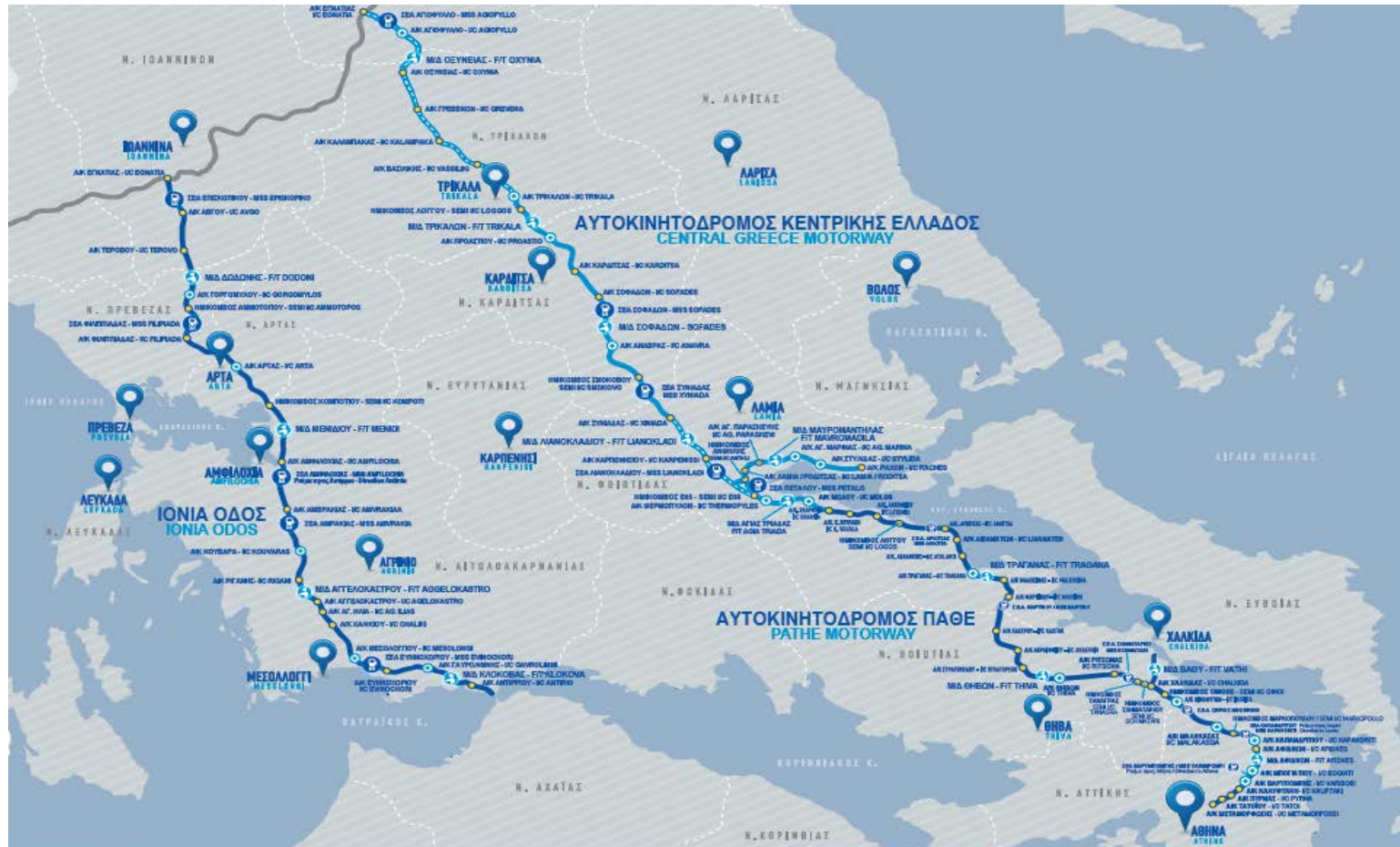
Who we are...

Nea Odos and Kentriki Odos are the Concession Companies which have undertaken the “Ionia Odos” and “Aftokinitodromos Kentrikis Ellados S.A. - E65” projects of a total budget of about 2.5 billion €.

We create contemporary and safe motorways that contribute to the national economic development, safeguard environmental protection and upgrade the quality of life of society at large.

Our primary objective is to provide safe and faster transportation as well as high quality services.

Who we are...



ΙΟΝΙΑ ΟΔΟΣ | ΑΥΤΟΚΙΝΗΤΟΔΡΟΜΟΣ ΠΑΘΕ | ΑΥΤΟΚΙΝΗΤΟΔΡΟΜΟΣ ΚΕΝΤΡΙΚΗΣ ΕΛΛΑΔΟΣ
IONIA ODOS | PATHE MOTORWAY | CENTRAL GREECE MOTORWAY

<p>ΥΠΟΜΝΗΜΑ LEGEND</p>	<p>Μετωπικός Σταθμός Διοδίων Frontal Toll Station</p>	<p>Ανιστόπεδος Κόμβος με πλευρικό Σταθμό Διοδίων Interchange with lateral Toll Station</p>	<p>Ανιστόπεδος Κόμβος Interchange</p>	<p>Αναβαλλόμενα τμήματα Postponed sections</p>	<p>Σταθμός Εξυπηρέτησης Αυτοκινητιστών Motolist Service Station</p>
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Who we are...

NeaOdos

KentrikiOdos

504 km total length
66 interchanges
12 twin tunnels
More than 65 bridges

5 traffic control centers
11 frontal & 16 lateral toll stations
43 plazas
256 lanes

GDPR

Does it apply to a motorway...



What constitutes personal data?

Any information relating to an identifiable person who can be directly or indirectly identified in particular by reference to an identifier.

Is large scale systematic monitoring being performed?

More than **1.500** CCTV cameras are in operation for the purpose of protecting human life and infrastructure, **5.100** emergency and **6.900** customer support monthly phone calls are recorded

Is large scale processing of sensitive p.d. being performed?

~ **70.000** ETC subscribers ~ **95.000** tags

GDPR

NeaOdos

KentrikiOdos

In a nutshell for ITS...

Right to Access

Data subjects have the right to obtain from the data controller confirmation as to whether or not personal data concerning them is being processed, where and for what purpose. Further, the controller shall provide a copy of the personal data, free of charge, in an electronic format.

Right to be Forgotten

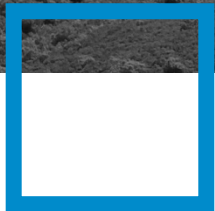
The right to be forgotten entitles the data subject to have the data controller erase his/her personal data, cease further dissemination of the data, and potentially have third parties halt processing of the data

Privacy by Design

The controller shall implement appropriate technical and organizational measures, in an effective way in order to meet the requirements of this Regulation and protect the rights of data subjects'. Article 23 calls for controllers to hold and process only the data absolutely necessary for the completion of its duties (data minimization), as well as limiting the access to personal data to those needing to act out the processing

Breach Notification

Must be done within 72 hours of first having become aware of the breach



What kind of data



Video
Voice
Name
ID Card or Passport or Driving
License

Address
Phone number
Tax registration number
License plate
Location (toll station)

Minimize risk...



Keep acquisition of personal data to the absolute necessary

Delete any personal data when no longer needed

Reduce risks by limiting access

Fully audit access

Video...



1500 CCTV cameras operate on all:

- administrative & service buildings
- lanes
- tunnels
- open road sections

24x7 recording





Video



Previous status

- no central administration
- disperse systems on site
- minimum security measures (common passwords)
- no audit

Current status

- all cameras integrated in a single administration system
- fine grain operator permissions
- permissions clearly identified and auditable at any moment
- cameras are password protected
- network traffic is encrypted

Audio...



Public telephone communications

- emergency phone number (5.100 calls per month)
- customer care services (6.900 calls per month)
- TETRA (technical & response teams, traffic police, fire departments)

4DIGIT EMERGENCY PHONE NUMBER

1075 24 hour availability

Customer Care Services
www.neaodos.gr, www.fastpass.gr
customercare@neaodos.gr

A.T.H.E Motorway
Afidnes Toll Station
33km National Road Athens to Lamia,
Direction to Lamia
Afidnes, 19014

Τηλ: +30 22950 26900
Fax: +30 22350 51230

Ionía Odos Motorway
Klokova Toll Station
15,35km Ionía Odos, Direction to
Ioannina
Gabrolimni, 30014

Τηλ: +30 2641 306306
Fax: +30 2641 306699

Terovo Toll Station
179,76 km Ionía Odos, Direction to
Ioannina
Terovo, 45500



All calls recorded





Audio



previous status

- no central administration
- disperse systems on site
- minimum security measures (common passwords)
- no audit

Current status

- all telephone communications unified
- central administration and logging
- clearly defined & auditable operator permissions
- operator actions auditable

ETC subscribers...

NeaOdos

KentrikiOdos

4 main actions for a database that holds data for 70.000 ETC subscribers

- access controls, to make sure personal information can only be viewed by relevant employees
- encryption, further mitigates the risk of data breaches by obscuring information
- audit, "last change by..." is no longer sufficient, all operator actions are now auditable by keeping full usage / change history
- pseudonymisation, data is now masked by replacing identifying information with artificial identifiers. Necessary when the system is supported by entities outside the organization



Procedures & Training



New procedures for every department aligned with the policies of GDPR

Training by the program “train the trainer”: Managers trained to all new procedures and then train their supervisors who train the operators etc.



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