

## GREECE

### Facts:<sup>1</sup>

- **Data Protection Authority (DPA):**  
Αρχή Προστασίας  
Δεδομένων  
Προσωπικού  
Χαρακτήρα (ΑΠΔΠΧ)
- **Budget of DPA in 2022:**  
€2.523.000
- **Employees in 2022:**  
Somewhere between  
30 and 51
- **Overview of complaints filed by noyb:** [link](#)

### What doesn't work? – Practice vs. law:

1. **High on expertise, but low on human and financial resources:** The Association of the Scientific personnel of the Hellenic DPA issued two statements in 2023 to publicly complain about the low numbers of human resources and their limited salaries, which pose significant challenges in the DPA's functioning.<sup>2</sup> The Hellenic DPA was excluded by a draft legislative package, which provides for higher remuneration of staff members of other authorities in Greece.<sup>3</sup> The DPA's scientific personnel highlights that *"it is unthinkable, especially in this period when the DPA is assuming more and more responsibilities and investigating critical cases of national and European interest, to be treated in this discriminatory manner, especially when the President of the DPA and our Association have already documented the need to provide appropriate resources and salary increases, necessary for the operation of the Authority in compliance with the requirements of EU law."*
2. **Very slow handling of complaints:** The lack of resources also translates into delays in practice. The Greek authority handles noyb's 101 complaints on EU-US data transfers very slowly: there is no decision after more than 2.5 years, despite other DPAs having issued decisions in those cases more than a year ago. A similar situation applies to complaints filed by Homo Digitalis, with the exception of the DPA's decision on the Clearview AI case that was concluded within one year.<sup>4</sup> For example, Homo Digitalis' complaint against Vodafone Greece regarding the denial of access to electronic communications metadata is under investigation since August 2019. In another complaint about a COVID-19 related SMS service, which was filled in February 2021 against the Hellenic Ministry of Citizen Protection, the DPA came to a decision within less than a year (December 2021), but has not managed to publish it until today due to workload.<sup>5</sup>

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<sup>1</sup> The number of employees is not specific because the numbers from the EDPB's report do not match the numbers from the Hellenic DPA's annual report. Probably, this is the case because the EDPB's report takes into consideration personnel that is on secondment or leave. See more in EDPB, *Overview on resources made available by Member States to the Data Protection Supervisory Authorities*, 5 September 2022 ([link](#)), p. 4 and 7, The Hellenic Data Protection Authority, *Annual Report 2021*, September 2022 ([link](#)), p. 20-23.

<sup>2</sup> Association of Scientific Personnel of the Hellenic Data Protection Authority, *Announcement-Resolution*, 3 February 2023 ([link](#)). See also the low increase since 2016 compared to other EU Member States ([link](#), p.7).

<sup>3</sup> Association of Scientific Personnel of the Hellenic Data Protection Authority, *Announcement against the exclusion from salary benefits*, 9 March 2023 ([link](#)).

<sup>4</sup> Homo Digitalis, *The Hellenic DPA fines CLEARVIEW AI with €20 million*, July 2022.

<sup>5</sup> Homo Digitalis, *GDPR infringement complaints against 13033*, February 2021.