



HELLENIC REPUBLIC



HELLENIC STATISTICAL AUTHORITY

ELSTAT
Statistical Confidentiality Policy

PIRAEUS, MARCH 2016

The Hellenic Statistical Authority (ELSTAT), in the framework of its mission to safeguard and continuously improve the quality of the country's statistics, strives, *inter alia*, to obtain and safeguard the confidence of the statistical reporting units – households, enterprises, and other entities – which provide confidential information for the production of statistical data. The statistical work of ELSTAT relies on the confidence of the above statistical units, since through this confidence ELSTAT is able to collect primary data for the production of its statistics. On the basis of the above confidence, ELSTAT protects, in all the stages of statistical production, the secrecy of personal data collected from the statistical units.

This policy includes the rules and principles implemented by ELSTAT 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

“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 anonymized survey microdata, in case these allow the indirect identification of statistical units concerned.

“Use for statistical purposes” means the use for the development and production of statistics.

2. LEGISLATIVE FRAMEWORK

The Statistical Confidentiality Policy of ELSTAT is based on:

- a) 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,
- b) the provisions on statistical confidentiality of Regulation (EC) No 223/2009 of the European Parliament and of the Council, as amended by Regulation No 2015/759, as well as the provisions of the Commission Regulation (EU) No 557/2013 as regards access to confidential data for scientific purposes,
- c) the European Statistics Code of Practice (principle 5 and relevant 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).

3. RULES AND PRINCIPLES OF THE STATISTICAL CONFIDENTIALITY POLICY OF ELSTAT

The statistical confidentiality policy of ELSTAT is defined through the following rules and principles:

- **Personal data of households and private companies collected, in paper or electronic form, by ELSTAT for statistical processing are strictly confidential and used exclusively for statistical purposes. They are not published or disseminated to third parties. It is explicitly not allowed to use such data: a) for any other purpose – including for economic purposes, or for other profit- or for any other purpose of political, collective or of otherwise defined nature, or for any decision, b) for the imposition of taxes, fees and other similar charges, c) in legal proceedings before any tax, judicial, police, military or other administrative authorities.**
- **Copies of completed questionnaires of ELSTAT statistical surveys and/or certificates pertaining to the answers to the aforementioned questionnaires are only provided to the person that has supplied the relevant data. Where the data provider is a legal person, the copies and/or certificates are provided to its legal representative or to a person legally authorized by the legal representative.**
- **ELSTAT does not publish data of individual General Government entities and does not communicate them to individual users of statistics. ELSTAT discusses such data with relevant General Government institutions (the supervising ministry of an entity or the General Accounting Office or the Court of Auditors) or the Bank of Greece, only if and only to the extent that – ELSTAT assesses that this is necessary for the purposes of compiling Government Finance Statistics. To the extent that ELSTAT has to provide the data of General Government entities to courts of law for the purposes of any investigation into the correctness of statistical calculations of Government Finance Statistics – i.e., regarding the conformity of these calculations to the law – and only for such purposes, ELSTAT shall do so.**
- **ELSTAT takes regulatory, administrative, technical and organizational measures to ensure physical and logical protection of secret and confidential data. It also implements physical and logical security measures to safeguard the security and integrity of statistical databases.**
- **The staff of ELSTAT who handles primary data at the level of statistical unit (completed questionnaires and other records with individual data of statistical units), in paper or electronic form, takes the necessary measures, as appropriate, with full responsibility, so as that these data are not accessible to third parties. When the above data are no longer necessary to ELSTAT 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, the staff of ELSTAT do not publish, or otherwise disseminate, the results of the statistical survey/work to which these data refer and which may allow the direct or indirect identification of personal data.**

- The statistics compiled by ELSTAT 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 units (households and companies) which provided the data or to which the data relate.
- Statistical data of any statistical survey/work of ELSTAT, before its completion and publication of its results, are treated as confidential and are not disseminated to third parties.
- ELSTAT aims to continuously enhance the accessibility of researchers to confidential data for scientific purposes, taking due account of technological developments and best practices within the European Statistical System, without compromising the high level of protection of these data. Clear conditions for granting researchers access to those data are defined and are unswervingly observed. The procedure and conditions for access are made public.
- The staff of ELSTAT is 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. The competent Divisions conducting statistical surveys/works are provided with particular guidance concerning the level of detail at which data are allowed to be made available, so as to render impossible the direct or indirect identification of the surveyed units.
- The external statistical survey workers and the statistical correspondents used by ELSTAT for the collection and checking of primary data of its statistical surveys, as well as the external experts providing ELSTAT with technical support or being assigned to carry out statistical works on account of ELSTAT, commit themselves to the observance of statistical confidentiality of the data to which they have access or which they handle and sign a statistical confidentiality declaration.
- In all the questionnaires of statistical surveys conducted by ELSTAT the secrecy of collected data and their use exclusively for statistical purposes is highlighted prominently, by making reference to the relevant provisions of the Greek Statistical Law.