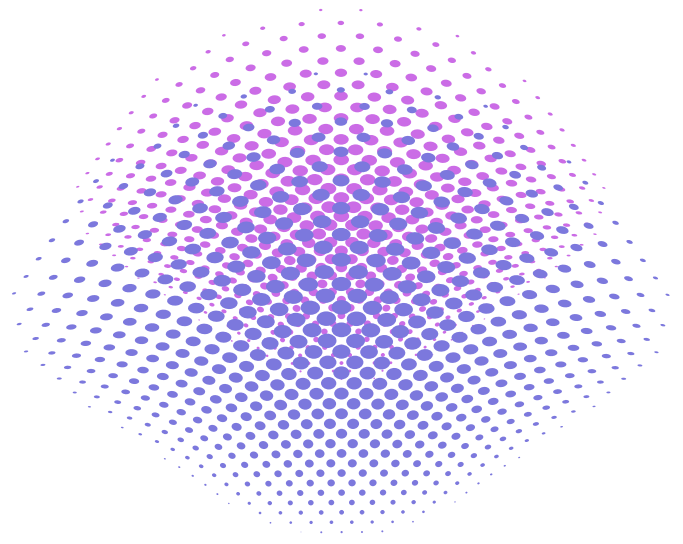


**Homo
Digitalis**

Protect your rights

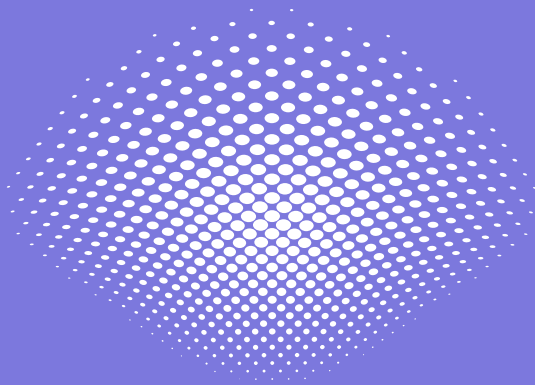


Annual Report

2025

www.homodigitalis.gr

Table of Contents



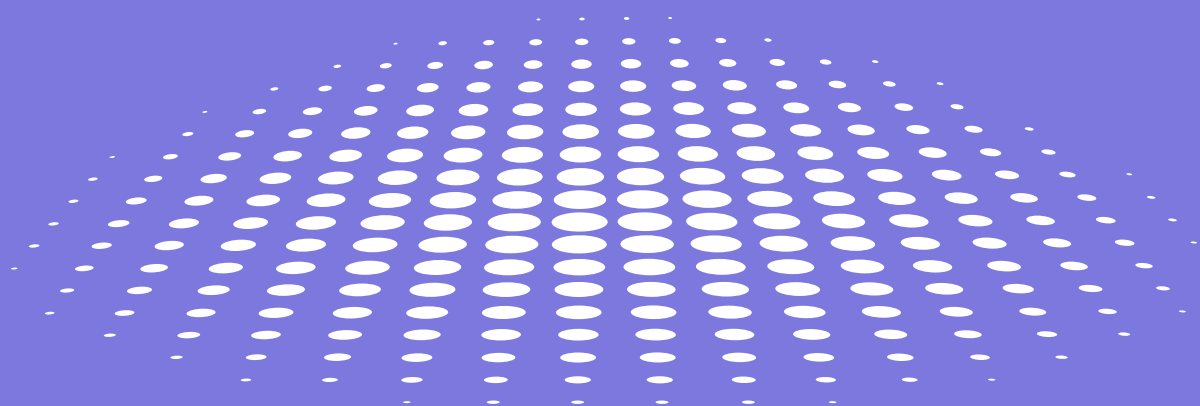
01 A few words from the Homo Digitalis team

02 Awareness-raising activities

06 Advocacy initiatives

09 Legal actions

13 Financial report



A few words from the Homo Digitalis team

Dear friends,

2025 was yet another important year for Homo Digitalis and for the advancement of digital rights in Greece and Europe. At a time when technological developments are accelerating and their societal impact is becoming increasingly complex, the need to protect fundamental rights in the digital sphere remains more relevant than ever. Through advocacy actions, legal interventions, research initiatives, and public awareness and educational activities, we actively contributed to the public dialogue on critical issues such as personal data protection, the use of artificial intelligence systems, surveillance, and the accountability of digital platforms.

Our collaboration in 2025 with civil society organizations (CSOs), academic institutions, public bodies, and international networks that share the same vision for a digital environment that respects human rights was also particularly significant. Through these partnerships, we strengthened the impact of our actions and contributed to shaping an ecosystem that fosters cooperation with the aim of a fairer and safer digital future.

At the same time, the Homo Digitalis community continued to grow and strengthen. Together with the Board of Directors, the organization's staff and volunteer members were the driving force behind all our actions and initiatives. Everyone's contribution, both in terms of scientific documentation and through active participation and support of Homo Digitalis' activities, has been a key factor in the organization's progress, development, and social impact.

Finally, strengthening our organizational sustainability was also of great importance. During the year, we succeeded in securing funding through successful applications to national and European programs, enabling us to expand our activities and further develop the organization's capacities.

As we look to the future, we remain committed to the mission we set eight years ago: defending citizens' rights and freedoms in the digital age. With consistency, independence, and a spirit of collaboration, we will continue working to ensure that technology serves society and democracy.

We would like to warmly thank all members of the Board of Directors, our staff, volunteer members, partners, and supporters of Homo Digitalis for their trust and contribution to this shared effort.

A close-up photograph of a person's hands holding a red smartphone. The person is wearing a dark jacket with a white knit collar and a teal scarf. The background is dark with several out-of-focus, colorful bokeh lights in shades of yellow, orange, and teal. The overall mood is warm and focused on the device.

Awareness-raising Activities

Together, we build an ecosystem of dialogue

For yet another year, we succeeded in co-organizing important events aimed at knowledge exchange, education, awareness-raising, and strengthening cooperation and trust among institutions, civil society organizations, experts, academics, and the wider public. In this context, we implemented six events in collaboration with valuable partners and allies.

Number of events we co-organized

6

Number of events under our auspices

4

The **first** event took place in February 2025 at our offices and was dedicated to the AI Act and the role of civil society organizations. More than 20 stakeholders participated, representing a broad and diverse spectrum, united by a shared interest in fostering collaboration around the challenges and opportunities arising from the implementation of the AI Act.

The **second** event took place in March 2025 at the JOIST Innovation Park in Larissa and focused on cybersecurity and personal data protection, strengthening dialogue among public institutions, small and medium-sized enterprises, and civil society organizations.

The **third** event was held in May 2025, when Homo Digitalis, as a Community Partner of TEDxPatras, co-organized an educational workshop at the Conference and Cultural Center of the University of Patras. The workshop focused on digital payments and privacy protection, within the framework of the Next Generation Internet (NGI TALER) program, co-funded by the European Commission.

The **fourth** event took place in October 2025 at the offices of the Greek Forum of Migrants and concerned the founding conference of the Cooperation Network for the Protection and Promotion of Human Rights in the development and use of artificial intelligence systems in Greece (Greek Artificial Intelligence Network – GAIN). This initiative is coordinated by the Homo Digitalis team, with the support of the European Artificial Intelligence & Society Fund (EAISF).

The **fifth** event was held in November 2025 at the Kypseli Municipal Market, as part of Journals n’ Spirits 2025. In collaboration with fifteen independent initiatives in journalism, research, and publishing, workshops, discussions, and live sessions were organized.

The **sixth** event took place in December 2025 at the offices of WHEN – Equity, Empowerment, Change in Athens. There, civil society organizations and members of the GAIN network had the opportunity to exchange views and attend educational presentations on Artificial Intelligence and Human Rights, with the participation of representatives from the Hellenic Data Protection Authority and the National Commission for Human Rights.

Finally, we granted our auspices to four events, namely AI Summit 2025, the 3rd In-House Lawyers Forum, InfoCom Security 2025, and the Digital World Summit Greece 2025

Articles, Talks & Interviews

The Board of Directors, our volunteer network, and our staff once again actively participated in awareness-raising and outreach activities in 2025, through articles, speeches at international and national conferences, as well as interviews in mass media and other fora.

More specifically, eleven members of our volunteer network published a total of 18 informative articles on our website, covering a wide range of topics related to the protection of digital rights and current developments.

In addition, members of the Board, our staff, and volunteers delivered speeches and interventions at more than 20 conferences, thematic workshops, seminars, and other high-profile events in Greece and abroad. These included landmark conferences such as the World Economic Forum 2025 in Davos, Switzerland, and the Computers Privacy Data Protection (CPDP) in Brussels, Belgium, as well as events organized by public institutions, civil society organizations, and European project consortia, among others.

Finally, members of the Board of Directors, our staff, and our volunteers gave more than 22 interviews, commenting on current affairs and offering a more critical perspective on issues related to digital rights in prominent international and national media outlets, such as POLITICO, as well as ANT1, Kathimerini, Efimerida ton Syntakton, ERT News, Athina 984, ELLE Greece, Ta Nea, Inside Story, News247, and Naftemporiki TV, among others.

These also included interviews in vlogs, podcasts, and online shows, such as those organized by KIDOT.

Articles

18

Speeches

20+

Interviews

22+





Advocacy Initiatives

Safeguarding digital rights in decision-making processes

Through bilateral meetings with decision-makers, active participation in public and closed consultations, involvement in working groups, and meaningful engagement in drafting and submitting open letters, as well as publishing evidence-based studies, we were able to contribute to public discourse with clear and well-substantiated arguments. Our approach was grounded in the use of reliable data and in highlighting the impacts of policy choices, thereby strengthening transparency and the quality of information.

At the same time, we sought to cultivate relationships of trust with relevant stakeholders and to promote the inclusion of diverse perspectives in decision-making processes. With a strong commitment to safeguarding digital rights, we contributed to shaping a more evidence-based and participatory policy-making framework, where knowledge and dialogue serve as key tools for responsible and sustainable decisions.

More specifically, we succeeded in organizing in-person meetings with representatives of the Hellenic Data Protection Authority, the Hellenic Telecommunications and Post Commission, the Greek Ombudsman, the National Commission for Human Rights, and the European Commission, in order to discuss a range of issues related to digital rights, as well as the implementation of relevant legislation, including the Digital Services Act (DSA), the General Data Protection Regulation (GDPR), and the AI Act.

In addition, we actively participated in six working groups established by the European Commission's AI Office, while also taking part in closed consultation meetings organized by both national authorities—such as the Ministry of Digital Governance and Artificial Intelligence—and EU bodies, including the European Commission Representation in Greece, focusing on the implementation of the AI Act and the DSA, respectively.

Furthermore, we contributed to the drafting of open letters addressed to Members of the European Parliament, the Greek Government, Europol, the European Commission, and the European Data Protection Board. We also submitted our views in open consultations prepared by the European Commission on a wide range of topics, and published 11 studies covering the AI Act, the Digital Omnibus packages, the retention of electronic communications metadata, the use of technologies at borders, the DSA, the GDPR, and the state of the rule of law in the country.

**Meetings with
Institutional Stakeholders**

7

Working Groups

6

Studies

11

Open Letters

19

Actively participating in new networks that contribute to decision-making

Homo Digitalis, for yet another year, recognizing the importance of networking and the combination of knowledge, skills, and experience in shaping decision-making, proceeded both to establish and to actively participate in networks with national and global reach.

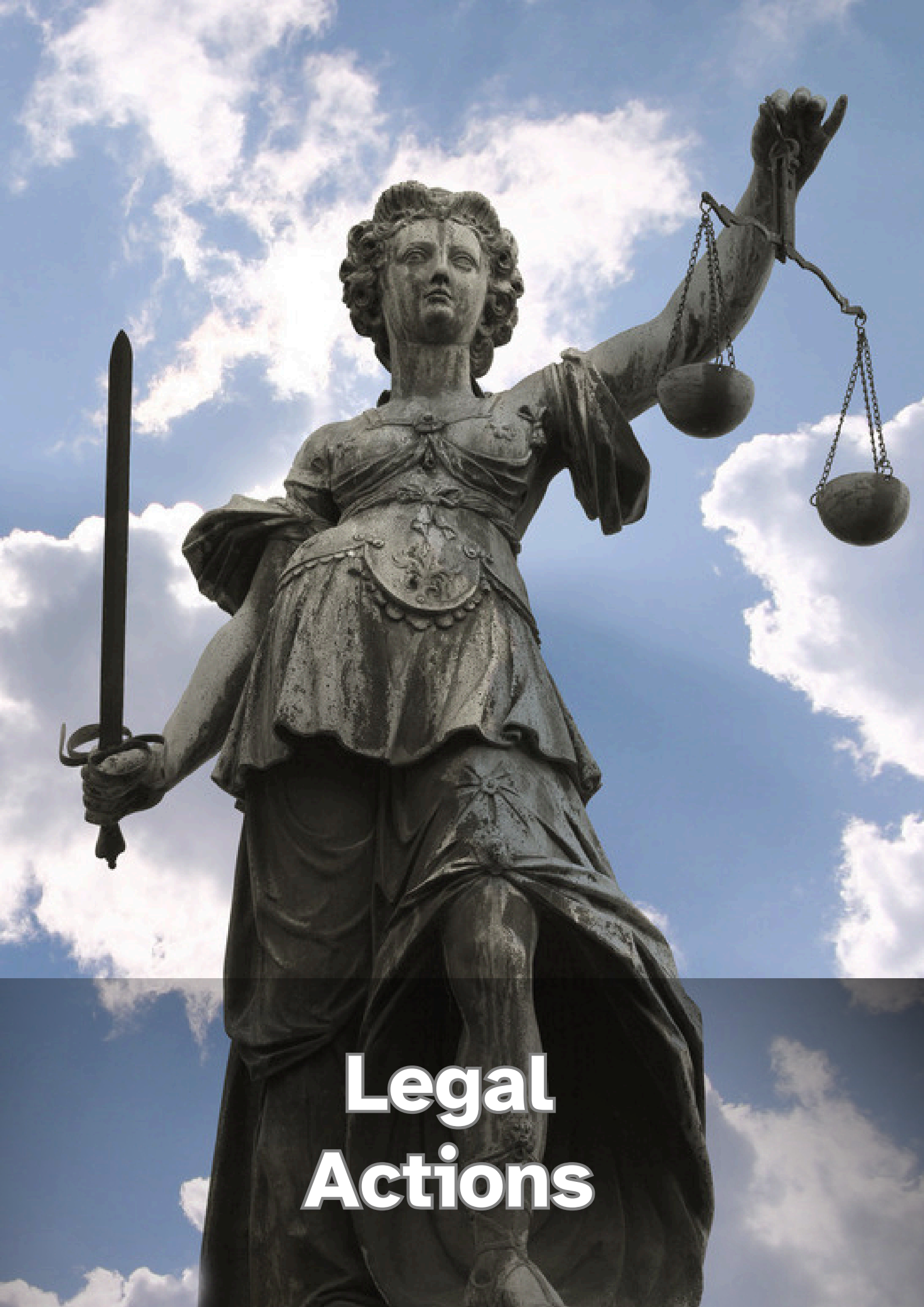
Specifically, in April 2025, Homo Digitalis became a member of the UNESCO Civil Society Organizations Network במסגרת its Global AI Ethics & Governance Observatory. In this context, in September 2025, we joined its Working Groups on Artificial Intelligence, Culture and Intellectual Property; on Red Lines; and on the Use of AI in the Public Sector.

Furthermore, in June 2025, together with the organizations Data Rights, Irídia – Centre per la Defensa dels Drets Humans, Társaság a Szabadságjogokért – Hungarian Civil Liberties Union, Gesellschaft für Freiheitsrechte e.V., Fundacja Panoptykon, and Share Foundation, we announced the creation of the “Pega Coalition,” a network aimed at coordinating legal and advocacy actions against spyware at both European and national levels in the countries where these organizations operate—namely Germany, Greece, Hungary, Poland, Serbia, and Spain.

In addition, in October 2025, together with 33 other organizations, we co-organized the founding conference of the Cooperation Network for the Protection and Promotion of Human Rights in the development and use of artificial intelligence systems in Greece, titled “Greek Artificial Intelligence Network – GAIN.” The network aspires to serve as a space for collaboration, knowledge exchange, mutual support, and advocacy actions, with the primary goal of safeguarding human rights in the development and use of AI systems. In December 2025, within the framework of GAIN, we also organized a closed meeting for exchange of views with network members and two Fundamental Rights Authorities under Article 77 of the AI Act (the Hellenic Data Protection Authority and the National Commission for Human Rights).

Finally, in November 2025, we became a member of the Union of Small and Medium-sized Civil Society Organizations, a dynamic network focused on information-sharing, collaboration, and collective advocacy for an enabling and functional environment for civil society in Greece.





Legal Actions

New legal battles and key successes from cases of previous years

2025 was a year marked by strategically significant legal actions for Homo Digitalis, while we were also pleased to witness the issuance of important decisions in cases from previous years, which substantially contributed to strengthening the protection of our digital rights.

More specifically, from the very beginning of the year, we engaged with the issue of large language models, submitting a request before the Hellenic Data Protection Authority (HDPa) to exercise its investigative powers regarding the use of the DeepSeek platform by data subjects in Greece. The HDPa proceeded with an ex officio investigation and, four months later, issued a decision confirming our concerns, finding that the company Hangzhou DeepSeek Artificial Intelligence Co., Ltd. had failed to comply with its obligation to appoint a representative in the EU.

With regard to other large language models, and specifically ChatGPT Edu by OpenAI, in September 2025 we submitted a request for access to documents before the Ministry of Education, Religious Affairs and Culture, concerning the “OpenAI for Greece” Memorandum of Cooperation. Our aim was to assess the compliance of the pilot implementation of the project in 20 schools with the applicable personal data protection framework, as well as to highlight challenges related to dependency on proprietary software systems. The Ministry failed to respond to our request, leading us to pursue further actions in 2026, with significant results.

In other cases, in April 2025 we submitted a request to the HDPa, asking it to investigate the programmatic agreement between the Ministry of Health, the company Real Genix, and the non-profit organization Beginnings – Newborn Sequencing Initiative. The agreement concerned the privatization of newborn screening and involved the processing of special categories of personal data, particularly genetic data, as revealed in reporting by Reporters United. Following our request to the HDPa, we also sent an electronic letter to the Data Protection Officer (DPO) of the Ministry of Health, calling for responses to a series of questions regarding personal data protection; however, we did not receive any reply.

Furthermore, in June 2025 we submitted a request to the HDPa, seeking the imposition of a temporary restriction on the processing of personal data and the prohibition of including the Personal Identification Number on new identity cards. In particular, despite Opinion 1/2025 of the Authority, which acknowledged the risks and the need to adopt safeguards, the Greek State had not proceeded with their implementation, exposing citizens to serious risks such as identity theft.

Furthermore, in September 2025, together with Reporters United and Vouliwatch, we submitted a joint request before the Hellenic Data Protection Authority (HDPa), calling for the exercise of its investigative powers regarding the use of surveillance systems by the National Technical University of Athens. We highlighted that there does not appear to be a clear legal basis enabling the institution to operate cameras and that the university itself does not clearly specify in its Data Protection Policy which legal basis it relies upon. Beyond actions related to personal data protection, in July 2025 we also undertook a joint initiative together with European Digital Rights, ARTICLE 19, Free Software Foundation Europe, Gesellschaft für Freiheitsrechte e.V., and Vrijdschrift.org regarding the implementation of the Digital Markets Act (DMA) before the European Commission. Through our complaint, we highlighted that, despite the clear rules of the DMA for “gatekeepers,” users on Android devices are effectively unable to uninstall pre-installed applications by Google. This practice constitutes a typical case of deceptive design, restricting users’ freedom of choice and reinforcing the dominant position of Alphabet Inc..

However, as noted at the beginning of this section, 2025 also brought positive developments regarding earlier cases of ours that had been pending before supervisory authorities. Specifically, in December 2020, Homo Digitalis, together with Reporters United and The Press Project, requested access from the Hellenic Police to decisions concerning the use of drones and body-worn cameras in public spaces, as provided for by law (Presidential Decree 75/2020). The Hellenic Police refused to comply, leading, in May 2021, to a joint complaint before the Hellenic Data Protection Authority (HDPa) for repeated violations. The Authority initiated an investigation,



5 years later...

The Hellenic Police, as required, publishes its decisions on the use of body-worn cameras



while even as late as 2024, the Hellenic Police continued to dispute its obligation to publish the relevant decisions. Ultimately, in February 2025, the Hellenic Police changed its practice and began publishing these decisions, following five years of pressure and advocacy. This development marks an important step toward transparency and accountability, as well as enabling the exercise of legal remedies against decisions authorizing the operation of surveillance systems.

Another important development concerns a strategic legal action we initiated back in 2019. Specifically, at that time, the Hellenic Police signed a contract with Intracom Telecom for the implementation of the “Smart Policing” program, with a total budget of €4 million. The project involved the procurement of 1,000 “smart” portable devices, equipped with capabilities such as facial recognition, fingerprint identification, as well as document and vehicle license plate scanning.

Homo Digitalis was the first organization to publicly highlight the case, through a joint investigative publication with AlgorithmWatch in December 2019. In the same month, we submitted a request for access to documents to the Ministry of Citizen Protection, seeking clarification on critical issues of legality and data protection. However, the response we received did not provide substantive answers to our questions.

As a result, in March 2020, we filed a complaint with the Hellenic Data Protection Authority (HDP), requesting an investigation into the matter. The Authority accepted our request and initiated an official inquiry in August 2020. In the meantime, the Greek State paid the full amount of €4 million (75% of which was funded by European resources), while the company delivered the devices to the Hellenic Police in September 2021.

Ultimately, on 31 December 2025, the Hellenic Data Protection Authority issued Decision 45/2025, by which it warns the Hellenic Police not to activate the Smart Policing System, as, under the current legal framework, any full (operational) deployment of it would constitute unlawful processing of personal data. The Authority found that there is no legal basis for the intended processing through this system, and that the required data protection impact assessment had not been carried out in a timely manner during the pilot phase of the system.

**Another important victory!
The Hellenic Data
Protection Authority ruled
that the operation of the
Greek Police's Smart
Policing system is unlawful!**



This development creates for us a strong sense of vindication, as it confirms, after six years, that the serious concerns we had raised from the very beginning were fully justified. At the same time, however, it highlights in the most emphatic way the waste of public resources for the development and procurement of technologies that could never operate lawfully. Four million euros of taxpayers' money were spent on a system which, under the current legal framework, was deemed unlawful before it even entered full operational use.

This case demonstrates the need for substantive legality checks, transparency, and accountability prior to the adoption of high-risk technological solutions, especially when they affect fundamental rights and are funded with public money



Financial Report

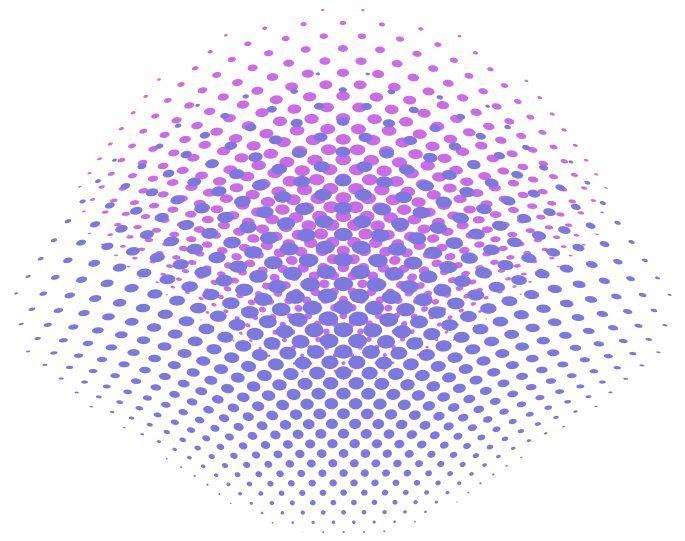
Financial Year 2025

Current Assets	Amount (Euro)
Initial amount	+ 249.089,84
Income	
Membership fees	2.871,76
NGI TALEN participation grant	129.312,50
Donation by Captain Wroble and Carmen Constantakopoulou Foundation	8.000
Donation by I Have Rights	2.500
Donation by EU AI Fund	129.312,50
Donation by HMI Legal	4.500
Donation by Herbe School	600
Donation by ECRU	22.291,73
Donation by Digital Freedom Fund	8.247,85
VDS guarantee return	850
Total income	+277.898,13
Expenditure	
Wages	59.026,25
Public insurance for employees	29.867,84
Tax expenses	19.340,41
Bank expenses	269,10
Rent	1.323,90
Travel expenses	6.486,12
ECRU membership fee	852,80
Accountant payment	8.267,60
Economic expert payment	2.496,00
Organization of public events	18.286,25
Hosting, Hardware & Software services	794,39
Expert legal services payment	15.070,24
Total expenditure	-216.133,50
TOTAL BALANCE (December 2024)	+272.854,38



Homo Digitalis

Protect your rights



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