



**ΚΥΠΡΙΑΚΟΣ  
ΣΥΝΔΕΣΜΟΣ  
ΚΑΤΑΝΑΛΩΤΩΝ**

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## **What Counts as Personal Data?**

**With the recent GDPR protecting individuals' personal data, it is firstly of outmost importance to understand what constitutes personal data under these regulations.**

According to the law, personal data is any information that relates to an identified or identifiable living individual. The law clarifies that an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.

The above law provision in essence covers a vast amount of data as the list is not finite and hence, in many circumstances, whether information is considered personal data often comes down to the context in which data is collected. That said, it is important to understand that different pieces of information, which collected together can lead to the identification of a particular person, also constitute personal data.

Moreover, any personal data that has been de-identified, encrypted or pseudonymised but can be used to re-identify a person remains personal data and falls within the scope of the law.

A few examples that can could be considered personal data, either on their own or in combination with other data are:

- biographical information or current living situation, including dates of birth, Social Security numbers, phone numbers and email addresses;
- looks, appearance and behaviour, including eye colour, weight and character traits;
- workplace data and information about education, including salary, tax information and student numbers;
- private and subjective data, including religion, political opinions and geo-tracking data;

- health, sickness and genetics, including medical history, genetic data and information about sick leave;
- location data (for example the location data function on a mobile phone);
- a cookie ID;
- the advertising identifier of a phone;
- an Internet Protocol (IP) address;

It should be noted that in some cases, there is a specific sectoral legislation regulating for instance the use of location data or the use of cookies – the ePrivacy Directive.

That said, cases where personal data is not considered personal data include anonymised data and generic information such as a company's registration number or a generic company email address such as '[info@company.com](mailto:info@company.com)'. 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. However, for data to be truly anonymised, the anonymisation must be irreversible and hence the data cannot be traced back to the individual linked with that data.