

## Executive Summary

The report “**Controlled and Confined: Unveiling the Impact of Tech-Driven Control in the Samos CCAC**” examines the human impact of the use of technology in the Samos Closed Controlled Access Centre (CCAC), including the removal of phones from people on the move upon their arrival as well as two EU-funded IT security systems deployed in the facility: Centaur and Hyperion. The report is the outcome of a year-long research funded by the Digital Freedom Fund and conducted by I Have Rights (IHR) and Border Violence Monitoring Network (BVMN) between December 2023 and December 2024. Drawing on interviews with people on the move, workers and nine experts as well as desk research, Freedom of Information (FOI) requests and Data Subject Access Requests (DSARs), the report examines the implications of the use of technology on privacy and fundamental rights and freedoms.

Context: The Samos CCAC is an EU-funded centre for asylum seekers. It exemplifies the growing reliance on restriction of movement and technology to monitor, track, and manage migration. Characterised by surveillance systems, checkpoints, multiple layers of barbed wire, and heavy policing, it effectively functions as an open-air prison. People on the move face *de facto* detention and endure overcrowded and dire conditions, with inadequate access to basic necessities. Operating within the framework of Greece’s deterrence policies and funded by the EU, CCACs serve as a blueprint for the EU’s New Pact, raising concerns about the replication of such restrictive and inhumane structures across Europe. Investigating the role of technologies in CCACs is therefore crucial amid a broader trend of expanding surveillance and control over people on the move.

Methodology: The research, centred on semi-structured interviews with 59 people on the move who were or who had been accommodated in the Samos CCAC, seven staff who work within the structure, and nine experts, including journalists and scholars. Besides reviewing publicly available documents, FOI requests were submitted to public bodies to obtain unpublished information. Many of those requests were denied or ignored, prompting follow-up actions and a complaint to the EU Ombudsman. Furthermore, DSARs were filed on behalf of IHR staff and people on the move allowing us to learn more about data processing policies and gain access to hundreds of hours of video footage from the facility.

### Key Findings:

**1) Widespread practice of removal of phones:** 88% of the people on the move interviewed reported having their phones removed, reportedly by the Hellenic Police. 58% of the people whose phones were taken reported being required to unlock their devices or provide passcodes. Upon being returned, some devices reportedly showed signs of use, like being connected to the WiFi, a change in battery and apps being open. The duration of removal varied, ranging from a few hours to several days, and in some instances, up to two weeks. The legal basis for this practice remains unclear, as does its purpose and if data is extracted and to what extent. The Hellenic Police deny the practice.

Interviews reveal a lack of transparency and information provided about the removal of phones. Of the 52 respondents whose phone had been taken, 96% reported that they were not informed of the reasons for the removal of their phones. 90% reported that they did not feel they could have refused to hand over their phone. 54% described feeling afraid, powerless, worried, distressed and/or uncomfortable when their phone was removed.

Overall, the removal of phones was perceived by people on the move as the most invasive use of technology on Samos. It deprives people of vital communication with loved ones, increases their isolation and vulnerability, and poses significant risks by potentially exposing personal information stored on the devices.

**2) Centaur** is an IT security system overseeing the CCAC through CCTV cameras and aerial drones. It deploys AI motion analytics to detect and flag behaviour, sending alerts to authorities, with live feeds monitored remotely by the Greek Ministry of Migration and Asylum in Athens. Respondents reported cameras are placed in common spaces, including areas such as canteens and corridors where people are required to sleep on the floor due to overcrowding.

The use of CCTV cameras and drones elicited mixed reactions among the people on the move interviewed. 46% of the 57 respondents who were aware of the presence of CCTV cameras reported feeling safer due to their presence, while 26% expressed feeling nervous, stressed, or fear. In contrast, of the 37 respondents aware of drone surveillance, only 16% indicated feeling safer, whereas 32% reported feeling worried, distressed, fear, or a sense of being surveilled. Among the seven workers interviewed, 86% felt uncomfortable or surveilled by cameras. Only one worker was aware the centre is surveilled by drones.

The research demonstrates that the Greek authorities have failed in their duty to provide information about the surveillance. Of the people on the move interviewed, 92% reported not being informed by authorities about CCTV monitoring in the Samos CCAC, and 85% stated they had not seen any signs on the use of cameras. Similarly, 100% of the workers interviewed confirmed they had neither received any information from the authorities about the cameras nor could they recall seeing any signs indicating that the CCAC is monitored by such technologies.

The Hellenic Data Protection Authority and the European Union Agency for Fundamental Rights have criticised the Ministry of Migration and Asylum for failing to provide clear information about surveillance in the Samos CCAC. While the Government claims data processing is based on legitimate interests or consent, interviews reveal that almost all respondents, including both people on the move and workers alike, had not been informed and could not recall consenting to this data processing. This raises serious concerns about the legality of the data processing and respect for privacy and other fundamental rights.

**3) Hyperion** is a management system regulating facility access using biometric data and ID card authentication. People on the move must scan their fingerprints and biometric ID cards to enter, exit, and sometimes move within the facility. Workers interviewed accessed the centre by showing their national ID cards only, i.e. without having a biometric card or scanning their fingerprints. Notably, 100% of the workers interviewed refused to register their fingerprints for CCAC access. Regarding transparency, 71% of people on the move interviewed reported not being informed about the purpose of fingerprint collection, a clear violation of GDPR requirements to disclose the reasons for data collection and individuals' rights. While fingerprinting alone caused less concern than phone removal or surveillance, 22% of the people on the move interviewed reported feeling discomfort. Many respondents highlighted frustration with the laborious entry and exit process, including long queues, multiple security checks, and strict restrictions, likening the overall experience to living in a prison.

**4) Overall Impact:** Among the people on the move interviewed, opinions on technology in the Samos CCAC were mixed. 34% felt it improved safety, 17% likened their experience to imprisonment, citing surveillance measures like cameras and fingerprint scanning while 22% reported no impact. Meanwhile, 100% of the workers interviewed reported that the technologies did not make them feel safer. However, it is important to note that when asked about necessary changes to the CCAC, people on the move prioritised improvements in basic necessities and procedures over concerns about the technology used for control and surveillance.

**5) Rights implications:** The report raises concerns regarding potential violations of important fundamental rights, which include, among others:

- **Right to privacy:** Intrusive surveillance, including the removal of phones, biometric data collection, and pervasive camera use, raises serious concerns about potential privacy violations and unwarranted data misuse.
- **Right to Information:** Lack of transparency about data collection, processing, and sharing leaves individuals unaware of their rights, violating GDPR requirements and undermining their ability to seek legal remedies.
- **Human Dignity:** Extensive surveillance and prison-like conditions in the CCAC create discomfort, anxiety, and a profound sense of powerlessness, with some respondents comparing the experience to imprisonment.
- **Equality and Non-Discrimination:** Biometric and AI surveillance risks amplifying racial and ethnic biases, with limited transparency and accountability regarding algorithmic operations and data sources exacerbating discriminatory practices.

## **Recommendations to the European Union and Greek Authorities**

### **Transparency and Accountability:**

- Investigate the removal of phones by the law enforcement authorities operating on Samos and clarify the legal basis used for the operation.
- Make public the technical details, data sources, and operational methods of Centaur and Hyperion.
- Conduct and release assessments of the impact of the envisaged processing operations on the protection of personal data for all high-risk technologies in CCACs, in accordance with GDPR Art.35.

### **Protection of Rights for People on the Move:**

- Cease removing mobile phones, as it infringes on privacy and hinders access to support.
- Provide accessible information about surveillance technologies, including their purpose and data processing.
- Use less invasive methods such as non-biometric ID cards instead of fingerprinting for facility access.

### **Safeguards Against Discrimination:**

- Ensure AI algorithms are unbiased through rigorous testing and external reviews.
- Regularly report on the technologies' impact on vulnerable groups and measures to prevent discrimination.