

Privacy Notice

General information

From May 25, 2018, a new Data Protection Regulation adopted by the European Union enters into force. The regulation aims to ensure the protection of data of individuals from all EU Member States and to harmonize the regulations for their processing.

As a personal data controller, Polihim-SS EOOD meets all the requirements of the new regulation by collecting only data of the persons insofar as they are necessary for the provision of the services and keeping them in a responsible and lawful manner.

Information about the Privacy Controller

1. Name "Polihim-SS" Ltd.
2. UIC / BULSTAT: 831233875
3. Seat and business address: Sofia, 1408, Triaditza district, 17, Dedeagach Str.
4. Address for exercising the activity: Lukovit 5770, "Revival" №139
5. Correspondence address: Sofia, 1616, 11, "Podgramada" Str
6. E-mail: polihim@abv.bg
7. Telephone: 029591545

Information on the competent supervisory authority

1. Name: Commission for Personal Data Protection
2. Seat and address of management: Sofia 1592, "Prof. 2 Tsvetan Lazarov
3. Correspondence data: Sofia 1592, "Prof. 2 Tsvetan Lazarov
4. Telephone: 02 915 3 518
5. Email: kzld@government.bg, kzld@cpdp.bg
6. Web site: www.cdpd.bg

"Polihim-SS" Ltd. carries out its activities in compliance with the Personal Data Protection Act and Regulation (EC) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of individuals with regard to the processing of personal data and on the free movement of such data.

Reason for collecting, processing and storing your personal data

Art. 1. (1) "Polihim-SS" Ltd. collects and processes your personal data in connection with the conclusion of contracts with the company on the grounds of Art. 6, para. 1, Regulation (EU) 2016/679, and in particular on the basis of the following:

- Your explicit consent as a client;
- Execution of the obligations of Polihim-SS Ltd under contract with you;
- Compliance with a legal obligation that applies to "Polihim-SS" EOOD;
- For the legitimate interest of Polihim-SS Ltd.

(2) "Polihim-SS" Ltd. is the administrator of personal data regarding the users of our goods and services. With respect to the personal data processed as part of the usage of our goods and services, Polihim-SS Ltd. acts in its capacity as processor of personal data.

Goals and principles of collecting, processing and storing your personal data

Art. 2. (1) "Polihim-SS" Ltd. collects and processes the personal data you provide us in connection with the use of our goods and services and for the conclusion of a contract with the company as well as for the following purposes:

- individualisation of a party to the contract;
- accounting purposes;

- statistical objectives;
 - protection of information security;
 - ensuring the performance of the contract for the provision of the relevant good or service;
 - sending informational messages, request messages, changes messages, etc.
- (2) "Polihim-SS" Ltd adheres to the following principles when processing your personal data:
- legality, good faith and transparency;
 - limitation of processing goals;
 - relevance to processing goals and minimization of collected data;
 - accuracy and timeliness of the data;
 - Restriction of storage in order to achieve the objectives;
 - integrity and confidentiality of the processing, and ensuring an adequate level of security of personal data.
- (3) When processing and storing personal data, Polihim-SS Ltd. may process and store personal data in order to protect its following legitimate interests:
- fulfilling its obligations to the National Revenue Agency, the Ministry of Interior and other state and municipal authorities.

What types of personal data do we collect, process and store ?

Art. 3. (1) "Polihim-SS" Ltd. performs the following personal data operations for the following purposes:

- Registration of a client / supplier for performance of a contract for the supply of goods and / or services. Conclusion of the Impact Assessment: Based on the above-mentioned impact assessment, the Data Protection Officer considers that the "Conclusion of a contract for the provision of goods and / or services" is permissible and is sufficient to protect the rights and the legitimate interests of the data subject in accordance with GDPR requirements.
- Conclusion and execution of a trade deal with a client or a partner - the purpose of this operation is to conclude and execute a contract with a commercial partner or client and its administration;
- Sending Information Messages - the purpose of this activity is to administer the process of sending messages to customers regarding improvements or changes to services, offers, queries, etc. under the contract.

(2) "Polihim-SS" Ltd. processes the following categories of personal data and information for the following purposes and on the following grounds:

- Data: Your individualized data (name and surname, email, country, address, phone)
- Goal for which data is collected: 1) User registration; 2) Making a contact with and sending information to the user.
- Reason for processing your personal data - Written consent between "Polihim-SS" Ltd and you. A contractual relationship is established, on which basis we process your personal data - art. 6, para. 1, b. (b) GDPR.

Other data, which Polihim-SS Ltd. processes - When signing a contract for the provision of goods and / or services, Polihim-SS Ltd. collects data about your employees who will directly participate in the transaction (accountants, responsible persons, drivers and others).

- Purpose for which the data are collected: In compliance with the requirements of the NRA, AM, MoEW and other departments for provision of normative reports and declarations.
- Reasons for data processing: Processing is necessary for the fulfillment of legal provisions, as a result of a concluded contract under which the data subject is a party - Art. 6, para. 1, b. (b) of GDPR.

Your Personal Invoice Data - If you would like an invoice to be issued to you as an individual, you should provide your personal identification number.

- Target for which data is collected: Issuing an invoice for making payments under a contract for the supply of goods and / or services.
- Reason for processing your personal data - When entering into a written agreement between Polihim-SS Ltd. and you are creating a contractual relationship, on which basis we process your

personal data - art. 6, para. 1, b. (b) GDPR.

(3) "Polihim-SS" Ltd. does not collect and process personal data that relate to the following:

- reveal racial or ethnic origin;
- Disclose political, religious or philosophical beliefs, or membership of trade unions;
- genetic and biometric data, health data, or data on sexual life or sexual orientation.

(4) The personal data are collected by Polihim-SS Ltd. from the persons to whom they refer.

(5) The Company does not make automated decision making with data.

Term of storage of your personal data

Art. 4. (1) "Polihim-SS" Ltd. keeps your personal data for a term not longer than written termination of the contractual relations. Upon their termination, Polihim-SS Ltd takes the necessary care to erase and destroy all your data without undue delay.

(2) "Polihim-SS" Ltd informs you in case the term of data storage needs to be extended in order to meet the objectives, performance of the contract, in view of the legitimate interests of Polihim-SS EOOD or otherwise.

(3) "Polihim-SS" Ltd. keeps the personal data which it is necessary to keep under the applicable legislation for the envisaged term, which may exceed the term after the termination of the contractual relations.

Transmitting your personal data for processing

Art. 5. (1) "Polihim-SS" Ltd. may at its own discretion transmit all or part of your personal data to processors for the fulfillment of the processing purposes in compliance with the requirements of Regulation (EC) 2016/679.

(2) "Polihim-SS" Ltd notifies you in case of intent to transfer part or all of your personal data to third countries or international organizations.

Your rights in the collection, processing and storage of your personal data

Withdrawal of consent to process your personal data

Art. 6. (1) If you do not wish all or any of your personal data to continue to be processed by Polihim-SS Ltd. for any or all processing purposes, you may at any time withdraw your consent to processing by filling in request in free text.

(2) "Polihim-SS" Ltd. may ask you to certify your identity and identity with the person to whom the data refer.

(3) With the withdrawal of the consent for the processing of personal data, which are obligatory for concluding a contract for provision of goods and / or services, the contractual relations shall be terminated.

Right of access

Art. 7. (1) You have the right to request and obtain from Polihim-SS EOOD confirmation whether personal data relating to you are being processed.

(2) You have the right to access the data related to it, as well as information relating to the collection, processing and storage of your personal data.

(3) "Polihim-SS" EOOD provides you with a copy of the processed personal data relating to you on request in electronic or other appropriate form.

(4) The provision of access to the data is free of charge, but Polihim-SS Ltd. reserves the right to impose an administrative fee in the event of recurrence or disproportionate claims.

Right of correction or completion

Art. 8. You may correct or fill in the inaccurate or incomplete personal data relating to you by sending a request to Polihim-SS Ltd.

Right to delete ("to be forgotten")

Art. 9. (1) You have the right to request from Polihim-SS Ltd. the deletion of the personal data related to you, and Polihim-SS Ltd. has the obligation to delete them without undue delay when there is any of the following grounds:

- personal data is no longer needed for the purposes for which it was collected or otherwise processed;
- You withdraw your consent on which the processing of the data is based and there is no other legal basis for the processing;
- You object to the processing of your personal data relating to you, and there are no legitimate grounds for processing that have an advantage;
- personal data has been tampered with;
- personal data must be deleted to comply with a legal obligation under EU law or the law of a Member State that applies to Polihim-SS EOOD;
- personal data have been gathered in connection with the provision of information society services.

(2) "Polihim-SS" Ltd. is not obliged to delete the personal data if it stores and processes them:

- exercising the right to freedom of expression and the right to information;
- to comply with a legal obligation that requires treatment provided for under EU law or the law of the Member State that applies to the Administrator or for the performance of a public interest task or the exercise of official authority;
- for reasons of public interest in the field of public health;
- for purposes of archiving in the public interest, for scientific or historical research or for statistical purposes;
- for the establishment, exercise or protection of legal claims.

(3) In order to exercise your right to "forget", you must submit a written request sent to Polihim-SS Ltd. and certify your identity and identity with the person to whom the data relate prior to Polihim-SS EOOD, by presenting your identity card on the spot for identification purposes of the data subject to a Polihim-SS employee.

(4) "Polihim-SS" Ltd. does not delete the data, which has a legal obligation to store, including for protection against claims against him / her or proof of his / her rights.

Right of limitation

Art. 10. You have the right to request from Polihim-SS Ltd. to limit the processing of your related data when:

- contest the accuracy of personal data for a period that allows Polihim-SS Ltd. to verify the accuracy of the personal data;
- the processing is illegal, but you do not want your personal data to be erased but only to be limited;
- "Polihim-SS" Ltd. no longer needs personal data for the purposes of processing, but you require them to establish, exercise or protect your legal claims;
- You have reproached the proceedings pending verification that the legitimate grounds of Polihim-SS EOOD have an advantage over your interests.

Right of portability

Art. 11. (1) You may at any time obtain the data that is stored and processed for you by Polihim-SS Ltd. by email request.

(2) You may request that Polihim-SS Ltd directly transfers your personal data to an administrator you provide when it is technically feasible.

Right to receive information

Art. 12. You may ask Polihim-SS Ltd. to inform you of all recipients to whom the personal data for which the correction, deletion or limitation of the processing has been requested has been disclosed. "Polihim-SS" Ltd. may refuse to provide this information if this would be impossible or would require

disproportionate effort.

Right of objection

Art. 13. You may at any time object to the processing of personal data of Polihim-SS Ltd., which apply to you, including whether processed for profiling or direct marketing purposes.

Your rights to violate the security of your personal information

Art. 14. (1) If Polihim-SS Ltd. establishes a violation of the security of your personal data, which may pose a high risk to your rights and freedoms, we shall notify you without undue delay of the violation as well as of the measures taken or are about to be undertaken.

(2) Polihim-SS Ltd. is not obliged to notify you if:

- has taken appropriate technical and organizational measures to protect the data affected by the breach of security;
- has subsequently taken measures to ensure that the violation will not lead to a high risk for your rights;
- Notification would require disproportionate efforts.

Individuals to whom your personal information is provided

Art. 15. To carry out the registration of the contracts, invoicing, filling in of reports and declarations, Polihim-SS Ltd. transmits the necessary information to its own employees and to the respective state administration.

Art. 16. Your data will not be transferred to third countries.

Other provisions

Art. 17. In case of violation of your rights under the above or applicable data protection laws, you have the right to file a complaint with the Personal Data Protection Commission as follows:

1. Name: Commission for Personal Data Protection
2. Seat and address of management: Sofia 1592, "Prof. 2 Tsvetan Lazarov
3. Correspondence data: Sofia 1592, "Prof. 2 Tsvetan Lazarov
4. Telephone: 02 915 3 518
5. Email: kzld@government.bg, kzld@cpdp.bg
6. Web site: www.cdpd.bg

Art. 18. You may exercise all of your rights to protect your personal data through the forms enclosed with this information. Of course, these forms are not mandatory and you can make your claims in any form that contains a statement about it and identifies you as the data holder.

Art. 19. If the consent relates to a transfer, the Administrator shall describe the possible risks for the transfer of data to third countries in the absence of a decision on adequate protection and appropriate remedies.

Art. 20 (1). When assigning Polihim-SS Ltd. to process personal data to a third party, Polihim-SS Ltd. acts as a personal data processor.

(2). In the cases under para. 1, "Polihim-SS" Ltd only acts on your instructions only insofar as it may have control over the personal data you are processing.

What security measures have we taken in Polihim-SS EOOD regarding the security of personal data?

The security of every type of information, including personal data, located on our infrastructure is a priority for us as a company. Security is something we can not afford to

compromise on. We add new rules daily and ensure that our customers' information is protected at the highest level.