

DATA PROTECTION NOTICE

Cordeel Bulgaria EAD

1. INTRODUCTION

Cordeel Bulgaria EAD, based in Sofia and registered at the Chamber of Commerce under company number 121895432, attaches great importance to the safe, transparent and confidential collection and processing of personal data. We place high priority on protecting data belonging to parties that include our clients, subcontractors and suppliers against, among other things, loss, leaks, errors, unauthorised access and unlawful processing.

By means of this Data Protection Notice, we inform you about the collection and processing of your personal data.

Please read this Data Protection Notice carefully as it contains essential information about how your personal data is processed and for what purpose.

By sharing your personal data, you expressly declare that you have read this Data Protection Notice and expressly declare your agreement with its terms which include processing of the data.

2. SCOPE

This Data Protection Notice is applicable to all services that we provide and, more generally, to all activities we perform.

3. THE CONTROLLER AND ITS OBLIGATIONS

Cordeel Bulgaria EAD, based in Sofia and registered under company number 121895432, is the controller of your personal data.

When collecting and processing your personal data, we comply with Bulgarian regulations on the protection of personal data and with the General Data Protection Regulation (GDPR), which came into force on 25 May 2018.

4. PERSONAL DATA

Depending on your activities and your relationship with our company, you may need to share the following personal data with us: your identity and contact details (name, title, address, e-mail address, telephone and mobile number). For certain specific legal obligations (electronic attendance registration, declaration of works), you may also need to provide us with additional data to register your attendance (such as your Personal Identification Number).

We would like to point out that you are responsible for all the information you provide to us and that we rely on its accuracy. If your details are no longer up to date, we ask that you inform us immediately.

You are under no obligation to share all your personal data; however, the provision of certain services or our collaboration is not possible if you do not consent to the collection and processing thereof.

5. PROCESSING PURPOSES AND LEGAL BASIS

5.1 Customer data

As part of our services and activities, we collect and process the identity and contact details of our customers and clients and their staff as well as designated individuals and other useful contact persons. This processing is carried out for the purposes of executing agreements with our customers, customer management, accounting and direct marketing activities, such as sending promotional or commercial materials. The performance of a contract, compliance with legal and regulatory obligations (including, for example, a digital declaration of works) and/or our legitimate interest serve as the legal basis for this.

5.2 Data from suppliers and subcontractors

We collect and process the identity and contact details of our suppliers and subcontractors and potential sub-subcontractors and their staff as well as designated individuals and other useful contact persons. This processing is carried out for the purposes of executing agreements, managing the suppliers/subcontractors, accounting and direct marketing activities, such as sending promotional or commercial materials. The performance of a contract, compliance with legal and regulatory obligations (including, for example, compulsory electronic recording of attendance, digital declaration of works, the attendance list or other public contract requirements) and/or our legitimate interest (such as direct marketing) serve as the legal basis for this. Where relevant, the Personal Identification Number will be processed for the purpose of electronic attendance registration. For direct marketing activities via e-mail (for example, newsletters or invitations to events), permission will always be requested and can also be withdrawn at any time.

5.3 Staff data

We process our employees' personal data for the purposes of staff management and wage administration. Due to the specific nature of these activities, this processing is dealt with in more detail in a Data Protection Policy for employees.

5.4 Other data

In addition to data belonging to our customers, suppliers/subcontractors and staff, we also process the personal data of other parties, such as potential new customers/prospects, useful contacts in our industry, network contacts and relevant experts. This processing is carried out in relation to our general, direct marketing and public relations activities. Our legitimate interest, or in some cases the performance of a contract, serves as the legal basis for this.

6. DURATION OF PROCESSING

We will store and process personal data for as long as such data is required for the purpose for which it was collected and for the purpose of our relationship with you (contractual or otherwise).

Customer data and data from suppliers or subcontractors will in any case be removed from our systems following a period of 10 years from the termination of the agreement or project, except for that personal data which we are required to retain for a longer period, either under specific legislation or in the event of an ongoing dispute for which the personal data is still required.

7. RIGHTS

In accordance with and subject to the conditions of Bulgarian privacy laws and the provisions of the GDPR, we hereby inform you that you have the following rights.

- The right of access and inspection: you have the right to inspect, free of charge, the data we hold about you and to determine what it is used for.
- The right to rectification: if your personal data is incomplete or incorrect, you have the right to rectification (correction or completion).
- The right to deletion or restriction of data: you have the right to request that we delete your personal data or that we restrict its processing in the circumstances and under the conditions set down in the GDPR. We may refuse to delete or restrict any personal data that may be necessary for us to comply with legal obligation, for the performance of a contract or for our legitimate

interest and to do so for as long as such data is required for the purpose for which it was collected.

- The right to data portability: you have the right to obtain the personal data you provided to us in a structured, accessible and readable form. You have the right to transfer this data to another data controller.
- The right to object to processing: you have the right to object to the processing of your personal data for serious and legitimate reasons. However, please be aware that you cannot object to the processing of personal data that is necessary for us to comply with legal obligation, for the performance of a contract or for our legitimate interest, and that this remains the case for as long as such data is required for the purpose for which it was collected.
- The right to withdraw consent: if the processing of personal data is based on prior consent, you have the right to withdraw this consent. In that case, personal data will be processed only if we have another legal basis for doing so.
- Automated decision making and profiling: we confirm that the processing of personal data does not include profiling and that you will not be subject to a decision that is based solely on automated processing.

You can exercise these rights by contacting Cordeel Bulgaria EAD. The relevant contact person is Mrs. Manuela Ivanova: manuela.ivanova@cordeel.eu.

We make every effort to handle your personal data carefully and lawfully in accordance with the applicable regulations. Nevertheless, if you believe that your rights have been breached and your concerns have not been addressed by our company, you are entitled to lodge a complaint with:

Commission for personal data protection
Address: 2 Prof. Tsvetan Lazarov Blvd., Sofia 1592
E-mail: kzld@cpdp.bg
Web-site: www.cdpd.bg

tel. +359 899 877 156
fax: +3592/91-53-525

In addition, you can appeal to a court of law if you believe that you would suffer loss or damage as a result of the processing of your personal data.

8. TRANSFER TO THIRD PARTIES

Certain personal data that we collect will be passed on to and possibly processed by third party service providers, such as our IT supplier, bookkeeper and accountant, and by the government (for example, for the digital declaration of works, electronic attendance recording or competing for government contracts).

One or more of the above third parties may be located outside the European Economic Area (EEA). However, personal data will only be transferred to countries that have a suitable level of protection.

The employees, managers and/or representatives of the abovementioned service providers or institutions, as well as the specialised service providers that they appoint, must respect the confidential nature of your personal data and may use this data only for the purpose for which it was provided.

Your personal data may be passed on to other third parties if necessary. For example, this might be the case if we were to be fully or partly reorganised, if our activities were to be transferred or if we were to be declared bankrupt. It may also be the case that personal data must be transferred as the result of a court order or to comply with a specific legal obligation. In that event, we will make reasonable efforts to inform you prior to this communication to other third parties. However, we ask you to recognise and appreciate that in certain circumstances this may not always be technically or commercially feasible or legal restrictions may apply.

Under no circumstances will we sell or make your personal data commercially available to direct marketing agencies or similar service providers without your prior consent.

9. TECHNICAL AND ORGANISATIONAL MEASURES

We take the necessary technical and organisational measures to process your personal data to a satisfactory security level and to protect it from destruction, loss, falsification, alteration, unauthorised access and accidental release to third parties as well as from any other unauthorised processing.

Under no circumstances can Cordeel Bulgaria EAD be held liable for any direct or indirect damage or loss resulting from incorrect or unlawful use of the personal data by a third party.

10. ACCESS BY THIRD PARTIES

To be able to process your personal data, our employees and others within our organisation are granted access to it. We guarantee a comparable level of protection by making these employees and others within our organisation subject to enforceable contractual obligations of a similar nature to this Data Protection Notice.

11. DO YOU HAVE ANY QUESTIONS?

If, after reading this Data Protection Notice, you have any further questions or comments regarding the collection and processing of your personal data, please contact Manuela Ivanona in writing at Cordeel Bulgaria EAD, ul. Chelopesko Shose 36, 1839 Sofia or by sending an e-mail to manuela.ivanova@cordeel.eu.