
Policy for processing of personal data related to reports under the Protection of Persons Reporting or Publicly Disclosing Information on Violations Act

1 Introduction.

- 1.1 In accordance with the requirements of the Protection of Persons Reporting or Publicly Disclosing Information on Violations Act (hereinafter referred to as "**PPRPDIVA**" or the "**Act**"), we of CETIN Bulgaria EAD (hereinafter referred to as "**we**", "**us**", "**CETIN**" or "**CETIN Bulgaria**") have created this Policy regulating the applicable conditions for Personal Data Processing related to Reports on violations.
- 1.2 This Policy intends to provide clear and specific rules, as well as inform the relevant persons about the procedure for Processing and protection of Personal Data that could be provided in the process of submitting Reports when:
 - 1.2.1 the established channel for internal submission of Reports under the PPRPDIVA is used; or
 - 1.2.2 other Reports for violations related to the activities of CETIN are filed outside the scope of the PPRPDIVA.
- 1.3 Given the sensitivity of the information shared, CETIN shall provide the necessary conditions to ensure sustainable and up-to-date rules to preserve its confidentiality.

2 Identification of the controller of Personal Data.

- 2.1 The controller of Personal Data contained in Reports, Processed in accordance with this Policy is CETIN Bulgaria EAD, UIC: 206149191, with headquarters and address of management: 6th building, Business Park Sofia, Mladost 4 district, Sofia, Republic of Bulgaria.

3 Definitions.

- 3.1 **Policy** means the current Policy for processing of personal data related to reports under the Protection of Persons Reporting or Publicly Disclosing Information on Violations Act, as well as its future amendments and supplements.
- 3.2 **Report** means a written or verbal notification addressed to CETIN, containing information about violations of the Bulgarian legislation and/or European Union acts.
- 3.3 **Reporting Person** means a natural person who reports through the internal reporting channel of CETIN, which may be:
 - 3.3.1 current or former employee, trainee or volunteer;
 - 3.3.2 job applicant;
 - 3.3.3 a self-employed person, a person exercising a liberal and/or craft profession or working without a contractual relationship or under an employment or civil contract;
 - 3.3.4 an auditor, shareholder or member of the Board of Directors of CETIN;
 - 3.3.5 employee of a supplier or subcontractor of CETIN.
- 3.4 **Other Protected Person** means a natural person designated by the Reporting Person who has the right to protection from retaliation. Such may be:
 - 3.4.1 persons who assist the Reporting Person in the reporting process and whose assistance should be confidential;
 - 3.4.2 persons who are connected through work or who are relatives of the Reporting Person and who may be subject to retaliation due to the reporting;

3.4.3 legal entities in which the Reporting Person is a shareholder, for which he or she works or with whom he or she is otherwise connected in a working context.

3.5 Affected Person means a natural person who is referred to when submitting a Report as a person to whom a violation is attributed or that person is connected with such violation.

3.6 Informant means a natural person who, according to the Reporting Person, can confirm the information specified in the Report or provide additional relevant information.

3.7 Responsible Officer means the ethics and compliance officer of CETIN, responsible for accepting, administering, reviewing and taking actions and measures on Reports, maintaining contact with the Reporting Person and the Commission for Personal Data Protection, as well as all other activities related to Reports.

3.8 Personal Data means any piece of information which identifies a specific person or relates to an identifiable natural person who can be identified, directly or indirectly.

3.9 Processing of Personal Data or Processing means any and all operations performed and related to Personal Data carried out by CETIN in its capacity as a Personal Data controller within the meaning of the Personal Data Protection Act and Regulation (EU) 2016/679.

4 Categories of Personal Data Processed in connection with Reports.

4.1 In and on the occasion of the reception and consideration of Reports, CETIN Processes the following categories of Personal Data:

Personal Data category	Reporting Person	Other Protected Person	Person concerned	Informant
Forename	Yes (required*)	Yes (if provided)	Yes (if provided)	Yes (if provided)
Middle Name	Yes (required*)	Yes (if provided)	Yes (if provided)	Yes (if provided)
Surname	Yes (required*)	Yes (if provided)	Yes (if provided)	Yes (if provided)
Phone number	Yes (required*)	Yes (if provided)	Yes (if provided)	Yes (if provided)
E-mail address	Yes (required, if any*)	Yes (if provided)	Yes (if provided)	Yes (if provided)
Contact address	Yes (if granted)	Yes (if provided)	Yes (if provided)	Yes (if provided)
Handwritten or electronic signature	Yes (required*)	Not	Not	Not
Working context (position, position, etc.)	Yes (required*)	Not	Yes (required)	Not
Other personal information contained in the Report	Yes (if provided)	Not	Yes (if provided)	Yes (if provided)

Other Information Collected During Consideration of the Report	Yes (if relevant to the consideration of the Report)	Not	Yes (if relevant to the consideration of the Report)	Yes (if relevant to the consideration of the Report)
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*The provision of information is mandatory when the Report is submitted under the terms and conditions of the Act. Otherwise, the information is processed only if it has been provided voluntarily by the Reporting Person.

5 Method of collection of Personal Data.

5.1 During and on the occasion of the reception and consideration of Reports for violations CETIN collects Personal Data in the following ways:

Category of person whose data is Processed under the Policy	Direct collection of data from the person to whom they relate	Obtaining data from a person other than the data subject	Collection of Personal Data from systems or registers of CETIN
Reporting Person	Yes (data is provided with the Report or for subsequent communication)	Not applicable	Yes (when checking for work context)
Other Protected Person	Not applicable	Yes (data provided by the Reporting Person)	Not applicable
Person concerned	Not applicable	Yes (data provided by the Reporting Person, if known)	Yes (as far as necessary for consideration of the Report)
Informant	Not applicable	Yes (data provided by the Reporting Person)	Yes (as far as necessary for consideration of the Report)

6 Reasons and grounds for Processing Personal Data.

6.1 CETIN Bulgaria Processes Personal Data provided and collected in connection with the administration of a specific Report in order to:

- 6.1.1 receive, inspect and document Reports, including storing information about them;
- 6.1.2 take follow-up actions and measures to prevent and/or terminate violations, during and on the occasion of Reports considered;
- 6.1.3 provides protection from retaliation against Reporting Persons and Other Protected Persons;
- 6.1.4 communicates and corresponds with Reporting Persons, Other Protected Persons, Affected Persons, and with Informants;
- 6.1.5 guarantees the rights of the Persons concerned;
- 6.1.6 maintain a register of received and viewed Reports;
- 6.1.7 provide information to the Commission for Personal Data Protection or other competent authorities (e.g. Police or Prosecutor's Office) in connection with received Reports, if required.

- 6.2** CETIN Bulgaria Processes Personal Data collected in the process of administering Reports to ensure the lawful fulfilment of its statutory obligations established by law.
- 6.3** CETIN Bulgaria may invoke a legitimate interest as a basis for the Processing of Personal Data collected in the course of administering a Report, in which legitimate interest is expressed as:
- 6.3.1 ensuring the ability to carry out inspection and take appropriate actions to prevent, avert, detect and interrupt violations related to the company's activities;
 - 6.3.2 protection of the legal interests of Reporting Persons;
 - 6.3.3 ensuring a transparent and accountable corporate culture, including a safe and ethical working environment;
 - 6.3.4 overall reduction of the risk of unlawful actions being taken by CETIN employees.
- 6.4** CETIN does not perform automated decision-making activities based on profiling that produces legal effects on data subjects or similarly significantly affects them.

7 Categories of persons to whom we may disclose Personal Data.

- 7.1** CETIN strives to ensure that the dissemination of Personal Data related to Reports to third parties will be minimized. However, to be able to ensure a timely, comprehensive and lawful Report investigation, we may disclose Personal Data related to a Report to the following categories of persons:
- 7.1.1 **Personal Data Processors** - Personal Data Processors are persons who Process Personal Data on behalf of and account of CETIN based on a written agreement. They are not entitled to Process the Personal Data provided to them for purposes other than the fulfilment of the purposes assigned to them.
 - 7.1.2 **Postal operators** - These are companies providing postal and courier services to which we can provide Personal Data within the framework of correspondence with a Reporting Person. It is important to know that these operators will not have access to confidential information related to the Reports, but will only receive contact details necessary for the delivery of the relevant items (names, address and telephone number).
 - 7.1.3 **Lawyers and law firms** - We may provide Personal Data to engaged lawyers and/or law firms if necessary to obtain legal services in connection with the administration of a Report and/or to investigate violations under it.
 - 7.1.4 **Third parties in connection with a transformation (e.g. merger or takeover) or transfer of an enterprise** - In the event of a transformation, takeover or merger of CETIN, as well as in the event of a transfer of assets under applicable law, Personal Data may be provided to a third party legal successor as part of archival documentation or to continue administering a Report and/or investigating for violations thereof.

8 Retention period of Reports and Personal Data.

- 8.1** The retention period of Personal Data provided through or in connection with a Report is five (5) years, according to the Act, after the completion of the investigation of a Report.
- 8.2** The retention period may be extended if criminal, civil, employment and/or administrative proceedings are initiated based on the Report.

9 Measures for the protection of Personal Data.

- 9.1** In accordance with the requirements of the current legislation and good practices, CETIN implements, procures and updates the necessary technical and organizational measures to ensure an adequate level of protection of Personal Data.

9.2 In order to ensure an adequate level of protection of Personal Data, CETIN Bulgaria uses modern technologies combined with some of the most popular security standards (ISO 27001:2019 and other applicable standards).

9.3 CETIN Bulgaria has established a comprehensive documentary framework for compliance with the established regulatory rules for the protection of Personal Data, as well as useful and valuable practices in this field, along with an appointed Data Protection Officer, who supervises the strict compliance with all applicable requirements for the protection of Personal Data.

10 Rights of natural persons concerning Personal Data collected through Reports.

10.1 Rights of natural persons concerning Personal Data collected through Reports are guaranteed by the Personal Data Protection Act and Regulation (EU) 2016/679.

10.2 Anonymous requests for exercising rights related to Personal Data may not be submitted, as only natural persons whose identification can be properly established have the opportunity to exercise their rights under this Section.

10.3 CETIN Bulgaria may request additional information to confirm the identity of the requestor concerned.

10.4 Individuals are notified of the actions taken on requests submitted by them for exercising rights related to Personal Data within one (1) month from the date of receipt of the respective request, and in certain cases, this period may be extended by up to two (2) months. CETIN shall inform the person concerned of any such extension within one (1) month of receipt of the request, together with the reasons for the extension.

10.5 Actions taken during and on the occasion of acceptance, verification, collection of information and sending a response to a request for exercising rights concerning Personal Data is completely free of charge. Where a person's request is noticeably unfounded or excessive (e.g. because of its repeatability), CETIN is entitled, at its discretion:

10.5.1 refuse to comply with the request; or

10.5.2 to require payment of a reasonable fee, determined based on the administrative costs necessary to provide the information requested or to take the action requested.

10.6 Natural persons have the right to obtain information as to whether Personal Data relating to them is Processed. If so, they are entitled to receive a copy of the relevant data.

10.7 Natural persons have the right to request correction of the Personal Data relating to them when it's inaccurate or outdated.

10.8 Natural persons have the right to request the deletion of Personal Data related to them in the following cases:

10.8.1 The Personal Data is no longer necessary in relation to the purposes for which it was collected or otherwise processed;

10.8.2 Personal Data relating to the data subject have been collected and/or unlawfully Processed;

10.8.3 The Personal Data have to be erased to comply with a legal obligation under Bulgarian and/or Union law.

10.9 Natural persons have the right to request that the Processing of Personal Data relating to them be restricted in the following cases:

10.9.1 the accuracy of the Personal Data is contested by the data subject, for a period enabling the accuracy of the Personal Data to be verified;

- 10.9.2 The processing is unlawful and the data subject opposes the erasure of the Personal Data and requests the restriction of its use instead;
- 10.9.3 CETIN no longer needs the Personal Data for the purposes of Processing, but they are required by the data subject for the establishment, exercise or defence of legal claims;
- 10.9.4 the person has objected to the Processing of Personal Data based on legitimate interest, pending verification of whether the legitimate interests of CETIN outweigh the interests of the person.
- 10.10** Natural persons have the right, at any time and on grounds relating to their particular situation, to object and protect their legitimate interests against the Processing of Personal Data concerning them.
- 10.11** Natural persons have the right to submit complaints and/or reports to the Personal Data Protection Commission in case they have concerns that there have been violations of the legislation regarding the protection of Personal Data.
- 10.12** Natural persons may lodge a complaint with other supervisory authorities on the territory of the European Union as provided for in Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data and repealing Directive 95/46/EC.

11 Updating the Policy.

- 11.1** This Policy is valid as of 23.04.2024.
- 11.2** This Policy may be amended, supplemented and updated by us without prior notice.
- 11.3** We invite you to periodically visit <https://www.cetinbg.bg/privacy/> to get acquainted with the current version of the Policy.