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**PRIVACY POLICY**  
**of CETIN Bulgaria EAD**  
**for working with corporate clients**

**I INTRODUCTION**

The security and proper use of personal data are of utmost importance to CETIN Bulgaria EAD.

Therefore, with this Privacy Policy we inform you about the way we process personal data in connection with the conclusion, performance and termination of relationships with our corporate clients.

For the sake of clarity and convenience for readers, in certain places in this Privacy Policy we have provided examples that illustrate why and/or how CETIN processes personal data. These examples are not exhaustive.

**II DEFINITIONS**

**1. Privacy Policy**

This Privacy Policy of CETIN Bulgaria EAD for working with corporate clients, including its further amendments.

**2. Personal Data**

In practice, this is any information that identifies a particular individual or relates to an individual who can be identified directly or indirectly.

**3. CETIN**

CETIN Bulgaria EAD, company number (UIC) 206149191, having its headquarters and registered office in Building 6, Business Park Sofia, Mladost-4 Residential Area, 1766 Sofia. In this Privacy Policy, the use of the pronouns "We", "Us" or "Our" shall also mean CETIN Bulgaria EAD.

**4. Corporate Client**

For the purposes of this Privacy Policy, this is:

- a natural person to whom CETIN provides goods and/or services to carry out a business or professional activity or who, as a party to a contract with CETIN, acts within his/her business or professional activity, for example a self-employed person, freelancer, or a sole proprietor;
- a legal entity to which CETIN provides goods and/or services, for example a limited liability company (OOD), a joint-stock company (AD), a non-profit organization, a foundation, etc.; or
- a civil society or consortium to which CETIN provides goods and/or services.

**5. Representative**

A natural person who represents a corporate client by virtue of the law (e.g. a manager or executive officer) or by virtue of a power of attorney.

**6. Contact Person**

A natural person designated by a corporate client as a contact person for certain matters. Such are, for example, contact persons for financial, commercial, technical or legal matters.

**7. GDPR or Regulation**

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

**III WHAT DATA OF CORPORATE CLIENTS DO WE PROCESS?**

The Controller of the data processed under this Privacy Policy is CETIN Bulgaria EAD, UIC 206149191, with headquarters and address of management in Sofia, 1766, Mladost 4 Residential Area, Business Park Sofia, Building 6.

According to this Privacy Policy, CETIN processes the following categories of personal data:

Type of data	Corporate client (natural person)	Representative	Contact Person
Full name	x	x	x
Title		x	
Personal ID Number	x	x	
Number, date, place and authority of issuance of identity document	x	x	
Email	x		x
Telephone number	x	x	x

It is important to note that the same natural person can act in more than one capacity (for example, as a representative and as a contact person). In such cases, CETIN will process the data shown in the Table above related to each of the natural person's capacities.

Data such as personal identification number, ID paper number, issuing date, place and authority are processed by CETIN only when needed to comply with regulatory requirements. For example, such are cases where a corporate client is represented by an Attorney-in-fact under a notarized power of attorney.

#### **IV HOW DO WE COLLECT PERSONAL DATA FROM CORPORATE CLIENTS?**

For the purpose of concluding, performing and terminating relationships with our corporate clients, CETIN collects personal data in various ways.

In most cases, we get information directly from the data subjects, such as cases where corporate clients (natural persons), representatives or contact persons thereof, provide us with information about themselves.

Sometimes, however, data is provided to CETIN by third parties, for example when:

- corporate clients provide information about their representatives or contact persons;
- competent authorities, when exercising their powers, provide information about the persons concerned;

When working with corporate clients CETIN also collects personal data from:

- public registers (such as the Companies Register and the Property Register);
- corporate clients' websites; and
- search engine results.

#### **V HOW DO WE PROCESS PERSONAL DATA OF CORPORATE CLIENTS?**

**We process personal data to negotiate with corporate clients as well as to participate in supplier selection procedures organized by them**

We process personal data related to representatives and contact persons of corporate clients when they:

- negotiate with us for the purpose of concluding a contract for any product and/or service offered by CETIN, including when the negotiations are conducted within the framework of a

tender procedure for the selection of a supplier organized by the relevant corporate clients;  
or

- conduct a public contract award procedure for products and/or services in which CETIN participates under such terms and conditions as provided for by the law;

In such cases, the processing of personal data is necessary in order for us to be able to participate in such negotiations, tender procedure or public contract award procedure, including to exchange information and offers with a view to the future conclusion of a contract.

#### **We process personal data to enter into contracts with corporate clients**

The conclusion of a valid and binding contract with a corporate client is impossible without processing certain personal data of that corporate client (when the supplier is a natural person) or a representative thereof.

The amount of personal data required to sign a valid contract with a corporate client depends on the type of contract - for example, when a corporate client representative is authorized by virtue of a power of attorney with the signatures subscribed thereto certified by a notary public, we will process not only the names and position of the Attorney, but also his/her personal identification number as well as data from his/her identity document.

#### **We process personal data to fulfill our commitments to corporate clients and seek fulfilment of their commitments to us**

In order to be able to fulfill our commitments to corporate clients, and to seek fulfilment of their commitment to us, we must process personal data of the corporate clients (if they are natural persons), representatives and contact persons thereof.

Without such processing it would be impossible to:

- provide the products and/or services agreed;
- carry on written correspondence or make telephone and/or video conversations and/or joint meetings on the performance of the signed contracts;
- organize the acceptance and testing of goods and/or services delivered by us;
- issue invoices and seek payments on them;

#### **We process personal data when amending or terminating contracts with corporate clients**

For the duration of the contracts signed with corporate clients it is possible, on the initiative of CETIN or the corporate clients themselves, to have negotiations on amendment or termination of such contracts. In such cases, in order for us to be able to participate in such negotiations, including to sign additional agreements or terminate any contract, we must process personal data of corporate clients (if they are natural persons), representatives and/or contact persons thereof.

#### **We process personal data in the event of assignment of claims (cession)**

In accordance with the legislation of the Republic of Bulgaria, CETIN has the right to assign to a third party any claims it has towards any corporate client (such as claims arising from issued but outstanding invoices) without obtaining the prior consent of such corporate client. For this purpose, an agreement for the assignment of claims ("cession agreement") is signed with the third party concerned.

Upon the execution of a cession agreement CETIN ceases to be the holder of the relevant claim, which passes to the third party (new creditor). One of CETIN's obligations under the cession agreements is for the new creditor to be handed over all documents establishing the assigned claims. In fulfilling this obligation, CETIN shall provide the new creditor with personal data about the persons whose data is processed by CETIN under this Privacy Policy contained in the relevant documents.

Upon the execution of a cession agreement, the relevant corporate client will be duly informed about it on behalf of CETIN.

**We process personal data where, under applicable law, we are obliged to render assistance to any competent government and/or municipal authorities when they conduct inspections**

CETIN's business operations are subject to control by various government and municipal authorities - Communications Regulation Commission (CRC), Consumer Protection Commission (CPC), Personal Data Protection Commission (PDPC), National Revenue Agency (NRA) and others. In the course of their control, the respective authorities have the power to conduct inspections, as well as to require CETIN to provide any documents and information that are in CETIN's possession. Documents and information requested in the course of such inspection may contain personal data of corporate clients (natural persons), representatives and/or contact persons thereof.

For example, when conducting a tax audit, the NRA authorities have the power to require CETIN to provide accounting documents that may also contain personal data of corporate clients (natural persons), representatives and/or contact persons thereof.

**We process personal data to fulfill obligations arising from the accounting and tax law**

The tax and accounting legislation in the Republic of Bulgaria requires CETIN to create and store, for a definite period of time, information, data and documents relevant to the tax and social security control.

In fulfillment of this obligation, the relevant information and documents, which also contain personal data of corporate clients – natural persons, representatives and/or contact persons thereof – are kept by CETIN for such time as stipulated in the relevant laws. Sometimes for a long time (for instance, the tax and social security documents should be kept for eleven years).

**We process personal data when it is necessary to settle legal disputes**

Sometimes, in order to exercise our rights or legitimate interests (for example, to seek any invoice payment), we may need to process personal data of certain corporate clients (natural persons), representatives, contact persons and/or employees thereof, to make an out-of-court claim or to bring an action against:

- corporate clients; or
- third parties from whom we have obtained and/or to whom we have disclosed personal data of the natural persons concerned in accordance with this Privacy Policy.

Accordingly, the corporate clients, the above third parties, and the natural persons themselves, may make an out-of-court claim or bring a case against CETIN. In such cases, we may need to process personal data in order to organize and conduct our defense, and thus prevent any encroachment upon our property and/or reputation.

The type and amount of the personal data processed depends on the nature of the out-of-court claim or the action brought.

**We process personal data of representatives upon their prior approval to make a credit assessment**

It is possible, according to CETIN's internal regulations and policies, upon obtaining the prior consent of the representatives of a corporate client, to process their personal data, including personal identification number, in order to make a credit assessment of the corporate clients represented by them.

Credit assessment is required when signing contracts for mobile and/or fixed services with corporate clients represented by the relevant representatives if the corporate clients wish to receive mobile devices on lease or preferential pricing with a subscription plan.

The consent of the representatives is voluntary. Should a representative refuse to give such consent the corporate client will be able to purchase the desired devices at their full retail price.

A credit assessment is a verification of the creditworthiness of a corporate client. Its purpose is to show us how likely the corporate client is to stop paying his liabilities to CETIN or to fall into a situation where he is not in a position to do so.

In preparing such assessment, previous data related to the corporate client as a customer of CETIN (if CETIN has such) is analyzed.

Upon representative's consent, an analysis of previous data for:

- other CETIN corporate clients who have been represented by the representative (if CETIN has such data); and
- the representative as a consumer of CETIN (if CETIN has such data),

is also carried out.

Also, the data for the corporate client and its representative are matched with aggregated statistical information about the Company's good and bad payers.

In the case of a lower credit score, the corporate client may be required to pay a certain initial installment, to provide any other guarantee or security, and in rare cases the corporate client may be offered lower-end devices.

## **VI CATEGORIES OF PERSONS TO WHOM WE DISCLOSE PERSONAL DATA**

### **Data Processors**

Data Processors are persons or entities who process personal data on behalf of CETIN on the basis of a written agreement. They are not allowed to process the personal data they have been provided for any other purposes than the performance of the tasks assigned to them by CETIN. Data Processors are required to follow all CETIN's instructions.

CETIN takes the necessary measures to ensure that the engaged Data Processors respect strictly the data protection laws and CETIN's instructions and that they have taken appropriate technical and organizational measures to protect the personal data.

Examples of Data Processors:

- Providers of services for the implementation and/or maintenance of information systems that are sometimes required to access personal data that is stored in the relevant systems; or
- Courier service providers;
- CETIN's master agents and franchisees;
- Persons who provide CETIN with invoice, credit note and suchlike printing services;
- Out-of-court debt collection companies processing personal data on behalf of CETIN;
- Providers of services for the organization, storage and maintenance of data archives, as well as data archive destruction services;
- Independent auditors;
- Law firms, accountants or other providers of advice services.

### **Partners**

In order to be able to provide certain services to corporate clients, CETIN enters into contracts with third parties (partners). In connection with the provision of the relevant services, it is sometimes necessary to provide the relevant partners with personal data of the natural persons whose data is processed by CETIN under this Privacy Policy.

### **Banks and payment institutions**

In connection with the servicing of corporate payments to CETIN by bank transfer or through a payment institution, it is necessary to exchange data between CETIN and the respective bank or payment institution.

### **Lawyers and law firms**

If necessary (for instance, a legal dispute between CETIN and a supplier), personal data of corporate clients (natural persons), representatives, contact persons and/or employees thereof,

may be disclosed to lawyers and law firms engaged by CETIN to protect its rights and legal interests.

#### **Authorities**

The provision of data to competent authorities is described above in this Privacy Policy.

#### **Third parties in connection with the reorganization (e.g. merger or fusion) or transfer of an enterprise**

In case of reorganization of CETIN or in case of transfer of assets in accordance with the applicable law, the personal data controlled by CETIN under this Privacy Policy may be provided to a third-party successor.

### **VII PROCESSING OF PERSONAL DATA OUTSIDE THE TERRITORY OF BULGARIA**

As a rule, CETIN strives not to send personal data processed under this Privacy Policy outside the territory of the European Union (EU) and the European Economic Area (EEA).

In some cases, however, certain data may be required to be sent to non-EU/EEA natural persons (e.g. to provide a CETIN information system support service that cannot be performed without access to personal data), subject to the requirements of the applicable law and this Privacy Policy.

If personal data of a corporate client (physical person), representative, and/or contact person thereof, is required to be sent by CETIN to a non-EU or EEA State, this will be done in accordance with this Privacy Policy and upon the existence of any of the following conditions:

- Where there is a European Commission decision to the effect that the country concerned provides an adequate level of data protection;
- When an agreement is made with the organization to which personal data is sent, with such agreement containing the standard data protection clauses approved by the European Commission with Decision No. 2010/87/EU (more information can be found on the following page of the Personal Data Protection Commission: [https://www.cdpd.bg/userfiles/file/Transfers/BCR\\_Commission\\_decision\\_2010-87\\_Bg.pdf](https://www.cdpd.bg/userfiles/file/Transfers/BCR_Commission_decision_2010-87_Bg.pdf)) and under the Recommendations 01/2020 on measures that supplement transfer tools to ensure compliance with the EU level of protection of personal data ([https://edpb.europa.eu/sites/edpb/files/consultation/edpb\\_recommendations\\_202001\\_supplementarymeasures-transfer-tools\\_en.pdf](https://edpb.europa.eu/sites/edpb/files/consultation/edpb_recommendations_202001_supplementarymeasures-transfer-tools_en.pdf));
- When the transfer of data is required to fulfill a commitment to the relevant corporate client, representative or contact person.

### **VIII PERSONAL DATA STORAGE PERIODS**

CETIN stores the personal data it processes under this Privacy Policy for as long as it is necessary to achieve the objectives stated herein (e.g. for the duration of the contracts signed with the corporate clients, until settlement of the relationship between the parties, until expiration of the applicable limitation periods, etc.) or to meet the requirements of the applicable law. For example, CETIN is obliged to keep the data containing tax and social security control documents for a period of 11 years.

### **IX HOW DO WE PROTECT PERSONAL DATA?**

Building and maintaining trust between us and our corporate clients is a priority for CETIN. Therefore, protecting our systems and the personal data of corporate clients (when they are natural persons), representatives and contact persons thereof, is of paramount importance to CETIN. In accordance with the requirements of the applicable law and good practices, CETIN takes the necessary technical and organizational measures to keep personal data safe.

To ensure personal data protection, CETIN uses state-of-the-art technologies combined with uncompromising security controls. Our framework is based on some of the most popular security standards (ISO27001: 2013, etc.).

In order to ensure maximum data protection, CETIN has adopted numerous data processing policies.

CETIN has appointed a Data Protection Officer and has special departments that take care of information security and fraud protection. They support the processes for safeguarding and securing the protection of personal data, as well as monitoring their compliance.

#### **X RIGHTS OF NATURAL PERSONS**

The natural persons whose personal data is processed by CETIN under this Privacy Policy are entitled to:

- request CETIN access and/or correction of any personal data relating to them, as provided for in the Regulation;
- request CETIN to limit the processing of any personal data relating to them and/or delete such personal data in such cases as provided for in the Regulation;
- object to the processing of any personal data relating to them, as provided for in the Regulation;
- file a complaint with the PDPC if they believe that CETIN is in any violation of the personal data protection law.

#### **XI CETIN CONTACT INFORMATION**

Should you have any questions and inquiries regarding the processing of personal data under this Privacy Policy, please contact [privacy@cetinbg.bg](mailto:privacy@cetinbg.bg).

This Privacy Policy is relevant as of 1<sup>st</sup> March 2021 and may be amended or supplemented due to an amendment to the applicable law, on the initiative of CETIN, the persons concerned, or any competent authority (e.g. the Personal Data Protection Commission).