

PRIVACY POLICY OF CETIN BULGARIA EAD RELATING TO THE PROCESSING OF EMPLOYEES' PERSONAL DATA

(full version)

1. INTRODUCTION

The security and proper use of personal data are of exceptional significance to us and to our employees. Therefore, it is important to us that the employees understand why and how we process their personal information.

This Policy applies with respect to personal data processed by CETIN in relation to employees as it covers the post-recruitment process. The processing of personal data of job applicants, persons referred and persons who have signed an employment contract but have not yet taken up their duties is the subject of the Recruitment Privacy Policy of CETIN Bulgaria EAD published at <https://www.cetinbg.bg/dist/pdf/Recruitment-EN.pdf>.

The processing of personal data of employees in the course of video surveillance in CETIN sites is not covered by this Policy. You may find information about this type of processing in the Video Surveillance Privacy Policy published at <https://www.cetinbg.bg/dist/pdf/video-surveillance.pdf>.

The processing of personal data of employees carried out in the course of security monitoring of CETIN's computer networks and systems is not covered by this Policy. The information about this type of data processing is provided separately to the employees.

For the sake of greater clarity and for convenience of the readers of this Policy, examples illustrating why and/or how CETIN processes personal data are stated in many parts of this Policy. These examples are not part of the Policy. Therefore, if an example is no longer up-to-date CETIN will not update this Policy.

2. DEFINITIONS

2.1. Policy

means this Privacy policy of CETIN Bulgaria EAD relating to the processing of employees' personal data, including its subsequent amendments and supplementations.

2.2. Personal Data

In practice, this is any information which identifies a specific individual or which relates to an individual who can be directly or indirectly identified. The types of personal data processed according to this Policy are described specified below.

2.3. Personal Data Processing

Personal data processing means any use of personal data. The following activities are personal data processing:

- Collection;
- Recording;
- Storage;
- Review;
- Check;
- Alteration;

- Retrieval;
- Disclosure;
- Restriction;
- Deletion;
- Destruction, etc.

2.4. CETIN or Employer

CETIN Bulgaria EAD, company ID number [UIC] 206149191, having its seat and registered office at building 6, Business Park Sofia, Mladost 4 Residential Estate, city of Sofia, postal code 1766.

In this Policy the use of pronouns “We”, “Us” or “Our” also means CETIN Bulgaria EAD.

2.5. Employee or Data Subject

An individual who is:

- a party to a full-time or part-time employment or civil contract with CETIN; or
- hired by another employer for the performance of temporary job and who works under CETIN's management and control under the Labor Code.

2.6. Restriction of personal data processing

Upon a restriction on processing CETIN may only store the relevant personal data unless:

- the employee has given his/her consent; or
- data processing is necessary for the establishment, exercise or defense of legal claims; or
- data processing is necessary for the protection of the rights of another natural person; or
- there are important grounds of public interest for the Republic of Bulgaria or the European Union.

3. WHAT PERSONAL DATA ABOUT EMPLOYEES WE PROCESS

In relation to the activities carried out as part of CETIN's performance of its duties and the exercise of its rights as an employer, CETIN processes the following categories of data regarding the employees:

3.1. Basic Data

Basic data means:

- Full name;
- Sex;
- Age;
- Personal identification number [EGN] or a personal number of a foreign citizen, or an official number from the National Revenue Agency;
- Data from identity documents (type, number, date of issue, place of issue);

- Photograph in digital form (it is necessary where the job is to be done at a site with access control for the purposes of preparation of an access card and in the internal gate subject to the rules on use;).

3.2. Contact data

These are employee's contact data such as:

- personal e-mail address (if provided by the employee);
- corporate e-mail address;
- permanent address;
- current address;
- office telephone number;
- personal telephone number (if provided by the employee).

3.3. Data regarding access to labor market

These are data relating to employees who are not citizens of the Republic of Bulgaria which are processed with a view to ensuring compliance with the applicable legislation which regulates the access to the labor market such as:

- Residence status and the visas or permits related thereto;
- Permits to access the labor market, etc.

3.4. Data regarding qualification and experience

These are data regarding:

- education;
- specializations;
- acquired qualifications, knowledge and skills;
- acquired capacity;
- the professional experience and length of service gained by the employee, including data about employee's previous or current legal relationships with other employers.

3.5. Data regarding family status and family members

These are data regarding the employee's family status as well as data about his/her spouse or partner, child/children or parent(s), including data regarding their health condition or death.

3.6. Data regarding the position held or Data regarding the position

These are:

- data regarding the contract entered into by and between CETIN and the employee;
- data regarding the position held;
- length of service at CETIN;
- employee's number in CETIN's staff management system;
- working hours;
- workplace, etc.

3.7. Data regarding remuneration

These are data regarding:

- the amount of the remuneration or compensation due;
- the system of payment;
- calculation/accrual of overtime/nighttime work done and/or period of availability;
- other accruals;
- withholdings and grounds for them
- taxes and social security contributions in relation to employee's contract;
- bank account in view of the payment of remuneration.

3.8. Data regarding the benefits

These are data regarding the additional incentives provided by CETIN to its employees in accordance with its internal rules and policies, such as:

- tariff plan;
- discounts for mobile devices for family and friends;
- Certificates regarding devices;
- additional medical insurance;
- additional accident insurance;
- vouchers;
- participation in the employee shareholding plan;
- parking space;
- company car, etc.

3.9. Data regarding the working hours

These are data regarding the employee's schedule, hours worked, nighttime and/or overtime work done and/or period of availability, etc.

3.10. Data regarding the leaves

These are data related to the leaves of absence which may be used, have been requested or used by the employee such as, for instance:

- type of leave;
- period of use;
- grounds for using the leave (e.g. basic paid annual leave, leave for performance of civil, public or other duties, leave in case of temporary disablement, leave due to pregnancy and birth, etc.).

3.11. Data regarding business trips

These are data regarding:

- period of the business trip;
- place of the business trip;

- type of the business trip;
- advance payments made;
- company car provided (if applicable);
- information about employee's transport and accommodation;
- amount of daily, accommodation, travel and other allowances and expenses in relation to the business trip;
- sums to be refunded to the employee
- sums to be refunded by the employee (e.g. in case of provided advance payment), etc.

3.12. Data regarding participation in CETIN's initiatives

These are data about employees which are processed by CETIN upon employees' participation in events or initiatives organized by CETIN (e.g. blood donation, volunteering, payroll donations, etc).

3.13. Data regarding training sessions

These are data regarding internal or external training and/or instructions which have been requested or carried out by the employee in view of enhancing his/her qualification or compliance with statutory duties.

3.14. Data regarding assets and resources provided

These are data regarding CETIN's assets and resources which have been provided or made available by CETIN to a specific employee in order to provide conditions for the performance of the work assigned to such employee. These might be, for instance, data regarding:

- Company cars provided, including their location;
- Office computers, SIM cards and/or mobile devices provided;
- Access control cards provided (for access to premises, carparks, etc.);
- provided e-mail addresses, profiles, usernames and passwords for access to CETIN's software and/or databases, etc.

3.15. Data regarding employee's performance

These are data such as:

- goals set;
- attestations and appraisals,
- assessments of performance and/or goals achieved;
- feedback given and received in relation to employee's performance;
- interests regarding employee's career development;
- development plans, etc.

3.16. Logs of access to premises

These are records generated automatically whenever an employee accesses a site or premises where access control is carried out by CETIN. These records contain information about all events while using the employee's access control card provided by CETIN, such as:

- Type of event (e.g. entrance or exit, unsuccessful attempt to enter or exit, and others);
- Information about the area and/or the premises in relation to which the event is being generated;
- date and time of event;
- identifier of the card used, etc.

3.17. Data regarding employee's liability

These are data regarding the employee which are processed by CETIN in order to ensure the compliance with the employment duties and the possible application of disciplinary measures upon violations of discipline at work as well as data processed by CETIN in relation to employees' pecuniary liability for damages caused. Such data might include:

- information about participation in disciplinary proceedings;
- information about imposed disciplinary penalties;
- information about employee's pecuniary liability invoked, etc.

3.18. Data regarding health condition

These are data revealing information about employee's physical or mental health condition. Such data might be:

- data regarding an illness;
- data regarding a disability;
- medical history;
- data regarding treatment being administered, etc.

3.19. Data regarding criminal record

These are data which reveal information about employee's convictions or about the existence of criminal proceedings initiated against the employee.

3.20. Data regarding religious beliefs

These are data which reveal information about employee's religious denomination.

3.21. Data regarding trade union membership

These are data which reveal information about employee's membership in a trade union.

4. HOW WE COLLECT PERSONAL DATA ABOUT EMPLOYEES

CETIN collects personal data about the employee in different ways. In most cases we receive information directly from the employee but sometimes the data are provided to CETIN by third parties or are received from other sources such as public registers or profiles. Certain data about the employees are generated in the course of work and/or upon participation in various initiatives of CETIN.

4.1. We collect personal data directly from the employees:

- In the course of signing the contracts with them;
- Upon or on the occasion of the performance of the contracts with them;

- Upon and on the occasion of the amendment or termination of the contracts with them.

4.2. We obtain personal data about the employees from third parties:

- from authorities and persons acting within the scope of their statutory competence (e.g. courts, enforcement agents, National Revenue Agency, National Social Security Institute, Disability Assessment Medical Commission [TELK], Labor Inspectorate, the bodies of the Ministry of Interior and others);
- from other employees, customers or suppliers of CETIN (e.g. when assessing the performance, when warning of wrongful conduct have been received, etc.).

5. HOW WE PROCESS EMPLOYEES' PERSONAL DATA

5.1. Processing of data necessary for the performance of contracts concluded with the employees in compliance with the applicable legislation

(i) We process employees' data so that we can administer the process of payment of remuneration

In order that we can fulfill our obligation to pay remuneration to the employees we need to process the following data about them: basic data, data regarding the position, data regarding the remuneration, data regarding the benefits and data regarding the leaves and/or other absences. When paying additional remuneration:

- for results attained we also need to process data regarding the employees' performance;
- for nighttime or overtime work, for work on public holidays or for period of availability we also need to process data regarding the working hours.

(ii) We process employees' data so that we can plan and manage the workflow:

In order that we can properly plan and manage the workflow (e.g. timely take into consideration scheduled absences, approve schedules and shifts, ensure replacement employees, make arrangements for succession in case of employee's departure, etc.) we need to process the following data about the employees: basic data, data regarding the position, data regarding the leaves and/or other absences, data regarding the business trips, data regarding the working hours, etc.

(iii) We process employees' data so that they can exercise their right to use a leave

In order that we can fulfill our obligation to afford the employees the opportunity to exercise their right to leaves we need to process the following data about the employees: basic data, data regarding the position, and data regarding the leaves. In addition to those data when an employee makes use of some types of leave we also need to process:

- data regarding the employee's family status and family members; or
- data regarding the employee's health condition; or
- data regarding the employee's religious beliefs; or
- data regarding the employee's trade union membership; or
- data regarding the employee's participation in CETIN's initiatives, e.g. blood donation.

(iv) We process employees' data so that we can administer the process of sending them on business trips

In order that we can send an employee on a business trip where CETIN's needs so necessitate as well as for the purposes of accounting for the business trip, accrual and payment of the business trip-related compensation we need to process the following data about the employee: basic data, data regarding the position, and data regarding the business trips.

(v) We process employees' data so that we can provide them with conditions for the performance of their work

In order that we can fulfill our obligation to provide conditions for the performance of employees' work (e.g. to provide them with equipment, software, corporate profiles for using information systems, company cars or others), we need to process the following data about the employees: basic data, data regarding the position, data regarding the qualification and experience, data regarding the assets and resources provided, etc.

(vi) We process employees' data so that we can fulfill our obligations to ensure occupational health and safety

In order that we can carry out operations to ensure occupational health and safety sometimes we need to process employees' personal data such as, for instance: basic data, data regarding the position, data regarding the qualification and experience, and, in certain cases, data regarding the health condition.

(vii) We process employees' data so that we can provide them with additional benefits

In order that we can fulfill our obligation to provide the employees with the additional benefits offered by CETIN we need to process the following data about the employees: basic data, data regarding the position, and data regarding the benefits. The use of certain benefits (e.g. sports cards) might also require the processing of data regarding employee's family status and family members.

(viii) We process employees' data so that we can provide them with conditions for maintenance and enhancement of professional qualification

In order that we can fulfill our obligation to provide conditions for maintenance and enhancement of employees' professional qualification, with a view to affording an opportunity for efficient performance of their duties under the contracts with CETIN and their future professional development, we process the following data about the employees: basic data, data regarding the position, data regarding training and data regarding the qualification and experience.

(ix) We process employees' data so that we can maintain their employment records

In order that we can create an employment record for the employee when (s)he takes up his/her duties as well as to keep in it the documents related to the coming into being, existence, amendment and terminating of the contract with CETIN we need to process employee's personal data contained in the relevant documents (e.g. basic data, data regarding the position, data regarding the qualification and experience and others).

(x) We process employees' data so that we can provide them with information and documents related to their contracts with CETIN

Where an employee requests that we issue and provide him/her with documents evidencing some facts related to his/her contract with CETIN (e.g. data from documents contained in his/her employment record), in order that we can fulfill the request we need to process some personal data related to such employee. The type of personal data being processed depends on the subject matter of the request and might include: basic data, data regarding the position, data regarding the qualification and experience, data regarding the remuneration, and others.

(xi) We process employees' data so that we can assess their performance and plan their development

Upon the performance of the contracts with the employees we process their personal data in view of setting goals, making an assessment of their performance based on the goals set, as well as planning the employees' future development. The processes of setting the goals, performance assessment and development planning accompany the performance of the contracts with the employees and are an integral part thereof. The data we process while we carry out these processes are: basic data, data regarding the position, data regarding the qualification and experience, data regarding training and data regarding employee's performance.

(xii) We process employees' data so that we can fulfill our obligations to employ people with disabilities

In order that we can fulfill the directions given by the competent healthcare authorities such as:

- to take the necessary measures to adapt the working conditions at the workplace and/or the working hours in order to eliminate the risk for the safety and health of pregnant or breastfeeding women as well as employees in an advanced stage of in vitro treatment; or
- to assign other appropriate work or the same work under easier conditions to employees of reduced work capacity,

we need to process certain personal data such as, for instance: basic data, data regarding the position, data regarding the qualification and experience, data regarding the health condition.

(xiii) We process employees' data when amending the contracts with them

In order that the contracts with the employees can be amended in accordance with the applicable legislation (e.g. when an agreement is reached, upon promotion, etc.) we need to process certain personal data of the employees such as, for instance: basic data, data regarding the position, data regarding the qualification and experience, data regarding the benefits, data regarding the assets and resources provided, etc.

(xiv) We process employees' data so that we can ensure the lawful termination of their contracts

In order that a contract with an employee can be terminated according to the requirements of the applicable legislation we need to process his/her personal data. The type of personal data we process for the purposes of termination of their contracts depends on the specific situation and the reason for termination but commonly they include: basic data, data regarding the position, data regarding the qualification and experience, data regarding training, data regarding the performance, data regarding the remuneration, data regarding the benefits, data regarding the assets and resources provided, data regarding the leaves, etc.

Where the termination is carried out due to employee's inability to perform the work assigned to him/her due to an illness which has resulted in permanently reduced work capacity or due to medical contraindications based on a conclusion by a Disability Assessment Medical Commission in order that the contract with such employee can be terminated we also need to process data regarding the employee's health condition.

In other cases where the termination is carried out due to a committed grave disciplinary violation, for the purposes of termination of the contract with the employee the data regarding employee's liability will also be processed, and if termination of the contract is made due to employee's arrest for enforcement of a conviction or because(s)he is deprived of the right to exercise a profession or to hold the respective position we will also process data regarding criminal record.

5.2. Data processing necessary for the fulfillment of statutory obligations

In order that we can fulfill the obligations stipulated in the legislation we have to process employees' personal data. Such are for instance CETIN's obligations:

- to charge and withhold taxes and social security contributions according to the taxation and social security legislation;
- to provide certain information to the competent authorities (National Revenue Agency, National Social Security Institute, Labor Inspectorate, Commission for Personal Data Protection (CPDP), enforcement agents, bodies of the Ministry of Interior and the judiciary and others);
- arising out of the legislation on labor migration and labor mobility by processing personal data about certain employees such as, for instance, data regarding the access to labor market;
- to ensure that the employees working at sites classified as important strategic sites for the national security of the country, have a valid permit issued by the bodies of the State Agency for National Security which necessitates the processing of their personal data (basic data, data regarding the position, data regarding the qualification, data regarding the health condition and data regarding criminal record) and the provision thereof to the State Agency for National Security;
- to maintain insurances which are mandatory by virtue of a law, etc.

5.3. Data processing necessary for protection of CETIN's legitimate interests

(i) We process employees' personal data in order to prevent, find and investigate unlawful acts in our sites and premises

Ensuring security and preventing acts that violate the legislation and/or our internal rules are of exceptional importance CETIN. Moreover, they are also important for our users, suppliers, employees and visitors. Therefore, we process basic data and logs of access to premises when carrying out access control for some of our sites in order to prevent, deter, find and investigate unlawful acts of such nature as to:

- threaten or harm the life and/or health of persons located in the sites where access control is being carried out;
- compromise the security of personal data of our customers and/or employees (e.g. accidental or unlawful destruction and/or loss of data, wrongful access to data, wrongful modification or dissemination of data, etc.);
- threaten or harm the property and/or other assets of CETIN (or, respectively, the property and/or assets of third parties).

The collected logs of access to premises, together with the basic data about certain employees may be made available to the competent authorities in case that the latter demand them as per the established procedure, or on our own initiative, e.g. when a signal is sent in view of initiating proceedings and carrying out an investigation.

(ii) We process employees' personal data so that we can ensure the compliance with discipline at work, in relation to imposing disciplinary penalties to employees, as well as for the purpose of invoking their pecuniary liability

Corporate responsibility is the foundation of our philosophy of developing our business in a sustainable and transparent way, and our goal is to increase as much as possible the benefits of telecommunication technologies, while striving to create added value both for the business and for the general public. CETIN is among the largest companies in Bulgaria. We work with many partners to create and offer our broad range of services and products satisfying our customers' needs of telecommunication services and we realize that compliance with certain norms of conduct forms the basis of our long-term success.

We constantly make efforts to ensure that our employees duly perform their duties to CETIN (including compliance with the company's internal rules and procedures). In this sense in order to prevent and find violations committed by employees and to invoke their (disciplinary and/or pecuniary) liability in accordance with the legislation we need to process certain personal data

about them. The type and volume of the data being processed depend on the specific situation as the following might be such data: basic data, data regarding the position, data regarding the qualification and experience, data regarding the remuneration, data regarding the benefits, data regarding the assets and resources provided, data regarding the liability, and others.

(iii) We process employees' personal data so that we can enter into and perform contracts with our customers, suppliers and partners as well as communicate with third parties in relation to the business carried on by CETIN

Since CETIN is a legal entity, the conclusion and performance of contracts with our customers, suppliers and partners, as well as the communication with third parties (e.g. competent authorities, job applicants, visitors of our sites and others) would be impossible without providing certain personal data of the employees who represent the company and/or who act as contact persons with respect to the respective customers, suppliers, partners or third parties. The personal data we process for such purposes are commonly: names, position, telephone for contacts and office e-mail address. However, in order to comply with the statutory requirements sometimes other data regarding the employees might also be disclosed to the aforesaid persons (e.g. the notarized contracts and powers of attorney will contain their personal identification numbers [EGN], data regarding the identity documents, permanent address and other data).

(iv) We process employees' personal data so that we can make internal research

We at CETIN believe that the successful social strategy of every company starts with the responsibility towards the people who build its success and reputation. Care and recognition for the employees who work at our company is the main factor behind our company's growth. Thus, in order to develop and improve our products and services, customer care, working conditions and processes at the company sometimes we seek the opinion of the employees within studies and surveys, the participation in which is completely voluntary. When carrying out such studies and surveys, we need to process employees' personal data which commonly include: basic data, data regarding the position as well as the feedback given.

(v) We process data regarding the location of company cars provided to employees for the performance of the tasks assigned to them for the sake of fleet management and accountability

Where a company car is provided to an employee in view of the performance of the tasks assigned to him/her, we process personal data regarding the location of such car (data generated by GPS modules) in order to manage the company's fleet, to guarantee the fulfillment of the official duties, to perform our obligations arising out of the tax legislation as well as to provide information to the competent authorities controlling the compliance with the traffic rules.

5.4. Processing of data based on a consent given by the employees

In certain cases CETIN processes personal data of the employees based on their consent. Giving consent is a completely voluntary act: the employees may refuse to give their consent without such refusal leading to any negative consequences for them, but they might not make use of certain privileges or incentives which are granted if they give their consent. The consent given by an employee may be withdrawn at any time by the employees, free of any charge, but it is important that they take into consideration that the withdrawal of the consent does not affect:

- the lawfulness of the processing of personal data based on the withdrawn consent before the withdrawal thereof; and
- the processing of personal data for purposes for which no consent is required according to the stipulations of this Policy.

Examples of cases where CETIN processes personal data of the employees based on their consent:

- participation in company's initiatives (e.g. donation campaigns, blood donation, volunteering);
- participation in company's campaigns (e.g. "Bring a friend to work");

In case of business trips, the employee may give his/her consent to his/her mobile device location data being processed by CETIN (by dialing a specific number or by sending a SMS to such number) in order to account for the business trip as an alternative to the submission of a business trip order signed and sealed by a person from the institution or the organization where the employee has been sent on a business trip.

6. CATEGORIES OF PERSONS TO WHOM WE DISCLOSE EMPLOYEES' PERSONAL DATA

6.1. Personal Data Processors

Personal data processors are persons or entities who process personal data on CETIN's behalf and further to an assignment made by CETIN based on a written agreement. They do not have the right to process the personal data provided to them for purposes other than the performance of the work assigned to them by CETIN. The processors are obliged to abide by all instructions given by CETIN.

CETIN takes the necessary measures in order to ensure that the hired processors strictly abide by the personal data protection legislation and CETIN's instructions as well as that they have taken appropriate technical and organizational measures to protect the personal data.

Examples of personal data processors:

- Persons to whom the provision of human resources services has been assigned, including but not limited to accrual and payment of remuneration, staff administration, recruitment and others;
- Occupational Medicine Services providers;
- Providers of services of organization, storage and maintenance of employees' data archives as well as services related to destruction of such archives;
- Providers of consulting services (e.g. persons assigned to carry out additional training.);
- Providers of courier services;
- Providers of services for implementation and/or maintenance of information systems where employees' personal data are stored.

6.2. Competent Authorities

Employees' personal data of may be provided to competent state and/or municipal authorities where required in view of the fulfillment of a statutory obligation. Such authorities are National Revenue Agency, National Social Security Institute, Labor Inspectorate, Ministry of Interior, courts, prosecution office, enforcement agents, CPDP, Consumer Protection Commission, Competition Protection Commission, Communications Regulation Commission, etc.

6.3. Suppliers, customers and partners of CETIN as well as third parties with whom CETIN communicates as part of the company's operations

The personal data of employees may be made available by CETIN to suppliers, customers and partners of the company as well as to third parties with whom CETIN communicates upon and on the occasion of company's operations (see what is stated above in this Policy). In such cases those persons act as personal data controllers within the meaning of Regulation No 2016/679 of the European Parliament and of the Council (also known as "GDPR").

Such third parties are, for example, the insurers to whom we provide data about the employees in view of taking out a group medical insurance, insurances against the risk of accident at work, partners providing sports cards, our suppliers and corporate clients, etc.

6.4. Banks and payment institutions

In relation to the servicing of payments made to the employees via bank transfer or via a payment institution, data exchange between CETIN and the respective bank or payment institution must be carried out.

6.5. Lawyers and Law firms

If necessary (e.g. in case of a legal dispute between CETIN and an employee) employees' personal data might be disclosed to lawyers and law firms retained by CETIN to defend its rights and lawful interests.

6.6. Third parties in relation to transformation (e.g. merger or consolidation) or transfer of an undertaking

In case of CETIN's transformation as well as in case of transfer of assets in accordance with the applicable legislation the personal data of the employees administered by CETIN may be made available to a third party successor.

7. PERSONAL DATA PROCESSING OUTSIDE THE TERRITORY OF BULGARIA

As a rule CETIN aims not to send the personal data of the employees outside the territory of the European Union (EU) and the European Economic Area (EEA). In certain cases, however, certain data need to be sent to persons outside EU/EEA (e.g. in order to provide the service of maintenance of an information system of CETIN, which cannot be carried out without access to personal data) subject to compliance with the requirements of the applicable legislation and the provisions described in this Policy.

In case that personal data regarding an employee need to be sent by CETIN to a country outside EU or EEA this will be done by abiding by this Policy and if any of the following conditions is present:

- Where there is a decision of the CPDP or the European Commission according to which the respective country ensures an adequate level of personal data protection;
- Where an agreement has been signed with the organization to which personal data are being sent and such agreement contains the standard clauses regarding data protection approved by the European Commission by Commission Decision No 2010/87/EU (the standard clauses are available at https://www.cdpd.bg/userfiles/file/Transfers/BCR_Commission_decision_2010-87_Bq.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_supplementarymeasurestransferstools_en.pdf);
- Where the data transfer is needed in order that a commitment to the respective employee is fulfilled.

8. HOW LONG WE KEEP THE PERSONAL DATA OF THE EMPLOYEES

CETIN stores the personal data of the employees for as long as necessary to achieve the purposes stated in this Policy (e.g. until the relationships between the parties are settled, until the expiration of applicable statutes of limitation or others), or to meet the requirements of the legislation. For example, CETIN is obliged to store the data contained in the payroll for a period of 50 years.

CETIN makes efforts to ensure that employees' personal data being processed are updated (and corrected if necessary) as well as that no data are stored, which are not necessary for the attainment of the aims described above.

9. HOW WE PROTECT THE PERSONAL DATA OF THE EMPLOYEES

Building and maintaining trust between us and our employees is a priority for CETIN. Thus, the protection of our systems and personal data is of paramount importance to the company. In accordance with the requirements of the legislation in force and the best practices CETIN takes the necessary technical and organizational measures to ensure that the employees' personal data are safe.

In order to ensure the protection of personal data CETIN uses advanced technologies combined with uncompromising management of security controls. Our framework is based on one of the most popular security standards (ISO27001:2013 and others).

In order to ensure the maximum protection of data a number of policies regulating data processing, including while carrying out recruitment, have been adopted at CETIN.

At CETIN there is an appointed a data protection officers and there are special departments taking care of information security and protection against fraud. They assist the processes of protecting and ensuring personal data security and see to their compliance.

10. WHAT RIGHTS NATURAL PERSONS HAVE IN RELATION TO PERSONAL DATA PROCESSING

10.1. General information about the rights of natural persons

(i) CETIN takes action upon a request from an employee to exercise a right under this section only if CETIN can identify the respective person:

Only persons who can be identified by CETIN may exercise their rights under this section. This means that if a natural person wants to exercise any of his/her rights under this section we will have to identify him/her to check whether (s)he is a current or a former employee.

If the purposes for which CETIN processes personal data do not require or do not require anymore the identification of a natural person CETIN is not obliged to maintain, acquire or process additional information in order to identify the person for the only purpose of taking actions based on a request from that person.

(ii) CETIN notifies the employees of the actions taken within one month following the receipt of a request under this section as in certain cases this period may be extended by not more than two months:

CETIN provides natural persons with information concerning the actions taken in relation to their requests to exercise rights under this section without unnecessary delay and in any cases within one month after the receipt of the request. If necessary, this period may be extended by two more months by taking into consideration the complexity and number of requests. CETIN informs the relevant person of any such extension within one month after the receipt of the request and state the reasons for delay as well.

(iii) In case of refusal to carry out a request CETIN notifies the respective employees of their rights:

If CETIN does not take actions further to the request of a natural person CETIN notifies such person without delay and not later than one month after the receipt of the request of the reasons for CETIN's failure to take actions as well as of his/her option to file a complaint to CPDP and to seek protection as per the legal procedure.

(iv) In certain cases CETIN may request additional information to verify the identity of the employees:

In case that CETIN has reasonable concerns in relation to the identity of the employee who files a request under this section CETIN may request the submission of additional information necessary for verification of such person's identity.

(v) The actions taken by CETIN upon submitted requests to exercise rights under this section are free of any charge for the persons unless their requests are obviously unfounded or excessive:

The actions taken by CETIN upon and on the occasion of the exercise of employees' rights are free of any charge. Where the request of a person is obviously unfounded or excessive (e.g. because of its repetitiveness), CETIN has the right, at its own discretion: (a) to refuse to comply with the request; or (b) to demand the payment of a reasonable fee determined on the basis of the administrative costs necessary for the provision of the requested information or for the requested actions to be taken.

10.2. The employees have the right to access to personal data relating to them

The employees have the right to receive from CETIN information as to whether any personal data related to them are being processed. If yes, they have the right to get access to the relevant data.

10.3. The employees have the right to demand that the personal data relating to them be corrected if the data are not accurate or up-to-date

In the event that the personal data being processed by CETIN are not accurate or up-to-date the employees have the right to demand that CETIN correct them.

10.4. In certain cases the employees have the right to demand that personal data related to them be deleted

The employees have the right to demand that CETIN delete personal data related to them in the following cases:

- the personal data are not necessary anymore for the purposes for which they have been collected or processed;
- an employee has withdrawn his/her consent on which personal data processing is based and there is no other legal basis for the processing of the same;
- an employee has objected to the processing of personal data based on CETIN's legitimate interests unless there are other legal grounds for processing, which prevail over the employee's interests, rights and freedoms or data processing is necessary for the establishment, exercise or protection of legal claims;
- the personal data related to the respective employee have been processed unlawfully;
- the personal data must be deleted by CETIN in view of the fulfillment of a legal obligation arising out of the law of the Republic of Bulgaria or the European Union.

10.5. In certain cases the employees have the right to demand that processing of personal data relating to them be restricted

The employees have the right to request that CETIN restrict the processing of personal data related to them in the following cases

- the accuracy of personal data is contested by the employees: for a period that makes it possible for CETIN to examine the accuracy of such personal data;
- processing is unlawful but the employee does not want his/her personal data to be deleted and, instead, demands such restriction of the use thereof;

- CETIN does not need anymore the personal data for the purposes of processing but the employee demands them in order to establish, exercise or defend against legal claims;
- the employee has objected to the processing of personal data based on CETIN's legitimate interests pending an inspection of whether the CETIN's legitimate interests prevail over CETIN's interests.

10.6. In certain cases the employees have the right to portability of personal data relating to them

The employees have the right to obtain from CETIN the personal data provided by them (e.g. the data provided upon the conclusion of a contract with CETIN), in a structured, commonly-used and machine-readable form as well as to transfer such data to another controller without being hindered by CETIN, where technically feasible. The employees have this right only if:

- CETIN processes the respective data for the purposes of conclusion or performance of a contract with the employee or based on a consent given by the latter; and
- processing of relevant data is made in an automated manner.

10.7. In certain cases the employees have the right to object to the processing of personal data relating to them

The employees have the right to object, at any time and for any reasons related to their specific situation, to the processing of personal data relating to them where CETIN processes their data for protection of its legitimate interests. Depending on the nature of the objection and the circumstances stated by the respective employee CETIN will make an internal check regarding the objection and will take a decision regarding the objection in compliance with this section by:

- notifying the employee that CETIN will discontinue the processing of his/her personal data; or
- making a justified refusal to discontinue the processing of his/her personal data if there is a legal basis for that.

10.8. The employees have the right to file a complaint before a supervisory authority on personal data protection

The employees have the right to file complaints or warnings to CPDP in case that in their opinion CETIN violates the legislation on personal data protection. There are instructions on filing complaints published on PDPC's website at: <https://www.cdpd.bg>

The employees may also file complaints before other supervisory authorities on the territory of the European Union according to the provisions of 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. CETIN'S CONTACT INFORMATION

CETIN Bulgaria EAD, company ID number [UIC] 206149191, having its seat and registered office at building 6, Business Park Sofia, Mladost 4 Residential Estate, city of Sofia, postal code 1766, is the controller of personal data, which are processed according to this Policy.

For any questions and inquiries regarding the processing of personal data under this Policy please contact privacy@cetinbg.bg

12. ENTRY INTO FORCE AND UPDATING OF THIS POLICY

This Policy is current as at 01.03.2021.

This Policy may be amended or supplemented because of amendments to the applicable legislation, on the initiative of CETIN, the employees or a competent authority (e.g. CPDP).

CETIN shall inform the employees of the amendments or supplementations of this Policy within a period not shorter than 7 (seven) days before their entry into force by:

- publishing the updated Policy on the company's intranet;
- notifying the employees by e-mailing them a link to the webpage the updated version of this Policy is published.

It is recommended that the employees regularly check the most up-to-date version of this Policy at the company's intranet.