

PERSONAL DATA PRIVACY
of CETIN Bulgaria EAD
for work with suppliers

I INTRODUCTION

The security and proper use of personal data are of paramount importance for CETIN Bulgaria EAD.

Therefore, with this Policy we inform you about the manner we process personal data in the selection of suppliers, as well as in relation with entering into, conducting and termination of relations with suppliers.

For better clarity and the convenience of the readers we have given examples in several places in this Policy to illustrate why and/or how CETIN processes personal data. These examples are not exhaustive.

II DEFINITIONS

1. Policy

This Personal Data Policy of CETIN Bulgaria EAD for work with suppliers, including its subsequent amendments and supplements.

2. Personal data

Practically, this is any information identifying a particular individual or referring to an individual who may be directly or indirectly identified.

3. CETIN

CETIN Bulgaria EAD, UIC 206149191, having its seat and registered address in Sofia, postal code 1766, Mladost 4 Residential Quarter, Business Park Sofia, building 6. In this Privacy Policy the use of the pronouns "We", "Us" or "Our" will also mean CETIN Bulgaria EAD.

4. Supplier

A natural person, a legal entity, a civil society or a consortium wherefrom CETIN receives goods and/or services. Suppliers in the meaning of this Policy also are: (a) the persons creating real rights in favour of CETIN and b) the persons transferring the ownership over real properties (or parts of properties) to CETIN.

5. Subcontractor

A legal entity, a civil society or consortium engaged by a supplier for the purpose of provision of goods and/or services to CETIN.

6. Representative

A natural person representing a supplier or a subcontractor under the law (e.g. a Managing Director or Executive Director) or by proxy.

7. Contact person

An individual designated by a supplier and/or subcontractor as a contact person for certain issues. These are for example contact persons for financial, business, technical or legal matters.

8. Employee

An individual employed by a supplier or subcontractor carrying out an activity relating to the provision of goods and/or services to CETIN.

9. GDPR or the 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 DO WE PROCESS WHEN WORKING WITH SUPPLIERS

The controller of the data processed under this Policy is CETIN Bulgaria EAD, UIC 206149191, having its seat and registered address in Sofia, postal code 1766, Mladost 4 Residential Quarter, Business Park Sofia, building 6.

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

Type of data	Supplier – natural person	Representative	Contact person	Employee
Names	x	x	x	x
Position	x	x	x	x
Personal ID number (PIN)	x	x		
Number, date, place and authority issuing the ID document	x	x		
Email address (email)	x		x	
Contact phone number	x		x	
Data about education, skills and/or qualification	x			x
Information about criminal record	x			x
Information on health status	x			x

It is important to note that one and the same individual may act in more than capacity (e.g. as a representative and contact person, and even as an employee). In such cases CETIN will process the data from the above table referring to each of the capacities of the respective individual.

Data about PIN, number, date, place and authority of issue of the identity document are kept by CETIN only where necessary for compliance with the regulatory requirements. For example such are the cases where contracts in a notarized form or with a notarial certification are entered into between CETIN and the suppliers, as well as in the cases where suppliers are represented by proxies whose powers of attorney are with notarization of signatures.

Criminal record and health status data are processed by CETIN only where necessary to comply with the regulatory requirements. For example:

- for a given supplier or its subcontractor to be able to work at strategic sites of CETIN it is necessary to have a permit issued by the State Agency for National Security to its employees which requires the processing of such data by us;
- for a supplier – a natural person with reduced capacity to work to be able to use the tax relief provided for in the legislation, we need to process data regarding his/her health status.

IV HOW DO WE PROCESS PERSONAL DATA WHEN WORKING WITH SUPPLIERS:

In the selection of suppliers, as well as for the purposes of entering into, conducting and termination of relations with our suppliers, CETIN collects personal data in different ways.

In most cases we receive information directly from the persons the data refer to. Such are for example the cases in which the suppliers – natural persons, the representatives of the suppliers or their contact persons provide us information about themselves.

Sometimes, however, the data are provided to CETIN by third persons, for example when:

- CETIN employees recommend a certain supplier and provide information about its contact person or
- the suppliers provide information about their employees or representatives, contact persons or employees of their subcontractors;
- competent authorities, in the exercise of their powers, provide information about the respective persons

When working with suppliers, CETIN collects personal data also from:

- public registers (e.g. the Commercial Register and the Property Register);
- websites of suppliers or their subcontractors; and
- results in Internet search engines.

V HOW DO WE PROCESS PERSONAL DATA WHEN WORKING WITH SUPPLIERS:

We process personal data to select suppliers

As one of the largest companies in Bulgaria, we realize that ethical attitude to our customers, employees and suppliers underlies our long-term success as a company. At CETIN we work towards the achievement of high standards of conduct in the business, good working conditions and internal rules for environmental protection. We expect the same approach from those we have business relations with, especially from our suppliers. We believe that with our actions and investments we contribute to the improvement of the quality of service, restriction of the disloyal practices and protection of the principles of market economy.

Therefore, in the selection of suppliers we are required to process personal data related to them (if they are individuals), their representatives and contact persons. We do that in order to make a research of the market for the products or services sought by CETIN, as well as to contact the potential suppliers and invite them to participate in a procedure for selection of a supplier or to negotiate with the directly.

If the invited suppliers decide to participate in the respective procedure or in negotiations with CETIN, we also process data for their employees in order to:

- decide whether the suppliers, incl. their subcontractors possess the qualifications, skills and expertise necessary for the proper delivery of the goods and/or services sought by CETIN and
- choose suppliers meeting CETIN's requirements as much as possible by making an evaluation of their offers (e.g. from a financial, technical or regulatory point of view).

We process personal data to conclude contracts with suppliers

The conclusion of a valid and binding contract with a supplier is impossible without processing particular data thereof (if the supplier him/herself is an individual) or of his/her representative(s).

The volume of personal data which needs to be processed for the conclusion of a valid contract with a supplier depends on the type of contract – e.g. for contracts with notarized signatures in order that provisions of the Civil Procedure Code are complied with it is necessary that the full

name, personal ID number of the representative(s) of the supplier or the supplier him/herself (if an individual) must be described in the contracts.

We process personal data to perform our obligations to the suppliers and demand performance from them

To be able to perform our obligations to the suppliers, respectively to be able to demand performance from them, it is necessary to process personal data for the suppliers (if they are individuals), for the representatives, the contact persons and the employees.

Without processing personal data of the suppliers (if individuals), the representatives, contact persons and the employees it would be impossible:

- to give, change, supplement or cancel orders to suppliers;
- to have written correspondence, as well as to make phone and/or video conversations and/or joint meetings regarding the performance of the concluded;
- to organize the acceptance and testing of delivered goods and/or services;
- to receive and account for invoices, as well as to make payments under them; etc.

We process personal data in the case of amendment or termination of contracts with suppliers

During the effective term of the contracts with suppliers it is possible, at the initiative of CETIN or the suppliers themselves to negotiate on their amendment or termination. In such cases, to be able to participate in such negotiations, including to enter into any additional agreements or terminate contracts, we have to process personal data for the suppliers (if individuals), for their representatives and/or contact persons.

We process personal data when pursuant to the governing law we obliged to assist the competent state and/or municipal authorities during inspections performed thereby

The business done by CETIN is subject to control by different state and municipal authorities—e.g. the Communications Regulation Commission (CRC), the Commission for Consumer Protection (CCP), the Commission for Personal Data Protection, the National Revenue Agency (NRA), the Directorate for National Construction Supervision (DNCS), etc. In the process of exercising their control the respective authorities have the powers to perform inspections, as well as to demand from CETIN to provide documents and information in its possession. It is possible that the documents and information required in the course of such inspection contain personal data of suppliers – individuals, their representatives, contact persons and/or employees.

For example, when conducting a tax inspection the NRA authorities have the power to demand from CETIN to provide accounting documents that could also contain personal data for suppliers – individuals, for their representatives, contact persons and/or employees.

We process personal data to comply with obligations arising of the laws on accounting and taxes

The tax and accounting legislation in the Republic of Bulgaria require from CETIN to create and keep for a defined period information, reports and documents important for tax and social security control.

In pursuance of this obligation the respective information and documents also containing personal data of suppliers – individuals, their representatives and/or contact persons are retained by CETIN for time periods provided for in the respective laws. These time periods are sometimes long in duration (e.g. the documents for tax and social security control should be retained for a period of eleven years).

We process personal data when it is necessary for the settlement of legal disputes

Sometimes, in order to exercise our rights or legal interests (for example to seek damages) we could have to process personal data of certain suppliers – individuals, their representatives and/or contact persons and/or employees in order to raise an out-of-court claim or bring a suit against:

- the suppliers or
- third parties from whom we have received and/or to whom we have disclosed personal data for the respective natural persons in accordance with this Policy.

Respectively, the suppliers, the abovementioned third parties and the natural persons themselves may raise an out-of-court claim or bring a suit against CETIN. In such cases we might have to process personal data in order to organize and hold our legal defence and thus to protect ourselves against illegal encroachments against our property and/or reputation.

The type and volume of the processed personal data depends on the nature of the raised out-of-court claims or initiated proceedings.

VI CATEGORIES OF PERSONS TO WHOM WE DISCLOSE PERSONAL DATA

Data processors

Data processors are persons who process personal data on behalf of and under an assignment by CETIN based on an agreement in writing. They are not authorized to process the personal data provided to them for purposes other than the work they are assigned by CETIN. Processors are obliged to follow all instructions of CETIN.

CETIN takes any necessary measures to ensure that engaged data processors follow strictly the personal data protection legislation and CETIN's instructions, as well as that they have taken the proper technical and organizational measure for personal data protection.

Examples of data processors:

- Providers of services for implementation and/or maintenance of information systems which sometimes need to access personal data of suppliers – individuals, their representatives, contact persons and/or employees, which data are kept in the respective systems or
- Courier service providers;
- Other suppliers of CETIN which provide goods and/or services relating to the goods and/or services provided by the respective supplier. For example, data for employees of a builder may be disclosed to a provider of construction supervision services; data for employees delivering goods and/or services to CETIN's sites may be disclosed to a provider of security services, etc.
- Independent auditors;
- Law offices, accounting companies or other consultancy service providers.

Banks and payment institutions

Having regard to the making of payments to suppliers – natural persons, CETIN discloses data about them to banks or payment institutions.

Lawyers and law offices

If necessary (e.g. a legal dispute between CETIN and a supplier) personal data for suppliers-individuals, their representatives and/or contact persons and/or employees may be disclosed to lawyers and law offices contracted by CETIN for the protection of its rights and legal interests.

Competent authorities

The provision of data to competent authorities has been described previously in this Policy.

Third parties in connection with reorganization (merger or takeover) or transfer of an enterprise прехвърляне на предприятие

In the case of reorganization of CETIN, as well as in the case of a transfer of assets in accordance with the applicable legislation, the personal data controlled by CETIN according to this Policy may be provided to a third party-successor.

VII PERSONAL DATA PROCESSING OUTSIDE THE TERRITORY OF BULGARIA

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

In certain cases, however, it may become necessary to send particular data to persons outside EU/EEA (e.g. for the provision of a service for maintenance of an information system of CETIN which cannot be performed without access to personal data) in compliance with the provisions of the applicable legislation and as described in this Policy.

If it becomes necessary for CETIN to send personal data of a supplier – natural person, representative, contact person and/or employee to a non-EU or EEA country, this shall be done in compliance with this Policy and in the presence of one of the below conditions:

- In the availability of a decision of the European Commission under which the respective country provides an adequate level of personal data protection;
- When an agreement has been made with the organization to which personal data are sent, containing the standard data protection clauses as approved by the European Commission by Decision No 2010/87/EC (more information is available on the following page of the Commission for Personal Data Protection: 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_supplementarymeasurestransferstools_en.pdf);
- When the transfer of data is necessary for the performance of an obligation to the respective supplier, representative, contact person and/or employee.

VIII TERMS FOR RETENTION OF PERSONAL DATA

CETIN retains the personal data it processes according to this Policy as far as it is necessary to achieve the purposes specified therein (e.g. for the term of validity of the contracts with the respective suppliers, until settlement of the relations between the parties, until expiry of applicable limitation periods, etc.) or in order to comply with the requirements of the applicable legislation. For example: CETIN is obliged to retain the data contained in documents for tax and social security control for a period of 11 years.

IX HOW DO WE PROTECT THE PERSONAL DATA

Building and preservation of the trust between us and our suppliers is a priority for CETIN. Therefore, the protection of our systems and the personal data of the suppliers (if natural persons), their representatives, contact persons and employees is of primary importance for CETIN. In compliance with the provisions of the applicable legislation and the good practices CETIN takes the necessary technical and organizational measures to ensure the safety of personal data.

To ensure protection of personal data CETIN uses modern technologies combined with uncompromised management of security controls. Our framework is based on some of most popular security standards (ISO27001:2013, etc).

To ensure maximum protection of the data CETIN has adopted multiple policies regulating data processing.

CETIN has adopted a data protection officer and specialized departments taking care of information security and protection against fraud. They support the processes for preservation and ensuring the security of personal data, as well as monitor the compliance therewith.

X RIGHTS OF NATURAL PERSONS

Natural persons whose data are processed by CETIN in accordance with this Policy have the right:

- to request from CETIN access and/or rectification of the personal data relating to them, as provided for in the Regulation;
- to request from CETIN to restrict the processing of personal data relating to them and/or to erase them, in the cases provided for in the Regulation;
- to object to the processing of personal data relating to them, as provided for in the Regulation;
- to file a complaint to the Commission for Personal Data Protection if they believe that CETIN violates the legislation for personal data protection.

XI INFORMATION FOR CONTACT WITH CETIN

For any questions and inquiries regarding personal data protection according to this Policy you can contact privacy@cetinbg.bg.

This Policy is valid as of 01.03.2021 and may be amended and supplemented due to changes in the applicable legislation, at CETIN's initiative, at the initiative of the concerned persons or a competent authority (e.g. the Commission for Personal Data Protection).