

PERSONAL DATA PROTECTION POLICY

(version in force from 25.05.2018)

SCOPE AND APPLICATION

PIM OOD ("we", "our", "the company" or "us"), with UIC 126010700 and with its registered office and management address in Haskovo, postal code 6300, 6 Vasil Levski Blvd., as a personal data administrator, realizes the importance of protecting your personal data.

This Privacy Policy aims to inform you about:

1. The categories of personal data we collect and process:

(i) when you fill out the electronic contact form with us, the electronic delivery request or the electronic service request, etc., as well as the other sections and services on our website www.pimbg.com;

(ii) when you apply for a position/positions that we have advertised, or upon your hiring and starting work with us as our employee or contractor under a procurement contract or other contract under the Obligations Act and contracts;

(iii) when you contact us at any of the company's official email addresses or request that we prepare and provide you with an offer, as well as regarding products and/or services that PIM OOD offers to its clients and partners;

2. The sources and ways in which we collect and protect the personal data we process.

3. The purposes for which we process personal data and the legal basis for processing them.

4. The collection and processing of personal data relating to children.

5. Cookie Policy

6. Cases in which we provide your personal data to other persons.

7. How long do we store your personal data and when will we delete it?

8. Your rights in relation to the processing of your personal data.

9. Protection of your personal data.

10. Ways to contact us on issues related to the processing of your personal data.

This Privacy Policy applies in all cases in which we process personal data.

We may update this Privacy Policy from time to time. In such cases, we will post a notice on our website to that effect, as well as the updated version of the policy.

If you have any questions related to this Policy, please do not hesitate to contact us in any of the ways described at the end of this document.

For the purposes of this Policy:

"Personal data" means any information relating to an identified or identifiable natural person ("data subject"); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.

"Special or sensitive personal data" includes personal data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs or trade union membership, as well as the processing of genetic data, biometric data for the sole purpose of identifying a natural person, data concerning health or data concerning the sex life or sexual orientation of a natural person.

We do not process sensitive personal data unless this is necessary for the performance of our statutory obligations, e.g. our obligations arising from employment or anti-discrimination legislation. We ask that you do not send us or otherwise provide us with sensitive personal data relating to you (or anyone else) unless we have explicitly requested this data from you in writing and after we have confirmed to you that we have the necessary consents and that all other legal requirements for processing the data have been met.

Processing of personal data means any operation or set of operations which is performed upon personal data or upon sets of personal data, whether or not by automatic means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction;

Data that cannot be linked or associated with a specific individual, as well as anonymized data, **are not "personal data"** .

WHAT CATEGORIES OF PERSONAL DATA DO WE PROCESS?

The personal data we process includes:

Basic information, such as your name (including prefix), the organization you represent or work for, and the position you hold.

Contact information, such as postal address, email address, telephone number, fax number.

Financial information, such as your bank account number connection to a specific transaction or series of related transactions.

Technical information, such as data generated as a result of using our website or an application integrated into it (application, plugin, etc.), as well as information related to materials and communications that we receive from you or send to you electronically.

Other personal data that you have provided to us or that has been provided to us on your behalf, or that has been generated in connection with our communication with you on matters relating to products and services that the company offers to its current and potential clients and partners, information resources, applications, etc., which you send to us at one of the official email addresses of PIM OOD or by sending an inquiry via the contact form in the "Contacts" section of the company's website.

SOURCES AND METHODS OF COLLECTING PERSONAL DATA

1. Personal data you provide to us directly

Some of the personal data that we collect and process is provided to us directly by you (e.g. when you send us an inquiry via the electronic contact form, fill out delivery or service requests, as well as in cases where you fill out a "Company Inquiry Form" or a "Delivery Inquiry Form", use the company's website or contact us by phone, fax or at one of the official email addresses of PIM OOD).

The personal data you provide to us directly includes in particular:

Identification data, such as your name, personal identification number (in case we need to issue an invoice to an individual in compliance with tax legislation), permanent address, correspondence address, telephone number and e-mail address, position/profession.

Personal data contained in electronic communication that you have sent to us, such as data contained in an email message addressed to us or our employee.

Financial information, such as your bank account number, in connection with the execution of a specific financial transaction or series of similar transactions.

Other data that you have provided to us at our request, when we are required or entitled by law to collect this data for the purpose of identifying you or confirming information we have received.

In certain cases, where permitted by law, we collect data related to convictions and offenses. For example, if the law requires us not to hire individuals who have been convicted of specific crimes for a particular position, we will process the data you provide to the extent necessary to fulfill our legal obligation.

2. Personal data we collect automatically

Some of the personal data we process is collected by us automatically when you use our website to contact us or make an enquiry. This information is provided by the devices (e.g. your personal or work computer, smartphone or tablet, etc.) you use to access our website, such as your user ID.

the device or a unique identifier associated with the device or browser you are using, location data, the type of device or browser you are using.

We do not collect data about your interaction with our website, such as location information and IP address. We do not use cookies to collect statistical information that allows us to better understand the behavior of visitors to our website, such as information about which sections and resources published on the website you have clicked on.

We **do not** carry out automated decision-making, including profiling, as a result of automated processing of personal data.

THE PURPOSES FOR WHICH WE PROCESS PERSONAL DATA AND THE LEGAL BASIS FOR PROCESSING THEM

We collect, store and process personal data, as far as this does not conflict with the law and in accordance with our own privacy policy. We process personal data for various purposes, and this processing is carried out on different legal grounds. According to the law, we must have a legal basis to process your personal data. Depending on the basis on which we process your personal data, you have certain rights. More information about your rights can be found in the section on data subject rights below.

In particular, we process the personal data we collect on the legal grounds set out below for one or more of the following purposes:

We process your personal data in connection with the conclusion and performance of a contract with you.

We may collect and process your personal data for the purposes of

the conclusion and performance of a contract with you, as well as in cases where, at your initiative, we take certain steps prior to concluding a contract. The main purposes for which we process personal data on this basis are:

- establishing the legal possibility of concluding a contract, as well as the additional requirements for the validity of the contract;
- providing additional information and clarifications regarding the subject matter of the contract and the parties to the contract, as well as regarding their rights and obligations under the contract;
- preparation of bills, invoices, credit/debit notes, protocols and reporting sheets for deliveries made, services provided to us in connection with our activities or in connection with deliveries made by us and/or services provided by us,

- tracking of payments made;
- contacting suppliers or contractors on issues related to the implementation or amendment of a concluded supply contract or the provision of services in connection with the activities of

the company;
- coordinating the activities for the implementation of a contract concluded with supplier and/or customer;
- prevent unauthorized disclosure, use, alteration or destruction of confidential information or other legally protected information;

We process your personal data for the purposes of **our commercial activity**, i.e. in connection with the products and services offered by us, by filling in the information requested by us in the electronic contact form, delivery request, service request or any of the questionnaires, through which the company receives information about the quality and level of the products and services offered by it and the degree of satisfaction from our customers and partners. For the above purposes, we process the following personal data of yours: names, address (in cases where this is not the registered office or management address of a legal entity), email address, telephone, mobile phone, fax, position/profession. You should keep in mind that the data you provide to us serve only and solely for the purposes of preparing and concluding a contract, organizing the implementation of the subject of the respective contract (delivery or service), organizing and logistical support for our customers and partners, for contacting you and sending attachments and other materials to an email address. In case PIM OOD does not have this data, it cannot perform

delivery, to provide quality service (warranty and post-warranty service), to provide consultations by phone and on site, to conduct training on working with the relevant equipment, etc.

We process your personal data to fulfill regulatory obligations we have under European Union law and our national law.

In particular, we process personal data in compliance with our legal obligations arising from the fact that we are both an employer and a user of goods and services, as well as a company carrying out commercial activities. In this regard, we process personal data to fulfill our specific obligations arising from or related to:

- social security of workers, employees and service providers under a procurement contract or other contract under the Obligations and Contracts Act, including the obligations arising from the Social Security Code, the Health Insurance Act and the laws in the field of personal income taxation, as well as their equivalents in other EU member states;
- identifying customers when this is necessary to fulfill our obligations under the Anti-Money Laundering Act or the Anti-Money Laundering Financing Act
terrorism;
- the lawful accounting of the business transactions in which we participate, including the taxation of the supplies of goods and services received by us and the services performed by us;
- our obligation to cooperate with the competent authorities in the course of their checks, audits and inspections, as well as in all other cases in which these authorities exercise their control powers on a legal basis;
- our participation in legal proceedings and related procedures as a party or third party, such as our obligation to provide data and information relevant to the resolution of a specific legal dispute;

We may collect and process your personal data with your consent

In certain cases, after we have received your consent for a particular way of processing your personal data, we may use

these data:

- for the purposes of **completing a company questionnaire or a delivery questionnaire** on our website. In case you do not agree to us processing your personal data in connection with the above-described purposes, you may complete the aforementioned questionnaires **anonymously**.
- for the purposes of your participation in various periodic surveys, polls, and filling out questionnaires related to the products and services we offer.
- to fulfill specific obligations towards you, which arise from law or contract, as long as the processing of the relevant personal data (e.g. health information or other sensitive personal data) is not prohibited by law.

The data you voluntarily provide to us is used only for the specific and explicitly stated purpose and is not further processed for other, incompatible purposes.

You have the right to withdraw your “consent” to the processing of your personal data, in relation to that personal information processed on this legal basis, at any time. More information about this right can be found below.

We may process your personal data when we have a legitimate interest in doing so:

- to monitor the technical status of our information systems and resources, including the company's website, as well as to troubleshoot any problems related to their proper functioning or their security and integrity;

COLLECTION AND PROCESSING OF PERSONAL DATA RELATING TO CHILDREN

We understand the importance of taking additional measures to protect the personal data of children. We do not collect personal data from children under the age of 16.

If we become aware that we have collected or processed personal data of a child without legally required parental consent, we will take steps to delete that information without undue delay.

COOKIE POLICY

This cookie policy governs the use of cookies and social media plugins on the website www.pimbg.com (hereinafter referred to as the "Website") of PIM OOD.

Cookies are small text files that are stored on a device's hard drive and contain certain information and sometimes personal data. Social media plugins are small pieces of software developed and provided by social media providers that add social media integration when embedded into a website.

By continuing to use the website after being informed about the use of cookies and social media plugins, you confirm that you have read and accept this Cookie Policy.

OVERALL

Your personal data is processed by PIM Ltd., Bulgaria. You can contact us by email at pim@pimbg.com.

Any reference in this Cookie Policy to specific laws or regulations also includes any amendment, replacement or repeal of those laws or regulations, including any related enforcement decisions.

We reserve the right to change this Cookie Policy from time to time at our sole discretion. Such change will be communicated via the Website. If you do not accept the changes, you must notify us by sending us an email to pim@pimbg.com. If we do not receive such email from you within three (3) business days after the changes to the Cookie Policy have been announced on the Website, you will be deemed to have accepted all changes.

Cookies and social media

You can prevent cookies from being placed by configuring your browser accordingly. For instructions on how to do this, please refer to your browser's information, for example:

for

Internet Explorer: <https://support.microsoft.com/en-us/help/17442/windows-internet-explorer-delete-manage-cookies>

Edge: <https://privacy.microsoft.com/en-us/windows-10-microsoft-edge-and-privacy>

Chrome: [https://support.google.com/chrome/answer/95647?co=GENIE_Platform=DDesktop&hl=en](https://support.google.com/chrome/answer/95647?co=GENIE_Platform=Desktop&hl=en)

Safari: https://support.apple.com/kb/ph21411?locale=en_US

However, disabling cookies when visiting the website may result in the cessation of certain or all functions of the website.

When you visit the website, we place several cookies. Most of the data relating to these cookies, their placement and use, allows us to identify you and we use them to understand how you and other visitors use the website by collecting statistics and usage data, which allows us to

provide a better user experience on the website.

We are aware of the following cookies used on the website: Google cookies (including YouTube cookies):

Strictly necessary cookies (PHPSESSID)

These cookies are necessary for the website to function and cannot be switched off. You can set your browser to block or warn you about these cookies, but some parts of the website will not work. These cookies do not store any personal information.

We use Google Analytics cookies to help us understand how you and other visitors use our website. With these insights, we can compile reports and improve our Website and services. These cookies collect information in an anonymous form, including the number of visitors to the website, where visitors came to the site from, and the pages they viewed.

visited.

Functional cookies (Google Tag Manager)

These cookies allow the website to provide enhanced functionality and personalization. They may be set by us or by third parties whose services we have added to our pages. These cookies allow us to analyze the use of this website by assigning a unique and randomly generated identification number to your device, which allows us to recognize your device on your next visit.

Performance cookies (Google Analytics)

These cookies allow us to count traffic and traffic sources so that we can measure and improve the performance of our site. We use Google Analytics cookies to determine how you and other visitors use our website. With these insights, we can compile reports and improve our Website and services. These cookies collect information in anonymous form, including the number of visitors to the website, where visitors came to the site from, and the pages they visited. For more information: <https://tools.google.com/dlpage/gaoptout>

We have integrated YouTube videos into our website, which are stored on www.youtube.com and can be played directly from our website.

If you access pages with integrated videos, data is only sent to the YouTube server when you play the videos. If you are logged into YouTube at the same time, this information will be assigned to your YouTube user profile. You can prevent this by logging out of your member account before visiting our website.

IN WHICH CASES DO WE PROVIDE YOUR DATA TO THIRD PARTIES?

1. To persons processing data on behalf of the Company

We may entrust the processing of your personal data to other persons – subcontractors (personal data processors) who assist us in the processing of this data. These persons process your data on our behalf and in accordance with our instructions for all or some of the purposes specified in this Policy. We do not allow personal data processors – subcontractors to use your personal data for their own purposes, including for direct marketing purposes.

We require all data processors who process your personal data on our behalf to process this data in accordance with the law and to ensure its security, including by taking the necessary technical and organizational measures to protect personal data. The categories of recipients who process personal data on our behalf are:

- accountants or accounting and auditing firms that process personal data for the purposes of accounting and auditing our financial statements, as well as for the fulfillment of our regulatory obligations in the field of labor, tax and social security legislation;
- persons who provide technical and logistical support for the activities of the company;
- persons who provide information society services, including hosting services, and/or information and technical services related to the maintenance, security and development of our information and communication infrastructure and resources
- licensed postal operators and transport or forwarding companies companies;
- licensed payment service providers for the purposes of processing payments from/to you;
- To government authorities to whom we are legally obliged to provide your personal data, such as courts or administrative

authorities performing regulatory, supervisory or other similar functions (e.g. the Consumer Protection Commission, the Personal Data Protection Commission, the Competition Protection Commission and other competent authorities that are legally permitted to collect and process personal data);

2. To protect our legitimate interests

In certain cases, where this is dictated by our legitimate interests, we may disclose your personal data to third parties, such as:

- legal advisors and/or our procedural representatives in connection with obtaining legal advice or preparing and organizing our defense in an existing or potential legal dispute, including for the purposes of our participation in a procedure

mediation or other procedure for voluntary dispute resolution.

3. To persons for whom we have received your explicit consent, such as:

- persons, suppliers of products or services who may provide you with information or offers about their own products and services.

HOW LONG DO WE KEEP YOUR PERSONAL DATA AND WHEN WILL WE DELETE IT?

We store your personal data for the period necessary or permitted in view of the purposes for which we process them. After the realization of these purposes or after our legitimate interest or legal basis for processing the data ceases to exist (e.g. when consent to the processing of certain data is withdrawn), we will delete the personal data without undue delay.

The criteria on the basis of which the retention period of your personal data is determined include: (a) the period during which we maintain relations with you and provide you with our services, (b) the periods for data retention provided for in the laws applicable to us, and (c) the period for which it is necessary to retain the data in connection with our participation and the protection of our rights and legitimate interests in judicial and administrative proceedings and the expiry of the relevant statutes of limitations.

For example, we will store personal data contained in our accounting documentation for the periods provided for in the Accountancy Act.

HOW WE PROTECT YOUR PERSONAL DATA

When processing your personal data, we take the necessary technical and organizational measures to protect this data from unauthorized access, modification or deletion. These measures include:

- establishing internal policies for the processing of personal data that aim to prevent unauthorized access to the systems we use and to the premises where we store your personal data
data;
- establishing an obligation to maintain the confidentiality of our employees, subcontractors and suppliers;
- entrusting the processing of your personal data only to such organizations and individuals who process personal data in accordance with the law, ensuring their security, including through taking the necessary technical and organizational measures to protect personal data.

YOUR RIGHTS IN RELATION TO THE PROCESSING OF YOUR PERSONAL DATA

At any time during the processing of your personal data by us, you have certain rights as set out below.

You can exercise your rights under this Policy and the General Data Protection Regulation (Regulation (EU) 2016/679) by sending a message to the email address below, containing your specific request and, if possible, signed with

a qualified electronic signature. In cases where you send us a request by post and/or courier service, your signature is required for the purpose of identifying you to us. If you are unable to sign your request in one of our preferred ways, we may ask you to provide additional information for the purpose of establishing your identity.

We will respond to your request free of charge and without undue delay, in accordance with the statutory deadline. In cases where we receive repeated requests from you, we may refuse to

take action on the request or determine a fee (based on the costs we will incur) that you must pay for providing the information or communication or taking the requested action.

RIGHT OF ACCESS AND INFORMATION

You have the right to request and receive:

- information about the purposes of processing your personal data, what categories of personal data we process and who are the recipients or categories of recipients to whom your personal data are or will be disclosed, as well as any information about the source of your personal data, in case your data were not obtained directly from you;
- a copy of your personal data that we process, in electronic or other suitable form;

RIGHT TO CORRECTION AND SUPPLEMENTATION

If you find that the personal data we process concerning you is inaccurate and/or incomplete, you may request that we correct and/or complete it. We will correct and/or complete your personal data without undue delay.

RIGHT TO OBJECT

Where we process your personal data based on our legitimate interest, you have the right to object to such processing. We will cease such processing without undue delay and erase your data unless we demonstrate compelling legitimate grounds for continuing to process your data which override your rights and legitimate interests or the processing of your personal data is necessary for the establishment, exercise or defence of legal claims. Furthermore, you have the right to object at any time to the processing of your personal data for marketing and advertising purposes. We will cease such processing without undue delay as soon as we receive your objection.

RIGHT TO RESTRICTION OF PROCESSING

You have the right to ask us to restrict the processing of your personal data in the future when:

- you believe that the personal data we process is inaccurate and you require us to correct it, for the time being until we verify the accuracy of your data and make the necessary correction;
- it has been established that for some reason we are unlawfully processing your personal data, but you do not want your data to be deleted, but instead want us to process part of your data;
- we no longer need your personal data, but you require us to retain this data for the purpose of exercising rights or defending against claims by third parties; or
- you have objected to the processing of your personal data (where this processing is based on our legitimate interest), if this is necessary to verify whether we have an interest or legal obligation to process your personal data.

RIGHT TO DELETION (RIGHT TO BE FORGOTTEN)

You have the right to request that we delete your personal data, and we are obliged to delete it without undue delay when:

- the personal data are no longer necessary for the purposes for which they were collected or otherwise processed; you have withdrawn your consent to the processing of the data, where the data were processed on the basis of your consent, and there is no other legal basis for the processing;
processing;
- You have objected to the processing and we have no legitimate grounds for the processing which override your interests, rights and freedoms;
- Your personal data has been processed unlawfully;
- Personal data must be deleted in order to comply with our legal obligation;
- The personal data were collected in connection with the provision of information society services.

In some cases, we will not be able to fulfill your request, as the processing of your personal data is necessary for:

- exercise of the right to freedom of expression and the right of information;
- compliance with our legal obligation;
- the establishment, exercise or defense of legal claims.

RIGHT TO WITHDRAW YOUR CONSENT

Where we process your personal data on the basis of your “consent”, you have the right to withdraw that consent with immediate effect. In such a case, we will cease processing your personal data for the future.

PORTABILITY OF YOUR DATA

In cases where we process your personal data on the basis of your consent or for the performance of our contractual obligations towards you, as long as this does not prejudice the rights and freedoms of other persons, you have the right to receive the data you have provided to us in a structured, commonly used and machine-readable format or - if technically feasible - to request that we transfer this data to a third party.

RIGHT TO COMPLAINT

If you believe that we are processing your personal data in breach of applicable law, you have the right to lodge a complaint with a competent authority. You can contact the supervisory authority responsible for your place of residence or country or the supervisory authority responsible for us.

The competent authority in the Republic of Bulgaria is the Personal Data Protection Commission, whose address is:

Sofia 1592 2 Prof. Tsvetan Lazarov Blvd.

Tel.: 02/915 3518

Email: kzld@cpdp.bg

WAYS TO CONTACT US

For all questions related to the processing of your personal data or the exercise of your rights, you can contact us in one of the following ways:

By e-mail, by sending an email to

pim@pimbg.com

By mail, to the address:

Haskovo 6300 V. Levski Blvd. No. 6 PIM OOD