

Privacy Statement

We value your privacy!

We, **'BUSINESS SOFTWARE CONSULT' JSC**, in our capacity of personal data controller are obliged to protect your personal data. In this regard, we are implementing relevant rules and procedures adopted by our Company.

'BUSINESS SOFTWARE CONSULT' JSC, hereinafter referred to as the "Company".

Registered address: 1504 Sofia, 82-82A Knyaz Al. Dondukov Blvd., 6th Floor, Apt. 10;

E-mail: office@bsconsult.bg

Website: <http://www.bsconsult.bg/>

Contact person regarding your personal data protection: olina.dobreva@bsconsult.bg
(+359) 88 822 1053 – Ms. Olina Dobreva – Data protection officer.

The present Privacy Statement is aimed at explaining in a clear and transparent manner what personal data the Company is collecting from you, on what legal basis or consent it does collect such information, as well as how such data are being used by us. All the relevant activities comply with 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 (General Data Protection Regulation).

We comply with the following principles of data protection:

- Personal data of data subjects shall be processed lawfully, fairly and in a transparent manner;
- Personal data of data subjects shall be collected only for legitimate purposes, which we have explicitly explained, and shall not be further processed in a way incompatible with those purposes;
- Personal data of data subjects shall not exceed the information required for the purposes we have specified;
- Data subjects shall be informed in case their personal data need to be processed outside the statutory requirements for processing;
- Personal data of data subjects shall be stored for a period not exceeding the period required for the purposes we have specified;
- Personal data of data subjects shall have adequate protection.

Data subject is a natural person, who has been identified or is identifiable based on particular information.

You have the following rights as data subject:

- Right to be informed (regarding your personal data processed by the Company).
- Right of access to your own personal data.
- Right of editing data (if the data is incorrect).
- Right of deleting personal data (right "to be forgotten") if this not prohibited by law. If personal data is being processed based on your consent, you are entitled to withdraw at any time your consent for further processing.
- Right to limit the processing by the personal data controller or the personal data processor, if this is not prohibited by law.
- Right to object the personal data processing.
- If your personal data protection rights have been violated, you are entitled to judicial or administrative redress.

We are collecting, processing and/or storing personal data that have been received based on employment or part-time employment contracts with employees, contracts with suppliers, customers and counterparts, legal provisions, etc. The data, which we have collected in rendering our services, are used to provide relevant services, to maintain, protect and improve such services, to develop new services, as well as to protect our employees and customers.

The information, which may contain your personal data, is processed for the following purposes:

- Human resources – we process personal data of job applicants, as well as of present and former employees. The collected data are used only for the purposes of administering employment and social security relations (for example: as per the Labour Code; as per the Decree on Employment Service Records; as per the Social Security Code; as per the Personal Income Tax Act; as per the Decree on Cash Benefits and Social Benefits, etc.), the data are stored for the periods specified in the national labour and social security legislation (for example: 50+1 years as per the Act on Payrolls and Wages Accounting; 5+1 years as per the Decree on Cash Benefits and Benefits from the State Social Security for declarations submitted under this decree; 3+1 years as per the Decree on Medical Expert Evaluation, etc.), and the data may be provided to third parties if this is stipulated by the legislation (for example: National Revenue Agency, National Social Security Institute; Labour Inspectorate; occupational health offices; banks, etc.). During human resources management, we are processing data related to physical, psychological, social, marital and economic identities, data on judicial record and violations, health status data, etc.

- Counterparties – for the purposes of our business activity we may process personal data of natural persons in order to implement the contracts signed as per the Commerce Act, the Obligations and Agreements Act or other laws. Insofar personal data of various natural persons may be processed for the implementation of such contracts, a minimal volume of such personal information shall be processed – a volume sufficient for the correct fulfilment of the contractual obligations (the period of storing as per the Accountancy Act is 10+1 years). Access to such data shall be granted to third parties only if this is required by law (for example: National Revenue Agency).

- Clients of services for processing salary-related data – we also process personal data of our customers' employees. For this purpose, we sign in advance contracts with these customers for rendering such services, wherein the subject and the duration of processing, the character and the purpose of processing, the type of personal data, the categories of data subjects, and the rights and the obligations of the contracting parties are stipulated. The collected data are used only for the purposes of administering employment and social security relations (for example: as per the Labour Code; as per the Decree on Employment Service Records; as per the Social Security Code; as per the Personal Income Tax Act; as per the Decree on Cash Benefits and Social Benefits, etc.) and are stored for the duration of the service contract signed between the data controller and our Company. Such data may be provided to third parties only if this is stipulated by the legislation (for example: National Revenue Agency, National Social Security Institute; Labour Inspectorate; occupational health offices; banks, etc.). During human resources management, we are processing data related to physical, psychological, social, marital and economic identities, data on judicial record and violations, health status data, etc.

- Visitors – personal data are collected with regard to the security and protection rules we have adopted. The aim of collecting personal data is to identify the individuals who are visiting Company's premises and to control the access to such premises.

The Company has implemented video surveillance for security purposes. Video surveillance records are stored for a period not exceeding 2 months. Access to such records is granted to designated employees in order to carry out their official duties.

- Exercising the rights of data subjects – you are entitled to exercise your rights as per Art. 15-22 of the General Data Protection Regulation. When you submit a request to exercise your rights, you shall be asked to identify yourself by providing ID documents or by other methods and means of

used only for the purposes of exercising the respective rights.

When we process your personal data, we do so with your consent and/or as a necessity, in order to provide you with the required products/services our Company is offering, to manage our Company, to fulfil our contractual and legal obligations, to protect our systems and our customers or to protect other legitimate interests of our Company.

The collected personal data are not shared with third countries outside the EU.

We are not using systems that make automated decisions on your behalf. We do not profile your personal data.

Data security

Our Company has implemented proper measures to prevent accidental loss of, misuse with or unauthorized access to, modification or dissemination of your personal data. In addition, we have limited the access to your personal data only for designated employees and third parties, which may require such information. They shall process the personal data only in compliance with our rules and procedures and according to their privacy obligations.

‘BUSINESS SOFTWARE CONSULT’ JSC has developed and implemented a Personal Data Protection System as per the General Data Protection Regulation (GDPR) and guarantees that the personal information of all data subjects is collected, processed and stored in a legitimate manner.

Changes in the Privacy Statement

We reserve the right to modify the present Privacy Statement.

Please, feel free to contact us should you need additional information!

April 2019

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Head office: 1504 Sofia, 82-82A Knyaz Al. Dondukov Blvd., 6th Floor, Apt. 10; <http://www.bsconsult.bg/>; e-mail: office@bsconsult.bg; Unified Company Identification Code:m130203096; VAT Registration Number: BG130203096

