

Privacy Notice Regarding Processing of Personal Data of Clients of Tiger Technology AD

The following document (“**Notice**”) is intended to inform our clients - individuals, respectively the representatives of clients - entities, or persons designated for contact in connection with the performance of a contract with a client (employees of a legal person client), about how **Tiger Technology AD** (“*we*”, “*us*”, “*our*”, “*the Company*”, “*the Data Controller*”), in the course of its business, uses or shares the personal data that you provide or that we have otherwise obtained or created and that relates to you.

When you contact us to conclude a contract for purchasing goods or for using services provided by us, or to make an enquiry or an offer for the purpose of concluding such contract, **you provide us with certain information about yourself** - such as your names, role/position, PIN, telephone number, email address, bank account and other.

In accordance with **legislation**, including *Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of individuals with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC, in force since 25 May 2018 (GDPR)*, **this information about you constitutes your personal data and you are its subject**. In turn, we are the Data Controller of your personal data. The details that identify us as Data Controller and how to contact us are set out at the end of this document.

From this Notice you will learn:

- **What personal data do we collect?**
- **How do we collect and use your personal data?**
- **With whom do we share your personal data?**
- **Transfer of personal data outside Bulgaria?**
- **For how long do we store your personal data?**
- **How secure is your personal data?**
- **What rights do you have?**
- **What is important to know when exercising your rights?**
- **How will we notify you in case of changes to the content of this notice?**
- **How to contact us?**

What personal data do we collect?

When you contact us, whether directly at our site or remotely by email at or through our website, to enter into a contract for the purchase of goods or the provision of services or to obtain

information, ask questions or assert your rights, we may obtain directly from you or ask you to provide us with certain information about yourself.

Your personal data that we collect in connection with the conclusion and performance of service contracts with you are defined in the applicable regulations.

The personal data we collect may include:

1. Data regarding physical identity – including full name, personal identification number, permanent address;
2. Contact information - including permanent address and address for correspondence, e-mail address, including work e-mail address, telephone number;
3. Data regarding professional identity – position or job title in the organisation you work for; for example, we collect personal data directly from you when you provide it to us for the purposes of signing a contract with the company you represent, and also from public sources, such as a trade register to check your representational authority. We may also obtain your personal data from your employer or colleagues, for example where they have named you as a contact person for the performance of a contract with us;
4. Data regarding economic identity – data about your bank account when paying amounts under a contract for sale or for the provision of services;

Where we process your personal data for the purposes of our core business, and to comply with our legal obligations, such processing is necessary to fulfil those purposes. Without this data, we could not carry out our activities. For example, if you do not provide us with your name, ID number and address, we would not be able to enter into a contract with you or provide you with the information necessary for its performance or refer you to a company from the Tiger group to conclude a contract with you. In other cases, when collecting your personal data, we will let you know whether the provision of data is necessary and what the consequences are if you refuse.

How do we collect and use your personal data?

We process your personal data based on the following ***legal grounds***:

- In connection with the conclusion and performance of a contract for provision of services by us and the companies from the Tiger group that we enter into with you; or
- For the performance of our obligations under statutory law, for example in connection with obligations under the Accounting Act and the Tax and Social Security Procedural Code, or when providing information to judicial and other government authorities; or
- Our legitimate interest or that of a third party, except where it is overridden by your interests or your fundamental rights and freedoms. Examples of our legitimate interests are establishing, exercising or defending legal claims; cyber security and protection against hacking attacks,

security breaches; improving our operations and the quality of our services;

- *Your explicit informed consent in certain cases*, for example to send electronic commercial communications (direct marketing); in case of provision of sensitive personal data or of enquiries, requests and complaints received; the consent you have given may be withdrawn at any time by writing to us at the addresses and email address set out at the end of this document, in which case we will cease to process your data.
- *In connection with entering into and performing a contract, for the purchase of goods or other services offered by us or the companies from the Tiger group.*

We use your personal data for one or more of the following purposes:

1. To fulfil our obligations under the contract with you;
 2. To contact you when we/you have asked you/us a question or made a complaint or request for a service fee estimate, or to notify you of changes to our work schedule or in case of a data breach; to send you electronically communications about our products and services when you are a customer (direct marketing);
 3. To comply with legal, regulatory and other requirements (such as in the areas of tax law and accounting), to conduct our business in accordance with applicable law and professional standards and rules, and to respond to requests from local or foreign regulatory, governmental or judicial authorities;
 4. To improve the services we provide, including for internal purposes such as audits, analyses and surveys to help us improve our business or to monitor and analyze trends and usage of our services;
1. In connection with legal claims, to protect our interests in litigation or other proceedings brought before competent authorities, and for the purposes set out elsewhere in this Notice;
 2. To redirect you to conclude a contract for the services offered by the Tiger Group to another company in the group that is closest to you.

Who do we share your personal data with?

In the course of our business, we need to share your personal data with some of the following:

- Our service providers (provision and maintenance of information systems and information security; human resources management, finance, accounting and employee health and welfare, courier services, etc.);
- Our lawyers, professional consultants and auditors;

- Regulatory, state and judicial authorities that by virtue of a statutory act have the authority to require the provision of information, including personal data, such as courts, prosecution, various authorities with authority to protect national security and public order, etc.
- Other companies from the Tiger Group, in connection with the conclusion of a contract with them for the services offered.

In all cases, we enter into data processing agreements in writing with the entities we work with, requiring them to take all necessary technical and organisational measures to ensure the protection of your personal data. We will only provide these contractors with the information they need to provide us with the agreed services, without allowing them to use your information for their own purposes. We will not provide your personal data to third parties to send you unsolicited marketing communications unless you have given the necessary consent to do so. In the event that you receive unsolicited marketing communications from contractors with whom we do business for their own purposes, please notify us at the contact address or email listed at the end of this document.

Transfer of personal data outside the Republic of Bulgaria

Your personal data may be transferred to third parties - companies from the *Tiger Technology AD group (Tiger Technology Group or Tiger group)*, based in and outside of the European Union and the European Economic Area, subject to the requirements of applicable law.

How long do we keep your personal data?

We have an internal policy that sets out how long we keep your personal data. It is based on (a) the type of information we collect and (b) the purposes for which we collect it.

In principle, we keep your personal data for as long as necessary for the processing purposes for which the data was collected and for any other permissible and related purpose, or until the expiry of a legally specified period (for example, for the storage and processing of accounting data and for tax control 10 years). It is in our legitimate interest to retain certain of your personal data until the expiry of the limitation period for making claims (5 + 1 years following the expiry or termination of our contract with you). We will not delete or anonymize your personal data if it is necessary for any pending judicial or administrative proceedings, or proceedings pursuant to a complaint you have made against us.

Where we have collected your personal data on the basis of your explicit written consent for direct marketing purposes, we will limit the processing of that data to 2 (two) years from the time of obtaining that consent, or until you withdraw your consent, if you do so before the expiry of the specified 2-year period.

How secure is your personal data?



We highly value your privacy and take the security measures of the personal data we have collected and store very seriously.

Your personal data stored electronically is located on our servers and information systems, for which we implement appropriate technical measures in light of the sensitivity of the information we maintain, to protect the personal data you provide to us from unauthorized access, use or disclosure. For example, we encrypt communications using an SSL encrypted connection, have firewalls and anti-virus programs, maintain backups of computer data, access control tools, cryptographic protection, password and identification protection for the transmission of data, and more.

We have adopted policies and procedures, regulated by Orders of the Executive Director(s) of Tiger Technology AD, while designating contact persons for data protection, the data records to be maintained, including in paper, the access to them, the retention periods of the personal data processed, and the procedures for their destruction.

We require our suppliers and business partners who have access to your personal data to use appropriate measures to ensure the protection and confidentiality of your personal data. The transmission of information over the Internet or by telephone may not be completely secure, given the passage of the same through the networks, channels and platforms of third-party electronic service providers, despite the measures we have taken.

What rights do you have?

In relation to your personal data, you have certain rights in relation to us which are granted to you by the GDPR and other applicable law. Sometimes certain rights can only arise and be exercised on certain grounds for processing your personal data; other rights are subject to certain limitations and exceptions under the law. To exercise your rights or ask questions, you should direct your request to the email or contact address below.

You have the **following rights under applicable law:**

- **The right of access** to personal data relating to you - you can request more detailed information about how we use your data and a copy of the information we hold about you;
- **The right to request rectification** of inaccurate personal data relating to you;
- **The right to request the restriction** of the processing of personal data relating to you;
- **The right to object to the processing** of your personal data - where it is based on a legitimate interest of the employer, unless there are compelling legitimate grounds for the processing or it is necessary for legal claims;
- **The right to request erasure** of personal data relating to you ("*the right to be forgotten*") - where there is no lawful basis for us to continue to process it;
- **The right to obtain the personal data** that you have provided to us and that concerns you,

and to reuse it by transferring it to another data controller (“*right of portability*”);

- **The right to lodge a complaint** before the competent supervisory authority or with a court if your rights have been violated or you have suffered unlawful processing of your personal data.
- Where the processing is based on consent given by you, **you have the right to withdraw your consent** to the processing of your personal data at any time by writing to us at the addresses and contact email at the end of this document, without prejudice to the lawfulness of the processing based on your consent before it is withdrawn.

You have the right of access and can request more detailed information about whether we process your personal data, what categories, for what purposes, to whom we disclose it, etc. If you have requested, we will provide you with access to your personal data that is being processed in the form of a copy of it. The copy is free of charge for you. If you request further copies or individually formatted or more detailed information or disproportionately exercise (abuse) your rights, we may charge you a reasonable fee to cover our administrative costs in producing them. If you have made the request by electronic means, we will, where possible, provide the information to you in a commonly used electronic form, unless you have requested otherwise from us.

If we do not process your personal data, we will let you know. If we refuse your request for a copy of the data, we will tell you the reasons for this decision.

The exercise of your right of access should not adversely affect the rights or freedoms of others, including trade secrets or intellectual property, and in particular the copyright protection of the software. In the event that we consider that there is reason to expect such a negative impact, we may reasonably restrict some of the information we provide to you so that it does not occur.

If we process a large amount of information about you, we may ask you to specify the information or processing activities to which your request relates. This will help us navigate better and faster, and help you get the data you need sooner.

If you have **objected to the processing** of your personal data based on our legitimate interest or the legitimate interest of a third party, we may continue the processing despite your objection if we can demonstrate that there are compelling legitimate grounds for the processing which override your interests, rights and freedoms or for the establishment, exercise or defence of legal claims. In the event that data relating to you is used for direct marketing purposes, you have the right to object to processing for this purpose free of charge and at any time and we will cease processing it by notifying us in writing at the addresses set out at the end of this Notice in the How to contact us section.

When you want us to **rectify** your personal data, you may request that we also notify the third parties to whom it has been disclosed, except where this is impossible or involves excessive effort.

You have the right to request the **erasure** of your personal data when they are no longer necessary for the purposes for which they were collected or otherwise processed; when you withdraw your consent to the processing of your personal data and there is no other legal basis for the processing;

when you object to processing based on a legitimate interest and it does not override your rights, freedoms and interests; when processing is without legal basis or the erasure of your personal data is our legal obligation under Bulgarian or European law. Pursuant to applicable law, we have the right to continue processing despite your request for erasure in order to comply with our legal obligations under the law of the Republic of Bulgaria or the European Union that require processing of your personal data or where necessary for the establishment, exercise or defence of legal claims.

In order to exercise the **right to restrict processing**, the following conditions must be met:

- You dispute the **accuracy** of the personal data;
- The processing is **without legal basis**, but instead of us deleting them, you request that we restrict their use;
- We no longer need the personal data for processing purposes, but you **require** it for the establishment, exercise or defense of legal claims;
- You have **objected** to processing on the grounds of “*legitimate interest*”.

Where the processing of your personal data has been restricted, we may still continue to process it in two cases:

- with your explicit consent; or
- for the establishment, exercise or defense of legal claims or for the protection of the rights of another individual or for important reasons of public interest for the Union or a Member State.
- The right of portability exists and can only be exercised where the following two conditions are met: (1) it is processing by automated means (i.e. this right does not apply to processing of data in the form of paper files) and (2) in addition to being processing by automated means, the processing of your personal data is based on (a) your consent or (b) a contract to which you are a party or to take steps at your request before entering into a contract. You have the right to receive your personal data in a structured, commonly used and machine-readable format or to request a direct transfer of your personal data to another data controller where this is technically feasible.

You should be aware that when you **exercise the right of portability**, this does not result in your data being deleted from our systems. You will be able to continue using our services even after the data portability operation. Data portability also **does not** affect the initial retention period that applies to the transmitted data. You may exercise your other rights that are set out in the legislation and we have listed here while we continue to process the data.

If you believe that we are in breach of the applicable law, please contact us for clarifications. Of course, you also have the right to immediately lodge a complaint with a supervisory authority in the European Union where you live, work or where the alleged violation of your rights took place.



The supervisory authority for personal data protection in Republic of Bulgaria is the **Commission on Personal Data Protection**, with its address in Sofia city, Sofia Municipality, 1592, 2, Prof. Tsvetan Lazarov Blvd., e-mail: kzld@cpdp.bg, website: www.cdpd.bg, telephone numbers: 02/91-53-519, 02/91-53-555. You can also seek protection of your rights in court.

What is important to know when exercising your rights?

How do we claim our rights? To exercise your rights under the GPDR you can email us or send us a letter by post to the contact details below.

Requests in relation to the exercise of your rights shall generally be made in person or by a person expressly authorized by you. Where there are statutory procedural rules in relation to the exercise of your rights (in the GDPR, the Data Protection Act and other acts), these should also be complied with.

In what form will we answer you? In the form in which you have made your request to us - in writing or in electronic form. When you have made a request by electronic means, if possible, the information will be provided to you in a commonly used electronic form, unless you have requested otherwise.

In what timeframe will you receive an answer? Within one month of receiving your request, we will provide you with information about the action we have taken. If necessary, this deadline may be extended by a further two months, taking into account the complexity and the number of requests. If such an extension is necessary, we will notify you within one month of the submission of your request, explaining the reasons for the extension.

Doubts concerning your identity. Where we have reasonable concerns about the identity of the individual making the request to us, we may require the provision of additional information necessary to confirm the identity of the data subject. If we do not receive such information and are unable to identify the data subject, we may refuse to act on a request made to us to exercise any of the rights set out in this Notice.

Where a citizen makes a request to us that is evidently ungrounded or excessive, in particular because of its repetitive nature, we have the right to either: a) charge a reasonable fee, taking into account the administrative costs of providing the information or communication, or taking the action requested, or b) refuse to act on the request.

How will we notify you of changes to the content of this notice?

We may periodically update the information in this Notice in response to developments in our business and changing legal requirements. We will notify you in the event that we would like or need to use your personal data for purposes and in a manner significantly different from what we have informed you about, and, if necessary, seek your consent.

How to contact us?

In order to exercise any of your rights under applicable data protection law or to contact us if you



have any questions regarding this document, you may contact us using any of the contact forms below:

Contact Person as regards to data protection is Mr. Nikolay Fesliyski.

Address for correspondence: Republic of Bulgaria, 1172 Sofia, Izgrev Region, 54 G.M. Dimitrov blvd., fl. 2.