



## **CONFIDENTIALITY NOTICE FOR THE COMMERCIAL PARTNERS OF HMC AD AND THEIR EMPLOYEES**

This document constitutes a confidentiality notice within the meaning of the General Data Protection Regulation. It was prepared by HMC AD especially for our partners and their employees. Below you will find information:

- ✓ concerning the Administrator responsible for the processing of personal data;
- ✓ on the categories of personal data processed;
- ✓ on the conditions under which personal data is being processed;
- ✓ on the purposes and the legal grounds for the processing;
- ✓ on the storage deadlines and the data security measures applied;
- ✓ as well as in which cases and in what order we share your personal data with third parties.

### **WHO IS RESPONSIBLE FOR THE PROCESSING OF YOUR DATA?**

The party responsible for the processing of the following categories of personal data is **HMC AD, with UIC: 203877597, with corporate seat and registered address at 9A, Al. Stamboliyski Blvd., City of Plovdiv, Yuzhen Region, Postal Code 4400, represented by the Executive Director Ivo Kirilov Vasilev**. If you would like to receive more information about what data we have collected for you, obtain a copy of the documents containing your personal data or exercise any of your rights under the General Data Protection Regulation and if you suspect that your data is being used in an unregulated manner, you can contact **Ivanka Shikova – Attorney, telephone number: 032 671 217, e-mail: [v.shikova@hmcbg.com](mailto:v.shikova@hmcbg.com)**.

### **WHY DO WE COLLECT YOUR DATA?**

In the context of its commercial relations, HMC AD processes, i.e. collects, stores, arranges, structures and uses personal data of employees of our contractors. This processing is related to the storage of contracts and other documents, signed by HMC AD and by the persons representing the contractors of HMC AD, provision of access to the employees of our contractors and others.

The main reason for the collection of personal data is to conduct our business activities, for example, upon the preparation of a list of authorized persons under a contract, handover protocols (to determine the time of delivery) and other documents related to our commercial contracts, and in order to defend our interests in any legal dispute over the performance of a contract.

### **WHAT KIND OF DATA DO WE COLLECT?**

Your processed personal data categories include names and other credentials, including signatures, as well as contact details (email, address, telephone).

### **ON WHAT LEGAL BASIS DO WE PROCESS YOUR DATA?**

HMC AD processes personal data only on a valid legal basis. A legal basis for processing your data is provided for HMC AD by special laws, such as the Accountancy Act, the Tax Insurance Procedure Code and the Measures against Money Laundering Act. The processing of data is also necessary for the protection of the rights and interests of HMC AD as a party to a contract, for example to certify the fulfillment of obligations



under a contract and/or the organization of the protection of HMC AD in case of any legal dispute related to a contract.

#### **WHAT KIND OF MEASURES DO WE TAKE TO PROTECT THE COLLECTED DATA?**

The protection and security of you and your data is important to us. In order to prevent any loss, misuse or unauthorized access, we apply all reasonable measures and remedies, including limiting access to the premises of HMC AD, CCTV surveillance and back-up of the data of the servers of HMC AD. However, in case of suspected violation, we ask you to contact us immediately through the contact details.

#### **HOW LONG DO WE STORE YOUR DATA?**

HMC AD stores the personal data contained in the contracts with our contractors and the related documents for a period no longer than what is necessary and/or due according to the requirements of the applicable law. In particular, the data in the contracts shall be kept for a period of five years from the conclusion of the relevant contract, unless the mandatory rules of the law require from HMC to keep the data on its trading partners and their employees for a longer period (i.e. for the categories of documents that are kept according to the Accountancy Act, the Tax Insurance Procedure Code and/or the Measures against Money Laundering Act).

#### **WHAT RIGHTS DO YOU HAVE UPON THE PROCESSING OF YOUR DATA?**

The General Data Protection Regulation provides for a number of options for the protection of individuals with regard to the collection and processing of data, in particular:

- ✓ right of **access and information** upon the processing of your data;
- ✓ right to **object** to the video surveillance;
- ✓ right to **correct** inaccurate data;
- ✓ right to ask **“to be forgotten”** when the processing is no longer necessary or is in general illegal.
- ✓ right to **file a complaint** to a supervisory authority (see below).

#### **HOW DO WE SHARE YOUR DATA WITH THIRD PARTIES?**

In order to provide our services and protection and to obtain up-to-date information, we may provide your data to third parties, as well as to the following for the purposes listed below:

- the competent tax authorities and other state bodies during the inspection;
- our partners (i.e. accountants or lawyers upon litigation);
- upon merger, your data can be shared with the new owner(s), for which you will be notified. In any case, your data will not be shared with third parties established outside the EEA (EU, Norway, Iceland and Liechtenstein), unless expressly permitted by local law and if adequate protection mechanisms are in place.

#### **HOW CAN YOU CONTACT THE COMPETENT SUPERVISORY AUTHORITY?**



Notwithstanding the foregoing, in case of any complaints you have the right to contact the Personal Data Protection Commission (PDPC):

- ✓ **personally**, at address: 2, Prof. Tsvetan Lazarov Blvd.;
- ✓ **by letter**, at address: 2, Prof. Tsvetan Lazarov Blvd., City of Sofia, Postal Code 1592;
- ✓ **by fax**: 029153525;
- ✓ **to the e-mail of the PDPC**: [kzld@cpdp.bg](mailto:kzld@cpdp.bg);
- ✓ **through the website of the PDPC**: <https://www.cdpd.bg/>.

In view of the requirements of the legislation, the above information may be changed by HMC AD. For any questions and up-to-date information about the processing of your data, please contact us through the contact details.

By signing below, I declare that I have read the Confidentiality Notice and the information I provide is accurate and up-to-date:

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