

## **PERSONAL DATA PROTECTION POLICY**

Personal Data Administrator: "**Alexander Logistics**" Ltd., UIC 831216840, with headquarters in the village of Kazichene, Municipality of Stolichna and address of management: 9A, Third March Street

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### **Personal Data Protection**

As a Personal Data Administrator, we process personal data of our clients, while respecting the principles and requirements of the General Data Protection Regulation EU 2016/679 (GDPR) and current legislation, in order to ensure protection and the privacy of personal data.

The personal data processing is carried out only for the purposes for which the data are collected, fully ensuring their lawful and transparent use.

### **What kind of personal data do we process?**

"ALEXANDER LOGISTICS" Ltd. processes personal data of its clients in order to fulfil its contractual obligations. The personal data being processed by the Company are ordinary data related to the identification of the individual and necessary for the conclusion of a contract and the fulfilment of our engagements.

The offices and warehouses of "ALEXANDER LOGISTICS" Ltd. are equipped with video surveillance, creating videos that contain personal data of the visitors. The data stored are related to the image and the characteristics of the visitors.

### **Why and how do we process your personal data?**

We process personal data of our Customers in order to carry out our commercial activities and fulfil our contractual obligations. The collected personal data are limited to the minimum necessary and required by the legislation in relation with the conclusion of a contract with the Company and the fulfilment of the obligations between the parties.

In addition, data processing is also related to the guarding of property, ensuring of security, safety and order in the safeguarded locations, prevention of theft and other abuses, as well as assistance to the competent authorities.

Personal data are processed only to the extent necessary and only for the purposes specified.

## **To whom will we provide your personal data?**

Under the contractual obligations, personal data may be provided to our business partners with whom we are in a business relationship. The provision of personal data involves additional guarantees from our partners for the processing of personal data only for the fulfilment of specific obligations. When providing personal data to our business partners, we require a guarantee that your personal data will only be used for the purpose for which it is provided.

Your data may be disclosed to third parties, judicial and other public authorities in order to protect the rights and interests of the Company.

Upon request, personal data processed by us is provided to the person to whom they refer.

## **How long do we store your personal data?**

The storage of personal data is bound by the purposes for which it is stored. "ALEXANDER LOGISTICS" Ltd. keeps the personal data for a period of 5 years from the achievement of the objective, unless there is another statutory term.

When the objective is achieved and the statutory term expires, the Company deletes your data.

## **What rights do you have with regard to your personal data?**

All individuals whose data are processed by the Company have the following rights with respect to their personal data.

### **Right of access**

All persons whose personal data are processed may request confirmation from the Company whether their personal data are being processed, the purpose of the processing, and obtain a full copy of the personal data.

The right of access is limited by the rights and freedoms of other persons, so the provision of personal data is fully in line with that.

In cases where individuals require the same information that has already been provided or the request is beyond their authority, the Company may refuse to provide this information.

### **Right of correction**

Any individual whose data is processed by the Company may request us to correct personal data that is inaccurate and incomplete.

## **Right to delete**

The individuals whose data we process have the right to request the deletion of their personal data and to be "forgotten". This is possible in case the personal data:

- Is no longer necessary for the purposes for which they were collected and/or the contractual relationship has been completed;
- Consent has been withdrawn if the processing is based on it as outlined above;
- The right of objection has been exercised, etc.

You should keep in mind that your personal data will be immediately deleted when: the statutory terms for storing personal data have been expired as set out above and the purposes for which the data were collected were met. It is possible that personal data will not be erased within the specified timeframe when it is necessary for the protection of the interests of the Company, or their provision is required by a requirement of a public authority or other legal requirement.

## **Right to restrict processing**

In some cases, you may ask us to restrict the processing of your personal data. Restricted processing is usually limited to storing your personal data, with any other processing being discontinued.

## **Right to withdraw your consent**

In the event that the processing of data by us is subject to your consent, you should be aware that it is possible to withdraw your consent at any time. Withdrawal of consent to the processing of personal data will result in their limited use and/or deletion. This is only possible after the performance of contractual relations between us and the expiration of legally defined terms, if any.

## **Right to appeal**

If, during the processing of your personal information, we have violated the applicable personal data protection legislation, you have the right to file a complaint with the Personal Data Protection Commission, which is the competent authority in the Republic of Bulgaria.

To provide the required data, we may request additional information to guarantee your identity, respectively that you have the right to receive this information.

The provision of information by the Company is free of charge unless the requests are obviously unreasonable or unauthorised – in such cases we may request payment of a fee to cover the administrative costs or refuse to take action on the request.

### **How can you exercise your rights?**

You can exercise your rights by contacting us at the contact details listed. We will respond to your comments, questions and requests within one month of receiving them. If necessary, this period may be extended and you will be notified accordingly.

### **How do we protect your personal information?**

The Company has taken all necessary organizational and technical measures to ensure that the processing of personal data is legal and transparent.

Employees who are concerned with the processing of personal data are aware of the requirements regarding the protection of your personal information. The processing of personal data is entirely based on the principles of limited collection and limited use, disclosure and storage.

Periodically, all security measures in the Company, the ways of processing and storing of personal data for fulfilment of the set objectives are being reviewed.