

Data Privacy Notice – Contractors

1. PURPOSE OF THE DOCUMENT

The protection of your privacy and the security of your personal data are a major priority for Bulgartransgas EAD.

This notice describes how we collect and use your personal data to justify, conduct and terminate our relationship with you. All activities described herein are in accordance with the General Data Protection Regulation (Regulation 2016/679) (GDPR). This notice can give you useful information.

Bulgartransgas EAD is a data controller. This means that we are responsible for the decisions we take regarding the storage and use of your personal data. We have a legal obligation under the data protection legislation to provide you with the information contained herein.

This notice is not part of the contract with us. We can update this notice at any time.

It is important that you read carefully this notice in order to understand how and why we use your personal data.

2. DATA PROTECTION PRINCIPLES

We will comply with the data protection legislation under which data must be:

- processed lawfully, fairly and in a transparent manner;
- collected only for valid purposes which we have explained clearly and not be further used in a manner that is incompatible with those purposes;
- adequate, relevant and limited to what is necessary in relation to the purposes we have specified;
- accurate and up to date;
- kept for not longer than is necessary for the purposes we have specified;
- duly protected.

3. WHAT INFORMATION DO WE HAVE ABOUT YOU?

Personal data or personal information is any information about a natural person by which such person is identified or identifiable.

There are specific categories of more sensitive data which require a higher level of protection.

We will collect, store and use the following categories of personal data about you:

- Name, Personal Identification Number/Personal Number of a Foreigner, address, telephone number and e-mail address
- Birthdate, place of birth
- ID date (ID card / passport number and date of issue)
- Family status and children (in specific cases at the time of the conclusion of a civil-law contract: personal data of the spouse and other relatives for the exercise of rights, for example, in case of maternity leave)
- Information about bank accounts
- Information about current financial standing
- Information about your professional experience and professional competence
- Information about group membership
- Information about property
- Information about pre-trial proceedings brought or pending

- Information about origin of funds
- Place of employment
- Video surveillance system records as well as other information received electronically such as information about electronic access cards
- Information about your use of out information and communication systems

We may also process the following special categories of more sensitive data about you:

- Information about your health status
- Information about criminal convictions and offenses

4. HOW DO WE COLLECT YOUR PERSONAL DATA?

We collect your personal data in the course of the procedure at the time when the contract is concluded. We may sometimes receive personal data from third parties the so called public sources and databases, central credit register, National Social Security Institute, BNB bank account register, etc.

We will also collect personal data in relation to your work during the validity of our contract with you.

5. HOW WILL WE USE YOUR PERSONAL DATA?

We will only use your personal data if that is allowed under the law. We will use your personal data mostly on the following grounds:

- For the performance of our contract with you.
- For the fulfilment of contractual obligations.
- Where that is necessary to safeguard our (or of third parties) legitimate interests, for example to obtain judicial redress against your unlawful actions.

We may also use your personal data in the situations described hereunder which however we expect to occur rarely:

- To protect your (or someone else's) interests, for example for emergency medical aid;
- Where the processing is in the public interest.

6. SITUATIONS IN WHICH WE WILL USE YOUR PERSONAL DATA

We will use the above categories of personal mainly to fulfil our contractual obligations towards you and to comply with our legal obligations. In some cases, we may use your personal data to our or third parties' legitimate interests but only where those interests are not overridden by your interests or fundamental rights.

We will process your personal data in the following situations:

- Decision making on the contractual terms and conditions we will offer you.
- Payment of your remuneration, tax deductions, social security contributions.
- Business management and planning, including accountancy and audit.
- Compliance with the occupational health and safety legislation.
- Monitoring of the use of our information and communication systems

We may have more than one legal grounds to process your personal data.

7. IF YOU DO NOT PROVIDE THE PERSONAL DATA WE REQUEST

Your failure to provide the requested personal information may prevent us to perform our contract with you (or make us unable to pay your remuneration) or to comply with a legal requirement. Your refusal to provide the necessary information for the exercise and fulfilment of the rights and obligations under the contract may be a cause for not entering into or termination of the contract.

8. CHANGE OF PURPOSE

We will use your personal data exclusively to the purposes for which they are collected, unless according to our sensible discretion we have to use them on other grounds which are compatible with the initial purpose. If we have to use your personal data, we will notify you thereof, explaining the legal grounds for the use.

9. HOW WILL WE USE SENSITIVE PERSONAL DATA?

The special categories of sensitive personal data require a higher level of protection and additional grounds for collection, storage and use thereof. We may process special categories of personal data in the following situations:

- For the implementation of pre-contractual relations and already signed contracts
- For compliance with our legal obligations
- With your express consent in writing

In rare cases we may process sensitive personal data where that is necessary for defense in legal dispute or protection of your or someone else's interests and you are not capable of giving valid consent, or where you have publicly disclosed this sensitive information.

10. SOME OF OUR MAJOR OBLIGATIONS

We will use information about your physical and mental health in order to secure your health and safety during your stay in the premises and sites of the company.

11. DO WE NEED YOUR EXPLICIT CONSENT?

We do not have a duty under the law to obtain your consent for the processing of sensitive personal data for the purpose of compliance of legal obligations.

However, we believe that we will have your explicit, voluntary and informed consent on the basis of the information provided to you herein.

12. INFORMATION ABOUT CRIMINAL CONVICTIONS AND OFFENCES

We may only use information about criminal convictions and offences where the law so permits. These will usually be cases where processing is necessary for compliance with our legal obligations.

13. DATA SHARE

We may share your personal data with third parties, including service providers, for instance при signing a compulsory insurance against accidents at work, supplementary pension schemes, etc.

We require any third parties to respect data security and comply with the data protection legislation. To ensure the security of your information we have signed contracts for the protection of your personal data that provide for a complete confidentiality in their processing by third parties and we have ensured the technical and organisational measures to protect the data, corresponding to the requirements of the national and European legislation.

We may send personal data to third countries outside the EU and the European Economic Area, however in these cases you can as well expect such level of protection of your personal data.

In all of the above cases the persons to whom we supply your personal data (on the territory of the EU and EEA) have declared that they guarantee an adequate level of protection of your personal data. Concerning companies and organisations, located outside the EU and the EEA, on a case-by-case basis the respective company/organization guarantee that they guarantee an adequate level of protection of personal data in line with the requirements of the European legislation.

We will transfer your personal data with third parties where that is required by law, where that is necessary for the administration of our relationship or where we have other legitimate interest in that.

14. HOW DO WE ENSURE THE SECURITY OF YOUR INFORMATION WHEN WE TRANSFER IT TO THIRD PARTIES?

Any service provider has the duty to take appropriate security measures in order to protect your personal data. They may only use your personal data for the purposes we have defined and in accordance with our instructions, and not for their own purposes.

15. DATA SECURITY

We have introduced appropriate measures in order to prevent incidental loss, use or unauthorised access, change or provision of your personal data. Furthermore, we restrict the access to your personal data to those officers and third parties who need to have that information. They will only process personal data on the basis of our instructions and in accordance with their confidentiality obligation.

16. HOW LONG WILL WE USE YOUR PERSONAL DATA?

We will store your personal data only for as long as we need them to fulfil the purposes for which they are collected, including to comply with legal requirements.

To determine the appropriate storage period, we take into account the quantity, nature and sensitivity of the personal data, the potential risk of damages as a result of unauthorised use or provision of the data, the purposes for which we process them and whether we could attain those purposes by other means, as well as the applicable legal requirements.

In certain situations, we may anonymise your personal data so that they can no longer be related to you. In consequence, we can continue using your data without notifying you thereof. Upon termination of our contractual relations with you we will store your information in accordance with our policies and the legal requirements and will destroy it in a secure manner after the end of the storage period described in our policies and regulated by law.

17. RIGHT OF ACCESS, RECTIFICATION, ERASURE AND RESTRICTION

Your obligation to notify us of change

Keeping your personal data accurate and up to date is important. Please notify us of any change in your personal data.

Your rights in relation to your personal data

- **Access to information:** this right enables you to receive a copy of the personal data we store about you and check whether we have legal grounds for processing thereof.
- **Rectification:** this right enables you to require us to rectify any incomplete or inaccurate information about you.
- **Erasure:** this right enables you to require us to erase or remove your personal data where we do not have a valid reason to continue processing thereof. You may also require that your personal data be erased or removed where you have exercised your right to object against processing thereof.
- **Objection against processing:** in the cases where we rely on our legitimate interests as grounds for processing, you may object to this processing.
- **Restriction of processing:** this right enables you to request us to suspend the processing of your personal data, for example if you want us to establish the accuracy of the data or the reasons for processing thereof.
- **Data portability:** this right is limited to cases where data have been provided to us by you for the purposes of a contract and enables you to require us to transfer your personal data stored in an electronic form to a third party.

If you want to exercise any of the above rights, please contact:

Data protection officer

Bulgartransgas EAD
Sofia, Lyulin Residential Complex 2
66, Pancho Vladigerov St.
dlzd@bulgartransgaz.bg

If you make such a request, we may need to receive information from you confirming your identity. This requirement is part of our data protection measures and aims to ensure that no personal information is made available to any person who does not have the right to receive it.

You may lodge a complaint with the Commission for Personal Data Protection – the Bulgarian data protection regulatory authority, at any time.

18. YOUR RIGHT TO REVOKE YOUR CONSENT

If you have given your explicit consent for the processing of your personal data for a specific purpose, you have the right to revoke this consent. To revoke your consent, please contact:

Data Protection Officer

Bulgartransgas EAD
Sofia, Lyulin Residential Complex 2
66, Pancho Vladigerov St.
dlzd@bulgartransgaz.bg

Upon receipt of your request, we will terminate the processing of the data for the purpose/purposes for which you have originally given your consent if we do not have any other legal grounds to continue the processing of which you will be duly notified.

19. DATA PROTECTION OFFICER

We have designated a data protection officer to exercise control for compliance with the personal data protection legislation in our organisation. You can contact this person as follows:

Data Protection Officer

Bulgartransgas EAD

Sofia, Lyulin Residential Complex 2

66, Pancho Vladigerov St.

dlzd@bulgartransgaz.bg

20. MODIFICATIONS OF THIS NOTICE

We reserve the right to make modifications and updates to this notice at any time.

You can always find an updated confidentiality and personal data protection notice on our website and in Section Procurement for every specific public procurement organized in line with the requirements of the Public Procurement Act.