

**QF 4.2-4 Data protection policy****Personal data protection policy**
of "ECO-CONSULT ENGINEERING" Ltd VAT 102222771**PRINCIPLES, PURPOSES, SCOPE OF THE PROCESSING OF PERSONAL DATA**

1. "ECO-CONSULT-ENGINEERING" LTD, VAT 102222771, address: city of Burgas, " Slaveykov" residential area, building 126, entrance A, floor 3, office 9, e-mail info@ecoeng.bg, phone/fax 056 586667, (hereinafter referred to as **the Company**), in its capacity as an administrator, processes all personal data in accordance with the applicable legislation, namely: the General Data Protection Regulation (EU Regulation 2016/679), the Personal Data Protection Act data (PDP) and the by-laws. The personal data processed by **the Company** are not used illegally, nor do they become the possession of any unauthorized third party.

2. **The company** processes personal data of its employees, counterparties (when they are individual persons) and of the persons representing the counterparties (when they are legal entities). The purposes of the processing of these personal data are the implementation of **the Company's activities** and the fulfillment of its obligations according to the tax, labor, insurance and any other legislation in force in the Republic of Bulgaria.

3. The company processes basic personal data for identification and contact (name, nickname, social security number, address, e-mail, telephone number, etc.). The Company does not process sensitive personal data such as data on health status, racial or ethnic affiliation, political views, religious beliefs, nor data on the location, traffic and content of communication of the subjects of personal data. The company processes only the personal data necessary for the purpose of working with the relevant entity.

4. The company provides personal data to third parties only in connection with the above-mentioned processing purposes, and the correct, reliable and lawful use of data by the third party is guaranteed by contract, where applicable. The company does not provide third parties with personal data for marketing and advertising purposes.

GROUND, RULES AND TERMS FOR THE PROCESSING OF PERSONAL DATA

1. "ECO-CONSULT ENGINEERING " Ltd. processes personal data when there is an express consent of the data subject, when the personal data is necessary for the performance of a contract between it and the data subject or for actions at the request of the data subject before the conclusion of such contract, as well as when another legal basis for processing personal data is available and applicable.

2. The company stores personal data on paper and in electronic form, supporting various software applications for document processing. The company ensures the storage and processing of personal data in a secure environment. Access to the subjects' personal data is granted only to its employees who need it to achieve the purposes of their processing or for which there is a legal requirement. The processing of personal data may include collecting, recording, organizing, structuring, storing, adapting or changing, retrieving, consulting, using, disclosing by transmission, distribution or in any other way in which the data becomes available, arranging or combining, limiting, erasing or destruction.

3. The company stores the personal data of the subjects in accordance with the legal requirements applicable to its activity. When there are no such requirements, the Company stores the personal data for a period not longer than 12 months from the end of the activities for which the data were processed.

4. The company provides and maintains appropriate technical and organizational measures to protect the subjects' personal data against unauthorized access or their illegal use and/or against

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their accidental loss, modification, disclosure, access and/or damage or copying. These measures are intended to ensure the continued protection and privacy of personal data.

The company reevaluates the measures regularly in order to achieve permanent security of personal data.

5. In the event of a violation of the security of personal data, the Company shall notify the supervisory authority - the Commission for the Protection of Personal Data (CPPD) - no later than 72 hours after discovering the violation by submitting the necessary information. If there is a possibility that the violation will create a high risk for the rights and freedoms of the data subjects, the Company will also inform them accordingly.

RIGHTS OF SUBJECTS RELATING TO THE PROTECTION OF PERSONAL DATA

Under the terms of the law, the rights of subjects in relation to the protection of their personal data are as follows:

1. Right of Access

The subject has the right to receive confirmation from "Eco-Consult-Engineering" Ltd whether his personal data is being processed by him. This includes the right of access to the personal data, the right to obtain a free copy of the data (except in cases of excessive and repetitive enquiries), unless otherwise provided for in the applicable personal data protection rules, and the right of the subject to a description of the main characteristics related to the processing of his personal data shall be provided.

2. Right to rectification

The Subject has the right to correct or request the Company to correct, without undue delay, inaccurate, incomplete or outdated personal data relating to him.

3. Right to erasure (right to be forgotten)

The subject has the right to request from "Eko-Consult Engineering " Ltd the deletion of personal data related to him without undue delay, when any of the following grounds apply:

- (a) the personal data are no longer necessary for the purposes for which they were collected or otherwise processed;
- (b) the subject has objected to the processing as set out below;
- (c) the subject's personal data has been unlawfully processed; or
- (d) the subject's personal data must be deleted in order to comply with a legal obligation under EU law, the law of a member country or the law of another country.

The Company may refuse to delete the subject's personal data if their processing is necessary:

- (a) to exercise the right to freedom of expression and the right to information;
- (b) to comply with a legal obligation that requires the processing, or for the performance of a task of public interest; and/or
- (c) for reasons of public interest in the field of public health, for the purposes of scientific or historical research, or for statistical purposes; and/or
- (d) for the establishment, exercise or defense of legal claims.

4. Right to restriction of processing

The subject has the right to request the Company to limit the processing of his personal data in the following cases:

- (a) when disputing the accuracy of the personal data, as provided by the subject and processed by "Eko-Consult-Engineering" Ltd (the limitation is for a certain period, which allows the Company to verify the accuracy of the personal data);
- (b) where the processing is outlaw, but the subject does not wish the personal data to be deleted, but instead requires the restriction of its use;

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(c) when the Company no longer needs the personal data for the purposes of processing, but the subject requires them to establish, exercise or defend legal claims;

(d) when the subject has objected to the processing and expects the Company to verify whether the same legal grounds for the processing of personal data take precedence over the interests of the subject.

When the processing of the subject's personal data is restricted by the Company, it will inform the subject in advance, as well as before this processing restriction is lifted.

5. Right to object

In principle, the subject has the right at any time, on grounds related to his particular situation, to object to the processing of personal data concerning him. The subject can exercise the right only in relation to the processing of his personal data, which is carried out by the Company for the purposes of his legitimate interests. In case the objection is well-founded, the Company will stop processing the personal data concerning the objected subject, unless the Company shows that there are compelling legal grounds for the processing that take precedence over the interests of the subject.

6. Right to data portability

This right includes the following possibilities:

(a) to obtain the personal data in a structured, widely used and machine-readable format to be transferred to another controller, or (b) to obtain a direct transfer of the personal data to another controller, if this is technically achievable. Given the legal basis on which the Company processes personal data, the application of this right to the subject is limited.

7. Right of appeal

The subject has the right to file a complaint regarding the processing of his personal data by "Eco-Consult-Engineering" Ltd to the Commission for the Protection of Personal Data (CPPD), which is the competent state authority.

The entity may proceed to exercise its rights by means of a written communication to the Company. The subject may at any time object to the processing by "Eco-Consult-Engineering" Ltd of personal data concerning him, and this shall be done in writing.

The policy of "ECO-CONSULT-ENGINEERING " Ltd for the protection of personal data is effective from 25.05.2018. In the event of a change in any of its aspects, the Company will update it in a timely manner, providing access to it to the subjects of personal data and to all other interested parties.

Manager:


eng. V. Sharlopov