

POLYCOMP LTD

PRIVACY POLICY

WE TAKE EVERY PRECAUTION TO PROTECT YOUR PERSONAL DATA

WHO ARE WE?

Identification of the personal data controller: POLYCOMP LTD (hereinafter referred to as POLYCOMP) is a commercial company registered in the Commercial Register and the Register of Non-Profit Legal Entities kept by the Registry Agency, with UIC 107052730, with registered office and address in the town of Gabrovo, 48 Nikolaevska Str., represented by Ivan Bozhinov, in his capacity as Director, and as the controller of personal data in accordance with the provisions of Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data (General data protection regulation) and the Personal Data Protection Act (PDPA).

HOW TO CONTACT US?

Address: 9 Boyan Damyanov Str., Sofia, tel. +359 2 8144141, e-mail: dataprivacy@polycomp.bg

POLYCOMP RESPECTS THE CONFIDENTIALITY OF YOUR PERSONAL DATA

The protection of your personal information throughout the processing of personal data, as well as the security of all your personal data, is an important issue for us. We process personal data confidentially and in accordance with the legal provisions at national and European level.

Data protection and information security are included in our corporate policies.

WHAT IS THE PRIVACY POLICY?

This Privacy Policy aims to provide you with clear and accessible information on the actions taken with the personal data that has been processed by POLYCOMP in connection with its business relations, including:

- what personal data we collect about you;
- the purpose of processing this data;
- the period we store personal data for;
- with whom do we share your personal data;
- details regarding the processing of personal data of natural persons related to our business partners (employees and representatives of our business partners and other natural persons related to our business partners);
- your rights regarding your personal data.

With this Privacy Policy POLYCOMP LTD declares that it applies all technical and organizational measures to ensure the protection of personal data of natural persons, as prescribed by law or other regulations at national and European level.

YOUR RESPONSIBILITIES

Read this Policy and make sure to check it regularly.

If you are in a contractual relationship with us or if you are a natural person who is related to our business partners/employees and/or a representative of our business partner or another natural person related to our business partner, you could (if you have the right and opportunity to do so) check the terms contained in contracts and other documents - they may contain additional details about how we collect and process your data. If you wish, you could turn to the relevant business partner to whom you are related (respectively to your colleague, whose functions include these matters) in order to ascertain this information.

Pay attention to the additional information and conditions that we introduce to you at different stages of our interaction.

If you provide us with information on third parties, you should have a legal basis for doing so. Also, before providing us with the data of a third party, you should inform them that you will provide us with their data. You should also inform them about the way we will process said data and inform them about this Policy.

Please notify us in case of a change, error, or incompleteness in your data that we process.

By providing us with data, you declare that you are over 18 (eighteen) years of age.

WHAT IS PERSONAL DATA?

"Personal data" means any information which is related to an identified natural person or a natural person who can be identified ("data subject").

WHAT PERSONAL DATA DOES POLYCOMP COLLECT ABOUT YOU?

To provide effective access to its products/services, POLYCOMP collects certain information about you:

- name, telephone number, email address, other contact details, place of residence, organization – when filling in any of the forms (contact/registration) on POLYCOMP's website www.polycomp.bg;
- technical data, which is automatically sent to us when you use POLYCOMP's website - IP address, information about the device you are using to visit POLYCOMP's website;
- Cookies to identify your browser or device.

Regarding the data of natural persons related to our business partners, see the special section "PROCESSING OF PERSONAL DATA OF NATURAL PERSONS RELATED TO OUR BUSINESS PARTNERS (EMPLOYEES, REPRESENTATIVES) AND OTHERS" below.

DO YOU HAVE TO PROVIDE US WITH PERSONAL DATA?

In any case, if you do not provide us with the personal data we have requested, we may not be able to achieve one or more of the processing purposes described in this Policy. In some cases, the provision of personal data could be a legal and/or a contractual requirement (in these cases, if the data is not provided, the relevant consequences provided by the law or by the contract could occur). The provision of certain personal data may be a necessary requirement for the conclusion of a contract (in these cases, if this data is not provided, it would not be possible to conclude the relevant contract).

If you have any doubts about the data you must provide us with, send your question to us and we will answer you.

ON WHAT BASIS DOES POLYCOMP PROCESS YOUR PERSONAL DATA?

The processing of personal data includes the collection, storage, transmission, correction, updating, deletion, destruction, and all other actions that are performed with your personal data.

If you are a natural person with whom we have concluded a contract, or you have requested to conclude a contract in the future, POLYCOMP processes your data to fulfill its contractual obligations under the concluded contracts or to take steps before concluding a contract.

In some cases, POLYCOMP processes personal data after obtaining a clear, free, and unambiguous consent from you for the purposes of said processing. Consent to the processing of your personal data could be provided, for example, by ticking the appropriate box for consent on the website or the mobile application of POLYCOMP, by providing a written declaration of consent when visiting our office or otherwise. The consent you provide can always be revoked as described below in section "WHAT ARE YOUR RIGHTS REGARDING YOUR PERSONAL DATA?".

POLYCOMP could also process personal data in compliance with legal obligations and, if necessary, in order to protect the life and health of the data subject.

POLYCOMP may also process personal data if it or a third party has a legitimate interest in doing so (unless the interests or fundamental rights and freedoms of the natural person who requires the protection of their personal data do not take precedence over that interest).

WHAT IS THE PURPOSE OF PROCESSING YOUR PERSONAL DATA?

Your personal data will be used to enable us to fulfill our obligations (contractual or legal), as well as to fulfill other purposes, including but not limited to:

- to exercise the rights and/or fulfill the obligations under concluded contracts (this could be a contract between POLYCOMP and you or a contract between POLYCOMP and its business partner with whom you are related to), and/or to take steps in connection with the conclusion of such contracts;
- to make it possible to order products/services through the website and the mobile application of POLYCOMP;
- to provide access to the website and the mobile application of POLYCOMP. In this regard, we may display content that is relevant and personalized (to you or our business partner to whom you are related) and limited by the criteria set;
- to respond to your inquiries, opinions, recommendations, and/or other communications;
- to send/provide you with certain information in connection with our relationship with you or our business partner;
- with a view to establishing, exercising or defending legal claims;
- to comply with legal obligations that apply to us.

HOW DO WE COLLECT YOUR PERSONAL DATA?

Most often POLYCOMP collects personal data in the following ways:

- by filling in registration forms on POLYCOMP's website;
- by other persons providing us with your data - for example when our business partners provide us with contact details and other necessary data about natural persons related to them (employees, representatives, etc.);
- by filling in forms and declarations. The forms are provided and filled in in free form or in a form provided to you on paper or electronic media by POLYCOMP;
- by visiting and using the online ordering platform/website of POLYCOMP;

- when updating data at your request and filling in an update form on paper or in an electronic environment;
- by processing information about your visits to POLYCOMP's website;
- by processing IP address information, cookies to identify your browser or device.

FOR HOW LONG DO WE STORE AND PROCESS YOUR DATA BEFORE WE DESTROY IT?

Depending on the basis on which we process your personal data, the period of storage of said personal data is different. When deciding on the exact retention period of data, we take into account its volume, nature and sensitivity, the potential risk of harm from unauthorized use or disclosure, the purposes of processing, whether it can be achieved by other means and the applicable legal requirements.

If we process your personal data on the basis of your consent, we will continue to process the data for the period for which the consent was given, or until you withdraw the consent (unless we then apply another reason for processing). However, we may terminate the processing on the basis of consent even earlier if we determine that we no longer need the data for the relevant purposes or for other reasons (for example, in order not to violate the applicable legislation).

Your personal data is stored by us for a period of 6 years from the termination of our contractual grounds if we are processing the personal data for the performance of contractual obligations to you. After the expiration of this period, and in the event that there is no other reason to continue storing your personal data, the information about you is destroyed. In this case, the records for you are permanently deleted from our system. All the paper media containing your personal data is also destroyed.

If we process your personal data based on legitimate interests, POLYCOMP will continue to process your data as long as there is a legitimate interest. If we process your data based on legitimate interests and you object to the processing of your data, POLYCOMP should stop processing it, unless:

- proves that there are compelling legitimate grounds for processing that take precedence over your interests, rights, and freedoms; or
- processing is necessary for the establishment, exercising or defense of legal claims.

If we process your personal data in order to comply with our legal obligations, we will continue to process it for the period necessary to comply with the legal obligation (unless we then apply another legal basis).

TO WHOM CAN WE TRANSFER YOUR PERSONAL DATA? INTERNATIONAL DATA TRANSMISSION.

POLYCOMP may disclose your personal data to the following persons:

- companies providing courier services;
- the company that provides hosting services related to the POLYCOMP's website;
- public bodies, including those performing supervisory functions;
- banks and financial institutions in the country and abroad when conducting money transactions;
- insurance and reinsurance companies on loans and credit lines granted by POLYCOMP;
- lawyers, auditors, notaries, courts, prosecutors, police, investigation;
- third parties - debt collection companies;
- POLYCOMP's contractors for fulfillment of obligations, such as IT companies, logistics, telecommunications, collection, printing services, marketing, and others;
- our suppliers - when we provide them with your contact details in order for the respective provider to communicate with you regarding trainings, events and/or marketing information.

Each transfer is made in strict compliance with the confidentiality and security of your personal data.

In all of the above cases, the persons to whom we provide your personal data have declared that they provide an adequate level of protection of your personal data.

Your personal data is usually processed within the European Union or the European Economic Area and is not transferred to other countries ("third countries"), nor is it transferred to international organizations. If data transfer to a "third country" is required, prior to such transfer we ensure that the necessary level of data protection in the third country or at the recipient in that third country is guaranteed. This may be based on a decision of the European Commission on the adequate level of data protection in a particular third country as a whole. Alternatively, the data transfer may be based on so-called "standard contractual clauses" agreed upon with the recipient or on other appropriate/applicable guarantees. We will be happy to provide you with additional information upon request (including how you can acquaint yourself with the relevant texts/documents guaranteeing the protection of your data).

PROFILING - USING COOKIES

POLYCOMP's website uses cookies. To read the Cookie Policy, click [here](#).

PROCESSING OF PERSONAL DATA OF NATURAL PERSONS RELATED TO OUR BUSINESS PARTNERS (EMPLOYEES, REPRESENTATIVES AND OTHERS)

If you are a natural person who is related to a business partner of ours (their employee, representative or other), you should know and understand how POLYCOMP processes your personal data in connection with the relationship between POLYCOMP and the respective business partner (reseller, supplier, etc.).

We often collect your data directly from you. In some cases, we may receive your data from your colleagues or from other persons related to the respective business partner. We may also receive your data from publicly available information in a commercial register and/or from the website of our business partner for whom you work or with whom you are otherwise related. Most often we have the following information about you: names, email, phone, other contact information, your communication with us (e.g. by email).

Polycomp processes your data on the following grounds:

- Grounds of "legitimate interests" (Article 6, paragraph 1, letter f) of the General Data Protection Regulation 2016/679 (GDPR)). These could be the legitimate interests of POLYCOMP and/or the legitimate interests of the respective business partner, as follows:
 - for exercising the rights and/or fulfilling the obligations under concluded contracts between POLYCOMP and the respective business partner;
 - to take steps in connection with the conclusion of a contract between POLYCOMP and the respective business partner;
 - to make it possible to order products/services through the website and the mobile application of POLYCOMP;
 - in order for POLYCOMP to provide access to its website and mobile application. In this regard, POLYCOMP could display content that is relevant and personalized (to our business partner to whom you are related) and limited by the criteria set;
 - in order for POLYCOMP to respond to your inquiries, opinions, recommendations, and/or other messages;
 - transmission of contact information to POLYCOMP's providers - in order for the respective provider to communicate with you regarding trainings, events and/or marketing information;

- in order to establish, exercise or defend legal claims;
 - in order for POLYCOMP to send you information regarding the relationship between POLYCOMP and its business partner to whom you are related;
 - the grounds of "legitimate interests" does not apply to sending of information for which we envisage using the grounds of "consent". Please see below for which cases we have foreseen that we will apply the grounds of "consent".
- Grounds of "consent" (Article 6, paragraph 1, letter a) of the General Data Protection Regulation 2016/679 (GDPR)). We use this grounds in all cases where we have informed you that consent is the grounds for the processing of your personal data.

In all cases where we have provided grounds of "consent", you have the right to freely decide whether to give your consent or not. In addition, if you have given your consent, you will have the right to withdraw it at any time and this will not affect the lawfulness of processing on the basis of consent before it is withdrawn. You can withdraw your consent in the ways described in section "WHAT ARE YOUR RIGHTS REGARDING YOUR PERSONAL DATA?" below.

- Grounds of "compliance with a legal obligation applicable to POLYCOMP" (Article 6, paragraph 1, letter c) of the General Data Protection Regulation 2016/679 (GDPR)). This applies, for example, to data contained in accounting documents, data stored for tax purposes, etc.

If you are a natural person related to our business partner - RESELLER (Buyer), read carefully the following additional information applicable to you.

In addition to the information provided by POLYCOMP through their website and mobile application, POLYCOMP also carries out commercial communication with the RESELLER through individuals related to the RESELLER (its employees, representatives, and others). If you are such a person, POLYCOMP may use your contact details at its disposal and will be guided by the contractual relationship with the respective RESELLER (to whom you are related), their interests, as well as the interests of POLYCOMP. Thus, you will usually receive and actively participate in the following communication:

- Communication for which we use grounds of "legitimate interests":
 - Communication, which is related to activating, changing and other issues related to your user profile (if you have one) on the website and the mobile application of POLYCOMP.
 - Communication, which is related to activating, changing and other issues related to the RESELLER's user profile (if they have such a profile) on the website and the mobile application of POLYCOMP - in the cases where you manage this profile.
 - Communication, which is related to orders made by the RESELLER, complaints, questions/requests, and other issues related to specific sales/transactions made by POLYCOMP to the RESELLER.
 - Communication, which is related to your position and role at the RESELLER, for example connected to payments and accounting - if you are part of the RESELLER's financial and accounting team.
 - Any other communication, except for communication for which we use the grounds of "consent".
- If you do not wish to receive communication for which we use the legal grounds of "legitimate interests", you may request this from POLYCOMP (to exercise your right to object) by contacting us as set out in section "WHAT ARE YOUR RIGHTS REGARDING YOUR PERSONAL DATA?" below. Before doing so, we encourage you to discuss this with the RESELLER you are related to, as they may require you to receive said communication in view of their contract with POLYCOMP. If, despite everything, you make such an objection to us in order to receive communication, we have the following rights:
 - to satisfy your request; or

- not to satisfy your request, because our judgement is that our legitimate interests or the legitimate interests of the RESELLER to whom you are related take precedence over your request. To make this assessment, we may decide to contact the RESELLER to discuss your request not to participate in such communication.
- Communication for which we use the grounds of "consent":
We will conduct certain types of communication with you only if we have obtained your consent for said communication. This refers to communication on changes in product prices, new products, changes in product characteristics, newsletter subscription, rebate programs, invitations for trainings and seminars, product promotions, other types of communication, which we have explicitly informed you that are performed only if we have your consent.

You can give your consent for each of the above types of communication by checking (ticking) the appropriate box for consent when registering/activating your user profile (user profile managed by you) on the website and/or the mobile application of POLYCOMP, or later in the user profile itself. Please make sure that no one else has access to the consent settings regarding communication with you and that you are the only one managing them. Also, you cannot change the communication settings between us and others (for example, in a profile that is not yours). The data you provide us with in connection to your consent (such as contact email) should be yours and not that of others. Please be informed that we will consider that the settings/consent for communication with you have been made by you. Therefore, we would like to ask you not to disclose your password for accessing the profile to others and to notify us immediately if you suspect or learn that another person has given or withdrawn consent to the processing of your data instead of you. In case you gave your consent for a certain type of communication, we will use your contact details from your user profile, as well as your contact details obtained in other ways. Your consent may be revoked as set out in section "WHAT ARE YOUR RIGHTS REGARDING YOUR PERSONAL DATA?" of this Policy.

In some cases, we could carry out automated processing of your personal data - automatic communication with you in relation to overdue obligations of our business partner to whom you are related, automatic communication for which we use the grounds of "consent" (it is indicated above in which cases we use this grounds), automatic communication related to orders placed, automatic communication related to the activation, existence and/or administration of a user profile on the website and/or the mobile application of POLYCOMP.

WHAT ARE YOUR RIGHTS REGARDING YOUR PERSONAL DATA?

In compliance with the Bulgarian and European legislation on personal data protection, including the General Data Protection Regulation 2016/679 (GDPR), you can exercise the following rights:

- the right of access to the personal data that POLYCOMP processes for you;
- the right to request from POLYCOMP to correct/add data in case you find any inaccuracies, incompleteness (taking into account the purposes of processing) in said data or if there is a need to update your personal data;
- the right to request a restriction on the processing of personal data in the cases specified by law;
- the right to request from POLYCOMP the deletion of your personal data, in case there are conditions for that;
- the right to object to the processing of your personal data in the cases specified in the legislation;
- the right to withdraw your consent to the processing of your data at any time. Withdrawal of consent shall not affect the lawfulness of processing on the grounds of consent before it was withdrawn;

- the right to request the portability of your personal data in a structured, widely used, and machine-readable format and/or to transfer your personal data to another controller (in the cases specified by the legislation).

For more information on the above rights, please see the next section "WHAT DOES EACH OF THE ABOVE RIGHTS MEAN?".

You can exercise any of the above rights by contacting us via email at dataprivacy@polycomp.bg or at the office address: 1784 Sofia, 9 Boyan Damyanov Str.

In some cases, the following additional options for exercising your rights are applicable:

- If the "unsubscribe" (or similar) option is available in a message sent to you, you could opt out of this type of communication by following the "unsubscribe" (or similar) option. In this case, it will be considered that you withdraw your consent for communication (if we use the grounds of "consent") or that you have objected to a certain type of communication (if we use the grounds of "legitimate interests");
- The persons with a user profile on the website and the mobile application of POLYCOMP have the following additional opportunities to exercise some of their rights:
 - they can view personal data filled in their user profile, as well as change their access password using the functionalities in their user profile;
 - if they have given their consent by ticking/marketing the relevant box for consent (upon registration/activation of their user profile or through the user profile itself), the persons have the right to withdraw their consent at any time by removing the respective tick/marketing in their user profile on the website and the mobile application of POLYCOMP.

When you submit a request to exercise any of your rights, we will grant the request if we deem it necessary to do so in accordance with applicable law.

If there are any changes, errors, inaccuracies and/or incompleteness in your personal data, please notify us, as well as correct and/or complete your data in your user profile (if you have one) on the website and/or the mobile application of POLYCOMP. Please notify us immediately if you suspect or learn that somebody has gained unauthorized access to your user profile.

WHAT DOES EACH OF THE ABOVE RIGHTS MEAN?

Right of access to personal data: this right gives you the opportunity to receive confirmation whether your personal data has been processed and, if so, to gain access to the data and certain information related to it. In addition, you have the right to receive a copy of your personal data that is being processed.

Right to delete, correct/add, restrict processing: the right to request from POLYCOMP to delete, correct/add or restrict the processing of your personal data.

Right to object: You have the right at any time and on the grounds related to your specific situation, to object to the processing of personal data on the grounds of "legitimate interests".

Right of portability: when the processing of personal data takes place in an automated manner, you have the right to receive the personal data which you have provided to POLYCOMP and which is related to you in a structured, widely used and machine-readable and interoperable format. Where technically possible, you have the right to directly transfer personal data to another controller. This right should apply when you have provided your personal data on the grounds of your own consent or the

processing is necessary due to an obligation under a contract to which you are a party. This right should not apply where the processing is based on other legal grounds. By its very nature, this right should not be exercised in respect to data controllers who are performing their public duties. Therefore, this right should not be applied when the processing of personal data is necessary to comply with a legal obligation to which the controller is subjected to, or to perform a task in the public interest, or in the exercise of official authority conferred on the controller. Your right to transmit or receive personal data related to you does not create an obligation for POLYCOMP as an administrator to adopt or maintain technically compatible processing systems. Where more than one data subject is affected in a given set of personal data, the right to receive personal data should not infringe upon the rights and freedoms of other data subjects in accordance with the General Data Protection Regulation.

Right to lodge a complaint with a supervisory body: if you believe that the processing of your data violates the General Data Protection Regulation 2016/279 (GDPR) and/or any other applicable data protection legislation, you have the right to refer this matter to the supervisory body. In Bulgaria, this body is the Commission for Personal Data Protection (CPDP), address: 1592 Sofia, 2 Prof. Tsvetan Lazarov Blvd.; e-mail: kzld@cpdp.bg; website: www.cdpd.bg. You have the right to refer this matter to the supervisory body by the expiry of certain time limits. In case of violation of your rights under the legislation on personal data protection, you also have the right to appeal the actions and acts of POLYCOMP in court. The court cannot be referred to if there are pending proceedings before the CPDP for the same violation or a decision of the CPDP on the same violation has been appealed and no court decision has entered into force.

CHANGES TO THE PRIVACY POLICY

Polycomp reserves the right to change this Privacy Policy at any time. In case of changes in the Privacy Policy, an updated version containing the changes made will be published on the website and the mobile application of POLYCOMP.

If required by applicable law, or if we deem it necessary, we will notify you in an appropriate manner (for example by email) of the changes made to this Privacy Policy. In addition, we may notify you of changes to this Privacy Policy by posting notices in our offices and/or on our website.

In view of the changes, you will be able to discontinue the use of some or all of the services (if this is possible and permissible in the specific case in terms of the law, concluded contracts, etc.) and/or to exercise your rights, part of which are explicitly mentioned above.

The current update of the Privacy Policy comes into force on June 10, 2020. From this date, the Privacy Policy applies to all existing and future relationships and any existing and future processing of personal data carried out by POLYCOMP.