

## Privacy Policies

Information about the company that processes your data:

Denomination: "BULMAR TRADE" EOOD

VAT BG202852185

Headquarters And Office Varna, Bulgaria postal code 9000, Mladost district, 132 Devnya Street, regulated plot with identifier 10135.3514.333

Correspondence Address: Varna, Bulgaria postal code 9000, Mladost district, 132 Devnya Street, regulated plot with identifier 10135.3514.333

Phone +359 52 55 41 74

Email [office@bulmartrade.com](mailto:office@bulmartrade.com)

Website <https://B2B.BULMARTRADE.COM>

Information about the competent supervisory body for the protection of personal data:

Denomination Commission for the Protection of Personal Data

Address: Sofia, Bulgaria 2 Prof. Tsvetan Lazarov Street,

Phone: +359 2 9153525

Email: [kzld@cpdp.bg](mailto:kzld@cpdp.bg)

Website: [www.cdpd.bg](http://www.cdpd.bg)

"BULMAR TRADE" OOD (hereinafter referred to as the "Controller" or the "Company") carries out its activities in accordance with the Personal Data Protection Act and Regulation (EU) 2016/679 of the European Parliament and of the Council of April 27, 2016 on the protection of natural persons in connection with the processing of personal data and on the free movement of such data. This information is intended to inform you about all aspects of the processing of your personal data by the Company and the rights you have in relation to this processing.

### **Basis for collecting, processing and storing your personal data**

Article 1. The Controller collects and processes your personal data in connection with the use of the B2B.BULMARTRADE.COM online store and the conclusion of contracts with the company on the basis of Art. 6, para. 1, Regulation (EU) 2016/679 (GDPR), and more specifically on the following grounds:

Express consent received from you as a customer;

Fulfillment of the Controller's obligations under a contract with you;

Compliance with a legal obligation that applies to the Controller;

For the purposes of the legitimate interests of the Controller or a third party.

### **Your personal data**

Article 2. (1) We collect and process the personal data that you provide us in connection with the use of the B2B.BULMARTRADE.COM online store and the conclusion of a contract with the Company, including for the following purposes:

creating a profile and providing full functionality when using the online store;

individualization of a party to the Contract;

accounting purposes;

statistical purposes;

protection of information security;

ensuring the performance of the Contract for the provision of the relevant service.

sending a newsletter and e-mails with special offers upon your request.

(2) We observe the following principles when processing your personal data:

legality, good faith and transparency;

limitation of processing purposes;

relevance to the purposes of the processing and minimization of the data collected;

accuracy and timeliness of data;

limitation of storage in order to achieve the purposes;

integrity and confidentiality of processing and ensuring an appropriate level of personal data security.

(3) When processing and storing personal data, the Controller may process and store personal data in order to protect the following legitimate interests:

fulfillment of obligations to the National Revenue Agency, the Ministry of Internal Affairs and other state and municipal bodies.

#### **What types of personal data does our Company collect, process and store**

Article 3. (1) The Company performs the following operations with the personal data provided by you as customers, for the following purposes:

Registration of a customer in the e-store and execution of a remote purchase and sale contract - the purpose of this operation is to create a profile for using the e-store to purchase goods and provide contact details for delivery of purchased goods. It is considered that the operation "Registration of a user in the e-store and execution of a remote contract for purchase and sale" is permissible to perform and provides sufficient guarantees to protect the rights and legitimate interests of the data subjects in accordance with the requirements of the GDPR.

Sending a newsletter – the purpose of this operation is to manage the process of sending newsletters, e-mails with special offers, promotions, promo codes, news and new features to customers who have indicated that they wish to receive them.

Exercising the right of refusal or making a complaint - the purpose of this operation is to manage the process of exercising the right of refusal or complaint by the customer for the goods in respect of which these rights can be exercised.

(2) The Controller does not collect or process personal data relating to the following:

revealing racial or ethnic origin;

revealing political, religious or philosophical beliefs, or membership in trade unions;

genetic and biometric data, health data or data about sex life or sexual orientation.

(3) The personal data are collected by the Controller from the persons to whom they relate.

(4) The Controller does not perform automated decision-making with data.

(5) The Company does not collect data on persons under the age of 16, except with the express consent of their parent or legal representative.

**Article 4. (1) The Controller processes the following categories of personal data and information for the following purposes and on the following grounds:**

Your personalizing data (email, name, etc.)

Purpose for which the data is collected:

- 1) Making contact with the user and sending information to them;
- 2) for the purposes of user registration in the online store, as well as
- 3) to send newsletters, emails with special offers, promotions, promo codes, news and new features.

**Basis for processing your personal data**

By accepting the General Terms and Conditions and registering in the electronic, or upon concluding a written contract, a contractual relationship is created between the Controller and you, on the basis of which we process your personal data - Art. 6, para. 1, letter b) of the GDPR. Your data for sending newsletters and e-mails are processed based on your express consent - Art. 6, para. 1, letter a) of the GDPR.

Delivery information (names, phone, address, etc.)

Purpose for which the data is collected: fulfillment of obligations of the Controller under the contract of purchase and sale and delivery of the purchased goods.

Basis for processing your personal data - by accepting the General Terms and Conditions and registering in the electronic store or placing an order without registration, or upon concluding a written contract, a contractual relationship is created between the Controller and you, on the basis of which we process your personal data - Art. 6, para. 1, letter b) of the GDPR.

Purpose for which the data is collected:

- 1) Making contact with the user and sending information to them; and
- 2) for the purposes of user registration in the online store.

Basis for processing your personal data

**Term for storing your personal data**

Article 5. (1) The Controller stores your personal data for a period not longer than the existence of your profile in the online store. After deleting your account or completing the order, the Controller takes the necessary care to delete and destroy all your data without unnecessary delay or to anonymize it (i.e. to make it in a form that does not reveal your identity).

(2) The Controller stores your personal data, provided in connection with online orders, for a period of 5 years for the purpose of protecting the legal interests of the Controller in legal or administrative disputes with users of the online store, and the accounting documents are stored for the relevant statutory term.

(3) The Controller notifies you in the event that the data storage period needs to be extended in order to fulfill a legal obligation or in view of legitimate interests of the Controller or otherwise.

(4) The Controller stores the personal data that they are required to keep by virtue of the applicable legislation for the relevant stipulated period, which may exceed the period of existence of your profile in the electronic store or until the completion of the order.

Article 6. (1) The Controller stores the personal data of the legal representatives of its commercial partners for the period of performance of the Contract, to comply with the legitimate interests and legal obligations of the Controller, and this period may exceed the term of the concluded contract.

**Transmission of your personal data for processing**

Article 7. (1) The Controller may, at their own discretion, transfer part or all of your personal data to data processors for the fulfillment of the processing purposes you have agreed to, subject to compliance with the requirements of Regulation (EU) 2016/679 (GDPR).

(2) The Controller notifies you in case of intention to transfer part or all of your personal data to third countries or international organizations.

Your rights in the collection, processing and storage of your personal data. Withdrawal of consent to the processing of your personal data

Article 8. (1) If you do not wish all or part of your personal data to continue to be processed by the Company for specific or all processing purposes, you may at any time withdraw your consent to processing by filling in the "Form for withdrawal of consent for purposes of processing" or by request in free text.

(2) The Controller may request that you verify your identity and that you are the person to whom the data relates.

(3) With the withdrawal of consent to the processing of personal data, which is mandatory for the creation and maintenance of a profile in the online store, your account will become inactive. Of course, you will be able to browse the online store and the products offered and make a new registration.

(4) If there is an order placed by you that is being processed, the earliest you can withdraw your consent to processing is upon successful completion of the order.

(5) You may at any time withdraw your consent to the processing of your personal data for direct marketing purposes.

(6) The withdrawal of consent does not affect the legality of the processing of personal data, which the Controller has carried out up to this point.

### **Right of access**

Article 9. (1) You have the right to request and receive confirmation from the Controller as to whether personal data related to you is being processed, and you can at any time see in your profile, if you are a registered user, the data that we are processing for you.

(2) You have the right to access the data related to you, as well as the information related to the collection, processing and storage of your personal data.

(3) Upon request, the Controller shall provide you with a copy of the processed personal data related to you in electronic or other appropriate form.

(4) Providing access to the data is free of charge, but the Controller reserves the right to impose an administrative fee in case of repetitive or excessive requests.

### **Right to rectification or completion**

Article 10. You can correct or complete inaccurate or incomplete personal data related to you directly through your profile on the website or by making a request to the Controller.

Article 11. (1) You have the right to request from the Controller the deletion of part or all of your personal data, and the Controller has the obligation to delete them without undue delay, when any of the following grounds are present:

the personal data are no longer necessary for the purposes for which they were collected or otherwise processed;

you withdraw your consent on which the data processing is based and there is no other legal basis for the processing;

you object to the processing of your personal data, including for direct marketing purposes, and there are no overriding legal grounds for the processing;

the personal data were processed unlawfully;

the personal data must be deleted in order to comply with a legal obligation under EU law or the law of a Member State that applies to the Controller;

personal data were collected in connection with the provision of services to the information community.

(2) The Controller is not obliged to delete the personal data if they store and process them:

to exercise the right to freedom of expression and the right to information;

to comply with a legal obligation that requires processing provided for in EU law or Member State law that applies to the Controller or for the performance of a task in the public interest or in the exercise of official powers conferred on them;

for reasons of public interest in the field of public health;

for the purposes of archiving in the public interest, for scientific or historical research or for statistical purposes;

For the establishment, exercise or defense of legal claims.

(3) In case of exercising your right to be forgotten, the Company will delete all your data, except for the following information:

information that is necessary to verify that your right to be forgotten has been met - email, IP address;

technical information about the functioning of the online store, which information cannot be linked in any way to your person;

e-mail with which you registered in the online store.

(4) In order to exercise your right to be forgotten, you need to take the following steps:

Submit a request by sending a completed "Request to be forgotten";

Identify yourself as the account holder;

(5) Once we have verified the identity of the person who made the request and the person to whom the data relates in accordance with the above steps, we will delete all data that we process about you in accordance with para. 3.

(6) If there is an order placed by you that is being processed, the earliest you can request to be forgotten is upon successful completion of the order.

(7) By deleting your personal data, your account will become inactive. Of course, you will be able to browse the online store and the products offered and make a new registration.

(8) The Controller does not delete the data that they have a legal obligation to store, including for protection in connection with legal claims made against them or to prove their rights.

### **Right to limitation**

Article 12. You have the right to request the Controller to limit the processing of your data when:

you dispute the accuracy of the personal data, for a period that allows the Controller to verify the accuracy of the personal data;

the processing is illegal, but you do not want the personal data to be deleted, but only to have its use restricted;

the Controller no longer needs the personal data for the purposes of processing, but you require them to establish, exercise or defend your legal claims;

you have objected to the processing pending verification of whether the legal grounds of the Controller take precedence over your interests.

(2) In case of exercising your right to restriction, the Company will stop processing your data, but will not remove the registered data that you have entered in the online store.

Right of portability

Article 13. (1) If you have consented to the processing of your personal data or the processing is necessary for the performance of the contract with the Controller, or if your data is processed in an automated manner, you may, after identifying yourself to the Controller:

ask the Controller to provide you with your personal data in readable format and transfer them to another Controller;

ask the Controller to directly transfer your personal data to a Controller specified by you, when this is technically feasible.

(2) You may at any time download or receive in machine-readable format the data that is stored and processed for you in connection with the use of the Controller's services by e-mail request.

#### Right to receive information

Article 14. You can ask the Controller to inform you about all recipients to whom the personal data for which correction, deletion or restriction of processing has been requested, has been disclosed. The Controller may refuse to provide this information if it would be impossible or would require a disproportionate effort.

#### Right to object

Article 15. You can object at any time to the Controller's processing of personal data concerning you, including if it is processed for the purposes of profiling or direct marketing.

#### Your rights in the event of a breach of the security of your personal data

Article 16. (1) If the Controller detects a violation of the security of your personal data, which may pose a high risk to your rights and freedoms, they shall notify you without undue delay of the violation, as well as of the measures that have been taken or are about to be taken.

(2) The Controller is not obliged to notify you if:

they have taken appropriate technical and organizational measures to protect the data affected by the security breach;

they have subsequently taken measures to ensure that the breach will not result in a high risk to your rights;

notifying you would require a disproportionate effort.

#### Persons to whom your personal data is provided

Article 17. For the purposes of processing your personal data and providing the service in its full functionality and in view of your interests, the Controller may provide your data to a Courier Company /Data Controller/ for the purpose of delivery to an address. The provision of personal data is carried out in compliance with all requirements for legality and security in the processing and storage of your personal data.

Article 18. The Controller does not transfer your data to third countries.

Article 19. In the event of a breach of your rights under the above or applicable data protection legislation, you have the right to lodge a complaint with the Commission for the Protection of Personal Data as follows:

#### Commission for the Protection of Personal Data

Address: Sofia, Bulgaria 2 Prof. Tsvetan Lazarov Blvd

Phone: +359 2 9153525

Email: [kzld@cpdp.bg](mailto:kzld@cpdp.bg)

Website: [www.cdpd.bg](http://www.cdpd.bg)

Article 21. If the consent refers to a transfer, the Controller describes the possible risks for the transfer of the data to third countries in the absence of a solution for adequate protection and suitable means of protection. You can exercise all your rights regarding the protection of your personal data through the forms attached to this information

or through the functionalities in your profile. Of course, these forms are not mandatory and you can make your requests in any form that contains a statement to that effect and identifies you as the data owner.

Article 22. The Company may amend the Privacy Policy by posting a notice to that effect on its site.

Forms for exercising your rights in relation to your personal data:

Form for withdrawal of consent for processing purposes - Appendix No. 1

Request "to be forgotten" - to delete personal data related to me - Appendix No. 2

Request for portability of personal data - Appendix No. 3

Request for correction of data - Appendix No. 4

## Appendix No 1

### Form for withdrawal of consent for processing purposes

Your Name:

Your name in the online store B2B.BULMARTRADE.COM (username):

Feedback data (e-mail):

To:

DENOMINATION: "BULMAR TRADE" EOOD

VAT BG202852185

Headquarters and Office Varna, Bulgaria postal code 9000, Mladost district, 132 Devnya Street, regulated plot with identifier 10135.3514.333

Correspondence Address: Varna, Bulgaria postal code 9000, Mladost district, 132 Devnya Street, regulated plot with identifier 10135.3514.333

Phone: +359 52 55 41 74

Email - Website [office@bulmartrade.com](mailto:office@bulmartrade.com) - b2b.bulmartrade.com

I withdraw my consent to the collection, processing and storage of the following personal data provided by me:

All personal data provided by me.

For this data only: .....

For the following purposes:

The following purposes: .....

All purposes.

I declare that I am familiar with the Company's Terms and Conditions for providing the service after withdrawal of consent.

In the event of a breach of your rights under the above or applicable data protection legislation, you have the right to lodge a complaint with the Commission for the Protection of Personal Data as follows:

Denomination:

Commission for the Protection of Personal Data

Headquarters And Office

1592 Sofia Bulgaria, 2 Prof. Tsvetan Lazarov Blvd

Correspondence Address

1592 Sofia, Bulgaria 2 Prof. Tsvetan Lazarov Blvd

Phone

+359 2 9153525

Website [www.cdpd.bg](http://www.cdpd.bg)

Signature of the person.....

## Appendix No 2

Request "to be forgotten" - to delete personal data related to me

Your Name:

Your name in the online store B2B.BULMARTRADE.COM (username):

Feedback data (e-mail):

To:

DENOMINATION: "BULMAR TRADE" EOOD

VAT BG202852185

Headquarters and Office Varna, Bulgaria postal code 9000, Mladost district, 132 Devnya Street, regulated plot with identifier 10135.3514.333

Correspondence Address: Varna, Bulgaria postal code 9000, Mladost district, 132 Devnya Street, regulated plot with identifier 10135.3514.333

Phone: +359 52 55 41 74

Email - Website [office@bulmartrade.com](mailto:office@bulmartrade.com) - [b2b.bulmartrade.com](http://b2b.bulmartrade.com)



I ask that all personal data that you collect, process and store, provided by me or by third parties who are related to me, according to the specified identification, be deleted from your databases.

I declare that I am aware that some or all of my personal data may continue to be processed and stored by the Controller for the purposes of fulfilling their legal obligations.

In the event of a breach of your rights under the above or applicable data protection legislation, you have the right to lodge a complaint with the Commission for the Protection of Personal Data as follows:

Denomination:

Commission for the Protection of Personal Data

Headquarters And Office

1592 Sofia, Bulgaria 2 Prof. Tsvetan Lazarov Blvd

Correspondence Address

1592 Sofia, Bulgaria 2 Prof. Tsvetan Lazarov Blvd

Phone

+359 2 9153525

Website

[www.cdpd.bg](http://www.cdpd.bg)

Signature of the person.....

### Appendix No 3

#### Request for portability of personal data

Your Name:

Your name in the online store B2B.BULMARTRADE.COM (username):

Feedback data (e-mail):

To:

DENOMINATION: "BULMAR TRADE" EOOD

VAT BG202852185

Headquarters and Office Varna, Bulgaria postal code 9000, Mladost district, 132 Devnya Street, regulated plot with identifier 10135.3514.333

Correspondence Address: Varna, Bulgaria postal code 9000, Mladost district, 132 Devnya Street, regulated plot with identifier 10135.3514.333

Phone: +359 52 55 41 74

Email - Website [office@bulmartrade.com](mailto:office@bulmartrade.com) - [b2b.bulmartrade.com](http://b2b.bulmartrade.com)

I request that all personal data related to me that is collected, processed and stored in your databases be sent to:

e-mail: .....

Controller - receiving the data:

Name

Identification number (VAT, reg. Number in CPPD)

E-mail

I request that my personal data be transmitted in the following format:

XML

CSV

Other: .....

I wish my personal data in the selected format to be transmitted to me/the Controller I have named:

at the stated e-mail:

On a physical optical or electronic medium (CD, DVD, USB) to your address, at my expense.

In the event of a breach of your rights under the above or applicable data protection legislation, you have the right to lodge a complaint with the Commission for the Protection of Personal Data as follows:

Denomination:

Commission for the Protection of Personal Data

Headquarters And Office

1592 Sofia, Bulgaria 2 Prof. Tsvetan Lazarov Blvd

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Phone

+359 2 9153525

Website [www.cdpd.bg](http://www.cdpd.bg)

[www.cdpd.bg](http://www.cdpd.bg)

Signature of the person.....

#### Appendix No 4

#### Request for correction of data

Your Name:

Your name in the online store B2B.BULMARTRADE.COM (username):

Feedback data (e-mail):

To:

DENOMINATION: "BULMAR TRADE" EOOD

VAT BG202852185

Headquarters and Office Varna, Bulgaria postal code 9000, Mladost district, 132 Devnya Street, regulated plot with identifier 10135.3514.333

Correspondence Address: Varna, Bulgaria postal code 9000, Mladost district, 132 Devnya Street, regulated plot with identifier 10135.3514.333

Phone: +359 52 55 41 74

Email - Website [office@bulmartrade.com](mailto:office@bulmartrade.com) - [b2b.bulmartrade.com](http://b2b.bulmartrade.com)

I ask that the following personal data that you collect, process and store, provided by me or by third parties who are related to me be corrected as follows:

Data subject to correction:

.....

Please correct them as follows:

.....

In the event of a breach of your rights under the above or applicable data protection legislation, you have the right to lodge a complaint with the Commission for the Protection of Personal Data as follows:

Denomination:

Commission for the Protection of Personal Data

Headquarters And Office

1592 Sofia, Bulgaria 2 Prof. Tsvetan Lazarov Blvd

Correspondence Address

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Phone

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Website [www.cdpd.bg](http://www.cdpd.bg)

[www.cdpd.bg](http://www.cdpd.bg)

Signature of the person.....