

## **Information about the Privacy Controller**

1. Name: "Auction.BG" Ltd.
2. UIC/BULSTAT: 128582461
3. Seat and registered address: 2-G-5 Zornitsa Residential area, 8600 Yambol, Bulgaria
4. Email address: identification[at]balkanauction.com
5. Website: balkanauction.com
6. Telephone: +359 892222980
7. Certificate number for the controller: 0021044

## **Information about the Data Protection Officer**

1. Name: "IT Partner" Ltd.
2. UIC/BULSTAT: 201084882
3. Seat and registered address: 15 Panayot Volov St., 9700 Shumen, Bulgaria
4. Telephone: +359 54888240
5. Email address: balkan.auction[at]it-partner.bg

## **Information about the Supervisory Authority**

1. Name: Commission for Personal Data Protection
2. Seat and registered address: 2 Prof. Tsvetan Lazarov Blvd., 1592 Sofia
3. Telephone: +359 29153518
4. Email address: kzld[at]government.bg
5. Website: cpdp.bg

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

Art. 1. Auction.BG shall collect and process your personal data on the grounds of Art. 6, Para. 1, Regulation (EU) 2016/679 (GDPR), and in particular on the following grounds:

- Taking action in relation to requests for a registration in the online platform of the company;
- Taking actions in relation to a demand for a contract when applying for a job;
- To carry out a contract or to take actions for signing a contract with a trading partner;
- Carrying out the statutory duty applicable to the Administrator;

- For the purposes of the legitimate interests of the Administrator or a third party;

## **Purposes and principles for collecting, processing and storing your personal data**

**Art. 2. (1)** When signing a contract with a trading partner we collect and process the personal data for the names of the legal representative of the legal entity - a party to the contract, for the purposes of the party's individualization to the contract and its implementation.

**(2)** Contact details of the legal representative or an employee are official information and therefore are not considered personal data.

**(3)** When signing a contract with a partner (an individual), we collect and process the personal data for full name, PIN (Personal Identification Number) and identity card details (number, date of issue, authority), for the purposes of the party's individualization to the contract and its implementation.

**Art. 3. (1)** We collect and process the personal data you provide us with as you send a request for a registration in the online platform of the company also for the following grounds:

- Identifying and authorizing a profile;
- Sending notifications and establishing contact with you;
- Accounting and statistical purposes;
- Protecting the information security.

**(2)** We store the personal data you have provided us with for the whole period of the account activity and in case of a deactivation and a request from the registered person – 10 years after the last activity.

**Art. 4. (1)** We collect and process the personal data you provide us with as you apply for a job in Auction.BG also for the following grounds:

- Individualization of the candidate;
- Establishing contact with you and conducting communication;
- Selection of job applicants.

**(2)** We shall store the personal data you have provided us with for a period no longer than the availability of a current job offer, but not more than 6 months. In case we are willing to keep storing your personal data after this period for a possible following contact with you, we shall contact you via email to ask for your explicit consent that we can continue storing your data.

**Art. 5.** We comply with the following principles when processing your personal data:

- lawfulness, conscientiousness, transparency;
- limitation of the processing purposes;
- relevance with processing purposes and minimization of the data collected;
- limitation of storing in order to fulfil the purposes;
- integrity and confidentiality of the processing as well as ensuring an adequate level of security of personal data.

**Art. 6.** When processing and storing personal data Auction.BG can process and store your personal data in order to protect the following legitimate interests:

- fulfilling their obligations towards The National Revenue Agency, Ministry of Internal Affairs and other state and municipal authorities.

**What kind of personal data does Auction.BG collect, process and store?**

**Art. 7. (1)** Auction.BG shall perform the following operations with personal data provided by you as a user for the following purposes:

- **Identification and authorization of the profile:** For the purpose of authorization of a profile by the Administrator we process personal data that is accompanied by the online registration form - name and surname, address, mobile phone number, online identifier, email address.

**Conclusion of impact assessment:** Given the limited amount of personal data that is collected, the Data Protection Officer considers that an impact assessment shall not be necessary for the current operation.

**(2)** Auction.BG shall not collect and process personal data that is related to the following:

- reveal racial or ethnic origin;
- genetic and biometric data, health data, or data related to sexual life or sexual orientation.

**Art. 8. (1)** Auction.BG performs the following operation with the personal data that you have provided us with as applicants for a job for the following purposes:

- **Conclusion and implementation of an employment or civil contract:** For the selection of job applicants, we process the personal data you have sent us in your CV.

**Conclusion of the Impact assessment:** Given the limited number of individuals whose data is processed and given the limited amount of personal data collected, the Data Protection Officer considers that an impact assessment shall not be necessary for the current operation.

**(2)** Auction.BG shall not collect or process personal data that relates to the following:

- reveal racial or ethnic origin;
- genetic and biometric data, health data, or data related to sexual life or sexual orientation.

**(3)** Personal data shall be collected by Auction.BG from the individuals to whom it relates.

**(4)** Auction.BG shall not perform automated decision-making with data.

**Art. 9. (1)** Auction.BG performs the following operations with personal data that you have provided us with as legal representatives or proxies of legal entities, business partners, including business partners who are individuals for the following purposes:

- **Conclusion and implementation of a commercial transaction:** For the conclusion and implementation of a commercial transaction with a trading company, we shall only process the full names of the legal representative or the person authorized by the company, or the full names of the individual-partner under a contract.

**Conclusion of the Impact assessment:** Given the number of individuals whose data is processed and given the limited amount of personal data that is collected, the Data Protection Officer considers that an impact assessment shall not be necessary for the current operation.

**(2)** Personal data shall be collected by Auction.BG from the individuals, to whom they relate, and from the Commercial Register at the Registry Agency.

**(3)** Auction.BG shall not perform automated decision-making with data.

### **Personal data storage period**

**Art. 10. (1)** Auction.BG shall store your personal data as a job applicant for a period no longer than the availability of a current job offer, published on our website or elsewhere, but not more than 6 months. Upon expiration of the job advert or the end of the selection, Auction.BG shall take the necessary care to erase and destroy all your data without unnecessary delay or to anonymize it (i.e. to bring it in a form that does not reveal your personality), unless you give your explicit consent that your data could continue to be stored and processed in the future.

**(2)** Auction.BG shall store personal data of the registered users in the online platform of the company for an unlimited time for the purposes of protecting the legitimate interest of Auction.BG and for fulfilling their obligations towards state authorities and institutions.

**(3)** Auction.BG shall store the personal data of the legal representatives of the legal entities - parties to a contract, or the individuals - partners under a contract with the company for an unlimited time, in order to protect the legitimate interests of Auction.BG and fulfill their legal obligations towards state authorities or institutions.

**(4)** Auction.BG shall notify you in case the storage period needs to be extended in order to comply with a statutory obligation or in consideration of the legitimate interests of Auction.BG or otherwise.

### **Transferring your personal data for processing**

**Art. 11. (1)** Auction.BG might, at their sole discretion, transmit all or part of your personal data to personal data processors for the fulfillment of the processing purposes you have agreed to, subject to the requirements of Regulation (EU) 2016/679 (GDPR).

**(2)** Auction.BG shall notify you in case of intention to transmit all or part of your personal data to third countries or international organizations.

## **Your rights in relation to collecting, processing or storing your personal data**

### **Withdrawal of consent for processing your personal data**

**Art. 12. (1)** If you do not wish all or any of your personal data to continue to be processed by Auction.BG for any particular or for any processing purpose, you may, at any time, withdraw your consent for processing by submitting a request in the contact form on the website.

**(2)** Auction.BG may ask you to prove your identity with subject, to whom the data relates, by requesting you to present an ID document.

**(3)** The withdrawal of your consent shall not affect the grounds of processing the personal data you have provided us with before the withdrawal of your consent.

**(4)** Auction.BG may continue to process some or all of your data if there is a legal obligation to do so, or for the purpose of protecting their legitimate interests.

**(5)** Regarding legal representatives and individuals - partners under contracts with the Company, Para. 4 shall be applied.

### **Right of access**

**Art. 13. (1)** You have the right to request and obtain from Auction.BG confirmation as to whether or not personal data about you is being processed.

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

**(3)** Auction.BG shall provide you with a copy of the processed personal data about you, in case you request it, in an electronic form.

**(4)** Providing access to the data shall be free of charge, but Auction.BG reserves the right to impose an administrative fee in the event of recurrence or disproportionate claims.

### **Right to rectification or filling in**

**Art. 14.** You have the right to request from Auction.BG to:

- rectify inaccurate personal data about you;
- fill in incomplete personal data about you.

Auction.BG may ask you to prove your identity with subject, to whom the data relates, by requesting you to present an ID document, as well as deny rectifying personal data if there is lack of accuracy.

## **Right to erasure (“right to be forgotten”)**

**Art. 15. (1)** You have the right to request from Auction.BG the erasure of any or all personal data about you, and Auction.BG shall have the obligation to erase it, without unnecessary delay, when one of the following grounds applies:

- the personal data is no longer necessary in relation to the purposes for which they were collected or otherwise processed;
- the personal data has been unlawfully processed;
- the personal data has to be erased in order to be in compliance with a legal obligation in the EU or Member State law to which Auction.BG is subject;

**(2)** Auction.BG shall not be obliged to erase the personal data, if it stores and processes the data:

- for carrying out the right of freedom of expression and information;
- for compliance with a legal obligation which requires processing by the EU or Member State law to which Auction.BG is subject or for the performance of a task carried out in the public interest or in the exercise of official authority vested in Auction.BG;
- for reasons of public interest or security;
- for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes;
- for the establishment, exercise or defense of legal claims.

**(3)** In case you carry out the right to be forgotten, the Company shall erase all your data, except your three names as a job applicant, for accounting purposes.

**(4)** The data of the user profiles in the online platform of the company shall continue to be preserved for 10 years after the request for erasing on the grounds of observance of a legal obligation of the Company, observance of the legitimate interest and the establishment, exercise or protection of legal claims.

**(5)** The data of the legal representatives and individuals - partners under contract with the Company shall continue to be preserved and processed despite the request to be forgotten, on the grounds of observance of a legal obligation of the Company, observance of the legitimate interest and the establishment, exercise or protection of legal claims.

**(6)** In order to exercise your right to be forgotten, it is necessary to send a request in free text and prove your identity with an ID document.

## **Right of restriction**

**Art. 16.** You have the right to request from Auction.BG to restrict the processing of personal data related to you, as a result the registered by you user profiles in the online systems of the company are being deactivated.

## **Right of data portability**

**Art. 17. (1)** If you have given your consent for the processing of your personal data or if such processing is necessary for the implementation of your contract with Auction.BG, or if your personal data is processed in machine-readable format, you may, having proved your identity to Auction.BG:

- request Auction.BG to provide you with your personal data in a readable format and you may transmit it to another controller;
- request Auction.BG to transmit directly your personal data to another controller which is chosen by you when technically feasible.

**(2)** You may exercise your right of data portability through sending a request in free text, but only after a legitimization.

## **Right to object**

**Art. 18.** You may object at any time against the processing of personal data related to you that is used by Auction.BG.

## **Your rights in case of personal data breach of security**

**Art. 19. (1)** If Auction.BG detects a breach in your personal data which is likely to result in a high-level risk to your rights and freedom, Auction.BG shall, without undue delay, notify you about this breach and about the measures that have been undertaken or are about to be undertaken.

**(2)** Auction.BG is not obliged to notify you if:

- it has implemented appropriate technical and organizational protection measures related to the personal data affected by the personal data breach;
- it has taken subsequent measures which ensure that the breach will not lead to a high-level risk to your rights;
- the notification would involve disproportionate effort.

## **Individuals provided with your personal data**

**Art. 20.** For the purpose of processing your personal data and implementing the contract, Auction.BG may provide third parties, processing personal data that complies with all legal and security requirements for the processing and storage of your personal data, with it.

**Art. 21.** Auction.BG shall not transfer your data to third countries.

**Art. 22.** In case of violation of your rights under the above or applicable data protection laws, you have the right to file a complaint with the Commission for Personal Data Protection as follows:

1. Name: Commission for Personal Data Protection
2. Seat and correspondence address: 2 Prof. Tsvetan Lazarov Blvd., 1592 Sofia
3. Telephone: +359 29153518
4. Email address: kzld[at]government.bg
5. Website: cpdp.bg

**Art. 23.** You may exercise all of your rights to protect your personal data through the contact form on the website owned by the company. Of course, these forms shall not be mandatory and you can make your claims in any form that contains a statement about it and identifies you as the data holder.