

PRIVACY NOTICE

In the context of our professional activities, CERHA HEMPEL Gerginov, law firm (hereinafter "CERHA HEMPEL" or "we") processes personal data as data controller on a daily basis. The purpose of this privacy notice is to inform you about how CERHA HEMPEL collects and processes your personal data. If you have any questions related to the processing of your data, please contact us using the following details:

CERHA HEMPEL Gerginov, law firm

Bulgaria, 1000 Sofia, 25 Peter Parchevich Street

Email: sofiaGDPR@cerhahempel.com

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What personal data we process

We process personal data of our clients and other categories of individuals, including people who work for our clients or are involved in matters we work for as instructed by our clients, people we have contractual or other relationships with (e.g. suppliers or contractors), or other persons who interact with us. Depending on the nature of our relationship with you, we may process different categories of data concerning you, such as:

- Identification data: including names, date of birth, gender, personal identification number, identification document details, signature, photo image.
- Contact details: including address, email address, phone number, fax number.
- Economic status: including financial affairs and bank account details.
- Professional information: including business and company affiliations, job position, professional contact details, information on your professional experience, education and employment background.
- Services details: the services we provide to you or to your company, including details about feedback and payment information; information on your experience with our services and survey responses.
- Marketing data: including your marketing preferences and areas of interest.

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- Other personal data provided by our clients in relation to our legal services: they may include special categories of personal data (related to racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, health, sex life or sexual orientation, genetic data and biometric data).
- Other personal data you have provided to us.

We may obtain such personal data directly from you, from our clients, from third parties such as our clients' counterparties, as well as from public sources such as companies registers.

It will sometimes be necessary to provide us with the personal data we have requested from you, e.g. in order to provide you with the services you have requested, or if we are required to comply with statutory obligations (e.g. identification requirements under the anti-money laundering laws). Otherwise we would be unable to enter into a contract with you or to provide the requested services.

NOTE: *Most of our clients and contractors are legal entities. We kindly ask our contract and business partners to bring this privacy notice to the attention of the individuals concerned (in particular their employees and members of corporate bodies). In addition, we may receive from our clients personal data of other individuals who may not be aware of our role in the respective case (e.g. employees of our clients' counterparties in the course of corporate transaction). We may be prevented from sending a privacy notice to such persons (e.g. due to confidentiality reasons or because we do not have contact with the respective persons). We want to kindly remind our clients that before disclosing such personal data to us, they are required to provide the affected individuals with appropriate information concerning the processing of their personal data in connection with the provision of our services.*

For what purposes and on what legal basis we process personal data

Below you will find information about the purposes and the legal bases on which we may process your personal data. Please note that depending on the particular situation one or more of the following may apply.

Purpose of processing	Legal basis for processing
<ul style="list-style-type: none">• To provide legal services to our clients• To enter into and maintain contractual relationships with our clients, suppliers and contractors	<ul style="list-style-type: none">• Performance of a contract
<ul style="list-style-type: none">• To ensure legal compliance and verify that our professional relationships meet the applicable statutory requirements and business standards	<ul style="list-style-type: none">• Performance of a contract• Compliance with legal obligations, including in relation to legal profession requirements and anti-money laundering laws

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<ul style="list-style-type: none"> • Client management and administration for the purposes of accounting, payments management and collecting debts 	<ul style="list-style-type: none"> • Performance of a contract • Compliance with legal obligations including in relation to accountancy and taxation
<ul style="list-style-type: none"> • Marketing activities: to provide information about services we offer, legal news or events we organize, such as client seminars. We may also ask for our clients' experience with our services, including by means of surveys 	<ul style="list-style-type: none"> • Consent, if required • Legitimate interests: to promote our services and develop our business
<ul style="list-style-type: none"> • Business development: we may analyse data in order to manage our business performance and to assess the quality of our services 	<ul style="list-style-type: none"> • Legitimate interests: to manage, maintain and develop our business relationships and to improve our services
<ul style="list-style-type: none"> • Establishment, exercise or defence of legal claims 	<ul style="list-style-type: none"> • Performance of a contract • Legitimate interests: to execute our rights and interests protected by law or to defend our legal claims

Who we share your data with

Your data will be disclosed by us only if there is a valid legal basis for such disclosure and provided it does not violate our duty of confidentiality. In any case, we only disclose your data to the extent necessary for each specific purpose, or as required under the applicable law, or, in the case of consent, as specified by you.

Where necessary, your data may be disclosed to the following categories of recipients:

- Law firms within our CERHA HEMPEL network or independent attorneys to the extent necessary for providing legal advice.
- Service providers we use in relation to our services, including tax consultants, auditors, accountants, banks and payment services providers, insurance services providers, IT service providers, postal services, translation agencies.
- Competent authorities (including tax authorities, anti-money laundering agencies, regulators) if required by law or as requested by you.
- Courts or arbitration bodies in relation to litigation procedures.
- Legal directories, in order to obtain references in relation to our provision of services to you.
- Other recipients based on your request.

We require any recipient to respect the confidentiality and security of your personal data and to comply with all requirements applicable in this respect.

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It is possible that we may need to transfer your data to a country outside the EU/EEA, for example, in the process of cooperation with law firms located in such countries. If such a need arises, we will apply specific additional measures to protect your personal data. Some countries have been declared by the European Commission as countries ensuring data protection which is practically equivalent to those guaranteed at European level. Therefore, when transferring personal data to such countries, no additional security measures are required. In all other cases we apply appropriate measures and guarantees for the protection of your personal data – standard contractual clauses. You may contact us if you want to receive a copy of these clauses.

How long we will keep your personal data

We are aware of the importance of the storage limitation principle and take all reasonable steps to ensure that we process personal data only for the period necessary for the purposes for which data are collected.

In principle, we retain your data until our contractual relationship is terminated. Furthermore, we are subject to various retention obligations, in accordance with which data are retained beyond the term of the contract, as stipulated for instance under tax law or anti-money laundering legislation. We also retain your data, where appropriate, as long as legal claims can be made in connection with our relationship. In case of pending litigations, we will retain your data until final closure of the respective proceedings.

If we process personal data for direct marketing purposes, we will do so until you object to such processing or withdraw your consent, depending on the applicable legal basis of processing.

Your rights

You have the following rights under the General Data Protection Regulation:

- **Right of access:** you have the right to receive confirmation from us as to whether personal data concerning you are being processed and if so, access to such data and information related to processing.
- **Right to rectification:** if we process personal data relating to you that are incorrect or incomplete, you have the right to request from us to rectify or complete them.
- **Right to erasure:** you have the right to request erasure of your personal data. Where applicable, we will erase the data as a result of such request – for example, if data have been processed unlawfully. However, please note that there may be reasons that may prevent the immediate erasure of your data, such as a legal obligation for their storage, pending court proceedings, etc.
- **Right to restriction of processing:** you have a right to ask us to restrict processing of your personal data under certain circumstances – if you contest the accuracy of personal data, for a period that allows us to verify the accuracy of the data; if the processing is unlawful, but you do not want your personal data to be erased; if we no longer need the personal data for the purposes of processing, but you require them for the establishment, exercise or defence of legal

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claims; or if you have objected to the processing we perform based on our legitimate interests pending the verification which interests have priority.

- **Withdrawal of consent:** where we process your personal data based on your consent, you have the right to withdraw your consent at any time. However, this would not affect the lawfulness of processing of data conducted before the consent withdrawal.
- **Right to objection:** you have the right to object to processing of your data if we process them based on legitimate interests or for direct marketing purposes.
- **Right to objection against direct marketing:** you may at any time object to processing of your personal data for direct marketing purposes. If you do so, we will cease processing of your personal data for such purposes.
- **Right to data portability:** you have a right to obtain the personal data relating to you which you have provided to us in a structured, commonly used and machine-readable format. If you ask us and where technically feasible, we may transmit those data directly to another controller specified by you. You can exercise your right of portability where the processing is based on your consent or on a contract and is carried out by automated means.
- **Right of complaint:** you have a right to lodge a complaint with a supervisory authority if you consider that processing of your personal data breaches the provisions of the applicable law. The competent supervisory authority for Bulgaria is the Commission for Personal Data Protection, with address at: 2 Prof. Tsvetan Lazarov Blvd., Sofia 1592, and email: kzld@cpdp.bg.

How to exercise your rights

You may exercise any of your rights above, except the last one, by sending a request to us:

- by electronic means using the following e-mail address: sofiaGDPR@cerhahempel.com; or
- by mail to our registered address: Bulgaria, 1000 Sofia, 25 Peter Parchevich Street.

We will provide you with information on actions taken on your request within one month as of its receipt. If necessary, this period may be extended by a further two months, taking into account the complexity and number of the requests. We may request provision of additional information necessary to verify your identity or further clarify your request.

This privacy notice was last updated in January 2020.