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POLICY FOR THE PROCESSING OF PERSONAL DATA OF INDIVIDUALS AND THE MEASURES TAKEN BY THE COMPANY TO PROTECT THIS DATA

БАЛКАНКАР ЗАРЯ АД
КОРПОРАТИВНА ОТГОВОРНОСТ

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1.0 Purpose

This document has been prepared in accordance with the requirements of Regulation (EU) 2016/679 of the European Parliament and of the Council of April 27, 2016, hereinafter referred to as the GDPR or the Regulation, as well as the relevant provisions of the Personal Data Protection Act, the secondary legislation for its implementation, and the guidelines of the Commission for Personal Data Protection. Its purpose is to describe the approach to the lawful processing and protection of your personal data within the scope of activities carried out by "BALKANCAR-ZARYA" AD.

2.0 Scope

THE POLICY INCLUDES THE FOLLOWING INFORMATION:

1. DETAILS OF THE DATA CONTROLLER AND CONTACT INFORMATION
2. WHAT PERSONAL DATA IS PROCESSED BY THE COMPANY AND FOR WHAT PURPOSES

3. LEGAL BASIS FOR PROCESSING YOUR PERSONAL DATA
4. THIRD PARTIES TO WHOM THE DATA IS DISCLOSED (DATA RECIPIENTS)
5. DATA RETENTION PERIODS
6. YOUR RIGHTS AS A DATA SUBJECT

2.1 Details of the Data Controller and Contact Information

"BALKANCAR-ZARYA" AD, registered in the Commercial Register of the Registry Agency under UIC 814191256, represented by its Executive Director, with headquarters and management address: **5200 Pavlikeni, 1 Tosho Kutev St.**, processes your data in its capacity as a data controller under the Personal Data Protection Act and the General Data Protection Regulation.

You can contact us regarding any questions related to the processing of your personal data via email at info@balkancarzarya.com or at our correspondence address: **5200 Pavlikeni, 1 Tosho Kutev St.**

2.2 What Personal Data is Processed by the Company and for What Purposes

The personal data processed by the company is intended to facilitate the performance of its activities, specifically:

- Maintaining employment relations with its employees in compliance with the relevant legal framework;
- Maintaining contractual relations with individuals—clients/principals and/or individuals representing clients/principals in connection with the company's core and/or ancillary activities, ensuring compliance with the applicable legal framework;
- Maintaining partnership relations with third parties to support its core and ancillary activities, including but not limited to: tax authorities, the Registry Agency, Occupational Health Services, the Labor Inspectorate, banks, insurance companies, insurance brokers, notaries, private enforcement agents, etc., in compliance with legal requirements;
- Establishing and maintaining good business relationships with clients and providing high-quality services based on continuous improvement;
- Securing company premises through a video surveillance system;
- Complying with applicable legal requirements relevant to the company's activities.

To achieve these objectives, "BALKANCAR-ZARYA" AD processes the following categories and specific types of personal data:

PERSONAL DATA REQUIRED FOR EMPLOYMENT RELATIONS

- **Names** – for employment contracts, powers of attorney, etc.;
- **Address** – for correspondence related to specific contracts; email address;
- **Personal Identification Number (PIN)/Foreign National Personal Number (LNCH);**
- **Phone numbers** – personal/work, with the subject's consent for receiving calls;
- **Employment record book, official notes from previous employers** – for reference on work experience, used annual leave, and taxable income for the year of hiring;
- **Diplomas, certificates relevant to the position;**
- **Personal bank accounts** – for salary payments;
- **CVs** – for job applications and/or hiring.

These data are stored in the "Personnel and Salaries" register.

PERSONAL DATA REQUIRED FOR SALES/CONTRACTUAL RELATIONS WITH CLIENTS AND SUPPLIERS

- **Names** – for contracts/sales/order execution;
- **Address** – for correspondence/deliveries related to specific contracts;
- **Email** – for correspondence related to specific contracts;
- **Phone numbers** – personal/work, with the subject's consent for receiving calls.

These data are stored in the "Clients" and "Suppliers" registers.

SENSITIVE PERSONAL DATA

In compliance with labor laws and safety standards applicable to production activities, "BALKANCAR-ZARYA" AD processes the following sensitive employee health data:

- **Pre-employment medical examination card/medical certificate** – upon hiring;
- **Sick leave certificates** – in case of temporary incapacity due to illness;
- **TELK/NELK medical committee decisions.**

These data are stored in the "Personnel and Salaries" and "Health Status" registers.

VIDEO SURVEILLANCE

In accordance with the requirements of the applicable legislation, "BALKANCAR-ZARYA" AD implements security measures, which include the following technical and organizational means for access control and ensuring physical security against encroachments on buildings and facilities, as well as for protecting the life and health of citizens: security alarm systems and a

video control system that performs 24-hour video surveillance, consisting of recording and storage devices.

Video surveillance and video recording are carried out in: the parking lot, the production workshop, the loading ramp, the administrative building, and the factory yard, according to a camera placement scheme. The recorded video footage is stored on a server with restricted access. Only explicitly designated individuals, appointed by order, have access to the recorded footage.

Through informational signs placed in visible locations, data subjects and other visitors who may be recorded are informed about the use of technical means for surveillance and control, as well as any other relevant information related to the conducted monitoring.

The data is stored in the "Video Surveillance" register.

COOKIE POLICY

What are cookies?

The functioning of our website requires the use of "cookies." Cookies are small text files that a website can save on your computer or mobile device when you visit a page or site. The cookie will help the site or other sites recognize your device the next time you visit it. Cookies serve various functions. For example, they help us remember your username or preferences, analyze how well our site performs, or even allow us to recommend content that we believe will be of interest to you. Some cookies contain personal information—for instance, if you clicked "Remember me" when logging into your account, the cookie will remember your username. Most cookies do not collect information that can identify you personally but rather collect general information about how users reach and use our site or their location.

How to disable cookies?

All modern browsers allow you to change cookie settings. These settings are usually found in the "options" or "preferences" menu of your browser. Please note that if you choose to "decline," you may not have access to certain sections of our website.

What personal data do the cookies on the "BALKANCAR-ZARYA" AD website collect?

The cookies we use may collect information regarding: name, surname, postal code, city, country, delivery address, contact phone number, email, IP address, browser, and operating system. The personal data collected through cookies is not shared with third parties.

2.3 Legal Basis for Processing Your Personal Data

"BALKANCAR-ZARYA" AD processes the above personal data on the following legal grounds under Article 6 of the GDPR:

- **Legal obligation** – when required by national and EU legislation (e.g., providing data to tax authorities, social security institutions, labor inspections).
- **Contractual necessity** – when processing is required to fulfill contractual obligations.
- **Legitimate interest** – for security, compliance, and protection of company property.
- **Consent** – in cases where no other legal basis applies, processing is conducted only upon obtaining explicit consent.

2.4 Third Parties to Whom Data is Disclosed (Data Recipients)

- Data in the "Personnel and Payroll" register is not shared with third parties except for reports submitted to the National Social Security Institute (NOI), National Revenue Agency (NRA), and Labor Inspectorate as required by law, as well as to Occupational Health Services (OHS), private enforcement agents (PEA), servicing banks, and insurance companies.
- Data in the "Health Status" register is shared only with NOI, OHS, and the company's insurance provider.
- Data in the "Clients" and "Suppliers" registers is shared only with competent authorities as required by law.
- Data in the "Video Surveillance" register is shared only with competent authorities as required by law.

2.5 Data Retention Periods

"BALKANCAR-ZARYA" AD retains your personal data for the following periods:

Personnel and Salaries Register

- All employee records, both in paper and electronic format, are retained for **50 (fifty) years** after the termination of the employment contract with the company.
- All documents proving work experience are retained for **50 (fifty) years** in accordance with Article 12, Paragraph 1 of the Accounting Act.
- **TELK/NELK medical committee decisions** are retained in employee files, both in paper and electronic format, for **50 (fifty) years** pursuant to Article 12, Paragraph 1, Item 1 of the Accounting Act, in conjunction with Article 8, Paragraph 2 of the National Classification of Labor Positions, and Article 1, Paragraph 1 of Instruction No. 5 of June 30, 2005.

- **Pre-employment medical examination card/medical certificate** is retained in employee files, both in paper and electronic format, for **50 (fifty) years**.
- **Documents submitted during hiring or reassignment**, such as diplomas for completed education, professional qualifications, etc., are retained for **up to 3 years** after the termination of the employment relationship, in accordance with Article 358, Paragraph 1, Item 3 of the Labor Code.

Health Status Register

- **Sick leave certificates** provided by data subjects are retained for **3 years**, starting from January 1 of the year following the year of issuance, in accordance with Article 56 of the Ordinance on Medical Expertise.

Suppliers Register

- Data in this register is retained for 5 years, starting from January 1 of the year following the year of contract completion, in accordance with Article 38, Paragraph 1, Item 4 of the Tax and Social Insurance Procedure Code.

Clients Register

- Data in this register is retained for 10 (ten) years, starting from January 1 of the year following the year of service provision or contract completion.

Video Surveillance Register

- Data is retained for a period of no more than 2 months from the date of recording.

2.6 Your Rights as a Data Subject

You have the following rights regarding the processing of your personal data by "BALKANCAR-ZARYA" AD:

- Right to information;
- Right of access to your personal data;
- Right to rectification;
- Right to erasure (right to be forgotten);
- Right to restriction of processing;
- Right to data portability;
- Right to object to the processing of your personal data.

You can exercise the above rights by submitting a request in free form to the email address of "BALKANCAR-ZARYA" AD: info@balkancarzarya.com. We will respond to any request without undue delay and within **14 days** from the date of receipt.

You also have the right to file a complaint with the **Commission for Personal Data Protection** as the national supervisory authority if you believe that there has been a violation concerning the processing of your personal data by the company.

City of Pavlikeni

Executive Director

/Ventsislav Stoynev/