

Translation from Bulgarian

PERSONAL DATA PROTECTION POLICY OF GEOTECHMIN GROUP

GEOTECHMIN is one of the leading business groups in the Bulgarian economy, having made significant contribution to the country's dynamic and sustainable development. Personal data protection is of key importance to all companies in GEOTECHMIN GROUP and in this regard personal data processing has been carried out in a completely open, honest and transparent manner.

RATIONALE

The rationale of this GENERAL POLICY is to set out the rules and principles which the companies belonging to GEOTECHMIN GROUP have incorporated in compliance with § 48 of the Preamble of the General Data Protection Regulation (Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016). Depending on the specific situation, the Group's companies may process personal data in their capacity as data controller and/or data processor.

DEFINITIONS

- 'Personal Data' means any information relating to an identified or identifiable natural person ('data subject'); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, psychic, mental, economic, cultural or social identity of that natural person.
- 'Processing' means any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination, taking photos or otherwise making available, alignment or combination, restriction, erasure or destruction.

- ‘Controller’ means the natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of personal data; where the purposes and means of such processing are determined by European Union or Member State law, the controller or the specific criteria for its nomination may be provided for by Union or Member State law.
- ‘Processor’ means a natural or legal person, public authority, agency or other body which processes personal data on behalf of the controller.
- ‘Recipient’ means a natural or legal person, public authority, agency or another body, to which the personal data are disclosed, whether a third party or not. However, public authorities which may receive personal data in the framework of a particular inquiry in accordance with Union or Member State law shall not be regarded as ‘recipients’. The processing of those data by those public authorities shall be in compliance with the applicable data protection rules according to the purposes of the processing.
- ‘Supervisory Authority’ means an independent public authority provided by a Member State to be responsible for monitoring the application of Regulation (EU) 2016/679.
- § 48 of the General Data Protection Regulation - Controllers that are part of a group of undertakings or institutions affiliated to a central body may have a legitimate interest in transmitting personal data within the group of undertakings for internal administrative purposes, including the processing of clients’ or employees’ personal data. The general principles for the transfer of personal data, within a group of undertakings, to an undertaking located in a third country shall remain unaffected.
- GEOTECHMIN GROUP includes companies registered in the Republic of Bulgaria, with a main distinctive feature being their direct or indirect relation to Geotechmin OOD and the owners. These companies are subsidiaries, affiliated or associated companies that have agreed upon and signed a Partnership Memorandum on Personal Data Protection in GEOTECHMIN GROUP of companies.

- Pursuant to §48 and the Partnership Memorandum signed between the companies of GEOTECHMIN GROUP, the company GEOTECHMIN OOD has been designated as the central body.

KEY POLICY OBJECTIVES AND PRINCIPLES RELATING TO PERSONAL DATA PROCESSING

The purpose of this POLICY is to inform all data subjects who are in business relationships with companies from GEOTECHMIN GROUP about the manner in which their personal data are processed, what personal data are processed, when it is necessary to disclose it to third parties, as well as the rights of the data subjects in accordance with the Regulation. The Policy is general for the Group and does not exclude the possibility of approving detailed and specific Policies in each of the Group's companies.

Personal data in each company of GEOTECHMIN GROUP are collected, processed, stored and submitted lawfully, in good faith and transparently in compliance with the following principles:

1. The data subject shall be informed in advance about the processing of his or her personal data.
2. Personal data shall be obtained for specified, explicit and lawful purposes, and shall not be further processed in any manner incompatible with those purposes.
3. Personal data must be adequate, relevant and limited to the extent necessary for the purposes they are processed for.
4. Personal data shall be accurate and, where necessary, kept up to date regularly.
5. Personal data shall be erased or rectified when they are found to be inaccurate or inconsistent with the purposes for which they are processed.
6. Personal data shall be stored in a form allowing identification of the respective data subjects for a period no longer than the one necessary for the purposes these data are processed for.
7. Any transfer of personal data in GEOTECHMIN GROUP of companies shall be carried out on the basis of a signed Partnership Memorandum on Personal Data Protection in GEOTECHMIN GROUP of companies.

DATA SUBJECTS AND PERSONAL DATA CATEGORIES

Geotechmin OOD and the companies of GEOTECHMIN GROUP shall collect, process and store personal data necessary for the exercise of their rights and obligations as employers, providers and

contractors in strict compliance with the requirements of applicable laws, legitimate interests and contract terms.

The data subjects whose personal data are processed in GEOTECHMIN GROUP of companies are mainly job applicants, employees, persons performing management or control functions, owners, participants in competitions and events organised by GEOTECHMIN GROUP, contractors and providers, as well as persons receiving sponsorships or donations.

1. The following job applicants-related personal data shall be collected and processed for the purposes of conducting selection and coordination with the respective candidate:

- Identification: full name, permanent and/or current address, phone number, email.
- Education and professional qualifications: data related to education, work experience, professional and personal qualifications and skills (CV).
- Others, if this has been expressly stated in the internal rules and procedures of the particular company.

2. The following personal data shall be collected from the persons hired under employment relationships and management contracts as minimum necessary data for appointment in the company in compliance with applicable laws and for the purposes of concluding an employment contract or a management contract:

- Identification: phone number, email, identity card data or passport data – full name; Unified Civil Number, Personal Number of a Foreigner (date of birth), permanent and/or current address, number and date of issue of the identity card.
- Education and professional qualifications: data related to education, work experience, professional and personal qualifications and skills (work records, copies of diplomas, qualifications related to the relevant position).
- Health data: the company shall process sensitive data only to the extent necessary to fulfill its specific rights and obligations in the sphere of labour and social security legislation and social benefits and payments.
- Other data:
 - Data related to social status: marital status, number of children under the age of 18.

- Conviction Status Certificate: only when a law or a regulation requires a certificate to confirm the lack of or presence of a person's criminal history.
- Video image: photographic images and other data whose processing is necessary for the purposes of carrying out the obligations and exercising specific rights of the controllers from GEOTECHMIN GROUP in their capacity as an employer and/or for protecting their legitimate interest.

3. The following personal data necessary for signing and executing the respective contract shall be collected from natural persons – clients of the company:

- Identification: full name; Unified Civil Number (date of birth), permanent and/or current address, phone number, email, and job title.

4. The following personal data shall be collected from natural persons – external service providers to the company for signing and executing contracts for provision of services:

- Identification: full name; Unified Civil Number (date of birth), permanent and/or current address, phone number, email.

5. Regarding natural persons – children – participants and representatives of juries, in art competitions organised by the companies and subsequent publications on the corporate website, company bulletins, the media, brochures, booklets, preparation and dissemination of video presentations, films, etc. – when implementing the public relations policy and programmes for corporate social responsibility in the companies. These data shall be collected on the basis of obtaining informed consent from a parent, a guardian or a trustee if the person is under the age of 18.

- Identification of children – Competitions: full name, school class, place of residence, photographic images and videos.

6. Personal data collected during the protection of the companies' property and access control in the companies' buildings and facilities:

- Identification: full name, job title, organisation/company, video images.

PROTECTION OF PERSONAL DATA

Data controllers and processors from GEOTECHMIN GROUP of companies have taken the necessary technical and organisational measures in accordance with Regulation (EU) 2016/679 and Personal Data Protection Act, and apply the best practices from international standards. In order to ensure maximum security in personal data processing, transfer and storage, all reliable mechanisms are used to protect personal data from loss, theft and misuse, as well as from unauthorised access, disclosure, modification or destruction.

ACCESS TO PERSONAL DATA

If necessary, the controllers from GEOTECHMIN GROUP may provide personal data to third parties, such as competent state authorities and institutions when required by law. The controllers may also provide personal data to processors on the basis of an express contract. All data subjects whose personal data are processed by the above-mentioned entities shall be duly informed.

In cases where a data controller provides personal data about employees (including those employed under management contracts), clients or service providers to a data processor, the data controller shall be obliged to:

- require that the data processor shall provide sufficient guarantees for data processing in accordance with data protection regulations and good practices.
- conclude a written agreement or other legal act with identical effect, which regulates the processor's obligations and meets the requirements of Art. 28 of Regulation (EU) 2016/679.
- inform the natural persons whose personal data shall be provided to a processor.

Access to personal data may also be granted to the relevant state authorities – court, investigation service, prosecutor's office, auditing bodies, etc. The aforementioned authorities may duly require the data in connection with the performance of their duties.

PROVISION OF PERSONAL DATA TO COUNTRIES OUTSIDE THE EU

A transfer of personal data to countries outside the EU/EEA may only take place if one of the following conditions applies:

- The European Commission has issued a decision confirming that the country to which the personal data are transferred shall ensure an adequate level of protection for the data subjects' rights and freedoms.
- Appropriate safeguards are in place such as Binding Corporate Rules (BCR), Standard Contractual Clauses (SCC), an approved code of conduct or a certification mechanism approved by the Commission for Protection of Personal Data and/or the European Commission.
- The data subject has provided explicit consent to the proposed transfer after being informed of any potential risks, or
- The transfer is necessary for the legitimate business purposes, including the performance of a contract with the data subject, protection of the public interest, establishing and defending legal claims, protecting the vital interests of the data subject in cases where the data subject is physically or legally incapable of giving consent.

PERSONAL DATA STORAGE AND DESTRUCTION

Personal data shall be stored according to the terms and conditions determined by the respective normative acts and regulations. The specific time limits for storing data are set out in the respective personal data registers according to the type of data and the purposes of data processing. When the personal data are no longer necessary in relation to the purpose for which they were processed and/or the time limits have expired, the data controller and the data processor (according to the controller's instructions) shall erase or destroy the data safely and securely.

PERSONS RESPONSIBLE FOR COLLECTING, PROCESSING AND STORING PERSONAL DATA

The collection, processing, storage and protection of personal data shall be performed only by persons who have been expressly instructed to do so and whose official duties or a specifically assigned task require to perform that.

A Data Protection Officer has been appointed in GEOTECHMIN GROUP of companies for the purposes of ensuring better regulation, coordination and implementation of common technical and organisational protection measures. By doing so, the Group guarantees that personal data shall always be processed lawfully, fairly and in a transparent manner. The main role of the Data Protection Officer

is to provide all necessary guidance and control for the proper implementation of the personal data protection policy in the Group. Apart from the Data Protection Officer, other responsible persons for protecting personal data shall be appointed in each company and they shall be obliged to report to the Data Protection Officer in the Group and consult with him about the implementation of this Policy.

The persons responsible for personal data protection and the persons processing personal data on behalf of the data controller and/or the data processor shall be natural persons who have assumed a confidentiality obligation beforehand. They must have the required level of competence and shall be appointed and/or authorised by a relevant written act.

DATA SUBJECT'S RIGHTS

The data subjects shall have the following specific rights when it comes to processing their personal data:

Right of access to their personal data

Natural persons shall have the right to access their personal data at any time of data processing, without delay, within the statutory period, free of charge and in accordance with the procedure established by the respective company.

Right to object

The data subjects shall have the right to object at any time to processing of their personal data by the company or by a data processor.

Right to rectification

The data subjects shall have the right to have their personal data rectified or completed, if their personal data are inaccurate or incomplete.

Right to erasure ('right to be forgotten')

The data subjects shall have the right to obtain from the company the erasure of their personal data without undue delay where one of the following grounds applies:

- The personal data are no longer necessary in relation to the purposes for which they were collected or otherwise processed.
- The data subject withdraws his or her consent on which the data processing is based and there is no other legitimate ground for the processing.

- The data subject objects to the processing and there are no overriding legitimate grounds for the processing.
- The personal data have been unlawfully processed.
- The personal data must be erased for compliance with a legal obligation in Union or Member State law to which the controller is subject.
- The personal data have been collected in relation to the offer of information society services to a child and consent was given by the holder of parental responsibility over the child.
- The controller may refuse to delete the individual's data in cases where there is a legal obligation to store these data.

Right to data portability

The data subject shall have the right to receive the personal data concerning him or her, which he or she has provided to a controller, in a structured, commonly used and machine-readable format and shall have the right to transmit those data to another controller without hindrance from the controller to which the personal data have been provided, where the processing is based on consent or on a contract and the processing is carried out by automated means.

Right to restriction of processing

The data subject shall have the right to request the controller to restrict the processing of personal data concerning him or her, where one of the following applies:

- The accuracy of the personal data is contested by the data subject, for a period enabling the controller to verify the accuracy of the personal data.
- The processing is unlawful, but the data subject opposes the erasure of the personal data and requests the restriction of their use instead.
- The controller no longer needs the personal data for the purposes of the processing, but they are required by the data subject for the establishment, exercise or defence of legal claims.
- The data subject has objected to processing:
 - necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller, or

- necessary for the purposes of the legitimate interests pursued by the controller or by a third party;
- pending the verification whether the legitimate grounds of the controller override those of the data subject.

The data subjects shall also have the right to:

- be informed and give their consent to the processing of personal data when such is needed. The consent shall be freely given, specific, informed and unambiguous indication of the data subject's wishes by which he or she signifies agreement to the processing of personal data relating to him or her by the company. Data subjects can withdraw their consent at any time.
- request information about the purpose and grounds of providing their personal data to a third party for processing.
- object to a decision being made entirely on the basis of automated processing, including profiling, if applicable.
- be notified of a personal data breach which is likely to pose a high risk of adversely affecting individuals' rights and freedoms.
- file a complaint with a regulatory authority.
- in some cases, the data subject shall have the right to receive or request the personal data concerning him or her to transmit those data to countries outside the European Union in a structured, commonly used and machine-readable format ('right to data portability').
- be informed about the consequences if they do not provide personal data.

EXERCISING THE RIGHTS

Data Protection Officer

Any interested person can contact the Data Protection Officer in the respective company or at the following email: GTMGroup_DPO@geotechmin.com.

Right to lodge a complaint with a supervisory authority

Every data subject, who considers that their personal data are processed unlawfully in GEOTECHMIN GROUP of companies, can contact the Data Protection Officer at the above-

mentioned email. The data subject shall also have the right to lodge a complaint with the supervisory authority in the Republic of Bulgaria – the Commission for Personal Data Protection

Updating the Personal Data Protection Policy

This Policy has been updated periodically to reflect changes in the evolving external or internal operating environment. In the event of any changes in the Personal Data Protection Policy, the latest version of the Policy shall be always be available on the corporate website.

PROF. DSC. ENG. TZOLO VOUTOV

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