



InfoNotary

PRIVACY AND DATA PROTECTION DECLARATION

OF
QUALIFIED TRUST SERVICE PROVIDER
INFONOTARY PLC

VERSION 1.0

Entry into force 25.05.2018

The Privacy and Data Protection Declaration of INFONOTARY PLC („Privacy Declaration“) is based on the requirements lay down in Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (Regulation (EU) 2016/679) and Personal Data Protection Act.

All amendments of the Privacy Declaration shall be applied after its publication on INFONOTARY PLC’s website: <http://www.infonotary.com>

Data about the controller

INFONOTARY PLC with UIC 131276827 registered office and headquarters at 16 Ivan Vazov St., 1000 Sofia, Bulgaria is a data controller, processing your personal data by lawful, fair and transparent manner and in compliance with the provisions set in Personal Data Protection Act and Regulation (EU) 2016/679.

You may contact us at the registered office: 16, Ivan Vazov St, 1000 Sofia, Bulgaria, phone: +359 2 921 08 90, 02 451 08 90

The Data Protection Officer of INFONOTARY PLC is:

Emil Kirov

address: 16, Ivan Vazov St, 1000 Sofia, Bulgaria

phone: +359 2 921 08 90

email address: dpo@infonotary.com

Personal data which are being processed

INFONOTARY PLC (INFONOTARY) is a qualified trust service provider, providing qualified trust services in accordance with REGULATION (EU) No 910/2014 and national law, recognized by the Bulgarian Supervisory Authority. Depending on the specific objectives and grounds INFONOTARY processes the personal data indicated below separately or in combination:

1. Personal data provided by you, that is necessary for identification and providing the trusted services as well as fulfillment of the contractual obligations between INFONOTARY and the Customer.

- Names, personal identification number, date of birth for foreigners, nationality, address, phone number, e-mail address;

- Names, personal identification number, address and other data of your representative, specified in the document whereby you authorized him/her to represent you before INFONOTARY;
- Identity document number, date of issue, date of expiry and issuing authority;
- Data collected upon payment – number of credit or debit card, bank account and other payment information collected upon processing the payments made by you.
- Data provided upon participation in games, lotteries and/or other seasonal or promotional campaigns organized by INFONOTARY and intended for an unlimited circle of persons, including through social networks;
- Data about the applications and browsers used by you, type of the device used for access to INFONOTARY’s website or other Internet or mobile applications of INFONOTARY. This information includes device identifier, application version, operational system version, information about the mobile network, including operator name and phone number, IP address.

2. Other data related to the service provision process by INFONOTARY:

- Video recording during a visit to INFONOTARY's headquarters, made with CCTV for security purposes and providing a reliable service to the customers;
- Recordings of calls made from and to the contact center of INFONOTARY, e-mail, letters, complaints, applications and other feedback we receive from you;
- Video recordings or photos made in compliance with the preliminary announced conditions for participation in games, lotteries and/or other promotional campaigns organized by INFONOTARY and addressed to an unlimited number of persons, including through social networks.

Objectives and legal grounds for processing data:

INFONOTARY processes your data for the following purposes:

1. To perform all activities as a Trust Service Provider and to manage customer relationships, as:

- Obtaining a prior information required to conclude a service contract;
- Identification of a customer who are using trusted services providing by INFONOTARY; fulfillment of requests for provisioning of information and clarification of the services that are being currently used;
- Updating your personal data provided upon registration/signing a contract for services and products provided by INFONOTARY.

- Verification the type of services registered and used by you, at your request/complaint/objection or to protect our customers and INFONOTARY from fraud and abuse by third parties. Providing of information about services that are being currently used;
 - Consideration of received objections, complaints, carrying out control, providing feedback;
 - Technical assistance and support provided by phone, email or in place regarding the use of INFONOTARY's trusted services.
 - Settling disputes before the competent authorities (court, arbitration, conciliation commission, administrative bodies, etc.) relating the INFONOTARY's activities.
- 2.** To meet the legal obligations related to the provision of certification services as a Trust Service Provider under Regulation (EU) No 910/2014 and Electronic Document and Electronic Trusted Services Act, tax and accounting legislation and other applicable legislation relevant to the INFONOTARY's activities.
- 3.** NFONOTARY processes the respective data provided with the customer's consent for their processing, in cases where a specific consent to the processing of your personal data is required. In cases where such consent is required to process your personal data and you make an informed decision not to provide it, INFONOTARY PLC may not be able to provide the relevant product/service for which consent was required.
- INFONOTARY processes the respective data provided with the customer's consent for their processing to include your name, photos, video and other forms of presence in advertising and media publications of INFONOTARY as a result of your participation in lotteries and games, or such of our partners and/or the social networks.
- When processing personal data for a particular purpose is based on your consent, you may withdraw it at any time without prejudice to the legality of the processing prior to its withdrawal.
- 4.** INFONOTARY processes your data for the following legitimate interests:
- Preparing and keeping statistical information and aggregate data - INFONOTARY performs the analysis to develop and improve the services provided and the customer service;
 - When providing data to third parties: when performing legal or contractual obligations of INFONOTARY or on other valid legal grounds.

Categories of third parties - recipients of personal data:

In compliance with the requirements of Regulation (EU) 2016/679 INFONOTARY has the right to disclose personal data they process to the following categories of recipients:

- Natural persons to whom the data refer;

- Third parties, natural persons, legal entities, public authorities and institutions, external and internal auditors, insurance companies, supervisory and regulatory authorities, when performing legal or contractual obligations of INFONOTARY or on other valid legal grounds, for instance, detecting, preventing or performing other activities regarding fraud, technical or security-related problems;
- State and government institutions when it is legally and explicitly required;
- Persons assigned by INFONOTARY to support equipment and software used for processing your personal data;
- Security companies licensed to carry out private security activity which are processing video recordings from offices of INFONOTARY in the process of controlling the access to these sites;
- Companies providing services related to the organization, safekeeping, indexing and erasure or destruction of archives stored electronically and/or in paper.
- Persons who process personal data on behalf of INFONOTARY (Processors), such as the INFONOTARY's Registration Authorities. Processors perform their tasks in compliance with a contract or another legal document and according to the instructions of INFONOTARY. Processors provides sufficient guarantees to implement appropriate technical and organizational measures that the processing will meet the requirements of Regulation (EU) 2016/679.

Transfers of personal data to a third country or international organization

INFONOTARY will comply with the requirements of Regulation (EU) 2016/679 in case there is a need to transfers of personal data to a third country or an international organization, including the possible subsequent transfer of personal data from a third country or international organization to another country or organization.

Time limit of storage of personal data

The storage period of your personal data depends on the processing purposes for which it was collected:

- INFONOTARY processes your personal data the time limits established in the national legislation. Personal data for which there is no explicit legal obligation to store will be erased once the purposes for which these personal data have been collected and processed have been achieved.
- Personal data, which are collected, processed and archived for the purposes of providing the trusted services is stored for a period of 10 years after the service has been canceled.
- INFONOTARY may store some of your personal data for a longer period until the relevant limitation period has expired in purpose of protection in case of any customer's claims

relating to services provisioning/termination of registration/service contract and ets., as well as longer period until the final settlement of a litigation has arisen, relating the previously mentioned, with a judgment has entered into force.

- Record of phone calls - up to two years after the call has been taken.
- Video recording when visiting INFONOTARY's offices - up to one year from the date the record has been created.

INFONOTARY's security measures for personal data protection

The personal data protection of customers is one of the main priorities of INFONOTARY.

The company updates continuously the technical and organizational measures applied, which are necessary to ensure a high level of security and data protection. In carrying out its activity INFONOTARY applies the quality management system certified according to ISO / IEC 9001: 2008 and ISO / IEC 27001: 2013 certified security management information system.

Customers rights regarding personal data processing by INFONOTARY:

As a customer and in terms of your personal data you have the following rights:

- 1.** To receive information about your personal data processed by INFONOTARY regarding a trusted service you use, after you fill a standard request form and identify yourself at the central office of INFONOTARY and in the local registration authority offices of INFONOTARY, a list of which can be found at <http://www.infonotary.com>.
- 2.** You can require your personal data to be corrected when it is inaccurate or should be supplemented for processing purposes.
- 3.** You can require that your personal data be erased – only in the following cases:
 - the personal data are no longer necessary in relation to the purposes for which they were collected or otherwise processed
 - The data subject withdraws consent on which the processing is based when the processing is based only of the explicit consent of the subject;
 - There is no legal or contractual basis for their processing;
 - The personal data have been unlawfully processed;
 - The national or European legislation requires this.
- 4.** You can require that your personal data processing should be limited in any of the following cases:
 - the processing is unlawful, and the data subject opposes the erasure of the personal data and requests the restriction of their use instead;
 - Observing the data subject rights lay down in Regulation (EC) 2016/679.
- 5.** You can request the portability of your personal data, relating to you and submitted to INFONOTARY, according to the data subject's rights pursuant in Regulation (EC) 2016/679 and

if you comply with the INFONOTARY terms and conditions. Your right to data portability concerns personal data that comply with the following conditions: **a)** the processing is based on your explicit consent or a contractual ground; **b)** the processing is carried out by automated means.

All admissible request will be performed in a reasonable time, but no longer than one month from the receiving date.

6. You can make an objection before INFONOTARY at any time, on grounds relating to your situation, for the processing of your personal data, which INFONOTARY is processing on a legitimate ground.

In case of objection to the processing of your personal data for other purposes, NFONOTARY will reply in a reasonable time, but no longer than one month, whether NFONOTARY considers your objection justified and whether shall terminate processing this personal data for such purposes.

7. You can withdraw your consent for the processing of your personal data when the processing is based on your explicit consent.

8. You can lodge a complaint with the Data Protection Commission if you consider that your rights regarding the processing of your personal data have been violated.

Submission of request

INFONOTARY provides the following possibilities for request submission as per Regulation (EU) 2016/679:

- A request submission form in paper – it should be filed at the INFONOTARY's central office and in the local offices of INFONOTARY's Registration authority. The list of these offices can be found here: <http://www.infonotary.com>.
- Electronic request submission form – it should be signed with a qualified electronic signature and sent to the following email address: dpo@infonotary.com.

In order to get a correct reply from INFONOTARY, you should be duly identified, therefore in the request form, it is necessary to provide certain obligatory data: **a)** from your ID card/passport - ID card/passport number, expiry date, current address and etc., **b)** phone number, e-mail as well as in what role would you like to exercise your rights under Regulation (EU) 2016/679 – for instance: client/former client, legal representative, actual owner, etc. If the information provided is incorrect and/or incomplete, we may not be able to meet your request or part thereof.

Right to lodge a complaint with a supervisory authority

You have the right to lodge a complaint with the relevant supervisory authority, which in Bulgaria is the Commission for Personal Data Protection. The Commission contact data is:

2, Prof. "Tsvetan Lazarov" Blvd., Sofia 1592, www.cpdp.bg.

If you want to lodge the complaint regarding the processing of your personal data to INFONOTARY, you may submit a complaint through the above mentioned contact details of the company or directly to a Data Protection Officer by e-mail: dpo@infonotary.com.