



VJF Ltd.

CONFIDENTIALITY AND PERSONAL DATA PROTECTION POLICY

In effect from 25.05.2018

I. INTRODUCTION

VJF respects the privacy of its clients' personal life and guarantees as much as possible the protection of their personal data. The present Confidentiality and personal data protection policy (referred to as "Confidentiality policy") was drawn and is based on the effective Bulgarian and European legislation in the area of personal data protection.

The present Confidentiality policy regulates the process of processing the personal data of physical persons or representatives of legal entities of our clients or prospective clients, as well as users of our website: www.vjf.bg (the "Site"), in relation to the services being rendered by us, including the ones being rendered and accessible via the Site.

The present Confidentiality policy together with the General terms and conditions for use of Website, the Policy on usage of "Cookies", as well as all other documents mentioned on the Website, defines the rules that VJF would conform to when processing the personal data we collect from you or about you, or the ones you provide us with. The present Confidentiality policy does not impact, does not limit and does not suspend your rights that ensue from the Personal Data Protection Act ("PDPA") or another relevant legislation.

Should you have any questions or comments concerning the present Confidentiality policy, please contact us at the following email: [www.vjf.bg](mailto:office@vjf.bg).

Please, read carefully the present Policy before using the Site or provide your Personal data, irrespective of whether this is done online at the Site or on paper, since with the provision of your Personal data you agree with its terms and conditions. If you do not want us to be processing your personal data in the manner described in the present Confidentiality policy, please do not provide them to us. The provision of personal data on your behalf is voluntary, in order to be using particular services being rendered by us and the Site and/or accessing it, as well as in view of your online shopping at the Site. Please bear in mind that in some cases we would not be able to provide you with the service and/or sell you the commodity you have requested, if you do not provide us with the necessary information. Additionally, you should bear in mind that in some cases your consent for having your personal data processed may not be necessary, if VJF has another legal grounds, for example performance of the obligations provided in the regulations.

II. Who processes and bears responsibility for your personal data?

VJF is a corporate group that collects, processes and stores your personal data according to the terms and conditions of the present Confidentiality policy. VJF is a personal data controller under the Personal Data Protection Act ("PDPA"). You could contact us in some of the following ways:

Registered address: city of Sofia, 115, "Professor Tsvetan Lazarov" Boul.

Telephones: tel.: 029629696, fax: 029629695

e-mail: office@vjf.bg

Personal data protection officer: Liliya Sholeva

III. Personal data categories being processed by VJF

1. VJF could process publicly accessible personal data and/or personal data provided by you. The main types of personal data being processed are the following:

- (i) Information for personal identification (including name, email address, communication language etc.);
- (ii) Contact data (including postal and email addresses, your telephone and fax numbers or the telephone and fax numbers of a contact person defined by you and others);
- (iii) Financial information (bank account and others);
- (iv) Information about representative (legal representative or a proxy of one) of our client that is legal entity;
- (v) Data about entering sale agreements, dealership, wholesale, delayed payment etc. with physical persons or legal entities (such as names, PIN etc.).

2. VJF could process data that were elaborated and generated by VJF while rendering the services:



- (i) data about the utilized end digital communication device, device type, used operating system, IP address, location;
- (ii) data about the commodities and services preferred by you;
- (iii) data from the communication between us and you, your habits, preferences, satisfaction from our services (activity when using the services, complaints, orders etc.);
- (iv) Information about the Site visits and Site use, including operations and history of the Site use;
- (v) the data resulting from the performance of the obligations that originate from the regulations (i.e. data that result from inquiries, regulations, investigating bodies, notary, tax services, court, private bailiff);
- (vi) Video-recording when visiting the stores or the head office;
- (vii) Video-recording or photography in conformity with the terms and conditions announced in advance for taking part in games, and/or other promotional campaigns organized by VJF.
- (viii) Data about subscription for our newsletter - names and emails.

3. In order to ensure the due performance of the services and obligations that result from agreements entered with clients, VJF has the right to be processing every information that is available in the public registers (including public database and the data disclosed online), as well as information received from third parties on the occasion of performance of statutory provisions concerning clients.

4. VJF has the right and obligation to check the authenticity of the personal data recorded in the database, and to this end requires from you to verify the data and if necessary, to correct them or confirm the authenticity of your data.

5. The various personal data types could be processed individually or in any combination.

IV. Purposes and legal grounds for personal data processing

1. Personal data processing that is necessary for entering or performing contracts with us or in relation to the preparation for entering contracts with us.

VJF processes your data for the following purposes:

- (i) Client identification when: entering a new or modifying a contract that was entered with you; clarifications about the used services; performance of a contract that was entered.
- (ii) Elaboration of proposals for entering contracts, sending pre-contractual information and draft-contract; management of pre-sale activities;
- (iii) Data received from you when performing the obligations that originate from contracts entered with you or with a company represented by you, exercising rights and procuring the performance of contracts on behalf of our clients;
- (iv) Administration and provision of answer to client complaints/inquiries/requests/claims; reimbursement of sums and return of commodities; product replacement;
- (v) Technical cooperation for the creation of account/s and restoration of forgotten password for accessing our Site, for electronic service of electronic invoices.
- (vi) Identification and validation of the statutory age when shopping online;
- (vii) Payment of obligations, re-scheduling due sums; management of receivables' collection;
- (viii) Warranty and service maintenance;
- (ix) Renewal of offers to the attention of dealers; sharing important information in relation to changes in our policy and other administrative information;
- (x) Management and administration of activities when shopping online; payments' management.

2. Furthering the performance of its statutory obligations, VJF processes your data for the following purposes:

- (i) Issuance of invoices;
- (ii) For tax-insurance control being exercised by the particular competent bodies;
- (iii) Performance of obligations in relation to remote sale, sale effected outside the site, provided for in the Consumers Protection Act;
- (iv) Provision of information to the Commission for Personal Data Protection in relation to the obligations provided for in the regulations on personal data protection – Personal Data Protection Act, Regulation (EU) 2016/679 of 27 April 2016 etc.;
- (v) Obligations provided for in the Accounting Act and the Tax-Insurance Procedural Code and other related regulations in relation to maintaining accurate and lawful accounting.



3. VJF processes the particular data provided with client's explicit consent in writing to be processed for the following purposes:

- (i) Answering the inquiries that were received through the website system;
- (ii) Direct marketing of products and services;
- (iii) Participation and management of inquiries, games with gifts, promotional campaigns;
- (iv) Sending newsletters.

4. Processing is necessary for the purposes of VJF's legitimate interests.

(i) In order to protect and secure the property, interests and security of VJF, its visitors and employees, VJF uses video-surveillance equipment.

(ii) Assessment and conclusions of consumers' satisfaction, as well as the advertisement effectiveness that we offer to your and others' attention, and answer your expectations, while presenting an adequate advertisement;

(iii) Analysis of the data about the history of purchases, preferences and behaviour of clients;

(iv) Assurance of clients' quality service (video-recording)

V. Categories of third parties provides with access and right to process your personal data

(i) Transport/courier companies, postal operators in view of performing their contractual obligations, sending correspondences and communications, in relation to the contract entered between us, sending the purchased commodities;

(ii) Persons that were assigned by VJF with the task to maintain equipment and software being used for processing your personal data;

(iii) Providers of debt collection services, notary, attorney at law, private bailiff or other third party if the client has violated the obligation that results from a contract entered with us;

(iv) The banks that service the payments being effected by and to you;

(v) Persons that were assigned by VJF with the performance of some activities or obligations related to a particular service that we owe you; persons that process personal data who on the grounds of contract entered with VJF process your personal data on behalf of VJF;

(vi) Persons that render consulting services in various areas – attorneys at law, auditors, accountants, marketing agencies etc.;

(vii) Bodies, institutions and persons that we should provide with personal data under the effective legislation;

(viii) Security companies that hold license for performing private security operations, process the video-recording from VJF sites/offices or maintaining other registers while ensuring the control-admission regime at the same sites;

VI. What is the term your personal data would be stored for?

The duration of storing your personal data depends on the processing purposes for which these were collected:

1. The personal data being processed in order to enter/modify and perform contracts between VJF and you or the company represented by you – during the effective term of the contract and until the final settlement of all financial relations between the parties. Additionally, VJF could store some of your personal data for a longer term until the expiration of the particular extinguishment prescription term in order to ensure protection in the case of possible claims raised by clients in relation to the performance/termination of contracts with us, as well as for longer term, in the case of a legal dispute that has already occurred until its final resolution with effective court/arbitration judgment;

2. The personal data being processed in order to issue accounting/financial documents for exercising tax-insurance control, including but not limited to – invoices, debit, credit notes, protocols of delivery and acceptance, contracts for rendering services/commodities are to be stored for at least 10-year period after the expiration of the prescription term for extinguishing public receivable, unless the effective legislation provides for longer term.

3. The personal data being processed for the direct marketing purposes – until the explicit withdrawal of the consent you have provided for direct marketing or receiving objection against having your personal data processed for direct marketing.

4. Data from video-recording from the security cameras – up to 30 days as of creating the recording.



5. The personal data collected as part of a registration for the newsletter will only be used to send our newsletter. There will be no transfer of personal data collected by the newsletter service to third parties. The subscription to our newsletter may be terminated by the data subject at any time. The consent to the storage of personal data, which the data subject has given for shipping the newsletter, may be revoked at any time. For the purpose of revocation of consent, a corresponding link is found in each newsletter. It is also possible to unsubscribe from the newsletter at any time directly on the website.

VII. Your rights in relation to processing your personal data

1. General rights

In relation to processing your personal data, you have the following rights you could exercise at any time while we are storing or processing your personal data after sending an inquiry to the abovementioned address of VJF or online to the following email: office@vjf.bg

You have the right to request from VJF:

- Copy of your personal data and accessing them at any time;
- Correct, without undue delay, your imprecise personal data, as well as the data that are no longer up-to-date;
- Your personal data in a type that is convenient for transferring them to another personal data controller or ask us to do it, without hindering you (right to data portability);
- Your personal data could be erased without undue delay if some of the legal grounds to this end is present;
- Limit your personal data processing, whereas in this case your data but be only stored but not processed. Our refusal to limitation would be explicitly in writing, whereas we have to reason it with the legitimate reason;

Additionally, you have the right to:

- Withdraw your consent for having your personal data processed at any time with an individual request sent to VJF, in the case of processing based on the issued consent;
- Object against having your personal data processed;
- Object against the automated processing, including profiling;
- Not to be a subject of resolution based solely on automated processing including profiling;

2. You have the right to submit a complaint to the Supervisory Body

You have the right to submit a complaint directly to the attention of the Supervisory Body, whereas the competent body to this end is the Commission for Personal Data Protection, address: city of Sofia 1592, 2, "professor Tsvetan Lazarov" Boul. (www.cdpd.bg).

In the case you would like to file a complaint concerning your personal data being processed by VJF, you could do it at the contact data defined by the Controller or directly to the Data protection officer (according to the abovementioned contact info).

3. Automated processing and profiling

When you visit our Site, we use automated processing in order to adapt the products and services to your needs in the best possible manner.

4. Objection against use for direct marketing

You have the right to object against the future processing of your data for the purposes of direct marketing and advertisement, as well as against disclosing them to third parties and using them on their behalf for the purposes of direct marketing and advertisement, whereas you could withdraw the consent provided by them anytime. To this end you could send an online message with the particular request for suspending your data use for the purposes of direct marketing at the following address: office@vjf.bg

5. Could you refuse providing VJF with personal data and what would be the consequences?

In order to enter contract with you and/or to provide you with the declared products and/or services and/or deliver the ordered commodities in conformity with the statutory and consequently contractual obligations, VJF needs certain data to identify the party to the contract, its proxy, contact data, data for remuneration payment.

If no such data are provided, this would not allow us to enter contract with you.

In order to effect purchase from our Site and to deliver you with the commodities or services ordered by you, you should create your profile in the Site. During the process of profile creation, VJF needs certain data to identify you, contact data, payment data. If you do not



provide such data, this would not allow you to purchase and deliver commodities or services for you.

VIII. How we protect your data

VJF implements organizational, physical, information-technological and other necessary measures in order to ensure the security and protection of your personal data and monitoring of your personal data processing.

Additionally, such security measures include the following activities:

- VJF has established the requirements towards processing, registration and storage of personal data with the internal procedures, and the conformity with these is being continuously observed;
 - the access of VJF employees to personal data and the permission for personal data processing in VJF database is limited, depending on their obligations;
 - VJF has established confidentiality obligations for its employees;
 - Every employee's access to VJF's office equipment and computers is limited.
 - We implement all necessary organizational and technical measures provided for in GDPR, as well as the best practices of international standards
 - In order to ensure the maximum security when processing, transferring and storing your data, we could use additional mechanisms for protection such as encryption, pseudonymization etc.
- The security measures we implement are being subjected to constant improvement and adaptation to the cutting-edge technologies.

IX. Link to other sites

Sometimes the Site could contain links/ references (hyperlinks) to other sites. We do not operate the linked sites and do not approve of the contents, services and products of these sites. We would like to recommend you to use the linked sites carefully and with the necessary attention to their contents and terms and conditions of use. VJF do not bear responsibility for the confidentiality policy or the contents of such sites and we advise you to review their confidentiality policies. Yet as soon as VJF receives information about unlawful activities or illegitimate information contained in such web pages, VJF would undertake immediate measures for eliminating the electronic references (links) to these.

Personal data about children

We do not conscientiously collect personal information about children aged below 14. If we find out we have collected personal information of a children aged below 14, we would undertake steps to erase the information as soon as possible or have the consent of the person who bears the parental responsibility for the child.

Modifications of the Confidentiality policy

We could regularly update our Personal data protection policy. When making changes in the present policy, we would publish an announcement on our website, as well as up-to-date Personal data protection policy. All modifications and supplementations in the Confidentiality policy would be enforceable only after publishing its up-to-date contents that is accessible via our Site.

The information contained in the present Site should provide the clients with general information on the issues in which they are interested. Its usage is entirely up to the clients. Even though we make efforts to maintain up-to-date and precise information in the Site, there may be omissions and errors. Additionally, the site could contain references to certain laws and provisions and these could be modified throughout time and should be interpreted solely at the particular time.

Our organization does not bear all kinds of liability related to errors, omissions or unauthorized change made in the contents of the present Site.

The comprehensive Site contents and all services rendered by it are provided without guarantees for completeness, precision or timeliness and in this light we could not be held liable for whatever contractual or non-contractual material or non-material damages that have occurred after using our Site.