

Personal Data Protection Policy

Any INDIVIDUAL visiting the website <https://bulvestprint.com/> and other web pages presenting the services of the company (visitor/customer) can browse its web pages and use its services and content, as well as the services and content of the prepress portal InSite, as the purposes for which personal data are collected and the principles for their storage and processing as a result of access to this website and other web pages of the company, resp. to the InSite prepress portal, are described in this Policy.

Every visitor who, after viewing the website, wishes to make an online request for using the services of **BULVEST PRINT AD** on the website <http://bulvestprint.com/> and other web pages presenting the services of the company, voluntarily provides their personal data to connect with the trader, namely: full name, telephone number, and e-mail address in the special contact form for individuals.

Registration as a customer is done only for individuals and legal entities who have expressed interest in placing an order, which is done through a separate **special platform for uploading and processing files in the InSite prepress portal**, which for convenience is referred to below as “**InSite prepress portal**”.

On this website, other registration of personal data, except when filling in and sending an inquiry through a completed contact form, is not provided and is not maintained.

Personal data such as names, address and contact telephone number can also be collected from a visitor by sending an e-mail inquiry to one of the company’s representative, the e-mail addresses of whom are listed on the website, when the visitor does not use the electronic contact form but decides to make direct contact via personal e-mail.

1. Legality and purpose of the processing, transparency and accuracy of the data, data sources

The company **BULVEST PRINT AD**, UIC 121669745, with address: 1, Mladen Pavlov Str., City of Sofia, Postal Code: 1124, is the administrator of the personal data of each visitor on the website <http://bulvestprint.com/> and other web pages presenting the services of the company and each registered customer in the **InSite prepress portal** and controls the processing of their data. **BULVEST PRINT AD** informs the customers of its website and the InSite prepress portal about the following:

a) **BULVEST PRINT AD** uses the following legal grounds for the processing of personal data related to browsing the content of the website <http://bulvestprint.com/> and other web pages presenting the services of the company and the use of the InSite prepress portal:

- For the implementation of a contract to which the visitor will be a party, or for taking steps at the request of a visitor prior to the conclusion of a contract (Article 6 (1) (b) of 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 /”**General Regulation on Data Protection**”/): In order to achieve this objective to fulfill the

contract and in particular to enable the customers to complete their orders for service requests listed on the website <https://bulvestprint.com/> and other web pages presenting the services of the company and in view of the related goals, described in detail in the next sentence, it is necessary to process the personal data provided by the customers in the contact form in the inquiry made by them when the customers are natural persons and they provide contact details.

The purpose of this necessary data processing is the completion of each order/request, the communication and notification messages about the stages of order/request processing, the provision of explanations in connection with the order/request, and in general the analysis and information about the orders/requests, which the customer has made, in order to fulfill the contractual obligations of BULVEST PRINT AD, the delivery of an order/request to the selected address, when necessary – the identification and confirmation of the customer, visits to the customer in connection with the execution of an order/request, and other purposes, related to the uploading and processing of files through the InSite prepress portal, as provided in the General Terms of Use of the website and the InSite prepress portal of BULVEST PRINT AD.

- Legitimate interests (Article 6, paragraph 1, letter f) of the General Regulation on Data Protection): Some types of personal data processing are necessary to improve the services provided by BULVEST PRINT AD, to promote/develop the activity and the services of BULVEST PRINT AD, for detection of frauds or abuses, and in general for establishment, exercise and/or protection of legal claims, as well as for possible cooperation with judicial and regulatory bodies. Also, data processing is necessary for regular communication with the visitor (before becoming a customer, in the process of negotiating the terms of a specific order, and then on the occasion of its implementation and delivery) by phone, mail, e-mail, mobile phone message (SMS) or other appropriate means of communication, by using the customer's contact details that have been lawfully obtained during the use of this website in connection with the services offered by BULVEST PRINT AD, in the context of relationship between them regarding a transaction and as long as the customer does not object to such communication. This communication may include information about the services and/or promotions and/or research of BULVEST PRINT AD in order for the company to improve the services provided to its customers, as well as for other promotional activities for similar purposes. Also, BULVEST PRINT AD can communicate with the visitor and/or the registered customer through OTT (over-the-top) communication services, such as Viber, WhatsApp, etc., for the purposes of good communication and cost efficiency. Finally, BULVEST PRINT AD considers that its legitimate interests include the presentation and promotion of the company (BULVEST PRINT AD), as well as its services in social networks and other services of the information society, enabling other customers of these networks to participate in promotions, as well as to express that they like our website and to post comments about our services.
- In order to comply with the legal obligations of BULVEST PRINT AD (Art. 6, para. 1, letter c) of the General Regulation on Data Protection): such may include, for example, obligations under tax legislation, accounting legislation, etc. The purposes of the processing in these cases are the observance of the respective legal obligation by BULVEST PRINT AD according to the applicable legislation.

b) Every visitor who has provided personal contact details has **the right, but also the obligation to access, correct and update his or her personal data**, which he or she discloses, and should notify BULVEST PRINT AD of any change in his/her personal information entered during the registration in the InSite prepress portal of BULVEST PRINT AD, in view of better service.

c) You are obliged to provide us with your personal data only if you have such a contractual (for example, according to the General Terms of Use of the website and the InSite prepress portal of BULVEST PRINT AD) or legal obligation. If you do not provide us with your data, we may not be able to enter into or implement a contract with you or fulfill any of our other processing purposes listed in this Privacy Policy.

When you make a request for a service through the website <http://bulvestprint.com/> our contract with you cannot be concluded/executed if you do not fill in the required personal data or do not provide us with additional information that we deem necessary for the conclusion/execution of the contract, through which we can individualize our counterparty to the contract unambiguously, in order to properly address its implementation.

In the same way, it would be impossible to fulfill a contract with you if the required personal data is not provided when using the InSite prepress portal.

d) In most cases BULVEST PRINT AD receives the personal data of the customers from them personally. However, BULVEST PRINT AD may receive data related to the order and/or its completion from partners of BULVEST PRINT AD, who assist it in fulfilling its obligations to the customers.

2. Processing and categories of personal data. Rights of the visitors

a) Processing of personal data: For online orders, BULVEST PRINT AD will process the personal data of the visitors, specified by the visitors in the contact form through the website <http://bulvestprint.com/> and other web pages presenting the services of the company to their request, submitted for the purpose of the negotiations on the conclusion of a production contract. BULVEST PRINT AD will process the personal data of each individual customer of the InSite prepress portal in the same way. The data processing in these cases will be as follows:

i) As a visitor who has submitted an inquiry through the website: In this case the collected personal data of the visitor will be kept by BULVEST PRINT AD in a form allowing identification for a period of 120 days, as of the date of the last communication/refusal of conclusion of a contract, as the data processing will concern only the negotiations on the conclusion of the contract and other purposes of processing, specified in this Privacy Policy. After this 120-day period the data will be anonymized (deleted). However, certain data proving the pre-contractual relationship and/or other data related to the negotiations for the conclusion of the contract, as well as proof of notification of the processing of personal data, will be kept in a form allowing identification after this period. (provided in the previous sentence), in order to comply with legal obligations of BULVEST PRINT AD (for example, for tax purposes) and/or to establish, exercise, and/or protect legal claims. Also, after the 120-day period under this item i), contact details (in a form allowing identification) will be stored and used by BULVEST PRINT AD for marketing purposes, unless the customer has stated that he or she does not wish such communication.

ii) As a registered customer in the InSite prepress portal: In this case the customers will have customer profiles in our electronic system and their personal data will be saved by BULVEST PRINT AD in a form allowing identification until the customer requests deletion of the customer profile (once he/she requests this, the data will be anonymized). However, certain data proving the pre-contractual relationship and/or other data related to the negotiations for the conclusion of the contract, as well as proof of notification of the processing of personal data, will be kept in a form allowing identification after this period. (provided in the previous sentence), in order to comply with legal obligations of BULVEST PRINT AD (for example, for tax purposes) and/or to establish, exercise, and/or protect legal claims. Also, after the customer requests the deletion of a customer profile, BULVEST PRINT AD will keep contact details (in a form allowing identification) and will use them for marketing purposes, unless the customer has stated that he or she does not want such communication. Once a year, BULVEST PRINT AD may ask the registered customer to confirm the accuracy of his/her saved data and to update them if changes have occurred. The registered customer may at any time change or correct his/her data by requesting the assistance of an employee from the Sales Department at the e-mail address indicated on the website <http://bulvestprint.com/>. In the same way, the customer may request in the future not to be included in marketing projects and goals of BULVEST PRINT AD and to withdraw the consent by sending an e-mail to an employee from the Sales Department, listed on the website <http://bulvestprint.com/>.

b) Categories of personal data

i) In particular, the personal data that each customer should provide (regardless of whether he or she makes an online inquiry as a visitor or as a registered customer) in order to conclude a contract and to place orders/requests for services of BULVEST PRINT AD are as follows (applicable only if the customer is a natural person, as well as when in the case of a legal entity, a natural person-employee, manager, or owner of the legal entity, provides its data falling within the listed below):

- name of the customer – natural person, resp. the name of his/her company, branch, legal form;
- personal (for individuals) or business (for legal entities) billing address;
- personal (for individuals) or business (for legal entities) phone number;
- Personal No, resp. UIC for legal entities;
- data of at least one authorized person for the conclusion of transactions (for example for legal entities – owner of the company), position of the person authorized for the conclusion of transactions (for example for legal entities – owner or other employee);
- e-mail address.

ii) In addition to the above, BULVEST PRINT AD collects and stores the following personal data for registered customers:

- history of orders/requests;
- frequency of visits;

iii) In case services are requested to be delivered to a third party other than the visitor/registered customer, the latter confirms that he or she bears full responsibility to notify and obtain due consent from the person designated as recipient for the presentation of his/her personal data to BULVEST PRINT AD, for the sole purpose of delivering the relevant services and the visitor/registered customer assumes full responsibility for any claims by this person (recipient)

against BULVEST PRINT AD. In all other cases, if BULVEST PRINT AD receives information about third parties in connection with the interaction with the visitor or the registered customer, then the latter should have a legal basis for providing this data (in cases where the visitor or the registered customer provides the data), for example the consent of the third party, and in all cases the visitor or the registered customer should inform the third parties about how BULVEST PRINT AD will process their data and provide the other necessary information contained in this Privacy Policy.

BULVEST PRINT AD accepts only bank payments, therefore it does not collect data on bank cards through online platforms or this website. The data of the bank accounts from which payments have been received from customers of the company are stored for accounting and tax purposes within the terms provided for this under the Accounting Act and the Tax Insurance Procedure Code.

iv) We also inform the visitor and the registered customer that regarding the communication with them by BULVEST PRINT AD, the same processes the contact data that the visitor/registered customer provides, in accordance with Directive 2002/58/EC of the European Parliament and of the Council of 12 July 2002 concerning the processing of personal data and the protection of privacy in the electronic communications sector (Directive on privacy and electronic communications), as amended, and the applicable national legislation. In addition, when the customer is sent notifications for changes in the General Terms of Use of the website and the InSite prepress portal of BULVEST PRINT AD and/or this Privacy Policy, via SMS/Viber/e-mail, and other similar communication services and these notifications contain a hyperlink, it is possible to record the IP address of the customer's electronic device (mobile phone, tablet, computer, etc.) so that it can be proven that the customer has received information about the changes.

v) BULVEST PRINT AD also processes other data that is necessary for the fulfillment of the purposes specified in section 1, letter a) above.

c) Recipients of data: For the individual purposes of data processing, customer data may be disclosed to the following persons (they could be processors or administrators of personal data):

i) The respective employees of BULVEST PRINT AD.

ii) The tax and other authorities in case of a relevant inspection and/or other authorities, as provided by law.

iii) The company which provides customer management services in respect of the InSite prepress portal and which has undertaken, inter alia, the registration, updating, and maintenance of the personal data base as a processor of personal data on behalf of BULVEST PRINT AD and in accordance with the relevant written orders of BULVEST PRINT AD and/or any other company that may provide BULVEST PRINT AD with similar data processing services in the future, instead of or in cooperation with the above company.

iv) External partners providing to BULVEST PRINT AD Internet services, storage, and management of online orders/requests, courier services, sales data analysis services, for which specific strict conditions for data processing are applied, which are agreed with BULVEST PRINT AD, as a data administrator. BULVEST PRINT AD may also disclose personal data to

other persons providing services to BULVEST PRINT AD, such as banks, auditors, lawyers, professional consultants, etc., in accordance with the applicable legislation.

v) In order to send communication via SMS and over-the-top (OTT) communication services, such as Viber, WhatsApp, etc., certain personal data is provided to the relevant service providers and mobile operators. For more information on this data processing, please see the relevant data protection conditions and policies applied by the respective service providers/mobile operators.

With regard to all procedures for data collection and processing, BULVEST PRINT AD requires its employees, persons with the quality of personal data processors, and their agents to fully comply with the provisions of the General Regulation on Data Protection, as well as the applicable Bulgarian legislation related to the protection of personal data, as they are bound by contractual obligations to comply with the requirements. BULVEST PRINT AD requires its employees, website providers, and other pages representing the company's services, as well as third parties – its partners, to take all necessary technical and organizational measures (including appropriate policies and procedures to prevent the disclosure of personal data of visitors/registered customers and to have adopted and implemented procedures for the management and processing of personal data in a manner that is lawful and provides protection in accordance with the General Regulation on Data Protection).

d) Rights of the data subject: Any visitor or registered customer, as a data subject, may at any time exercise his or her rights as provided for in the General Regulation on Data Protection, in particular Articles 12 to 23 thereof and the national legislation, and in particular:

i) the right to receive information and access to the data and/or to receive a copy of the data processed by BULVEST PRINT AD: the data subject has the right to receive confirmation whether personal data related to him or her have been processed and, if so, to obtain access to the data and related information, as well as a copy of this data.

ii) the right to restrict the processing of his/her data: the data subject may request from BULVEST PRINT AD a restriction on the processing of personal data relating to him/her.

iii) the right to correct/fill in or delete part or all of his/her personal data (the right to be deleted is also called the right to be “forgotten”): the data subject may require us to correct inaccurate personal data related to him/her, the completion of incomplete personal data relating to him/her (taking into account the purposes of the processing), as well as the deletion of personal data relating to him/her.

iv) the right to object, i.e. to oppose the processing of his/her personal data: the data subject has the right, at any time and on grounds related to his/her specific situation, to object to the processing of personal data on the grounds of “legitimate interest”. In order to continue the processing, BULVEST PRINT AD must prove that there are convincing legitimate grounds for the processing, which take precedence over the interests, rights and freedoms of the data subject, or for the establishment, exercise or protection of legal claims. If on this basis (“legitimate interest”) BULVEST PRINT AD processes data of the data subject for the purposes of direct marketing, then in case of an objection submitted by the data subject, BULVEST PRINT AD will be obliged to terminate the processing. Where personal data is processed for the purposes of scientific or historical research or for statistical purposes, the data subject has

the right, on the basis of his/her particular situation, to object to the processing of personal data concerning him/her, unless the processing is necessary for the performance of a task carried out for reasons of public interest.

v) the right to data portability: if BULVEST PRINT AD processes personal data on the grounds of “implementation of a contract to which the data subject is a party” or on the grounds of “consent”, the data subject may require BULVEST PRINT AD to receive personal data in a structured, widely used and machine-readable format and/or BULVEST PRINT AD to transfer personal data to another personal data controller.

BULVEST PRINT AD will take the actions requested by the data subject (by exercising any of the above rights) only when the conditions regarding the respective right are met according to the General Regulation on Data Protection.

The above rights may be exercised as follows:

In order to exercise the **right to access, delete (partially or completely) or to correct/fill in personal data**, BULVEST PRINT AD provides the opportunity to the registered customers in the InSite prepress portal to view their personal data through their personal customer profile, using the “My account” option and the “Personal data” field or to request access to, partial or complete deletion or correction/filling in of their data by e-mail (gdpr@bulvestprint.com, resp. to the Sales Department at the e-mail address listed on the website).

The customers of BULVEST PRINT AD who make inquiries as visitors, or other customers of the website <http://bulvestprint.com/> (as customers who have contacted BULVEST PRINT AD through the online contact form on the website <http://bulvestprint.com/> or by phone or e-mail), may exercise these rights by sending an e-mail to gdpr@bulvestprint.com, resp. to the Sales Department at the e-mail address listed on the website <http://bulvestprint.com/>.

In order to exercise its right to manage the commercial communication from BULVEST PRINT AD regarding some or all means of communication (e-mail, SMS, or Viber on a mobile phone, etc.), each customer can view them through their personal customer profile on the InSite prepress portal, using the “My account” option (applies only to registered customers) and request correction or termination of communication in certain ways by sending an e-mail to gdpr@bulvestprint.com, resp. to the Sales Department at the e-mail address listed on the website <http://bulvestprint.com/>.

For the **right to portability of personal data**, BULVEST PRINT AD provides an opportunity for data subjects (in the cases referred to in section 2, letter d), item v) above) to receive their personal data in a structured, widely used and adapted for machine-readable format and/or to be transmitted to another data administrator by submitting a request by e-mail to: gdpr@bulvestprint.com.

BULVEST PRINT AD will take all reasonable and technically feasible steps to satisfy the request of the data subject within one (1) month from the date of a valid submission of the request. In this case, we will inform the data subject that there is a minimum of his/her data, which needs to be kept by BULVEST PRINT AD, in order to protect his/her legitimate interests. We will further specify that the submission of a valid request requires appropriate

customer identification in order to ensure that the person requesting on behalf of the data subject is the actual data subject in relation to the relevant specific data.

The deletion of a customer profile of a registered customer on the InSite pre-press portal can be done through a request by an e-mail to the e-mail address: gdpr@bulvestprint.com, resp. to the Sales Department at the e-mail address listed on the website <http://bulvestprint.com/>.

The data of a visitor of the website, who has filled in such in a contact form or has made contact directly by e-mail or telephone and has provided his/her personal data to BULVEST PRINT AD, can be deleted after sending an e-mail to: gdpr@bulvestprint.com.

e) Term for data storage: The personal data of the customer, who as a visitor submits an inquiry, will be anonymized by BULVEST PRINT AD after 120 days from the cancellation of the specific order/request or refusal to conclude a contract. The data of the registered customer will be saved and processed by BULVEST PRINT AD, while the registered customer requests deletion of his/her customer profile. However, some necessary personal data related to the contracts of the registered customer/visitor with BULVEST PRINT AD, as well as proof of notification of the processing of his/her data may be kept as information about the visitor or the registered customer as a means of establishing the lawful processing of the data by BULVEST PRINT AD and or in order to guarantee the legal claims of the parties and/or in order to comply with legal obligations, e.g. for tax purposes and/or to send a marketing communication (please see point (a) of section 2 above). The data collected when you contact BULVEST PRINT AD, using the online contact form on our website or by phone or e-mail (if this is not related to a specific contractual relationship between you and BULVEST PRINT AD), will be anonymized up to two (2) years after this communication, unless it is necessary to retain the data after this period.

f) Special categories of personal data: For the purposes of this processing, BULVEST PRINT AD does not collect or require the disclosure of sensitive personal data (special categories of personal data).

g) Obligation of transparency: For any information on customer data, as well as its processing and protection, any data subject may contact the Data Protection Officer by e-mail: gdpr@bulvestprint.com.

Right to file a complaint:

We inform the customers that they have the right to file a complaint to the competent supervisory body (in Bulgaria this is the Commission for Personal Data Protection, with address: 2, Prof. Tsvetan Lazarov Blvd., City of Sofia 1592, e-mail: kzld@cpdp.bg, website: www.cdpd.bg).

h) Technical and organizational measures:

BULVEST PRINT AD, the personal data processors used by it, and any third party designated by BULVEST PRINT AD as its representative or agent who has access to personal data are contractually obliged to apply appropriate technical and organizational measures in order to best protect personal data against accidental or unlawful destruction or loss, alteration, unauthorized disclosure or access and, in general, to ensure their lawful processing (including

remote access to data) and to ensure the possibility of recovery of and access to data. These measures aim to ensure a level of security commensurate with the risks arising from the relevant data processing, taking into account the nature and criticality of the data, technological developments, implementation costs, and the nature, scope, context and objectives of each processing, applying procedures for regular testing, and evaluation of the effectiveness of these techniques and organizational measures. In any case, BULVEST PRINT AD, the personal data processors used by it and its agents/associates undertake to maintain the confidentiality of personal data and not to disclose or allow access to the personal data to any third party without prior information to the data subject, unless such access is explicitly provided for in the legislation.

i) Social Plug-ins (buttons), Facebook, Instagram, Twitter, Youtube, Pinterest, etc. You can use them if you wish. These buttons lead to third-party websites that collect and process personal data in accordance with their own policies. We are not responsible for the content and data processing carried out by these websites and it is your responsibility to find out about their privacy policies. We have placed these plug-ins/buttons in order to make our website more functional for visitors, as well as to promote our activities and services if you voluntarily share our content on the respective websites. We consider it our legitimate interest to be present in these social networks and to try to promote our services. We invoke our legitimate interests to establish a presence in electronic social networks and to try to promote our services. If you state your preferences on our website (for example, if you like our website) or follow us in an online social network service, this means, according to the practices of the respective social networks, that you will see messages, advertisements, or materials published by us on our website in the respective social network and that we will receive information from your public profile in the same social network. If you ask a question through the relevant page or make a post, they will be visible to all “friends” and “followers” on our website in the relevant social network and we can use the opportunities provided by the same network to answer you. If you send us a personal or direct message (PM or DM), you should know that their content will be available, in each case, for certain employees of BULVEST PRINT AD, as well as for third parties to whom we have assigned the management of our websites and activities in social networks. You should not post on our social media pages or send us messages with offensive or illegal content, and you should not share personal information of third parties with us unless you have obtained their valid consent. In addition, you should not post on our social media pages or use these means of communication to send us any sensitive (special categories) data or data on minors, as we cannot guarantee the security and restriction of access to this data. Any publications or personal/direct messages that do not meet the restrictions of the previous two sentences will be deleted and the customer’s data may be provided to the competent authorities if the publication or message also constitutes an illegal act.

j) Links to third party websites, plug-ins and applications: The website <http://bulvestprint.com/> and other pages representing the services of the company may contain links to websites, plug-ins and third party applications. Clicking or activating these links may allow third parties to collect or share customer data. BULVEST PRINT AD does not control these websites, plug-ins and third party applications and is not responsible for their statements/policies for personal data protection and for the processing of personal data performed by them. In case the customers leave the website <http://bulvestprint.com/>, BULVEST PRINT AD recommends them to read the statement/policies for personal data protection on each website they visit. The placement of these links on the website

<http://bulvestprint.com/> is based on the legitimate interest of BULVEST PRINT AD to improve its services and develop its activities.

3. Security

The Secure Sockets Layer (SSL) Protocol is currently the global standard on the Internet for certifying websites for Internet customers and for encrypting data between Internet customers and web servers. Encrypted SSL communication requires that all information sent between a customer and a server be encrypted by the sending software and decrypted by the receiving software, thus protecting personal information during transmission. In addition, all information transmitted by SSL is protected by a mechanism that automatically determines whether the data has changed during transmission.

In addition, the password you set when you register with the InSite pre-press portal provides personal security. In order to allow access to your online customer profile and to your available personal information, you must first enter your customer name and password. For this reason, you must store this information in a secure way so that it does not fall into the hands of unauthorized third parties. We also recommend that you create a password using characters in combination with alphanumeric characters.

BULVEST PRINT AD declares that the personal data of the customers will not be used for a purpose other than the purposes specified in this Privacy Policy, without prior notification and, where necessary, explicit consent of the data subject.

BULVEST PRINT AD may change this Privacy Policy at any time. You should check it regularly for changes.

This Privacy Policy is valid and applicable as of 01.05.2021