

E.U. General Data Processing Regulation (GDPR) Policy



The following information offers you an overview of how we are processing data you submit to us, who is responsible for the processing, and about your rights in connection with the processing of your data according to the European General Data Processing Regulation.

A) Who is responsible for our Data Processing and who can I turn to for information

In case of any questions relating to our General Data Processing please contact

PIRINITE EOOD
Data Protection
Bul. Gen. Tottleben 53-55
1606 Sofia / Bulgaria
Email info@pirinite.com

B) What Sources of Data do we use

We are using data submitted to us by our customers, based on our normal business relationships. In addition, we might process data as received from third parties such as banks, insurance companies or other businesses offering us suitable data acquired in compliance with local legal regulations. Finally, we are processing publically available data (for example from exhibition listings or press releases), which we receive in legally compliant ways.

Personal data we are processing can comprise -amongst other aspects- the following:

Name, address, other contact information (for example phone number, email address), delivery address, profession, professional function, VAT identification number.

C) Customer Contact Information

During the course of our business relationships with our customers further information can be collected. Such information might include the occasion of the data collection, and the date as well as information concerning additional exchange of information in written or verbal form.

D) What is the objective of our Data processing and its' legal basis

We are processing personal data compliant to the EU-General-Data-Processing-Regulation (GDPR)

1. to fulfill our contractual obligations (article 6 GDPR)

The scope and purpose of the data processing is defined by the contractual agreement, the products or services selected, and might include survey of the customer's needs.

2. on the basis of your consent (article 6 GDPR)

Based on your consent for processing your data (for example within our group of companies to enable us to present to you more personalized offers) the lawfulness is based on your consent. You may cancel your consent for such data processing at any time. Please note that a cancellation of your consent is only effective for preventing future data processing; data already processed prior to the cancellation of your consent is not affected.

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3. based on legal obligations (article 6 GDPR) or on public interest (article 6 GDPR)

As a company, we are embedded in a legal framework, defining certain obligations for us. In order to fulfill these obligations, it might be necessary to process and present certain data, for example for reporting obligations.

E) Who has access to your data

Within our company only authorized employees have access to your data. Such access is only granted on the basis of necessity to fulfill contractual obligations with you or on the basis of legal obligations. In addition, we might choose subsuppliers if they express their consent to and agree with our data processing policy.

Based on the above stated preconditions, please see some examples of entities, we could be forwarding your data to:

Public Offices (for instance Customs' Offices, Taxation Offices, Statistical Offices) based on legal obligations to present your data

Other Suppliers for fulfilling our contractual agreements with you (for instance IT Service Providers, external Compliance Service Companies, Lettershops, Logistic Partners and Freight Forwarding companies, Marketing Partners, Media Service Companies, Payment Service Companies, Data Shredding Companies, Tax Counselling Service Providers, Receivables Collection Services).

In addition, we might be exchanging data with external partners such as Research and Testing institutions, based on your consent to do so.

F) Do we exchange Data with International Organisations or process it outside of the E.U.

We only exchange data with countries outside of the E.U. respectively the European Economic Zone, if the exchange is necessary for the execution of your orders (for instance with banks) or if we are legally obliged to submit data (for instance for Customs purposes), or based on your consent. In case we decide to use services from partners outside of the E.U. and the European Economic Zone, all partners must have signed written agreements to ensure our standards for data processing.

G) For how long do we keep your Data

We are processing and saving your data as long as we take to fulfill our contractual obligations. Please note that in many cases our business relationships last for many years.

Once data is no longer necessary for the fulfillment of our contractual obligations or according to legal obligations, we regularly will delete data.

Legal obligations sometimes demand for prolonged data conservation, for instance based on obligations for tax book-keeping or based on the conservation of proof in case of juridical actions.



H) What are your Rights concerning your Data

Every affected Person has the right to receive information according to article 15 GDPR, the right of notification according to article 16 GDPR, the right of correction of data according to article 16 GDPR, the right of deletion according to article 17 GDPR, the right to limit processing of their data according to article 18 GDPR, the right to appeal based on article 21 GDPR, as well as the right of data transfer according to article 20 GDPR.

In addition, every affected person has the right to contact governmental / public offices for appealing or submitting a complaint based on article 77 GDPR.

You are entitled to revoke a submitted consent for the processing of personal data at any time.

I) Are you obliged to submit Data to us

In the course of a business relationship with you we will need to collect certain data to establish our relationship, execute our obligations with you, and terminate our relationship. In connection with this, we are by law obliged to collect and save for defined periods certain data. Without submitting of this data and your consent to these procedures, we cannot enter into a business relationship with you.

J) Is your Data used to generate a 'Profile'

We process your data partially automated with the aim to evaluate certain aspects of our business relationship with you, for instance based on legal or regulatory obligations or with the aim of serving you in more suitable ways. This allows us to contact you more focussed on your activities.

Information concerning your Rights of Appeal according to Article 21 EU-General-Data-Processing-Regulations (GDPR)

1 Case Related Right of Appeal

Based on reasons from your particular living situations, you are entitled to appeal the processing of your personal data.

If you appeal the processing of your personal data, we will not continue to process it, with the exception of binding legal obligations, which outweigh your interest, rights and liberties.

2 Right of Appeal against Data Processing for Advertisement

In some cases, we might process your data for advertisement purposes. You are entitled to appeal the processing of your personal data at any time for the purpose of advertisements or similar commercial purposes.

If you appeal the processing of your personal data for advertisement, we will not process your data for advertisement or similar commercial purposes further more.