

# Privacy Statement

## Your privacy is important to us!

We, **VIAND EAD**, in our capacity of personal data administrator, have an obligation to protect your personal data by establishing and applying rules and procedures to ensure that protection.

**VIAND EAD** – hereinafter referred to as the “Company”.

Registered address: city of Sofia, 87, James Bourchier Blvd., 7th floor

Email: [office@viand.bg](mailto:office@viand.bg)

Website: [www.viand.bg](http://www.viand.bg)

Contact regarding your personal data: 02 / 988 91 20

This Privacy Statement aims to clearly and transparently explain what personal data the Company collects, on legal or consent-granted grounds, as well as how it is used. All activities are compliant to 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 Data Protection Regulation).

### Data protection principles that we comply with:

- The personal data of the subjects shall be processed lawfully, fairly and transparently;
- The personal data of the subjects shall be collected only for valid purposes which we have clearly explained and shall not be used in any other way that is not compatible with these purposes;
- The personal data of the subjects shall not exceed the required information that is necessary for the purposes we have specified;
- The data subjects shall be informed in cases where the personal data are processed outside the processing requirements established by law.
- The personal data of the subjects shall be stored for a period not longer than what is necessary for the purposes we have specified;
- The personal data of the subjects shall be properly protected.

A data subject is any natural person who is identified or identifiable on the basis of certain information.

### Your rights as a data subject:

- Right to information (in connection with the processing of your personal data by the Company).
- Right to access your personal data.
- Right to correction (if the data is inaccurate).
- Right to erasure of personal data (right to be forgotten) – in cases where the law does not prohibit it. If the processing of personal data is based on your consent, you have the right to withdraw your consent for future processing at any time.
- Right to restriction of processing by the administrator or processor – in cases where the law does not prohibit it.
- Right to object to the processing of personal data.
- You have the right to legal protection through judicial or administrative procedure in case your personal data protection rights have been violated.

We collect process and/or store the collected personal data on the basis of employment or civil relations with employees, contractual relations with suppliers, customers and contractors, legal regulations, etc. We use the information collected by all our services so we can provide, maintain, protect and improve them, develop new ones, and protect our employees and customers.

**The information that may contain your personal data is processed for the following purposes:**

- Human resources – we process personal data of job applicants, current and former employees. The collected data is used only for the purposes of administering labour and social security relations (for example in compliance with: the Labour Code; the Employment Record Book Ordinance; the Social Security Act; the Personal Income Tax Law; the Ordinance on Cash Benefits and Assistance, etc.), are kept within the time limits specified by the labour and social security legislation (examples: 50+1 years under the Accountancy Law for payrolls; 5+1 years under the Ordinance on Cash Benefits and Assistance from the State Social Security; 3+1 years under the Ordinance on Medical Expertise, etc.), are provided to third parties as required by the legislation (examples: National Revenue Agency, National Social Security Institute; Labour Inspectorate; Occupational Health Service; banks, etc.). In the course of human resource management activities, the processed data includes: data on physical, psychological, social, family and economic identities, data on convictions and violations, data on health status and others.
- Contractors – in carrying out our business, we may process personal data of individuals for the purposes of contracts under the terms of the Trade Act, the Obligations and Contracts Act or other laws. As far as personal data of individual physical persons is processed in connection with these contracts, the data is processed in minimum volume, sufficient only for the proper performance of the obligations under the respective contract (as per the Accountancy Law, with a retention period of 10+1 years). Access to this information is provided to third parties only when this is specified by law (example: the National Revenue Agency).
- Visitors – personal data is processed in connection with the security and safety rules applied. The purpose of collecting personal data is to identify individuals visiting Company sites and to grant access control.
- Video surveillance for security purposes is carried out in the Company. The video surveillance records shall be kept for a period not exceeding 2 months. Certain employees have access to the records within the scope of their duties.
- Exercise of the rights of data subjects – you have the right to exercise your rights under Art. 15-22 of the General Data Protection Regulation. When submitting requests for the exercise of rights, you will be asked to identify yourself – by providing an identity document or by other methods and means of identification. The personal data processed in connection with the processing of individual requests will be used only for the purpose of exercising the said rights.

When we process your personal data, we do so with your consent and/or as a necessity to provide our products/services you use, to run our Company, to meet our contractual and legal obligations, to protect our systems and customers or to fulfil other legitimate interests of ours.

The personal data collected are not provided to third parties outside the European Union.

We do not use systems that make automated decisions about you, we do not make profiling of your personal data.

**Data security**

We apply appropriate measures to prevent the accidental loss, use or unauthorised access to, alteration or distribution of your personal data. In addition, we restrict access to your personal data to certain employees and third parties who need to obtain this information. They will only process personal data on the basis of our rules and procedures and in accordance with their obligation of confidentiality.

**VIAND EAD** has developed and implemented a data protection management system under the General Data Protection Regulation and ensures that the data of all subjects is collected, processed and stored lawfully.

**Changes to the Privacy Statement**

We reserve the right to change our Privacy Statement.

**For more information, you can contact us!**

01.03.2019  
**VIAND EAD**