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Privacy and Data Protection Policy

Last review version 30.06.2023

SIRMA GROUP HOLDING JSC is a public company registered in the Commercial Register at the Registry Agency with UIC 20010236, with registered office and address: 135 Tsarigradsko Shosse Blvd., Sofia 1784, tel: +359 2 9768310, email: office@sirma.com, website: sirma.com

With this Privacy and Data Protection Policy, SIRMA GROUP HOLDING JSC takes into account the privacy of the person and strives to protect against unauthorized processing of the personal data of the individuals.

This document contains information on how we process personal data, the type of personal data that is collected, the purpose of using the collected personal data, the access of third parties to such data, the security measures to be taken with regard to the collection of personal data, as well as the options you own in connection with the use of the personal data you provide. All personal data is collected and processed in accordance with the laws in force in Bulgaria regulating the personal data protection.

Terms used

“Personal data” means any information by which an individual is identified or can be identified;

“Data subject” is a natural person who is identified or identifiable on the basis of certain information;

“Processing” means any operation or set of operations performed with personal data or a set of personal data by automatic or other means such as collecting, recording, organizing, structuring, storing, adapting or modifying, retrieving, consulting, using, disclosing by transmission, dissemination or other means by which data become available, arranged or combined, restricted, deleted or destroyed;

“Administrator” means a natural or legal person, a public authority, an agency or other entity which, alone or jointly with others, defines the purposes and means of processing personal data. In this case, the data controller is SIRMA GROUP HOLDING JSC;

“Personal data processor” means a natural or legal person, a public authority, an agency or other entity that processes personal data on behalf of the controller. “Personal data processing” in this policy shall mean an employee of SIRMA GROUP HOLDING JSC;

SIRMA GROUP HOLDING JSC handles personal data when using the above mentioned web sites. Personal data processed by SIRMA GROUP HOLDING JSC are provided directly by you or collected automatically.

The legal basis on which SIRMA GROUP HOLDING JSC handles personal data is your voluntary consent. For the purposes listed below, you should explicitly agree to each individual goal by ticking it in a CheckBox box that appears as a square box with accompanying text. When a choice is mJSCe, a check box appears in the context of which you have already agreed that your personal data will be processed by SIRMA GROUP HOLDING JSC. When no choice is made, the box is empty.

Personal data you provide

Personal data you provide directly is processed and used for the purposes set out in this Policy. The provision of your personal data when using the sites is optional unless you wish to make a voluntary registration. The personal data we collect on your voluntary registration is: name and surname, email JSCdress, and / or others, depending on the site you wish to sign up for. This is information you should provide in order to be able to sign up for the site and through which you can be personally identified.

When you provide publicly personal information on our sites, you should keep in mind that it may be viewed by other visitors on the same sites and we are unable to prevent further use by them.

The purposes of collecting the specified personal data are described below in this privacy and data protection policy.

How do we use social media?

We can integrate more social media services (such as social media messages) through which you can interact with us or your acquaintances in connection with our services. We can also maintain social media accounts and offer apps on various social media sites. Every time you contact us through social media, the provider of the relevant social media can allow you to share information with us. If you choose to share, you will be generally notified by the provider of which information

will be shared. For example, when you sign up for your account with your social media account, certain information (as authorized by the social media provider) can be shared with us. This may include your address, age, or profile photos saved in your account.

Personal data collected automatically

When you visit our web page, our web server automatically recognizes and collects your IP address that has been determined by your ISP and does not personally identify you.

Summary Information - Log Files - Like many other sites, we get information from log files: IP address; ISP (Internet Service Provider) the browser you use when visiting a site (such as Google Chrome, Internet Explorer and Mozilla Firefox); the time spent on a site, and which pages you've visited on the site. The information contained in these files includes:

Cookies: this is a small amount of information the web server sends to the web browser, allowing the server to collect feedback from the browser. You can choose to delete our or third-party cookies using the options of each browser. This may affect interaction with our or other site.

You can find more information about cookies at: <http://www.allaboutcookies.org/faqs/cookies.html>

We use the following types of cookies:

- Statistics cookies that anonymously remember your computer or mobile device when you visit our websites. They follow the search method and help us build an account of how our readers use the website. We may use this information to display ads that might be of particular interest to our and other websites.
- Service cookies that help us make our websites as effective as possible. They allow you to remember the registration and login data, to keep your preferred settings.
- Third-party advertising and analytics that are placed on behalf of independent advertisers advertising on our sites. These cookies can be placed in the ad or elsewhere on our sites. These cookies are anonymous - they can not identify you. They are used for statistical analysis, allowing the advertiser to count how many people saw his ad or have seen it more than once. They can also allow the advertiser to adjust the ad to you when you visit other websites.
- We do not have access to third-party cookies, and third-party organizations do not have access to ours. Third-party third-party cookies have their own strict confidentiality rules.

Web beacons are files that allow a website to collect information about the number of users who have visited it and have access to their cookies. More information about web beacons can be found

at: <http://www.allaboutcookies.org/faqs/beacons.html>

Purposes of processing your personal data

Sirma Group Holding JSC processes your personal data only for the purposes described below:

- for registering and managing your account, including troubleshooting;
- to measure and track statistical dependencies on user behavior on Sirma Group Holding JSC site in order to improve our products;
- send you a regular newsletter that you have explicitly subscribed to;
- for marketing purposes related to activities on the relevant website;
- send you marketing messages and information to third parties when we have expressly agreed to do so.

Recognition and IP address collection allows:

- disclosure of users' identity when required by law, legal procedures or to comply with these terms;
- analyzing traffic to sites and preventing malicious attacks;
- to show you an ad related to your location or service information such as the weather forecast of your location or closest to it.

Processing of personal data to persons under age of 16

We understand the importance of taking additional precautions to protect children's safety and safety. Accordingly, children under the age of 16 are not allowed to create profiles on the site of Sirma Group Holding JSC without the explicit consent of their parent / guardian. We will delete each account at Sirma Group Holding JSC, which is created by a child under the age of 16 without the permission of a parent / guardian, as soon as we are informed about it.

If you are under the age of 16, please do not send any information about yourself, including, but not limited to, name, address, telephone number, email address, and more. If we learn that we have collected personal information from a child under the age of 16 without the consent of a parent / guardian, we will delete this information as quickly as possible. If you feel we may have information from or for a child under 16, please contact us at the contacts listed below.

What we do to protect your personal information

We are making serious efforts to ensure the security of our websites. The data you provide us is protected by SSL technology. SSL is a standard method in the area of personal data encryption so that they can be securely transferred over the Internet.

The password you provide when signing up for our websites is encrypted to provide protection against unauthorized access to your personal information.

Keeping the privacy and security of your personal information is of the highest priority and restricting access to it only to those employees of Sirma Group Holding JSC who need to contact her in order to fulfill their role and to enable of our services being provided to you. We will keep your information confidential unless disclosure is required by law or for technical purposes.

We store your personal information for as long as necessary to ensure the effective operation of our websites. In general, we store your personal information while your profile is on a site or until you explicitly want to delete the data. The information provided and collected by you will not be sold or made available for use to any person without your personal consent.

Information can be provided in case of request by the respective government bodies and institutions, in order and in cases, determined by the Bulgarian legislation in force. We make every possible effort to protect your personal information, but nevertheless, when sharing information on the Internet, you should keep in mind that the transmission of information over the Internet can never be completely secure, and that security can not be fully guaranteed. Your rights with respect of your personal data

You have certain rights under the applicable law with regard to the personal data we hold for you, namely:

1. You are authorized to request access and receive personal data, which is stored for you as well as information regarding the purposes of the processing, the categories of personal data, the recipients to which your personal data may be disclosed and others;
2. You have the right at any time to request correction of inaccurate data relating to you, as well as supplementing incomplete data, if appropriate and / or necessary for the purpose with which the data are processed;
3. You may at any time withdraw your consent to the use of your personal data that you provided at a previous time. In this case, withdrawing your consent to the use or processing of your personal information may result in the inability to take advantage of certain products or services provided by the above sites;
4. If you do not wish Sirma Group Holding JSC to process your personal data, you have the right to be “forgotten”, that is, you may at any time ask for your personal information to be deleted for one of the following reasons:
 - 4.1. your data is no longer necessary for the purposes for which it was collected or otherwise processed;
 - 4.2. If you have withdrawn your consent to the processing of your personal data;
 - 4.3. If your personal data is being processed unlawfully;
 - 4.4. in case you have objected to the processing of your personal data;
 - 4.5. other cases provided for in the legislation governing the protection of personal data.
5. In many cases, you have the right to request, instead of deleting the data, to restrict the processing of your personal data;
6. Right of objection to Sirma Group Holding JSC against the processing of your personal data, provided there is a legal basis for that.

All listed rights can be exercised by submitting a free written application to the following email address: gdpr@sirma.com, sent from your registration email address, containing at least the following:

1. username, email and other identification data of the individual concerned;
2. a description of the request;
3. referencing the domain of a site to which this request relates;
4. Preferred form for providing information.

The submission of the application is completely free of charge. The time limit for processing the application shall be one month as from the date of receipt of the application.

In addition to the above rights, Sirma Group Holding JSC gives you the right to make some of the following changes in relation to the processing of your personal data yourself, as follows:

- In your profile, you can edit and delete personal data that is not mandatory for use the site and do not want to be publicly available;

- You can manage your subscription preferences from your profile settings and opt-out of receiving a specific email newsletter by selecting the write-off option at the end of each e-mail received. More information about personal data protection can be found on the Commission for personal data protection website: <https://www.cdpd.bg/?p=element&aid=1115>
Contact Us

If you have any questions, comments or complaints about this Data protection and privacy Policy, or if you wish to exercise your rights or update your personal information, please contact us by email the following address: gdpr@sirma.com or bd@sirmabc.com