PRIVACY POLICY OF THE "DIGITAL OFFICE" MOBILE APPLICATION

INTRODUCTION

Welcome to the "Digital Office" mobile application. With it you will be able to use various features available to CETIN Bulgaria's employees – everywhere and anytime.

Your privacy is important to us and we know it's important to you too. This is why the present privacy policy explains why and how we will process your personal data when you use the Digital office app.

We collect and process two categories of information about you: 1) information that we must have in order for you to use the Service; and 2) information that we may use to provide additional features and services if you choose to provide us with your consent.

INFORMATION ON THE DATA CONTROLLER

CETIN Bulgaria EAD, a company incorporated and existing in accordance with the laws of Republic of Bulgaria, registered in the Bulgarian Commercial Register under UIC 206149191, having its seat and registered address in Sofia, residential district "Mladost 4", Business Park Sofia, building 6, is the controller of personal data processed in accordance with the present privacy policy. In this privacy policy CETIN Bulgaria EAD will be referred to as "CETIN". Use of pronouns such as "we", "us" or "our" will also refer to CETIN Bulgaria EAD.

If you have any questions with respect to this Policy you may contact privacy@cetinbg.bg

DEFINITIONS

Personal data

This is any information that identifies a particular individual or which refers to an individual that may be directly or indirectly identified.

Processing of personal data

Processing of personal data refers to any operations performed on personal data. Examples include (but are not limited to) collecting, recording, organising, structuring, storing, modifying, consulting, using, publishing, combining, erasing, and destroying data, etc.

Privacy Policy or **Policy**

This refers to the present privacy policy as well as to its future amendments.

Digital Office, or **App,** or **Application**

This refers to the Digital Office app developed and supported by CETIN, as updated from time to time.

User, or **You,** or **Your**

This refers to any employee who uses the App, in particular a reader of this Policy.

GDPR or **Regulation**

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.

PERSONAL DATA PROCESSED PURSUANT TO THIS POLICY

Personal data we may process under this Policy includes:

Full name:

> Given name of the user;
>
> Middle name of the user;
>
> Last name of the user;

Contact information:

> Corporate MSISDN of the user;
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> Corporate email address of the user;

Location data:

> This is data about the approximate geographical location of the mobile device used by the user to access the App. It is processed when a user uses the module Network Quality Feedback in the App to provide feedback regarding the state/condition of CETIN's network, provided the user grants the needed permissions for CETIN to access such data.

Mobile phone data:

> IMEI of the mobile device used by the user.

Payment data:

> This is data regarding payments or orders made by the users, such as:
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> – Type/purpose of payment (donation, sport card, etc.),
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> – Date and time of the payment;
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> – Payment amount.

Employment data:

> This is data regarding users that is processed by CETIN in its capacity of employer, which may be accessed by the same or other employees through the "Contacts" module of the App, such as:
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> – Full name (see above);
>
> – Contact information (see above);
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> – Leave of absence information;
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> – Employee position and department;
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> – Reporting line (line managers and direct reports);
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> – Employee photo (if provided by the employee).
>
> This type of data also includes the unique employee IDs of users that use the App (HermesID), as well as information regarding applications for open positions that are made by employees through the App.

Survey and feedback data:

> Responses to surveys made by the user through the App;
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> Feedback regarding the App provided by the user through the App;

Feedback regarding the state/condition of the CETIN network provided by the user through the App;

Personal data about individuals that are not CETIN employees

This is data relating to:

(A) Individuals recommended by an user for open positions in CETIN, through the App, in particular:

– Names;

– Mobile number;

– Email address.

(B) Individuals for whom the user orders order sport cards (e.g. Multisport) through the App, in particular their names;

(C) Individuals who are referred to CETIN by users as potential customers through the Bring a Customer module of the App, in particular:

– Names;

– Phone number

– Email address (if provided by the user);

– Town of residence (if provided by the user);

– Information on current mobile services used by the referred individual (if provided by the user).

Analytical audience measurement data

We use third-party analytical tools (Google Analytics) to help us measure traffic, performance, and trends in using the Application. These tools collect information that is sent from the user's device (regardless of Digital Office) and from the Application. Analytical audience measurement data is aggregated along with other users' data in a way that does not allow an individual user to be identified. We also use the Advertising Features functionality of Google Analytics which allows us to receive aggregated information about the age, gender and interests of the users of the Application in a manner that does not permit their identification. To this end Google Analytics also collects information associated with the mobile advertising ID of the mobile devices with which the users access and use the Application. More information on mobile advertising IDs and how they are used by Google may be found here: https://policies.google.com/technologies/ads

Such data are:

– aggregated consumption data, total number of new/ existing users, sessions, share and type of operating systems, devices and operating systems used;

– aggregated data about browsing in the Application, pages visited, how and where the relevant pages were accessed, and in what order they were viewed;

– aggregated performance data for different app stores, how users reach the Application, which are the most effective in attracting users to the Application;

– aggregated data about the age, gender and interests of the users of the Application.

Analytical data for errors in the Application

We use third party's analytical tools (Firebase Crashlytics) to help us support the Application, including to prevent, detect, and remove errors in its operation. These tools collect information that is sent from the user's device (regardless of Digital Office) and from the Application. Analytical error data in the Application is aggregated along with the data of other users in a way that does not allow the identification of an individual user.

Such data are:

– aggregated consumption data, total new/ old users, sessions, share and type of operating systems, devices and operating systems used;

– aggregated data about the browsing in the Application, pages visited, how and where the relevant pages were accessed, and in what order they were viewed;

– aggregated data on problems, errors or crashes in the Application (including of its own functionalities or elements).

HOW WE COLLECT PERSONAL DATA

When you first start using the App, in order to authenticate you and enable your access to and use of the App (including its modules and features), we collect personal data about you from CETIN internal systems (such as Hermes and Active directory). This information is already provided by you in the course of your employment process and relates to full name, position, department, corporate mobile number and corporate email address.

After you download and register in the App in order to enable the use of the Service your personal data is automatically verified and generated from those internal systems.

We collect data directly from you when you use the App, in particular when you avail of its services, in particular:

– When you make payments or orders (e.g. when you make a purchase using the Digital Pay service, or make a donation through the Donation module, or when you subscribe to sport cards for you or friends/family, or when you book a bike through the Wellbeing module);

– When you provide feedback with respect to the App, CETIN's network, or when you respond to surveys in the App;

– When you apply for open positions through the Open Jobs module, or when you recommend other individuals that you deem suitable for open positions available at CETIN;

– When you refer an individual through the Bring a Customer module, etc.

If you allow us to access your location we also may use location data through the Network Quality Feedback module of the Application. For this purpose, every time you choose to participate in our surveys or other services that require such information we will ask you for your permission.

We may collect information about individuals that are not our employees (see above Personal data about individuals that are not CETIN employees).

Certain information about your use of the App is automatically generated in order to enable maintenance, support and development of the App, as well as for security purposes.

We also receive certain data from third parties, in particular:

– Analytical audience measurement data; and

– Analytical error data in the Application.

HOW WE USE PERSONAL DATA

Consistent with the permissions you give us and in order to enable and keep the Application functioning we may use the personal data processed pursuant to this Policy:

- to enable your use of the App and make available to you the different features and functionalities of the Application;

- to make available to you contact list of your colleagues and to fulfil your requests for contacting them. In that respect we make available for the registered users of the App the contact information (names, position, mobile number, email address, whether the employee is on leave, etc.) of CETIN employees to get easily in contact to each other;

- to bring to CETIN employees the option to benefit from company products and services. By using your information CETIN may easily inform you about existing and future company benefits such as discounts for car tires, hair and beauty products, devices on preferential prices, etc;

- to process your payments in the Canteen and Expo or other locations, by using Digital pay feature in the Application. By using this module you may further donate money for causes you choose, rent a bike, etc. For performing this service our Financial and Accounting departments and Payroll Team (Wellbeing Crew) need to processes your data in order to administrate your payments;

- to process your payment when you use sport card (e.g. Multisport). For granting you the required benefit your data need to be processed by our Payroll Team (Wellbeing Crew) as well as by sport card vendor in order to you to get your sport card;

- to give you, if you explicitly provide us your permission to use your location data, the option to express your opinion about our network. We also may process data about your mobile phone for assessing network problems. Through the Network Quality Feedback module you may share your experience with our network and send us your feedback to us. This way you help our engineers to improve the services CETIN offers;

- to inform you about the corporate events, when such events will be held and their agenda;

- to enable you to book annual prophylactic exams through the App;

- to bring you the opportunity to participate in surveys where you can share your view about different topics related to your day-to-day work experience;

- to provide feedback regarding the modules of the App;

- to provide you access to multiple job related services. The Hub for Apps will allow you to get advantage from all work applications on one place such as – Workplace, Workchat, Bulstrad, etc.;

- to allow you to refer individuals to benefit from our services (Bring a Customer) by providing you the option to refer him/her to our shop assistants or other employees to come up with special offer for our services;

- to allow you to apply for open positions available at CETIN, or to recommend other individuals for open positions;

- to communicate with you via notifications, or other messages about new functionalities of the Service or to inform you about other important matters related to you or the company;

- to ensure technical functionality of the Service, develop new products and services;

- to ensure security of the App, as well as to prevent, detect, investigate and remedy threats and vulnerabilities or other potentially risky or fraudulent activities.

CATEGORIES OF PERSONS TO WHOM WE DISCLOSE PERSONAL DATA

For providing you with certain services through the Application CETIN enters into contractual relationship with third parties. In this respect CETIN may have to share certain information about you in the following scenarios:

- When an employee wishes to take advantage of certain benefits (such as Multisport) CETIN may need to provide personal data to the external partner who provides the relevant benefit, in order to enable receipt of and use of the benefit;

- In order to develop, support and update the App, to provide various services through it, including ensuring is security, CETIN may engage with third parties which will act on its behalf and on its instructions (data processors). Such third parties will not be allowed to access or use personal data processed pursuant to this Policy for purposes other than those laid out above;

- It is also possible to disclose personal data related to you to competent authorities or lawyers, for the purposes of official inquiries or providing statements for filed claims, as well as when needed to settle legal disputes.

HOW WE PROTECT PERSONAL DATA

CETIN is committed to protecting your information. This is why we apply various technical and organizational security measures that aim to ensure security of your data. Among the security measures that we use are:

- An authentication service which is used to authenticate, authorize and give access to the Application. The authentication service is offered in accordance with OAuth 2.0 standard.

- We use commercial scanning solution for vulnerability assessment and restricted network access to our servers as well as HTTPS (HTTP Secure) connection.

USE OF COOKIES

The App uses the following cookies

Name of the cookie	Purpose of the Cookie	Content of the Cookie	Storage period
PHPSESSID	Maintenance of user session	Unique identifier of the session	End of session
_ga	Distinguishing between different users (part of Google Analytics)	Unique ID	2 years
_gat	Limiting the tempo of queries (part of Google Analytics)	Value of maximum threshold	10 minutes
UID	Distinguishing between different users	Unique ID	1 year

HOW LONG WE KEEP PERSONAL DATA PROCESSED PURSUANT TO THIS POLICY

All other personal data is stored while employee has existing employment relationship. After termination of the employment contract employee account created in the Application shall be deleted. However, data regarding employee payments, orders or subscriptions made through the Application will be stored for at least three years as from the moment of the salary deduction even in case of termination of employment contract.

RIGHTS OF DATA SUBJECTS

CETIN keeps informed the users of the Application about the personal data it is being processed. Our purpose is to provide you with clear information about the data we collect and help you make justified choice in the course of data processing. The users have the following rights:

−   to request from CETIN access and/or rectification of the personal data relating to them, as provided for in the Regulation;

−   to request from CETIN to restrict the processing of personal data relating to them and/or to erase them, in the cases provided for in the Regulation;

−   to object to the processing of personal data relating to them, as provided for in the Regulation;

−   to file a complaint to the Commission for Personal Data Protection if they believe that CETIN violates the legislation for personal data protection.

CHANGES TO THE PRIVACY POLICY

This Policy is valid as of 01.03.2021.

Occasionally we may, in our discretion or when required to meet statutory obligations or orders of competent authorities, make changes to this Policy. When we make such changes we will notify you as appropriate under the circumstances. Please therefore make sure you read any such notice carefully. If you do not wish to continue using the App under the new version of the Privacy Policy, you may cease using the App at any time.