

PRIVACY NOTICE
for Third-Party Payees under Lease Agreements
of CETIN Bulgaria EAD

I. GENERAL INFORMATION

At CETIN Bulgaria (hereinafter referred to as the “**Company**” or “**CETIN**”), we value the privacy and security of personal data to the highest degree. This Privacy Notice (hereinafter referred to as the “**Notice**”) is issued and provides detailed information under Article 14 of Regulation (EU) 2016/679 (hereinafter referred to as “**General Data Protection Regulation**” or “**GDPR**”) and is intended to provide transparency regarding the processing of personal data provided to us for the purpose of effecting payments under entered-into lease agreements. You are receiving this information because your personal data—specifically, your name and bank account details—have been provided to us by a party to an entered-into lease agreement (typically the manager of a condominium association) to which you are not a direct party but in which you have been designated as the recipient of rent payments.

This Notice serves as a legally binding statement of our obligations under the GDPR. It is designed to inform third-party individuals how their personal data will be handled, their legal rights, and our data protection procedures in connection with ensuring proper performance of entered into lease agreements.

II. DATA CONTROLLER

The Company operates as the Data Controller under the meaning of the GDPR, which means that we determine the purposes and means of processing personal data received from the relevant party to a particular lease agreement in connection with effecting monthly rent payments.

As the Data Controller, we are responsible for ensuring that all personal data is processed in accordance with the legal obligations under the GDPR and the applicable Bulgarian legislation.

III. CATEGORIES OF PERSONAL DATA COLLECTED

We process the following categories of personal data concerning you:

- Full legal name (as provided in the particular lease agreement);
- Bank account number (IBAN and/or other unique account identifier, as provided);
- In some cases, information contained in payment references (e.g., transaction dates or related invoice numbers).

We shall not request and will not process any special categories of personal data. In the event that such personal data is collected inadvertently or by other means, we will take immediate steps to delete it, except where we are required by law to retain the data for legal purposes.

IV. SOURCE OF PERSONAL DATA

Your personal data has been obtained indirectly, specifically from the contracting party in the particular lease agreement—most often the building manager or representative of a condominium association—who has designated you as the authorized recipient of rent payments due under that agreement.

V. PURPOSES FOR PROCESSING PERSONAL DATA

We process your personal data for the following purposes:

- Performance of our obligations under lease agreements;
- Making accurate and timely rent payments to the bank account designated in the lease contract;
- Financial accounting and audit compliance;
- Compliance with the applicable tax legislation.

The purposes outlined above are pursued in strict adherence to the principles of data minimization, meaning that we only process data that is strictly necessary for the intended purpose.

VI. LEGAL BASIS FOR PROCESSING

We rely on the following legal bases for the processing of personal data for the purposes outlined in this Notice, in accordance with Article 6 of GDPR:

6.1 Legitimate Interest (Article 6(1)(f) GDPR)

The primary basis for processing your personal data is the legitimate interest of CETIN Bulgaria in ensuring the timely and accurate performance of entered into lease agreements between CETIN and the contracting party. To that end, we have assessed our legitimate interest through a thorough Legitimate Interest Assessment (LIA) to ensure full compliance with the data processing principles.

6.2 Consent (Article 6(1)(a) GDPR)

In cases where you voluntarily provide sensitive or other data for which we do not have other legal grounds for processing, we will request your explicit consent to process such information unless the processing is justified under another legal ground. You may withdraw your consent at any time by contacting us, though this will not affect the lawfulness of any processing carried out prior to the withdrawal.

VII. DATA RETENTION

7.1 General Data Retention

We will retain your personal data as outlined in this Notice for no longer than is necessary to fulfil the purposes for which the data was collected and to comply with applicable legal obligations – typically 10 (ten) years under the national accounting and tax legislation.

In cases where legal obligations or ongoing legal disputes require extended retention, we will securely store the relevant data until the matter is resolved and any statutory retention periods have been satisfied.

7.2 Special Categories of Personal Data

If any special categories of personal data are collected inadvertently or by other means, these will be immediately deleted unless retention is required by law. Our retention policy is in full compliance with the GDPR, specifically Article 9(2), which prohibits the processing of special categories of data unless specific legal conditions are met.

7.3 Archiving

Personal data will be archived as required for compliance with legal obligations, such as but not limited to financial record-keeping, legal claims, or auditing purposes. Any archived data will be securely stored with access restricted to authorized personnel only.

Upon expiration of the retention period, all personal data will be securely and permanently deleted from our systems or anonymized to ensure that individuals cannot be identified from the data.

VIII. DATA SECURITY MEASURES

We have implemented the necessary data security measures and employ a variety of technical and organizational measures to safeguard personal data against unauthorized access, alteration, disclosure, or destruction. These include, but are not limited to:

8.1 Encryption

All personal data is encrypted both in transit and at rest using secure encryption protocols. This ensures that data is protected from interception during transmission and while stored on our servers.

8.2 Access Control

Access to any personal data is restricted to authorized personnel only. These individuals are granted access based on the principle of least privilege, ensuring that only those who require access for legitimate purposes are granted permission.

8.3 Anonymization and Pseudonymization

Where possible, personal data will be anonymized or pseudonymized to reduce the risk of identification in the event of unauthorized access.

8.4 System Security

The systems related to data processing and storage are protected to prevent unauthorized access at all times. We utilize secure IT systems with up-to-date firewalls, intrusion detection systems, and anti-virus software to protect against cyberattacks.

Regular security audits and vulnerability assessments are conducted to ensure our systems are protected from potential threats.

8.5 Incident Response and Breach Notification

In the event of a data breach that affects personal data, we have implemented an incident response plan that complies with the GDPR's breach notification requirements.

If a breach is likely to result in a high risk to the rights and freedoms of data subjects, we will notify the affected individuals and the relevant supervisory authority, the Bulgarian Commission for Personal Data Protection (CPDP), within 72 hours of becoming aware of the breach.

8.6 Supplementary Measures

All employees with access to personal data are subject to confidentiality agreements and are regularly trained on GDPR compliance and data protection practices.

IX. DATA SHARING AND THIRD-PARTY PROCESSING

CETIN Bulgaria does not share personal data received under this Notice with third parties except in the following circumstances:

9.1 Banks or payment service providers for the execution of transfers

We use banks and/or other payment service providers to effect rent payments under the relevant lease agreement in order to comply with our contractual obligations.

9.2 Legal Requirements

We may disclose personal data where required by law, in response to requests from public authorities, or in connection with legal proceedings.

9.3 International Transfers

As a rule, we strive not to transfer personal data outside of the European Economic Area (EEA). If such a transfer becomes necessary, we will ensure that appropriate safeguards are implemented in line with the GDPR, such as Standard Contractual Clauses (SCCs) or other approved mechanisms for international data transfers.

X. DATA SUBJECT RIGHTS

Under the GDPR, you have specific rights with respect to your personal data. These rights are outlined below, and you may exercise them at any time by contacting us.

10.1 Right to Access

You have the right to request a copy of the personal data we hold about you, along with information about how and why it is being processed.

10.2 Right to Rectification

If any of the personal data we hold about you is inaccurate or incomplete, you have the right to request that we correct or update it without undue delay.

10.3 Right to Erasure (Right to be Forgotten)

In certain circumstances, you may request that we delete your personal data, for example, if the data is no longer necessary for the purposes for which it was collected or if you withdraw your consent (where consent was the legal basis for processing).

10.4 Right to Restrict Processing

You have the right to request that we limit the processing of your personal data in specific situations, such as when you contest its accuracy or object to the processing based on our legitimate interests.

10.5 Right to Data Portability

You may request that we provide you with your personal data in a structured, commonly used, and machine-readable format and transfer that data to another controller where feasible.

10.6 Right to Object

You may object to the processing of your personal data where the processing is based on our legitimate interests, including profiling. We will cease processing unless we demonstrate that the processing is based on compelling legitimate grounds that override your interests, rights, and freedoms.

10.7 Right to Withdraw Consent

Where processing is based on your consent, you may withdraw your consent at any time. This will not affect the lawfulness of any processing carried out before the withdrawal of consent.

10.8 Right to Lodge a Complaint

If you believe that your personal data has been processed in violation of the GDPR, you have the right to lodge a complaint with the Commission for Personal Data Protection (CPDP) or the data protection authority in your country of residence.

XI. CHANGES TO THE NOTICE

We reserve the right to update or modify this Notice at any time to reflect changes in the data protection legislation or our data processing practices. Any updates will be posted on our website (www.cetinbg.bg/privacy), and significant changes can be communicated to you directly via email or other appropriate means.

This Notice shall enter into force and shall be applied as of 20.05.2025.

All future changes shall take effect immediately or within the term indicated by us.

XII. ADDITIONAL INFORMATION

If you have any questions about this Notice and how we handle personal data, please do not hesitate to contact us.