
PRIVACY POLICY
of CETIN Bulgaria EAD
for working with corporate clients

I. INTRODUCTION

The security and proper use of Personal Data are of utmost importance to CETIN Bulgaria EAD. Therefore, with this Privacy Policy we inform you about the way we process Personal Data in connection with the conclusion, performance and termination of relationships with our Corporate Clients.

For the sake of clarity and convenience for readers, in certain places in this Privacy Policy, we have provided examples that illustrate why and/or how CETIN processes Personal Data. These examples are not exhaustive.

The Data Controller, which processes Personal Data according to this Privacy Policy, is CETIN Bulgaria EAD, UIC 206149191, having its headquarters and registered office at Building 6, Business Park Sofia, Mladost-4 Residential Area, 1766 Sofia.

II. DEFINITIONS

2.1 Privacy Policy

This Privacy Policy of CETIN Bulgaria EAD for working with corporate clients, including its further amendments.

2.2 Personal Data

In practice, this is any information that identifies a particular individual or relates to an individual who can be identified directly or indirectly.

2.3 CETIN

CETIN Bulgaria EAD, UIC 206149191, having its headquarters and registered office at Building 6, Business Park Sofia, Mladost-4 Residential Area, 1766 Sofia. In this Privacy Policy, the use of the pronouns "We", "Us" or "Our" shall also mean CETIN Bulgaria EAD.

2.4 Corporate Client

For the purposes of this Privacy Policy, this is:

- a) a self-employed person practising as a freelancer or a sole proprietor and acting within the limits of his commercial or professional activity;
- b) a legal entity, e.g., a limited liability company (OOD), a joint-stock company (AD), a non-profit organisation, a foundation, etc., or
- c) a civil society or consortium.

2.5 Representative

A natural person who represents a Corporate Client by virtue of the law (e.g. a manager or executive officer) or by virtue of a power of attorney.

2.6 Contact Person

A natural person designated by a Corporate Client as a contact person for certain matters. Such are, e.g., contact persons for financial, commercial, technical or legal matters.

2.7 Employee

A natural person, employed under an employment or civil contract in a specific position by a Corporate Client.

2.8 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.

III. WHAT DATA WE PROCESS WHEN WORKING WITH CORPORATE CLIENTS

According to this Privacy Policy, CETIN processes the following categories of Personal Data:

Category of Personal Data	Corporate Client – natural person	Representative	Contact Person	Employee
Names	✓	✓	✓	✓
Position	X	✓	O	O
UCN, Foreigner's PIN or other ID	✓	✓	X	X
Number, date, place and authority of issuance of an ID document	✓	✓	X	X
Correspondence address	✓	O	O	O
E-mail	✓	O	✓	✓
Phone number	✓	O	✓	✓

Legend:

✓ – Data without which it will not be possible to achieve the goals specified in this policy;

O – Data provided voluntarily by the subject;

X – Data which CETIN doesn't collect.

It is important to note that the same natural person can act in more than one capacity (for example, as a Representative and as a Contact Person). In such cases, CETIN will process the data shown in the Table above related to each of the natural person's capacities.

Data such as personal identification number, ID paper number, issuing date, place and authority are processed by CETIN only when needed to comply with regulatory requirements. For example, such cases are where a Corporate Client is represented by an authorised person under a notarised power of attorney.

IV. HOW WE COLLECT PERSONAL DATA FROM CORPORATE CLIENTS

In most cases, we get information directly from the data subjects, such as when Corporate Clients, Representatives, Contact Persons, or Employees provide us with information about themselves.

Sometimes, however, data is provided to CETIN by third parties, for example, when:

- a) Corporate Clients provide information about their Representatives or Contact Persons;
- b) competent authorities, when exercising their powers, provide information about the persons concerned.

When working with Corporate Clients, CETIN also collects Personal Data from:

- a) public registers (e.g., the Commercial Register and the Property Register);
- b) Corporate Clients' websites; and
- c) search engine results.

V. PURPOSES FOR WHICH WE PROCESS PERSONAL DATA OF CORPORATE CLIENTS

5.1 We process Personal Data to negotiate with Corporate Clients as well as to participate in supplier selection procedures organised by them

We process Personal Data related to Representatives, Contact Persons and Employees of Corporate Clients, when they:

- a) negotiate with us for the purpose of entering into a contract, including when the negotiations are conducted within the framework of a tender procedure for the selection of a supplier organised by CETIN or the relevant Corporate Client; or
- b) conduct a public contract award procedure for products and/or services in which CETIN participates under the terms and conditions provided by the law.

In such cases, the processing of Personal Data is necessary for us to participate in such negotiations, tender procedures, or public contract award procedures, including to exchange information and offers with a view to the future conclusion of a contract.

5.2 We process Personal Data to enter into contracts with Corporate Clients

The conclusion of a valid and binding contract with a Corporate Client is impossible without processing certain Personal Data about them (when the supplier is a natural person) or about their Representative(s).

The amount of Personal Data required to enter into a valid contract with a Corporate Client depends on the type of contract – e.g., when a Corporate Client's Representative is authorised under a power of attorney with notarised signatures, we will process not only the names and position of the authoriser, but also his/her personal identification number as well as data from his/her identity document.

5.3 We process Personal Data to fulfil our obligations to Corporate Clients and to ensure the fulfilment of their commitments to us

In order to fulfil our obligations to Corporate Clients and seek fulfilment of their commitments to us, we must process the Personal Data of the Corporate Client's (if they are natural persons), Representatives, Contact Persons, or Employees.

Without such processing, it would be impossible to:

- a) provide the agreed-upon services;

- b) carry on written correspondence, as well as make telephone and/or video conversations, and/or joint meetings regarding the performance of the entered into contracts;
- c) organise the acceptance, handover and testing of goods and/or services;
- d) issue and receive invoices;
- e) effect and seek payments.

5.4 We process Personal Data when amending or terminating contracts with Corporate Clients

During the term of the contracts with Corporate Clients, it is possible, at CETIN's behest or the Corporate Clients themselves, to negotiate amendments or termination of such contracts. In such cases, in order for us to be able to participate in such negotiations, including signing additional agreements or terminating any contract, we must process Personal Data of Corporate Clients (if they are natural persons), Representatives, Contact Persons and/or Employees.

5.5 We process Personal Data where, under applicable law, we are obliged to render assistance to any competent government and/or municipal authorities when conducting inspections

CETIN's business operations are subject to control by various government and municipal authorities – e.g., Communications Regulation Commission (CRC), Commission for Consumer Protection (CCP), Commission for Personal Data Protection (CPDP), National Revenue Agency (NRA) and others. In the course of exercising their control functions, the respective authorities have the power to conduct inspections, as well as to require CETIN to provide any documents and information that are in CETIN's possession. Documents and information requested in the course of such inspection may contain Personal Data of Corporate Clients (natural persons), Representatives, Contact Persons and/or Employees.

For example, when conducting a tax audit, the NRA authorities have the power to require CETIN to provide accounting documents that may also contain Personal Data of Corporate Clients (natural persons), Representatives, Contact Persons and/or Employees.

5.6 We process Personal Data to fulfil obligations arising from the accounting and tax laws

The tax and accounting legislation in the Republic of Bulgaria requires CETIN to create and store, for a definite period of time, information, data and documents relevant to the tax and social security control.

In fulfilment of this obligation, the relevant information and documents, which also contain Personal Data of Corporate Clients – natural persons, Representatives, Contact Persons and/or Employees – are kept by CETIN for such time as stipulated in the relevant laws. Some of these terms are quite lengthy (e.g., the tax and social security documents should be kept for eleven years).

5.7 We process Personal Data when it is necessary to settle legal disputes

Sometimes, in order to exercise our rights or legitimate interests (e.g., to seek any invoice payment), we may need to process Personal Data of certain Corporate Clients (natural persons), Representatives, Contact Persons and/or Employees, to make an out-of-court claim or to bring an action against:

- a) Corporate Clients; or
- b) third parties from whom we have obtained and/or to whom we have disclosed Personal Data of the relevant natural persons in accordance with this Privacy Policy.

Accordingly, the Corporate Clients, the above third parties, and the natural persons themselves may make an out-of-court claim or bring a case against CETIN. In such cases, we may need to process Personal Data in order to organise and conduct our defence, and thus prevent any judicial or non-judicial actions against CETIN.

The category and amount of the Personal Data processed depends on the nature of the out-of-court claim or the action brought.

5.8 We process Personal Data for market research purposes

In order to improve the quality of the services provided, CETIN may assign third parties to conduct satisfaction surveys among Corporate Clients. For this purpose, official contact details of certain Contact Persons are processed. The processing is carried out on the basis of CETIN's legitimate interest in improving customer service and is limited to the minimum necessary data. The data shall not be used for any other purpose and shall not be disclosed outside the scope of the assigned research. Natural persons have the right to object to such processing.

5.9 We process Personal Data for other clearly communicated purposes

In the event that CETIN needs to process the data of Corporate Clients for purposes other than the abovementioned, CETIN will notify and communicate clearly and precisely the respective purposes with the involved data subjects. The notification may be made both publicly via CETIN's website, as well as by deliberate communication with the persons concerned, made by e-mail, telephone or other appropriate means. The use of Personal Data in this regard may not be carried out in violation of this or other policies published by CETIN or in violation of the applicable legislation.

VI. CATEGORIES OF ENTITIES TO WHICH WE MAY DISCLOSE PERSONAL DATA

6.1 Data Processors

Data Processors are persons or entities who process Personal Data on behalf of CETIN on the basis of a written agreement. They are prohibited from processing the Personal Data they have been provided for any other purposes than the performance of the tasks assigned to them by CETIN. Data Processors are required to follow all CETIN's instructions.

CETIN takes the necessary measures to ensure that the engaged Data Processors respect strictly the data protection laws and CETIN's instructions and that they have taken appropriate technical and organizational measures to secure and protect the Personal Data.

Examples of Data Processors:

- a) Providers of services for the implementation and/or maintenance of information systems that are sometimes required to access Personal Data that is stored in the relevant systems;
- b) Courier service providers;
- c) CETIN's commercial agents;
- d) Providers of services for the organisation, storage and maintenance of data archives, as well as data archive destruction services;
- e) Independent auditors;
- f) Law firms, accountants or other providers of consultancy services.

6.2 Partners

In order to be able to provide certain services to Corporate Clients, CETIN enters into contracts with third parties (partners). In connection with the provision of the relevant services, it is sometimes necessary to provide the relevant partners with Personal Data of the natural persons whose data is processed by CETIN under this Privacy Policy.

6.3 Banks and payment institutions

In connection with the servicing of payments to CETIN's Corporate Clients by bank transfer or through a payment institution, it is necessary to exchange data between CETIN and the respective bank or payment institution.

6.4 Lawyers and law firms

If necessary (e.g., a legal dispute between CETIN and a supplier), Personal Data of Corporate Clients (natural persons), Representatives, Contact Persons and/or Employees, may be disclosed to lawyers and law firms engaged by CETIN to protect its rights and legal interests.

6.5 Authorities

The provision of data to competent authorities is described above in this Privacy Policy.

6.6 Third parties in connection with the reorganisation (e.g., merger or acquisition) or transfer of an enterprise

In case of reorganisation of CETIN or in case of transfer of assets in accordance with the applicable law, the Personal Data controlled by CETIN under this Privacy Policy may be provided to a third-party successor.

VII. PROCESSING OF PERSONAL DATA OUTSIDE THE TERRITORY OF BULGARIA

As a rule, CETIN strives not to transfer Personal Data processed under this Privacy Policy outside the territory of the European Union (EU) and the European Economic Area (EEA).

In some cases, however, certain data may be required to be transferred to entities outside the EU/EEA (e.g., to provide support services for CETIN's information system that cannot be performed without access to Personal Data), while observing the requirements of the applicable law and this Privacy Policy.

If Personal Data of a Corporate Client (natural person), Representative, Contact Person and/or Employee, is required to be sent by CETIN outside the EU or EEA, this will be done in accordance with this Privacy Policy and upon the existence of any of the following conditions:

- a) Where there is a European Commission decision to the effect that the country concerned provides an adequate level of data protection;
- b) When an agreement is made with the organization to which Personal Data is sent, with such agreement containing the standard data protection clauses approved by the European Commission with Decision No. 2010/87/EU (more information can be found on the relevant [page of the Commission for Personal Data Protection](#)) and under [Recommendations 01/2020 from the European Data Protection Board](#) on measures that supplement transfer tools to ensure compliance with the EU level of protection of Personal Data;
- c) When the transfer of data is required to fulfil a commitment to the relevant Corporate Client and their affiliates.

VIII. PERSONAL DATA STORAGE PERIODS

CETIN stores the Personal Data it processes under this Privacy Policy for as long as necessary to achieve the objectives stated herein (e.g., for the duration of the contracts signed with the Corporate Clients, until settlement of the relationship between the parties, until expiration of applicable limitation periods, etc.) or to meet the requirements of the applicable law. For example, CETIN is obliged to keep the data contained in tax and social security control documents for a period of 11 years.

IX. HOW WE PROTECT PERSONAL DATA

Building and maintaining trust between us and our Corporate Clients is a priority for CETIN. Therefore, protecting our systems and the Personal Data of Corporate Clients (when they are natural persons), Representatives, Contact Persons and Employees, is of paramount importance to CETIN. In accordance with the requirements of the applicable law and good practices, CETIN takes the necessary technical and organisational measures to keep Personal Data safe.

To ensure Personal Data protection, CETIN uses state-of-the-art technologies combined with uncompromising security controls. Our framework is based on some of the most popular security standards (ISO 27001: 2022, etc.).

In order to ensure an adequate level of data protection, CETIN has adopted numerous data processing policies.

CETIN has appointed a Data Protection Officer and has special departments that handle information security and fraud protection. These departments support the processes for safeguarding and securing Personal Data and monitor compliance.

X. RIGHTS OF NATURAL PERSONS

The natural persons whose Personal Data is processed by CETIN under this Privacy Policy are entitled to:

- a) request from CETIN access and/or rectification of any Personal Data relating to them, as provided for in the Regulation;
- b) request from CETIN to limit the processing of any Personal Data relating to them and/or delete such Personal Data as provided for in the Regulation;
- c) object to the processing of any Personal Data relating to them, as provided for in the Regulation;
- d) file a complaint with the Commission for Personal Data Protection if they believe that CETIN is in any violation of the personal data protection legislation.

XI. CONTACT INFORMATION

Questions and inquiries regarding the processing of Personal Data under this Privacy Policy can be sent to privacy@cetinbg.bg.

This Privacy Policy is relevant as of 20.10.2025 and may be amended or supplemented by CETIN at any time due to amendments of the applicable legislation, at CETIN's initiative, the persons concerned, or a competent authority (e.g. the Commission for Personal Data Protection).