

PRIVACY POLICY
of CETIN Bulgaria EAD
for working with suppliers

I. INTRODUCTION

The security and proper use of Personal Data are of paramount importance for CETIN Bulgaria EAD.

Therefore, this Policy informs you about the manner in which we process Personal Data when selecting Suppliers and entering into, conducting, and terminating relations with Suppliers.

For better clarity and the convenience of the readers, we have given examples in several places in this Policy to 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 Policy

This Privacy Policy of CETIN Bulgaria EAD for working with suppliers, including its subsequent amendments and supplements.

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 seat and registered address in Sofia, postal code 1766, Mladost 4 Residential Quarter, Business Park Sofia, building 6. In this Privacy Policy, the use of the pronouns "We", "Us" or "Our" will also mean CETIN Bulgaria EAD.

2.4 Supplier

A natural person, a legal entity, a civil society or a consortium wherefrom CETIN receives goods and/or services. Suppliers within the meaning of this Policy also are: a) the individuals creating real estate rights in favour of CETIN, and b) the persons transferring the ownership of real estate properties (or parts of properties) to CETIN.

2.5 Subcontractor

A legal entity, a civil society or consortium engaged by a Supplier for the purpose of the provision of goods and/or services to CETIN.

2.6 Representative

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

2.7 Contact Person

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

2.8 Employee

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

2.9 GDPR or the 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 DO WE PROCESS WHEN WORKING WITH SUPPLIERS

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

Category of Personal Data	Supplier – natural person	Representative	Contact Person	Employee
Names	✓	✓	✓	✓
Position	X	✓	O	O
Uniform civil number (UCN), Foreigner's PIN or other ID	✓	✓	X	X
Number, data, place and authority issuing an ID document	✓	✓	X	X
Correspondence address	✓	O	O	O
E-mail	✓	O	✓	✓
Phone number	✓	O	✓	✓
Education, skills and/or qualifications data	✓	X	X	X
Criminal records information	✓	X	X	X
Health status information	✓	X	X	X

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 one and the same natural person can act in more than one capacity (e.g., as a Representative and 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 about UCN, number, date, place and authority of issue of the identity document are kept by CETIN only where necessary for compliance with the regulatory requirements. For example, such are the cases where contracts in a notarized form or with a notarial certification are entered into between CETIN and the Suppliers, as well as in the cases where Suppliers are represented by proxies whose powers of attorney are with notarization of signatures.

Criminal record and health status data are processed by CETIN only where necessary to comply with the regulatory requirements. For example:

- a) for a given Supplier or its Subcontractor to be able to work at strategic sites of CETIN, it is necessary to have a permit issued by the State Agency for National Security to its Employees, which requires the processing of such data by us;
- b) for a Supplier – natural person with reduced capacity to work to be able to use the tax relief provided for in the legislation, we need to process data regarding his/her health status.

IV. HOW WE COLLECT SUPPLIERS' PERSONAL DATA

CETIN collects Personal Data in different ways, e.g., to select Suppliers and to enter into, conduct, and terminate relations with them.

In most cases, we receive Personal Data directly from the data subject, such as when Suppliers, 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) CETIN Employees internally recommend a certain Supplier and provide information about its Contact Person;
- b) the Suppliers provide information about their Employees or Representatives, Contact Persons or Employees of their Subcontractors;
- c) competent authorities, when exercising their powers, provide information about the persons concerned.

When working with Suppliers, CETIN also collects Personal Data from:

- a) public registers (e.g. the Commercial Register and the Property Register);
- b) Suppliers or their Subcontractors' websites; and
- c) search engine results.

V. PURPOSES FOR WHICH WE PROCESS SUPPLIERS' PERSONAL DATA

5.1 We process Personal Data to select Suppliers

In selecting Suppliers, we are required to process Personal Data related to them (if they are natural persons), their Representatives, and Contact Persons. We do that to conduct market research for the products or services sought by CETIN, contact potential Suppliers, and invite them to participate in a procedure for selecting a Supplier or to negotiate with them directly.

If the invited Suppliers decide to participate in the respective procedure or in negotiations with CETIN, we also process data for their Employees in order to:

- a) decide whether the Suppliers, incl. their Subcontractors, possess the qualifications, skills and expertise necessary for the proper delivery of the goods and/or services sought by CETIN; and
- b) choose Suppliers that meet CETIN's requirements as much as possible by evaluating their offers (e.g., from a financial, technical, or regulatory point of view).

5.2 We process Personal Data to enter into contracts with Suppliers

The conclusion of a valid and binding contract with a Supplier 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 Supplier depends on the type of contract—e.g., for contracts with notarized signatures, the full name and personal ID number of the Supplier's Representative(s) must be mentioned in the contracts to comply with the provisions of the Civil Procedure Code.

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

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

Without such processing, it would be impossible to:

- a) provide, amend, supplement or cancel purchase orders to Suppliers;
- 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 Suppliers

During the term of the contracts with Suppliers, it is possible, at CETIN's behest or the Suppliers 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 Suppliers (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 Suppliers (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 Suppliers (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 Suppliers – 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 Suppliers (natural persons), Representatives, Contact Persons and/or Employees, to make an out-of-court claim or to bring an action against:

- a) Suppliers; 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 Suppliers, 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 Suppliers. 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 Suppliers 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 Banks and payment institutions

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

6.3 Lawyers and law firms

If necessary (e.g., a legal dispute between CETIN and a person), Personal Data of Suppliers (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.

6.4 Authorities

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

6.5 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 Supplier (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 Suppliers 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 Suppliers, 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 Suppliers is a priority for CETIN. Therefore, protecting our systems and the Personal Data of Suppliers (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 privacy 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 29.10.2025 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).