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**PRIVACY POLICY**  
**of CETIN Bulgaria EAD**  
**when carrying out personnel recruitment**

## **I. INTRODUCTION**

Security and the proper use of personal data are of utmost importance to both us and the individuals who apply for a job at CETIN Bulgaria EAD. Therefore, it is important for us that referred individuals and job applicants understand why and how we process their personal information when making recruitment decisions.

This Policy applies to the personal data that CETIN collects and processes in connection with the performance of personnel recruitment, covering the process from initial employment application. The processing of personal data of employees (i.e. individuals who have entered into an employment contract and have started performing their duties) is not subject to this Policy.

For the sake of clarity and convenience, we have included examples in certain sections of this Policy to illustrate why and how CETIN processes personal data. These examples are not exhaustive.

## **II. DEFINITIONS**

### **2.1 Policy**

This Privacy Policy of CETIN Bulgaria EAD when carrying out personnel recruitment, including its subsequent amendments and supplements.

### **2.2 Personal data**

In practice, this refers to any information that identifies a specific natural person or relates to a natural person who can be directly or indirectly identified. Personal data subject to this Policy may be separated as follows:

#### **2.2.1 Basic data:**

- a) Full name;
- b) Correspondence address;
- c) Gender;
- d) Age.

#### **2.2.2 Data to be provided when applying for a job:**

Personal data that job applicants need to provide to CETIN to assess the compliance of the applicant's professional experience and qualifications with the requirements for the position for which the recruitment is made. Their provision is voluntary, but without them, CETIN cannot carry out personnel recruitment.

- a) Applicants' names;
- b) Correspondence address;
- c) Contact phone;
- d) Contact email;
- e) Information about previous professional experience, including employment biography;

- f) Information on the type and level of education, including additional qualifications (e.g. language level, driving licence, etc., at the discretion of the applicant or in view of the requirements for the position);
- g) Recommendations from a former employer (if the applicant has provided such).

## 2.3 CETIN

CETIN Bulgaria EAD, UIC 206149191, with headquarters and address of management at Sofia, Mladost 4, 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 Processing of personal data

This is any action performed by CETIN in relation to the data, consisting of:

- a) collection;
- b) recording;
- c) storage;
- d) review;
- e) examination;
- f) alteration;
- g) retrieval;
- h) disclosure;
- i) restriction;
- j) deletion;
- k) destruction, etc.

## 2.5 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.

## 2.6 Applicant or Job Applicant

A natural person who has provided personal data for the purposes of and in connection with applying for a job with CETIN.

## 2.7 Referred Individual

A natural person who our employee has recommended for an open position in CETIN.

### III. HOW WE COLLECT PERSONAL DATA ABOUT REFERRED INDIVIDUALS AND APPLICANTS

CETIN collects personal data about applicants in various ways. In most cases, we receive information directly from applicants during the recruitment process for a specific position and upon the conclusion and execution of employment contracts with them. Sometimes, data is provided to CETIN by third parties when a CETIN employee recommends a certain person for an open position. CETIN creates certain data about the applicants at the time of the recruitment.

We collect personal data provided directly by applicants in the following cases:

- a) When applying for a job;

- b) When carrying out personnel recruitment (e.g. when interviewing an applicant);
- c) In the pre-contractual relations with the applicants who have been selected following the end of the recruitment process for the purposes of sending an offer and drafting an employment contract;
- d) When entering into an employment contract with CETIN with the selected applicants who have accepted an offer from CETIN.

We collect personal data about applicants from third parties in the following cases:

- a) From public sources (public profiles in social networks, Internet search engines), when it is necessary to assess whether an applicant meets the ethical standards of behaviour of CETIN, according to this Policy;
- b) From competent state or municipal authorities, in accordance with the legislation. In such cases, the data shall be provided by the relevant authorities;
- c) Other sources (e.g. previous employers, excluding current employers).

We collect personal data about referred individuals from our employees for an open position at CETIN. If the referred individuals express interest in the respective position and confirm their desire to participate in the recruitment process, they become applicants, and CETIN will collect and process data about them in accordance with this Policy.

Data generated by CETIN:

- a) Information obtained during a test for acquired knowledge and skills for work;
- b) Information reflected in protocols of interviews;
- c) Documents for evaluation of the applicant;
- d) Personality test.

#### **IV. HOW WE PROCESS THE PERSONAL DATA OF REFERRED INDIVIDUALS AND APPLICANTS**

##### **4.1 We process data of referred individuals to contact them and find out if they are interested in open positions in CETIN**

At CETIN, we have created a program that encourages employees to recommend their acquaintances, friends or relatives for open positions in the company. With it, we aim to enable existing employees to contribute to the recruitment process, while optimising it to enhance the relationship between new and existing employees, and to strengthen CETIN's image as an employer that professionals recommend as a place to work.

If an employee of ours refers a person for a position open with CETIN, we will process the data about this person (referred individual) to contact him/her, provide him/her with information about the position and how the recruitment is conducted, as well as to establish whether the referred individual is interested in the position.

To protect the right to privacy, we have instructed our employees to inform referred individuals that they will be required to provide their personal data to CETIN, and to ensure that referred individuals do not object to this before making a recommendation.

If the referred individual expresses interest in the relevant position and confirms their desire to participate in the recruitment process, we will treat them as an applicant and process their data in accordance with the other provisions of this Policy. If the referred individual is not interested in the

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position for which he/she is referred, CETIN will suspend the processing of his/her personal data and delete it.

In the case of an open position recommendation, the data we process about the referred individuals is:

- a) Name and surname;
- b) Contact email;
- c) Contact phone; and
- d) State.

#### **4.2 We process data about applicants to assess their knowledge, skills and experience**

To assess whether the applicants' education, qualifications, competencies, and professional experience meet the requirements for the position for which they are being recruited, we need to process their personal data.

Full names, date of birth, work biography, and educational qualifications are part of the minimum content required to carry out the recruitment process. The provision of this data is completely voluntary. However, if an applicant refuses to provide it, CETIN will be unable to carry out the recruitment, and therefore, the application will not be considered.

In the process of recruitment, data on the presence or absence of a driving licence, additional qualifications (level of knowledge of a foreign language, etc.) necessary for the performance of job duties related to the respective position are also processed, and in certain cases it is possible to check the knowledge indicated by the applicant, skills and professional qualities (e.g. by taking a language proficiency test).

This assessment is conducted to select applicants to whom we will make an offer.

#### **4.3 We process data about applicants to assess whether they meet CETIN's ethical standards**

To achieve the company's strategic goals and ambitions, high ethical standards of responsible behaviour are established at the heart of our activities, guiding us through the daily dilemmas we face. These standards are outlined in our Code of Ethics, which can be found on the following website: <https://www.cetinbg.bg/code-of-ethics>.

To ensure that the individuals we hire comply with these ethical standards, we conduct a preliminary internal assessment, which requires processing applicants' data. It is in addition to the assessment of the knowledge, skills and experience of the applicants, but is not carried out in relation to all applicants, but only in relation to:

- a) positions where the nature of the work is such that there is a risk of potential abuse (e.g. misuse of personal data of CETIN clients, corrupt practices, etc.); and
- b) the selected applicants (i.e. those to whom we would make an offer if we consider that they meet the ethical standards of the company).

#### **4.4 We process data about applicants to be issued a work permit at strategic sites**

CETIN provides public electronic communications networks and/or services in accordance with the legislation of the Republic of Bulgaria. Given the enormous importance of this activity, it is classified as a strategic activity of national security significance, and certain sites within our network are designated as strategic sites of national security importance.

In view of this, the applicable legislation requires that persons working in our strategic sites obtain permission from the State Agency for National Security (SANS) authorities.

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For the purposes of obtaining such authorisation, CETIN should process certain personal data about individuals who have accepted an offer to work at strategic company sites, including sensitive data (e.g., data on mental state and data on convictions). In such cases, applicants must provide:

- a) Criminal record certificate;
- b) Certificate of absence of mental illness;
- c) Certificate of the presence or absence of initiated and pending criminal proceedings and charges brought.

Obtaining a work permit in strategic sites, when required, is a prerequisite for concluding an employment contract with the respective applicant.

#### **4.5 We process data about applicants, necessary for the preparation of an employment contract**

To prepare an employment contract and fulfil the legal obligations arising from it, it is necessary to process the personal data of the selected applicants.

In the process of preparing the employment contract, the following data is processed:

- a) The names of the person;
- b) Permanent address;
- c) Unified Civil Number (personal/service number - for a foreigner);
- d) Data from an identity document (ID card number, date of issue, place of issue);
- e) The type and degree of education held, as well as data on the scientific degree held, if it is related to the work performed by him;
- f) The duration of the employment contract;
- g) The basic and additional remuneration of a permanent nature, as well as the frequency of their payment;
- h) Other conditions, rights and obligations agreed during or after the recruitment process;
- i) The length of the work day or week;
- j) Medical certificate;
- k) Additional data on the state of health in the presence of specific circumstances. They are necessary to be able to meet the legislative requirements for the use of additional privileges and/or benefits;
- l) Photo in digital form. It is necessary when the work is carried out on a site where access control is carried out for the purpose of drawing up an access card;
- m) Bank account details.

#### **4.6 We process applicants' data when concluding an employment contract**

To conclude an employment contract, the information specified in the preceding item is processed by consulting the originals of the documents containing the specified information, providing in the original the listed certificates and certificates, as well as an employment record book (in the presence of such, in the absence or filling in of an existing one, a new corresponding continuation of the existing one is issued).

#### **4.7 Processing of applicants' data necessary for their participation in other recruitment procedures**

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We may retain the applicant's data for up to 6 (six) months from the completion of the recruitment process for the position for which they have applied. Within 6 (six) months from the completion of the recruitment procedure for the position, we will return to the applicant all originals or notarised copies of documents provided to us that certify the physical and mental fitness of the applicant. The necessary qualification degree and length of service for the position held, if the applicant has provided this information to CETIN.

Upon receipt of the consent of an applicant, we may retain his/her data even after the expiry of the specified 6 (six) month period after the completion of the recruitment procedure for the position for which he/she has applied, so that we can assess whether other (current or future) positions are suitable for that applicant, notify him/her thereof and invite him/her to participate in the recruitment and/or directly apply bid.

In such cases, data about the respective applicant shall be stored for a period not exceeding 2 (two) years, starting from the beginning of the year following the year in which they applied for a job at CETIN, or until the applicant withdraws their consent, if it occurs earlier. After the expiration of this period or upon withdrawal of the applicant's consent, his/her personal data will be deleted or destroyed.

We may retain the applicant's data contained in the internal documents of the company created by us regarding the recruitment and recruitment procedures carried out for up to 3 (three) years from the completion of the recruitment procedure for the position, and after the expiration of this period, the internal documents of the company containing personal data will be deleted or destroyed.

## **V. CATEGORIES OF PERSONS TO WHOM WE DISCLOSE THE PERSONAL DATA OF REFERRED INDIVIDUALS AND APPLICANTS**

### **5.1 Processors**

Processors are individuals who process personal data on behalf of and on behalf of CETIN, in accordance with a written agreement. They are not permitted to process the personal data provided to them for any purpose other than the performance of the work assigned to them by CETIN. Processors are obliged to comply with all CETIN instructions.

CETIN takes the necessary measures to ensure that the processors engaged comply strictly with the legislation on personal data protection and CETIN's instructions, as well as that they have taken appropriate technical and organizational measures for the protection of personal data.

Examples of processors:

- a) Persons assigned to carry out personnel recruitment;
- b) Providers of services for the organization, storage and maintenance of data archives for referred individuals and/or applicants, as well as services for the destruction of such archives;
- c) Consultancy service providers (e.g. persons assigned to check applicants' knowledge and/or skills);
- d) Providers of services for the implementation and/or maintenance of information systems, which are sometimes necessary to access personal data that is processed in the respective systems used by CETIN in the recruitment of personnel.

### **5.2 Competent authorities**

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Personal data of the referred individuals or applicants may be provided to competent state and/or municipal authorities when this is required to fulfil a legal obligation (e.g., for the issuance of a work permit in strategic sites).

### 5.3 Third parties in connection with a transformation (e.g. merger or acquisition) or transfer of an entity

In the case of the transformation of CETIN, as well as in the event of asset transfer in accordance with applicable legislation, it is possible for the personal data of the referred individuals and/or applicants administered by CETIN to be provided to a third-party successor.

## VI. PROCESSING OF PERSONAL DATA OUTSIDE THE TERRITORY OF BULGARIA

As a rule, CETIN strives not to send personal data processed under this Policy outside the territory of the European Union (EU) and the European Economic Area (EEA).

However, in certain cases, certain data may need to be sent to persons outside the EU/EEA (e.g. to provide a maintenance service for a CETIN information system, which cannot be performed without access to personal data), in compliance with the requirements of the applicable legislation and the requirements described in this Policy.

In case CETIN must send personal data of a referred individual or applicant to a country outside the EU or EEA, this will be done in compliance with this Policy and in the presence of any of the following conditions:

- a) In the presence of a decision of the European Commission, according to which the respective country ensures an adequate level of protection of personal data;
- b) In the presence of an agreement with the organization to which personal data is sent, containing the standard data protection clauses approved by the European Commission by Decision No 2010/87/EU (more information can be found on the relevant [website of the Commission for Personal Data Protection](#) and [compliance with Recommendation 01/2020 of the European Data Protection Board](#) on measures complementing transfer tools to ensure compliance with the protection of personal data at EU level);
- c) Where the data transfer is necessary to fulfil a commitment to the relevant person.

## VII. TERMS FOR RETENTION OF PERSONAL DATA

CETIN stores the personal data of the referred individuals and the applicants for as long as necessary to achieve the objectives set out in this Policy or to comply with the requirements of the legislation, but not more than 6 (six) months from the completion of the recruitment procedure for the position for which the person has applied.

With regard to the applicants who have not become employees of CETIN and:

- a) have given their consent to this, the personal data provided, such as CV, cover letter and references, are stored for a maximum period of 2 years from the end of the calendar year in which they applied for a job or until the applicant's consent is withdrawn, which occurs earlier.
- b) have not given their consent to this, the personal data provided, such as CV, cover letter and references, are destroyed/deleted immediately after the completion of the recruitment for the position for which they have applied.

CETIN makes efforts to ensure that the processed personal data about referred individuals and applicants is updated (and corrected if necessary) and that no data is stored that is not necessary to achieve the purposes described above.

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### VIII. HOW WE PROTECT PERSONAL DATA

Building and maintaining trust between CETIN and referred individuals and applicants is a high priority. Therefore, the protection of our systems and personal data is of paramount importance to CETIN. In accordance with current legislation and best practices, CETIN takes the necessary technical and organisational measures to ensure the safekeeping of personal data.

To ensure the protection of personal data, CETIN utilises state-of-the-art technologies in conjunction with rigorous management of security controls. Our framework is based on some of the most popular security standards (ISO 27001:2022, etc.).

To ensure an adequate level of data protection, CETIN has implemented numerous policies that govern data processing.

CETIN has appointed a Data Protection Officer and specialised departments that are responsible for information security and fraud protection. They support the processes for protecting and ensuring the security of personal data, as well as monitoring their compliance.

### IX. RIGHTS OF NATURAL PERSONS

Natural persons whose personal data CETIN processes in accordance with this Policy have the right to:

- a) request CETIN to access and/or correct personal data relating to them, as provided for in the Regulation;
- b) to request CETIN to restrict the processing of personal data concerning them and/or to delete them, in the cases provided for in the Regulation;
- c) object to the processing of personal data concerning them as provided for in the Regulation;
- d) to file a complaint with the Commission for Personal Data Protection in case, in their opinion, CETIN violates the legislation on personal data protection.

### X. CONTACT INFORMATION

Questions and inquiries regarding the processing of personal data under this Policy may be sent to [privacy@cetinbg.bg](mailto:privacy@cetinbg.bg).

This Policy is current as of 30.10.2025 and may be changed or supplemented by CETIN at any time due to changes in the applicable legislation, at the initiative of CETIN, of the affected persons or of a competent authority (e.g. the Commission for Personal Data Protection). In case of amendment of this Policy, CETIN may notify the entities relevant to this Policy at its own discretion.