

**PRIVACY POLICY**  
**of CETIN Bulgaria EAD**  
**for referring individuals for open positions**

**I. GENERAL INFORMATION**

- 1.1** At CETIN Bulgaria EAD (hereinafter referred to as the "**Company**" or "**CETIN**"), the privacy and security of personal data are of utmost importance. This privacy policy for referring individuals for open positions (hereinafter referred to as the "**Policy**") provides detailed information on how we collect and process personal data of individuals who have been referred for an open position within CETIN by a current employee.
- 1.2** This Policy is designed to inform you about how your personal data will be handled, your rights, and our data protection procedures, in compliance with the General Data Protection Regulation (GDPR) (Regulation (EU) 2016/679) and applicable Bulgarian law.

**II. DATA CONTROLLER AND CONTACT DETAILS**

- 2.1** The Data Controller processing your personal data is:

**CETIN Bulgaria EAD**

Uniform Identification Code (UIC): 206149191

Address: Building 6, Business Park Sofia, Mladost 4 district, Sofia 1766, Republic of Bulgaria

E-mail: [info@cetinbg.bg](mailto:info@cetinbg.bg)

Website: <https://www.cetinbg.bg/>

- 2.2** Contact Details of CETIN's Data Protection Officer (DPO):

E-mail: [privacy@cetinbg.bg](mailto:privacy@cetinbg.bg)

**III. PURPOSE AND LEGAL BASIS FOR PROCESSING**

- 3.1** We process your personal data for the purpose of contacting you to evaluate your interest and suitability for job opportunities within our company, based on a recommendation from a current employee.
- 3.2** The legal basis for this processing is our legitimate interest (Article 6(1)(f) of the GDPR) in identifying and recruiting suitable candidates to support our business needs and growth.

**IV. CATEGORIES OF PERSONAL DATA**

- 4.1** The categories of personal data we process are limited to the contact information provided by the employee who referred you, which includes:
- 4.1.1 First and last name;
  - 4.1.2 E-mail address;
  - 4.1.3 Phone number;
  - 4.1.4 Country.

## **V. PROCESSING AND DATA RETENTION**

- 5.1** Your personal data was provided to us by a CETIN employee via our internal employee referral program. Upon receiving your data, we can decide to contact you to inform you about the open position and ascertain your interest.
- 5.2** If you express interest in the position, you will be considered a job applicant, and your personal data will be processed further in accordance with our Recruitment Privacy Policy, available at <https://www.cetinbg.bg/privacy>.
- 5.3** Personal data of referred individuals will be retained for a period of six (6) months. With your explicit consent, we may retain your data for up to two (2) years to consider you for future job opportunities.

## **VI. DATA RECIPIENTS**

- 6.1** Your personal data will be shared with internal staff involved in the recruitment process (e.g., HR professionals and hiring managers). As a general rule, we do not share your data with third parties. In case we do, we will notify you accordingly via an explicit e-mail or through a notice on our website.

## **VII. DATA TRANSFERS OUTSIDE THE EU/EEA**

- 7.1** 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).
- 7.2** 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.
- 7.3** 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.

## **VIII. YOUR RIGHTS AS A DATA SUBJECT**

- 8.1** Under 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.
    - 8.1.1 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.
    - 8.1.2 Right to Rectification**
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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.

#### **8.1.3 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).

#### **8.1.4 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.

#### **8.1.5 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.

#### **8.1.6 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.

#### **8.1.7 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.

#### **8.1.8 Right to Lodge a Complaint**

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

### **IX. CHANGES TO THE POLICY**

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

**9.2** This Policy was last updated on 17.12.2025.

**9.3** All future changes shall take effect immediately.

### **X. ADDITIONAL INFORMATION**

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