

PERSONAL DATA POLICY OF CETIN BULGARIA EAD UPON STAFF RECRUITMENT

INTRODUCTION

Security and proper use of personal data are of exceptional importance both for us and for the people who apply for a job at CETIN. Thus, for us it is important that the persons referred understand why and how we process their personal information when we carry out staff recruitment.

This Policy applies with respect to personal data collected and processed by CETIN in relation to the performance of staff recruitment operations and it covers the process until applicant takes up his/her duties. The processing of personal data of employees (i.e. persons who have entered into an employment contract and have taken up their duties) is not the subject of this Policy.

For the sake of greater clarity and for convenience of the readers of this Policy, examples illustrating why and/or how CETIN processes personal data are stated in many parts of it. Such examples are not part of the Policy.

DEFINITIONS

Policy

means this Personal Data Policy of CETIN Bulgaria EAD upon staff recruitment

Personal Data

In practice, this means any information which identifies a specific natural person or which relates to a natural person who can be directly or indirectly identified. The types of personal data being the subject matter of this Policy are: basic data; data provided when applying for a job; data provided upon conclusion of a employment contract; data regarding the contracts.

Basic Data

Basic data means:

- Full name;
- Permanent address;
- Sex;
- Age.

Data provided when applying for a job

The personal data the applicants for a job must provide to CETIN in order that the latter can assess the correspondence of applicant's professional experience and qualification with the requirements for the job for which the recruitment is made. The provision of such data is voluntary but without them CETIN cannot make staff recruitment.

Such data are:

- Applicant's names;
- Correspondence address;
- Telephone for contact;
- e-mail address for contact;
- information about professional experience, including employment biography at preceding employer(s);
- information about the type and level of education, including additional qualifications (e.g. level of command of languages, existence of a driver's license and others in the opinion of the applicant or in view of the requirements for the position);
- recommendations from a former employer (if submitted by the applicant).

Personal Data Processing

Personal data processing means any use of personal data.

Personal data processing means the actions of:

- Collection;
- Recording;
- Storage;
- Examination;
- Check;
- Change;
- Retrieval;
- Disclosure;
- Restriction;
- Deletion;
- Destruction, etc.

CETIN

CETIN Bulgaria EAD, company ID number [UIC] 206149191, having its domicile and registered office at building 6, Business Park Sofia, Mladost 4 Residential Estate, city of Sofia, postal code 1766.

In this Policy the use of pronouns "We", "Us" or "Our" also means CETIN Bulgaria EAD.

Applicant or Applicant for a Job

A natural person who has provided personal data for the purposes of and in relation to applying for a job at CETIN.

Person referred

A natural person who has been recommended by an employee of ours for an open position at CETIN.

Restriction of personal data processing

Upon a restriction on processing CETIN may only store the relevant personal data unless: (a) the applicant has given his/her consent; or (b) data processing is necessary for the establishment, exercise or defense of legal claims; (c) data processing is necessary for the protection of the rights of another natural person; or (d) there are important grounds of public interest for the Republic of Bulgaria or for the European Union.

HOW WE COLLECT PERSONAL DATA ABOUT PERSONS REFERRED AND ABOUT APPLICANTS

CETIN collects personal data in different ways. In most cases we receive information directly from the applicants upon and on the occasion of the recruitment for a specific position and the conclusion and performance of the contracts with them. Sometimes the data are provided to CETIN by third parties or are received from other sources such as public registers or profiles. Certain data about the applicants are created by CETIN while carrying out the recruitment itself.

We collect personal data directly from the applicants:

- When applying for a job;
- When carrying out the staff recruitment (e.g. when conducting an interview with an applicant);
- In pre-contract relations with the applicants selected after the recruitment is made (for preparation of an employment contract);
- When CETIN concludes an employment contract with the selected applicants who have accepted CETIN's offer;

We collect personal data on the applicants from third parties:

- From public sources (public profiles in social media, Internet search engines), where necessary in order to assess whether an applicant meets CETIN's ethical standards of conduct according to this Policy;
- From competent state or municipal authorities in accordance with the legislation. In such cases the data are provided by the relevant authorities;
- Other sources (e.g. previous employers, save for the current employer and others).

We collect personal data about the persons referred from our employees who recommend them for an open position at CETIN. In case that the persons referred show an interest in the respective position and confirm their desire to participate in the process of recruitment for such a position the same become applicants as CETIN shall collect and process data about them in accordance with this Policy.

Data created by CETIN:

- Information obtained upon making a test of acquired knowledge and working skills;
- Information reflected in minutes of conducted interviews.
- Documents regarding the applicant's assessment;
- Personality test

HOW WE PROCESS THE PERSONAL DATA OF APPLICANTS AND PERSONS REFERRED

We process data about the persons referred so that we can contact them and find out if they show an interest in open positions at CETIN

At CETIN we have created a program encouraging the employees to recommend their acquaintances, friends or relatives for open positions at the company. By this program we aim to provide our existing employees with an opportunity to contribute to the recruitment process while we simultaneously optimize it in order to improve the relations between the new employees and the existing ones as well as to affirm the image of CETIN as an employer recommended as a workplace by the professionals.

In case that an employee of ours recommends a person for a position opened at CETIN we shall process the data about such person (person referred) so that we can contact him/her, provide him/her with information about the position and the manner of performance of the recruitment as well as establish whether the person referred shows an interest in the position.

In view of the protection of the rights to privacy of personal data we have obliged our employees to inform the person referred that they shall make their personal data available to CETIN as well as to guarantee that the person referred do not object to that before our employees make a recommendation.

In case that the person referred shows an interest in the respective position and confirms his/her desire to participate in the recruitment we shall treat him/her as an applicant and shall process the data about him/her as per the remaining provisions of this Policy. If the person referred does not show an interest in the position for which (s)he has been recommended, CETIN shall discontinue the processing of his/her personal data and shall delete them.

When a reference for an open position is made the data we shall process regarding the referee shall be: names, e-mail and telephone for contacts.

We process data about the applicants in order to assess their knowledge, skills and experience

In order to assess whether the applicants' education, qualification, competences and professional experience meet the requirements for the position for which the recruitment is carried out we need to process their personal data.

Full name, date of birth, employment biography and educational level are part of the minimum content of the information necessary for the recruitment. The provision of such data is entirely voluntary but in case that an applicant refuses to provide them CETIN would be unable to make the recruitment and therefore the application would not be considered.

In the course of recruitment data regarding the existence or absence of a driver's license, additional qualification (level of command of a foreign language, etc.) are also processed as in certain cases a check might be made of

applicant's knowledge, skills and professional qualities (e.g. by sitting a test of command of a language). This assessment is made in order to select the applicants to whom we would make an offer.

We process data about the applicants in order to assess whether they meet CETIN's ethical standards

In order to achieve the company's strategic objectives and ambitions some high ethical standards of responsible conduct underlying our business have been established to guide us when we face everyday dilemmas. These standards are contained in the Code of Conduct published on the following page on the Internet: <https://www.cetinbg.bg/dist/pdf/code-of-conduct-bg.pdf>.

In order to ensure that the persons we hire will abide by these ethical standards we carry out a preliminary internal assessment and thus we need to process applicants' data. This assessment is in addition to the assessment of applicants' knowledge, skills and experience but it is not made for all applicants but only for:

- positions where the nature of the job is such that there is a risk of potential abuse (e.g. abuse of personal data of CETIN's customers, corruption practices, etc.); and
- the selected applicants (i.e. the ones to whom we would make an offer if we deem they meet the company's ethical standards).

We process data about the applicants in order that a work permit for strategic sites be issued

CETIN provides public electronic communication networks and/or services in accordance with the legislation of the Republic of Bulgaria. Considering the huge importance of this business it is classified as one of strategic importance for national security and certain sites of our network are classified as strategic sites for national security.

In view thereof the applicable legislation requires that the persons to be employed at our strategic sites be granted a permission from the bodies of the State Agency for National Security.

For the purposes of obtaining such permission CETIN must process certain personal data of the persons who have accepted an offer to be employed at company's strategic sites, including sensitive data (e.g. data about the mental state and data about pronounced verdicts). In such cases the applicants must submit:

- a certificate of absence of mental illnesses;
- a certificate of existence or absence of pending criminal proceedings;

Obtaining a Work Permit for strategic sites, where required, is a mandatory condition for the conclusion of an employment contract with the respective applicant.

We process data about the applicants necessary for the preparation of an employment contract

In order to prepare an employment contract and to fulfill the statutory obligations arising thereof we have to process personal data of the selected applicants:

In the course of preparation of the employment contract the following data are being processed:

- Person's names;
- Permanent address
- Personal identification number [EGN] (personal/official number – for aliens);
- Data from identity papers (ID card number, date of issue, place of issue);;
- Type and level of education acquired as well as data about the scientific degree held, if related to the job done by the applicant;
- The duration of the employment contract;
- The base and the additional pay of permanent nature as well as the periodicity of payment thereof;
- Other conditions, rights and obligations;
- The duration of work day or work week;
- Medical Certificate;
- Additional health data in case of specific circumstances. It is necessary to meet the legislative requirements for the use of additional benefits;
- A photograph in digital form. It is necessary where the job is to be done at a site with access control for the purposes of preparation of an access card;
- Data about a bank account;

We process data about the applicants upon the conclusion of employment contracts

In order that an employment contract be entered into the information stated in the preceding item is processed by checking the original documents where the stated information is contained as the listed certificates must be submitted in original as well as an employment record book (if any; if there is no employment record book or if there is one but it is full of entries, a new employment record book or a continuation of the existing one shall be issued).

Processing of applicants' data necessary in view of their participation in other recruitment procedures

We can keep the applicant's data for up to (6) six months as of completion of the selection procedure for the position for which he / she has applied. Within 6 (six) months from the completion of the selection procedure for the position, we return to the candidate all provided to us originals or notarized copies of documents certifying the physical and mental fitness of the candidate, the required qualification and experience for the position (in case that the applicant has provided such to CETIN).

If we have obtained the applicant's consent we can keep his/her data after the expiration of the specified 6 (six) month period the completion of the recruitment procedure for the position (s)he has applied for so that we can assess whether there are other (present or future) positions appropriate for such applicant, or, respectively, notify him/her of that and invite him/her to participate in the recruitment and/or make an offer directly.

In such cases the data about the respective applicant shall be stored for a period not longer than 2 (two) years, as from the beginning of the year following the one when (s)he has applied for a job at CETIN (i.e. if a person submits

his/her application in 2020 and agrees that we process his/her data in view of his/her participation in other recruitment procedures the data shall be stored until the end of 2022) or until the withdrawal of the candidate's consent, which occurred earlier. After the expiration of this term or upon withdrawal of the candidate's consent, his / her personal data will be deleted or destroyed.

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

CATEGORIES OF PERSONS TO WHOM WE DISCLOSE THE PERSONAL DATA OF PERSONS REFERRED AND APPLICANT

Personal Data Processors

Personal data processors are persons who process personal data on CETIN's behalf and further to an assignment made by CETIN based on a written agreement. They do not have the right to process the personal data provided to them for purposes other than the performance of the work assigned to them by CETIN. The processors are obliged to abide by all instructions given by CETIN.

CETIN takes the necessary measures in order to ensure that the hired processors strictly abide by the personal data protection legislation and CETIN's instructions as well as that they have taken appropriate technical and organizational measures to protect the personal data.

Examples of personal data processors:

- Persons assigned with the task of staff recruitment;
- Providers of services related to organization, storage and maintenance of records of data about the persons referred and/or the applicants as well as services of destruction of such records;
- Providers of consulting services (e.g. a person assigned with the task of checking the applicants' knowledge and/or skills);
- Providers of information system implementation and/or maintenance services, who sometimes need to have access to personal data being processed in the relevant systems used by CETIN when carrying out staff recruitment.

Competent Authorities

Personal data of persons referred or applicants may be provided to competent state and/or municipal authorities where required in view of the fulfillment of a statutory obligation (e.g. issuance of a work permit for a strategic site);

Third parties in relation to transformation (e.g. merger or consolidation) or transfer of an undertaking.

In case of CETIN's transformation as well as in case of transfer of assets in accordance with the applicable legislation the personal data of the persons referred and/or the applicants administered by CETIN may be made available to a third party successor

PERSONAL DATA PROCESSING OUTSIDE THE TERRITORY OF BULGARIA

As a rule CETIN aims not to send the personal data of the persons referred and the applicants outside the territory of the European Union (EU) and the European Economic Area (EEA). In certain cases, however, certain data need to be sent to persons outside EU/EEA (e.g. in order to provide the service of maintenance of an information system of CETIN, which cannot be carried out without access to personal data) subject to the requirements of the applicable legislation and the provisions described in this Personal Data Policy.

In case that personal data regarding a person referred and/or an applicants need to be sent by CETIN to a country outside EU or EEA this will be done by abiding by this Confidentiality Policy and if any of the following conditions is present:

- Where there is a decision of the PDPC or the European Commission according to which the respective country ensures an adequate level of personal data protection;
- Where an agreement has been signed with the organization to which personal data are being sent and such agreement contains the standard clauses regarding data protection approved by the European Commission by Commission Decision No 2010/87/EU (https://www.cdpd.bg/userfiles/file/Transfers/BCR_Commission_decision_2010-87_Bg.pdf) and under the Recommendations 01/2020 on measures that supplement transfer tools to ensure compliance with the EU level of protection of personal data (https://edpb.europa.eu/sites/edpb/files/consultation/edpb_recommendations_202001_supplementarymeasurestransferstools_en.pdf);
- Where the data transfer is needed in order that a commitment to the respective person referred or applicant be fulfilled.

HOW LONG WE KEEP THE PERSONAL DATA OF THE PERSONS REFERRED AND OF THE APPLICANTS

CETIN stores the personal data of the persons referred and of the applicants for as long as necessary to attain the aims stated in this Policy, or to meet the requirements of the legislation, but not more than 6 (six) months from the completion of the selection procedure for the position for which the person has applied.

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

- have given their consent to that, their personal data provided, such as CV, motivation letter and recommendations, shall be stored for a maximum period of 2 years as from the end of the calendar year in which they have applied for the job or until the withdrawal of the candidate's consent, which occurred earlier;
- have not given their consent to that, their personal data provided, such as CV, motivation letter and

recommendations, shall be destroyed/deleted as soon as the recruitment for the position they have applied for is completed.

CETIN makes efforts to ensure that the personal data of person referred and applicants being processed are updated (and corrected if necessary) as well as that no data are stored, which are not necessary for the attainment of the aims described above.

HOW WE PROTECT THE PERSONAL DATA OF THE PERSONS REFERRED AND OF THE APPLICANTS

Building and maintaining trust between us, on the one hand, and, on the other, the persons referred and the applicants is a priority for CETIN. Thus, the protection of our systems and personal data is of paramount importance for CETIN. In accordance with the requirements of the legislation in force and the best practices CETIN takes the necessary technical and organizational measures to ensure that the personal data of the persons referred and of the applicants are safe.

In order to ensure the protection of personal data CETIN uses advanced technologies combined with uncompromising management of security controls. Our framework is based on one of the most popular security standards (ISO27001:2013 and others).

In order to ensure the maximum protection of data a number of policies regulating data processing, including while carrying out recruitment, have been adopted at CETIN.

At CETIN there is an appointed official in charge of data protection and there are special departments taking care of information security and protection against fraud. They assist the processes of protecting and ensuring personal data security and see to their compliance.

WHAT RIGHTS NATURAL PERSONS HAVE IN RELATION TO PERSONAL DATA PROCESSING

General information about the rights of natural persons

CETIN takes action further to a request from a natural person to exercise a right under this section only if CETIN can identify the respective person.

Only a person who can be identified by CETIN may exercise his/her rights under this section.

If the purposes for which CETIN processes personal data do not require or do not require anymore the identification of a natural person CETIN is not obliged to maintain, acquire or process additional information in order to identify the person for the only purpose of taking actions based on a request from that person.

CETIN notifies natural persons of the actions taken within one month following the receipt of a request under this section as in certain cases this period may be extended by not more than two months.

CETIN provides natural persons with information concerning the actions taken in relation to their requests to exercise rights under this section without unnecessary delay and in any cases within one month after the receipt of the request. If necessary this period may be extended by two more months by taking into consideration the complexity and number of requests. CETIN informs the relevant person of any such extension within one month after the receipt of the request by also stating the reasons for delay.

In case of refusal to carry out a request CETIN notifies the respective natural persons of their rights.

If CETIN does not take actions further to the request of a natural person CETIN notifies such person without delay and not later than one month after the receipt of the request of the reasons for CETIN's failure to take actions as well as of his/her option to file a complaint to Personal Data Protection Commission and to seek protection as per the legal procedure.

In certain cases CETIN may request additional information to verify the identity of natural persons

In case that CETIN has reasonable concerns in relation to the identity of the natural person who files a request under this section CETIN may request the submission of additional information necessary for verification of such person's identity.

The actions taken by CETIN upon and on the occasion of submitted requests to exercise rights under this section are free of any charge for the persons unless their requests are patently unjustified or excessive.

The actions taken by CETIN upon and on the occasion of the exercise of applicants' rights are free of any charge. Where the request of a person is patently unjustified or excessive (e.g. because of its repetitiveness), CETIN has the right, at its own discretion: (a) to refuse to comply with the request; or (b) to demand the payment of a reasonable fee determined on the basis of the administrative costs necessary for the provision of the requested information or for the requested actions to be taken.

The persons referred and the applicants have the right to access to personal data related to them

The persons referred and the applicants have the right to receive from CETIN information as to whether any personal data related to them are being processed. If yes, applicants have the right to get access to the relevant data.

The persons referred and the applicants have the right to demand that the personal data related to them be rectified if the data are not accurate or up-to-date

In the event that the personal data being processed by CETIN are not accurate or up-to-date applicants have the right to demand that CETIN rectify them.

In certain cases the persons referred and the applicants have the right to demand that personal data related to them be erased

The persons referred and the applicants have the right to demand that CETIN erase personal data related to them in the following cases:

- the personal data are no longer necessary for the purposes for which they have been collected or processed;
- the person referred or the applicant has withdrawn his/her consent on which personal data processing is based

and there is no other legal ground for the processing of the same;

- the person referred or the applicant has objected to the processing of personal data based on CETIN's lawful interests unless there are other legal grounds for processing, which prevail over the applicant's interests, rights and freedoms or data processing is necessary for the establishment, exercise or protection of legal claims;
- the personal data related to the respective person referred or applicant have been processed unlawfully;
 - the personal data must be deleted by CETIN in view of the fulfillment of legal obligation arising out of the law of the Republic of Bulgaria or European Union.

In certain cases the persons referred and have the right to demand that processing of personal data related to them be restricted

The persons referred and the applicants shall have the right to request that CETIN restrict the processing of personal data related to them in the following cases:

- the accuracy of personal data is contested by them: for a period that makes it possible for CETIN to examine the accuracy of such personal data;
- processing is unlawful but the person referred or the applicant does not want his/her personal data to be deleted and, instead, demands that the use thereof be restricted;
- CETIN does not need anymore the personal data for the purposes of processing but the person referred or the applicant demands them in order to establish, exercise or protect some legal claims;
- the person referred or the applicant has objected to the processing of personal data based on CETIN's lawful interests pending an inspection of whether the CETIN's legal grounds prevail over applicant's interests.

In certain cases the persons referred or the applicants have the right to portability of personal data related to them

The persons referred and the applicants shall have the right to obtain from CETIN the personal data provided by them (e.g. the data provided when applying for a job), in a structured, widely-used and machine-readable form as well as to transfer such data to another controller without being hampered by CETIN where technically feasible. This right applies only where CETIN processes the respective data in an automated manner.

In certain cases the persons referred and the applicants have the right to object to the processing of personal data related to them.

The persons referred or the applicants have the right to object, at any time and for any reasons related to their specific situation, to the processing of personal data related to them where CETIN processes their data for protection of its lawful interests. Depending on the nature of the objection and the circumstances stated by the respective person referred or applicant CETIN will make an internal check regarding the objection and will pronounce a decision regarding the objection in compliance with this section by: (a) notifying the person referred or the applicant that CETIN will discontinue the processing of his/her personal data; or (b) making a reasoned refusal to discontinue the processing of his/her personal data if there is a legal ground for that.

The persons referred and the applicants have the right to file a complaint before a supervisory authority on personal data protection

The persons referred and the applicants have the right to file complaints or warnings to Personal Data Protection Commission (PDPC) in case that in their opinion CETIN violates the legislation on personal data protection. There are instructions on how to file complaints published on PDPC's website at: <https://www.cpdp.bg>
The applicants may also file complaints before other supervisory authorities on the territory of the European Union according to the provisions of 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.

CETIN'S CONTACT INFORMATION

CETIN Bulgaria EAD, company ID number [UIC] 206149191, having its domicile and registered office at building 6, Business Park Sofia, Mladost 4 Residential Estate, city of Sofia, postal code 1766, is the controller of personal data, which are processed under this Policy.

For any questions and inquiries regarding the processing of personal data while carrying out staff recruitment please contact us at the following e-mail: recruitment@cetinbg.bg and, if necessary, we will help you get in contact with our official in charge of data protection.

ENTRY INTO FORCE AND UPDATING OF THIS POLICY

This Policy was most recently updated on 1st of March 2021.

This Policy may be amended or supplemented because of amendments to the applicable legislation, on the initiative of CETIN, the persons referred, the applicants or a competent authority (e.g. Personal Data Protection Commission).

CETIN shall inform the applicants of the amendments or supplementations of this Personal Data Policy within a period not shorter than 7 (seven) days before their entry into force by:

- publishing the updated Personal Data Policy on CETIN's website at www.cetinbg.bg; and
- notifying the applicants by sending them, via e-mail, a link to the website where the updated version of this Policy is published.

It is recommended that applicants regularly check the most up-to-date version of this Policy on CETIN's website.