



## RULES

for personal data management by Badestnost JSCo.

### I. GENERAL PROVISIONS

**Article 1.** These Rules aim to govern:

- 1.1. Personal data management by Badestnost JSCo.;
- 1.2. Principles relating to processing of personal data;
- 1.3. Rights of the data subject;
- 1.4. Responsibilities of personal data controller and processor;
- 1.5. Measures to address personal data breach.

**Article 2 Badestnost JSCo.** is the controller of personal data of Personnel, Clients, Suppliers, Visitors, Participants in recruitment procedures and Users registered on the website. Controller contact details: *Badestnost JSCo., Industrial Zone, administrative building, Chirpan, e-mail: [badestnost@hydraulic-vlv.com](mailto:badestnost@hydraulic-vlv.com), tel: (+359) 416 93012.*

**Article 3** Data protection officer:

Name: Metodi Ninov

Contact details: e-mail:gdpr@badestnost.net, tel.: (+359) 416 93012

**Article 4** Definitions:

**4.1. CONTROLLER:** A natural or legal person, public authority, agency or other body which, alone or jointly with others, defines the purposes and means of personal data processing.

**4.2. PERSONAL DATA:** Any information relating to an individual who is identified or can be identified, directly or indirectly, by an identification number or by one or more specific factors.

**4.3. PROCESSING OF PERSONAL DATA:** Any operation or set of operations that may be performed on personal data, whether or not by automated means, such as collection, recording, organisation, storage, adaption or alteration, restoration, consultation, use, disclosure or transmission, dissemination, updating or combining, blocking, deleting or destroying of data.

**4.4. PERSONAL DATA SUBJECT:** Any natural person whose personal data are processed.

**4.5. PERSONAL DATA PROCESSOR:** A natural or legal person, public authority, agency or other body which processes personal data on behalf of the controller.

**4.6. RECIPIENT:** A natural or legal person, public body, agency or other body to which personal data are disclosed, whether a third party or not.

**4.7 SUPERVISORY AUTHORITY:** A supervisory authority on the protection of personal data is: The Commission for Personal Data Protection.

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### **II. MANAGEMENT OF PERSONAL DATA OF PERSONNEL**

**Article 5** Personal data of personnel hereinafter referred to as “Employee” shall be provided by him/her on entrance into office / job assignment and are required for signing of contract of employment / services with an individual in compliance with a statutory obligation – the provisions of the Labour Code and the rules and regulations for its enforcement, the Social Insurance Code, etc., in any one of the following ways:

➤ 5.1. in the form of a hard copy – written documents such as applications for entrance into office/performance of work under contract of employment / services, and other documents necessary for amendment or termination of these relations, involving current business matters and submitted by the person;

➤ 5.2 from external sources (from judicial, financial, insurance, tax and other institutions in compliance with regulatory requirements).

If a person fails to provide the required personal data on entrance into office / job assignment, it shall be not possible to sign a contract of employment / services.

**Article 6** The recipients of personal data of an Employee and the relevant categories are:

➤ General and sensitive personal data – Executive Director, Chief Accountant, Payroll Officer, Technical Assistant, Health and Safety Officer, Labour Inspectorate, External Auditors, National Revenue Agency, National Social Security Institute, Medical Institutions and Occupational Medical Service.

➤ General personal data - Doorman, System Administrator, Heads of departments/workshops and units, software company and security company staff.

All activities related to processing of personal data by the processors are defined in their job descriptions or contract.

**Article 7** Scope and period of storage of personal data shall comply with and shall be governed by *Instruction No. 5 of 30 June 2005 on the acceptance and storage of payrolls and employment documents by liquidated companies without assignee and the Accountancy Act.*

**Article 8** Where a data subject wishes to correct, delete or restrict the processing of personal data, the person shall made it known or provide the necessary data to the controller.

**Article 9** The employee has the right to file a complaint with the supervisory authority if he/she considers that the processing of personal data relating to him/her violates the provisions of the Personal Data Protection Act.

**Article 10** The controller shall be entitled to process personal data for purposes other than the one for which they were collected after providing the employee with detailed information about that other purpose.

**Article 11** For the purposes of the legitimate interests of the controller on the territory of Badestnost JSCo., video surveillance shall be carried out in order to protect the property and maintenance of labour discipline. The storage period for video recordings is 7 days.

**Article 12** Each employee shall sign a declaration of consent for the storage and processing of personal data, familiarization with the Rules for Management of Personal Data and his/her respective rights.

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### **III. MANAGEMENT OF PERSONAL DATA OF CUSTOMERS**

**Article 13** Personal data of a customer, whether a natural person or a company representative, shall be provided voluntarily by him / her upon inquiry / receipt / placement of order and are necessary for the performance of contractual relations or legal obligations relating to the placement, coordination and recording of an order. Required data categories are: Names, Company, Address, Phone number, E-mail address.

Failure by a person to provide the required personal data upon inquiry / receipt / placement of order shall result in non-completion of the accepted order or reply to the inquiry.

**Article 14** Recipients of customer personal data and the relevant categories are:

- General personal data – Executive Director, employees from Accounting Department and Chief Accountant, employees and head of Sales Department, External Auditors.

All activities related to processing of personal data by the processors are defined in their job descriptions or contract.

**Article 15** The deadline for storage of personal data is 5 years from the date of completion (shipment) of the last placed order and the deadlines for keeping accounting information according to the provisions of the Accountancy Act.

**Article 16** Where a data subject wishes to correct, delete or restrict the processing of personal data, the person shall make it known or provide the necessary data to the controller.

**Article 17** The customer has the right to file a complaint with the supervisory authority if he/she considers that the processing of personal data relating to him/her violates the provisions of the Personal Data Protection Act.

**Article 18** The controller shall not process personal data for purposes other than the one for which they were collected.

**Article 19** Each customer is notified of the existence of the Rules for Management of Personal Data and is required to know his or her respective rights.

### **IV. MANAGEMENT OF PERSONAL DATA OF SUPPLIERS**

**Article 20** Personal data of a supplier, whether a natural person or a company representative, shall be provided or confirmed voluntarily by him / her upon inquiry / receipt / placement of order by an employee of Badestnost JSCo. and are necessary for the performance of contractual relations or legal obligations relating to the placement, coordination and recording of an order. Required data categories are: Names, Company, Address, Phone number, E-mail address.

Collection and processing of personal data by an employee of Badestnost JSCo. before the placement of order can be performed without the consent of the supplier if taken from the supplier's website or public register.

Failure by a person to provide or confirm the required personal data upon inquiry / receipt / placement of order by an employee of Badestnost JSCo. shall result in non-completion of the order.

**Article 21** Recipients of supplier personal data and the relevant categories are:

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- General personal data - Executive Director, employees from Accounting Department and Chief Accountant, Logistics Officer, Ecologist, Labour Inspectorate, External Auditors.

All activities related to processing of personal data by the processors are defined in their job descriptions or contract.

**Article 22** The deadline for storage of personal data is 5 years from the date of completion (receipt) of the last placed order and the deadlines for keeping accounting information according to the provisions of the Accountancy Act.

**Article 23** Where a data subject wishes to correct, delete or restrict the processing of personal data, the person shall make it known or provide the necessary data to the controller.

**Article 24** The supplier has the right to file a complaint with the supervisory authority if he/she considers that the processing of personal data relating to him/her violates the provisions of the Personal Data Protection Act.

**Article 25** The controller shall not process personal data for purposes other than the one for which they were collected.

**Article 26** Each supplier is notified of the existence of the Rules for Management of Personal Data and is required to know his or her respective rights.

### **V. MANAGEMENT OF PERSONAL DATA OF VISITORS**

**Article 27** Personal data of each visitor to the company are mandatory provided by the visitor prior to entering the territory of Badestnost JSCo. and are required for the fulfillment of the legitimate interests of the controller and in compliance with the provisions of the Site Rules and the implemented Information Security Management System. Required data categories are: Names, Company, Address, video surveillance recording.

In the event that a person fails to provide the necessary personal data, this person shall be denied access to the territory of Badestnost JSCo.

**Article 28** Recipients of visitor personal data and the relevant categories are:

- General personal data - Executive Director, Health and Safety Officer, Doorman, External Auditors and security company staff.

All activities related to processing of personal data by the processors are defined in their job descriptions or contract.

**Article 29** The period for storage of personal data, with the exception of video recordings, is 1 year from the visit.

**Article 30** Where a data subject wishes to correct, delete or restrict the processing of personal data, the person shall make it known or provide the necessary data to the controller.

**Article 31** The visitor has the right to file a complaint with the supervisory authority if he/she considers that the processing of personal data relating to him/her violates the provisions of the Personal Data Protection Act.

**Article 32** The controller shall not process personal data for purposes other than the one for which they were collected.

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**Article 33** For the purposes of the legitimate interests of the controller on the territory of Badestnost JSCo. video surveillance shall be carried out in order to protect the property. The storage period for video recordings is 7 days.

**Article 34** Each visitor signs a declaration of consent for the storage and processing of personal data, familiarization with the Rules for the Management of Personal Data and his/her respective rights.

### **VI. MANAGEMENT OF PERSONAL DATA OF CANDIDATES PARTICIPATING IN A PERSONNEL RECRUITMENT PROCEDURE**

**Article 35** Personal data of a participant in a recruitment procedure, hereinafter referred to as the "Candidate", shall be provided by him / her upon submission of an application for a job with Badestnost JSCo. and are required for the fulfillment of the legitimate interests of the controller and administration of the process of processing the applications and documents of the candidates. Required data categories are: Names, Address, Phone Number, information about completed education and previous employer.

If the candidate fails to provide the required personal data in his/her application, the candidate shall not be eligible for participation in the personnel recruitment procedure.

**Article 36** Recipients of candidate personal data and the relevant categories are:

- General personal data - Executive Director, Technical Assistant, Doorman, Heads of departments/workshops and units, Labour Inspectorate.

All activities related to processing of personal data by the processors are defined in their job descriptions or contract.

**Article 37** The period for storage of personal data is 3 years from the date of filing the application and is in accordance with the requirements for the storage of personal data of candidates participating in a recruitment procedure under the Personal Data Protection Act.

**Article 38** Where a data subject wishes to correct, delete or restrict the processing of personal data, the person shall make it known or provide the necessary data to the controller.

**Article 39** The candidate has the right to file a complaint with the supervisory authority if he/she considers that the processing of personal data relating to him/her violates the provisions of the Personal Data Protection Act.

**Article 40** The controller shall not process personal data for purposes other than the one for which they were collected.

**Article 41** Each candidate signs a declaration of consent for the storage and processing of personal data, familiarization with the Rules for the Management of Personal Data and his/her respective rights.

### **VII. MANAGEMENT OF PERSONAL DATA OF USERS REGISTERED ON THE WEBSITE OF BADESTNOST JSCO.**

**Article 42** Personal data of a user registered on the website of Badestnost JSCo., hereinafter referred to as the "User", whether a natural person or a company representative, are voluntarily

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provided by him / her upon registration and are required for the performance of contractual relations or legal obligations related to assignment, coordination, and recording of an order. Required data categories are: Names, Company, Phone Number, E-mail address. Additionally, a postal address is provided if the user is willing so.

If the user fails to provide the required personal data at the time of registration, then the registration of such user shall not be completed.

**Article 43** Recipients of user personal data and the relevant categories are:

- General personal data – Executive Director, employees and head of Sales Department, External Auditors.

All activities related to processing of personal data by the processors are defined in their job descriptions or contract.

**Article 44** The deadline for storage of personal data is 3 years from the date of completion (shipment) of the last placed order and the deadlines for keeping accounting information according to the provisions of the Accountancy Act.

**Article 45** Where a data subject wishes to correct, delete or restrict the processing of personal data, the person shall make it known or provide the necessary data to the controller.

**Article 46** The user has the right to file a complaint with the supervisory authority if he/she considers that the processing of personal data relating to him/her violates the provisions of the Personal Data Protection Act.

**Article 47** The controller shall not process personal data for purposes other than the one for which they were collected.

**Article 48** Each user gives his/her consent for the storage and processing of personal data, familiarization with the Rules for the Management of Personal Data and his/her respective rights.

### **VIII. RIGHTS AND RESPONSIBILITIES**

**Article 49** Badestnost JSCo., the controller, is responsible and ensures that the processing of personal data is performed in accordance with the Personal Data Protection Act. The necessary technical and organizational measures have been taken to protect personal data from unauthorized processing (accidental or unlawful destruction, accidental loss or alteration, unauthorized disclosure or access, unauthorized alteration or dissemination, and all other unlawful forms of processing of personal data) through the operation of the Information Security Management System implemented according to the provisions of ISO 27001.

**Article 50** The basic functions, duties, rights and responsibilities of the data processors are defined in the job descriptions, according to the data subjects and the category of the personal data processed.

**Article 51** In certain cases, the explicit consent of the data subject for personal data processing may not be necessary if there is another legal basis, such as compliance with statutory obligations on the part of the controller, need for performance of a contract, etc.

**Article 52** Each personal data subject shall have the right to obtain from the controller a confirmation whether personal data relating to him or her are being processed and, if so, to have access to the data and the following information:

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- purposes of processing;
- relevant categories of personal data;
- recipients or categories of recipients to whom personal data are or will be disclosed, in particular recipients in third countries or international organizations;
- wherever possible, the period for which the personal data will be stored and, if that is not possible, the criteria used to determine such period;
- existence of a right to require the controller to correct or delete personal data or restrict the processing of personal data relating to the data subject or to file an objection against such processing;
- right to appeal before a supervisory authority;
- when personal data are not collected by the data subject, any available information about their source;

### **IX. MEASURES IN THE EVENT OF PERSONAL DATA BREACH**

**Article 53** In the event of a personal data breach, the controller shall, without undue delay and where possible, but not later than 72 hours after becoming aware of a personal data breach, notify the Commission for Personal Data Protection. Each personal data breach, including facts relating to the personal data breach, its consequences and measures taken to address it, shall be documented. Each notification to the Commission for Personal Data Protection shall contain:

- description of the nature of the personal data breach, including, where possible, the categories and approximate number of data subjects and categories concerned and the approximate number of personal data records concerned;
- indication of the name and contact details of the data protection officer or other contact point from where more information can be obtained;
- description of the likely consequences of the personal data breach;
- description of the measures taken or proposed by the controller to address the personal data breach, including, where appropriate, measures to mitigate its possible adverse effects.

**Article 54** Every processor of personal data shall notify the controller without undue delay after becoming aware of a personal data breach.

**Article 55** When the personal data breach is likely to pose a high risk to the rights and freedoms of natural persons, the controller shall communicate the personal data breach to the data subject without undue delay. The communication to the data subject shall describe in a clear and a simple language the nature of the personal data breach and indicate the person from whom more information can be obtained, the likely consequences of the personal data breach and the measures taken or suggested by the controller to address the personal data breach, including, where appropriate, measures to mitigate possible adverse effects).

### **X. MISCELLANEOUS**

**Article 55** The Controller shall be entitled to make amendments and additions to the Rules for Personal Data Management at any time when the circumstances so require.

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**Article 56** The current version of the Rules for Personal Data Management shall be published on the Controller 's website and distributed within the company within 3 days after its update.

In effect from: **25.05.2018**

Approved by:  
Executive Director .....

Radoslav Gochev

