



CUSTOMER PRIVACY NOTICE

Last Updated on 01/10/2019

This document is intended to inform our customers and counterparties or physical persons, representing or working for our clients, about how we, Intercom Group Ltd., collect, use or share the personal information you provide to us in the course of our business, or which we have otherwise received or created and are related to you. It is advisable to take the time to read this Privacy Notice as well as to periodically review it, as this may change at some point depending on EU-wide regulations or internal company procedures.

Pursuant to General Regulation 2016/679 on Personal Data Protection (GDPR) (the "Regulation"), you, as an individual or as a client, representative of our client, in your capacity of an authorized person or a person which has been delegated with the authority to represent, are a subject of personal data administration procedures, and we have the quality of an administrator of your personal data that we process. Our administrator credentials and how to contact us are listed at the end of this document.

HOW WE COLLECT AND USE YOUR PERSONAL DATA

In order to conduct our business and provide you with the best possible service, we collect personal information. We collect personal data in the process of using our technological monitoring tools located in the administrative building of Intercom Group Ltd., as well as through electronic services, including e-mail communication sent to and from us, if it contains personal data. In other cases, we collect and process information about you when you provide it to us or in case you interact with us directly (in person) when purchasing the goods we offer.

We may use your personal information for the following purposes:

1. To provide you with our services related to the purchase and sale of goods, as well as their transportation, which we perform and which you have requested;
2. To provide you with information regarding these services, including through the communication channels you have selected (telephone, SMS, e-mail);
3. Contacting you when you have asked us a question or made a request for a service offer, or to notify you of important changes to our operating conditions or internal policies, or data security breaches;
4. To send you product offers that we offer;
5. To carry out our activities in accordance with the applicable legislation and professional rules and regulations, responding to requests from local or foreign regulatory, state or judicial authorities;
6. Improve the services we provide, including for internal purposes such as audits, analyzes and studies, to help us improve our operations or to monitor and analyze trends and uses of our services and to improve the design and content of our website or the content of our promotional materials.

We process your personal data most often on the following legal grounds:

- In case you request information about our services,

- In connection with and for the performance of a contract we have entered into with you,
- to fulfill our obligations following a regulatory act, for example in relation to obligations provided for in the Bulgarian Accounting Act and the Tax and Social Insurance Code of Procedure, or when providing information to the judicial and other public authorities,
- Our legitimate interest (in defense of legal claims for example) or
- Your explicit informed consent in cases where there is no regulatory basis, but the information provided is necessary for the purposes of this case and you agree to provide it to us.

WHAT PERSONAL DATA WE COLLECT

The personal information we ask you to provide to us, as customers or business partners, is set out in the applicable regulations.

When contacting us in connection with the purchase of goods we offer or in connection with the transport services we provide, the personal data relating to you that we collect may include:

- When concluding and executing a contract:

For clients - individuals: three names, personal identification number, address, e-mail address;

For individuals - representing and / or working for clients - legal entities: three names, position in the structure of the legal entity - our client;

We will also have data related to telephone numbers and calls, electronic and / or written correspondence, as well as any other information related to the history of our business relations.

- For inquiries sent to us - names, e-mail, and/or telephone number;
- For regular communication and clarification: e-mail, telephone number, position;
- For individuals - visitors to the building or some of the warehouses of 'Intercom Group' Ltd. - data from the video surveillance systems;

WHO WE SHARE YOUR PERSONAL DATA WITH

In the course of our business, we may need to share your personal information with any of the following:

- Our professional consultants and auditors;
- Regulatory, state and judicial authorities;
- Our suppliers or business partners who need your personal data to fulfill their task;

We enter into written contracts with the partners we work with, requiring them to take the necessary steps to ensure the protection of your personal information. We will only provide those of our contractors with the information they need to provide us with the agreed services, without allowing them to use your information for their own purposes. We will not share your personal information with third parties to send you unsolicited marketing communications unless you have given your explicit consent.

TRANSMISSION OF PERSONAL DATA OUTSIDE BULGARIA

We do not share your personal information with anyone else in another Member State or in a third country or with international organizations.

WHAT RIGHTS YOU HAVE

Under the Regulation and other applicable legislation regarding the processing of personal data, you have the following rights:

- Right of access to the personal data relating to you;
- The right to object to the processing of your personal data, for example when we invoke our legitimate interest;
- The right to request the correction of inaccurate personal data relating to you;
- The right to request the deletion of personal data relating to you (the "right to be forgotten");
- The right to request a restriction on the processing of personal data relating to you;
- The right to obtain the personal data you have provided to us that is of concern to you and to use it again by transferring it to another administrator ("portability");
- Right to file a complaint with the Commission for Personal Data Protection, at No 2 'Tsvetan Lazarov' Blvd., Sofia, p. Code 1592. You can also seek legal protection of your rights.

Sometimes certain rights may arise and those can be exercised only on certain grounds for the processing of your personal data; other rights are subject to certain limitations and exceptions under the law. For example, exercising the right of access to your personal data should not adversely affect the rights or freedoms of others, including the protection of our business secrets or intellectual property. If we consider that there is reason to expect such a negative impact, we may reasonably restrict some of the information we provide to you. You may request the deletion of your personal data in the cases provided for in the Regulation (for example, if your data is no longer needed for the purposes for which we have collected it or if you consider that we are processing it in violation of the applicable law and the Regulation), and we may refuse to satisfy your right, for example, if we need the information in connection with the filing of our legal claim or to comply with our other legal obligations under the regulatory acts described above.

You may at any time object to the processing of your personal data in the presence of a legitimate reason for doing so; we will discontinue processing unless we can prove that there are applicable legal grounds for the processing of the personal data that take precedence over your interests, rights and freedoms, or for the establishment, exercise or defense of legal claims.

HOW TO CONTACT US

Personal data administrator: INTERCOM GROUP LTD, registered in the Bulgarian Commercial register under UIC 103238730, with registered seat and address of management: Republic of Bulgaria, city of Varna, postal code – 9002, 'Mladost' district, Western Industrial Zone, No 11 'Eng. Pavlin Nikolov' Str.

Contact person: Stanislav Georgiev

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