

Translation from Bulgarian

Confidentiality Policy
of "ARSENAL" JsCo.
in accordance with the requirements of Regulation (EU) 2016/679
of the European Parliament and of the Council – General Data Protection Regulation
(GDPR)

Transparency in personal data processing

"Arsenal" JsCo is engaged in applying the guarantees concerning the right of personal data protection. The protection of personal data is regulated in Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 relating to the protection of natural persons with regard to the processing of personal data and on the free movement of such data, as well as on the repeal of Directive 95/46/EC (General Data Protection Regulation), and also in other EU legal acts and within the legislations of the EU member countries.

In its capacity of a personal data administrator, "Arsenal" JsCo shall be obliged to inform you about what to expect when your personal data are being processed by them.

Information, provided at collecting the personal data from the data subject or from another source (information under article 13 and article 14 of the General Data Protection Regulation):

1. Data of the administrator and their contact information

"Arsenal" JsCo is a personal data administrator, which personal data are processed either during or with relation to the activity of the Company.

The administrator contact information, at your choice for the specific mode, is as follows:

- Town of Kazanlak 6100, 100 "Rozova Dolina" street – the address to which you can send your requests for exercise of rights;
- To the same address, on each working day, in the interval from 10.00-12.00 am, you can submit your requests for exercise of rights in person;
- You can take the same actions by sending your requests by fax to: +359 431 63332, or via e-mail to the following address: arsenal@arsenal-bg.com.

2. Contact information of the data protection officer

With an order of the General Director at "Arsenal" JsCo there has been appointed a data protection officer and his contact information is as follows:

Stayko Hristov

6100 Kazanlak, 100 "Rozova Dolina" street

e-mail: admin_zld@arsenal-bg.com

telephone: +359 431 57030

3. Personal data categories, purposes, and grounds for processing them at "Arsenal" JsCo

The information that may comprise your personal data is processed for the following purposes:

- Human resources management, financial and accounting reporting;
- Counterparties;
- Requests under the Access to Public Information Act (APIA);
- Video surveillance;
- Visitors;
- Claims, reports and other requests;
- Processing personal data of children;
- Exercising the rights within the meaning of Regulation (EU) 2016/679 before "Arsenal" JsCo in their capacity of a personal data administrator;
- Internal register of infringements of Regulation (EU) 2016/679 and the Personal Data Protection Act;
- Notifications of data security breaches.

Human resources management, financial and accounting reporting

For the purposes of human resources management, we process personal data of shareholders of "Arsenal" JsCo, workers and employees of "Arsenal" JsCo, job applicants and former workers and employees of "Arsenal" JsCo.

In the course of activities of human resources management and financial and accounting reporting, the data processed include identification data of natural persons, education and qualification data, health data, contact information, and other data requested under the specific laws regulating employment and labour relations, tax and insurance relationships, accounting reporting, safe and healthy work conditions, as well as social issues.

The collected data are only used for the above purposes and are provided to third persons only in the cases when this is stipulated by law. In these cases, data can be provided for example to the National Revenue Agency, the Chamber of Audit, the General Labour Inspectorate Executive Agency, and other public bodies, in view of their authority and competence.

"Arsenal" JsCo provides appropriate technical and organizational measures for your personal data protection.

In relation to performing employment and labour relations, only the personal data required by law are processed, and they are saved within the terms as defined in the employment and social security law.

The personnel selection procedures shall follow the requirements of the specific laws regulating this activity.

"Arsenal" JsCo defines a period of three years for storing personal data of participants in personnel selection procedures.

In case the selection procedure requires providing originals or copies of documents certified by a notary, confirming the applicant's physical and psychological suitability, the needed qualification degree and experience with regard to the position occupied, the data subject who has not been approved for appointment, shall be entitled to request back, within 30 days from the finalization of the selection procedure, the documents they have provided. "Arsenal" JsCo shall return the documents in the way they have been submitted.

The results from the personnel selection procedures are communicated to the applicants in a way which guarantees that the information reaches them in a reliable manner.

The activities related to providing safe and healthy working conditions are carried out by the Occupational Health Service at the Company.

Counterparties

In carrying out their activities and in relation to their authorities, "Arsenal" JsCo processes personal data of natural persons for the purpose of implementing the contracts they conclude for the manufacture and product realization, according to the Obligations and Contracts Act, the Public Procurement Act, the Commerce Act, etc.

For as long as the implementation of such contracts involves the processing of personal data of certain natural persons, the information processed about them is minimal and only sufficient for the accurate fulfilment of the obligations under the respective contract. Access to this information is only provided to third persons if that is specified in a law.

Requests under the Access to Public Information Act (APIA)

In relation to processing the requests under the APIA, information is processed about different data subjects, which information may contain data about the physical, economic, social, and other identity of certain individuals. "Arsenal" JsCo provides such information only if and as long as it complies with the purposes of APIA.

Video surveillance

There is video surveillance for security purposes at "Arsenal" JsCo. The recordings from the video surveillance are stored for a period of 2 months. Only certain authorized security officers have access to the recordings, within the scope of their official duties.

Visitors

Processing personal data of visitors at "Arsenal" JsCo is carried out by certain authorized security officers who exercise control over the access to the premises of the

company. Personal data are collected for the purpose of identifying the natural persons visiting the premises of "Arsenal" JsCo.

Processing personal data of children

"Arsenal" JsCo takes into consideration the fact that children are the most vulnerable group in our society and therefore provides a balance with regard to their personal data protection adhering to the principle of voluntariness at providing such data, as well as their processing only for the purposes for which these data are necessary.

There is a functioning kindergarten and a football club at "Arsenal" JsCo, whose members are considered subjects of personal data which are processed.

4. Categories of personal data recipients outside "Arsenal" JsCo.

"Arsenal" JsCo reveals personal data of third persons and recipients only if they have lawful grounds for receiving it. The categories of personal data recipients are determined for each individual case in accordance with their lawful grounds for receiving the data, which grounds may be the following:

- State authorities according to their powers (for instance, the National Revenue Agency, the National Social Security Institute, Ministries, Special Services and others);
- Banks in view of paying the due remunerations of workers and employees of "Arsenal" JsCo;
- For postal and courier services when addressing correspondence to physical persons.

"Arsenal" JsCo shall not reveal personal data for the purposes of direct marketing.

5. Time limits on storing data

"Arsenal" JsCo applies the storage limitation principle and stores personal data for periods which are appropriate for the purposes for which these data are processed, taking into account their scientific-historical or reference significance. Depending on the type of data there is a different storage time limit.

Documents related to employment relations are defined as having a retention period of 50 years. Documents with temporary and operational and reference significance, shall have different retention periods, as per the requirements of normative documents or nomenclature of files with storage time limits.

6. Rights of natural persons

The General Regulation on Personal Data Protection defines the following rights of natural persons with regard to processing their personal data:

- *Right of access* to the personal data relating to the person, which are processed by the administrator;
- *Right to rectification* of inaccurate or incomplete personal data;

- *Right to erasure (“right to be forgotten”)* of personal data which have been unlawfully processed or have invalid legitimate grounds (retention time has expired, consent has been withdrawn, they are no longer necessary in relation to the original purpose for which they were collected, etc.)
- *Right to restrict processing* when there is a legal dispute between the administrator and the natural person until it has been resolved and/or for the purpose of establishing, exercising or protecting legal claims;
- *Right to data portability*, when the personal data are processed by automated means based on consent or an agreement. For the purpose, the data are submitted in a structured, widely used and machine-readable format;
- *Right to object* at any time and on grounds related to the particular situation of the person, under the condition that there are no existing persuasive lawful grounds for the processing prevailing over the interests, the rights and the freedoms of the data subject, or in case of a lawsuit;
- *Right of the data subject not to be subject to a decision based solely on automated processing, including profiling*, which produces legal effects concerning him or her or similarly significantly affects him or her.

The rights deriving from the General Regulation concerning data protection can be exercised in a written or electronic statement to the personal data administrator. This statement shall include your name, address and other data identifying you as the data subject, specify what your request is, what is the preferred form of communication and action regarding your request. You need to sign your request, to include the submission date and your correspondence address.

Personal data which are processed in relation to considering each of the requests shall only be used for the purposes of exercising the above-mentioned rights. In this connection, personal data can be provided to third persons only if it is stipulated by law.

“Arsenal” JsCo shall reserve their right not to satisfy your request in accordance with the possibilities provided in Regulation (EU) 2016/679.

7. The right to lodge a complaint with the Personal Data Protection Committee or with the Court.

If you think your data protection rights under the Regulation have been breached, you shall have the right to lodge a complaint with the Personal Data Protection Committee or with the Court.

8. Lack of automated individual decision-making, including profiling

At “Arsenal” JsCo the automated individual decision-making, including profiling, is not applied.

9. Transfer of personal data to third countries or international organisations

Transfer of personal data to a country outside the European Economic Area is made only if one or more of the following conditions apply:

- the transfer is to a country, territory or one or more specific sectors in this country (or international organisation), about which the European Commission has decided that they ensure an adequate level of data protection;
- the transfer is to a country (or an international organisation) which provides suitable safeguarding measures in the form of legally binding agreement between public authorities or bodies, binding corporate rules; the standard clauses for data protection adopted by the European Commission; compliance with the Code of Conduct accredited by the supervisory authority; certification under an approved certification mechanism (as provided for in the GDPR); contractual clauses, negotiated and authorized by the competent supervisory authority; or regulations concerning administrative arrangements between public authorities or bodies authorized by the competent supervisory authority;
- the transfer is made with the informed consent of the respective data subject;
- the transfer is needed for the implementation of a contract between the data subject and the Company (or for the pre-accession measures, taken at the request of the data subject);
- the transfer is necessary due to important reasons of public interest;
- the transfer is necessary for taking legal actions;
- the transfer is necessary to protect vital interests of the data subject or of other persons, in case the natural or the legal person is not capable of giving their consent themselves.

10. The importance of provided personal data

In the majority of cases, when "Arsenal" JsCo processes your personal data, it is a mandatory requirement for the execution of formal powers and legal obligations. Not providing your personal data in these cases will hinder the possibility to take actions with regard to your requests.

With your consent we process personal data when you decide voluntarily to participate in any announced initiatives of the Company. In these cases, you shall have the right to, at any moment, withdraw your consent. The withdrawal of your consent leads to discontinuation of your participation in the respective initiative due to the inability to further process your personal data. In case the initiative involves receiving financial support and you have already received such support, we shall store your personal data in order to obtain the necessary, according to the rules of the initiative, financial reporting.

11. Personal data sources

The personal data processed by "Arsenal" JsCo are provided by the natural persons they refer to, as well as by other persons in the cases regulated by a legislative act, and these

data are contained in their requests, offers, claims, applications, and others, or in documents provided by public authorities.

12. Using “cookies”

We use cookies on our website in relation to its functioning, as well as to collect statistical data in order to perform an analysis, to which end we use Google Analytics. The cookies used serve to distinguish between different users and sessions, to define new sessions, to submit applications, to save the traffic source and the way in which the site was reached. With the appropriate setting of your browser, you can always turn off both our cookies and the cookies of third parties. In this case, it is possible to lose part of the functionality of certain services on our website.

In case you use a link, which redirects you to another website, this link will have its own cookies and confidentiality policy which are beyond our control.

13. Log files

The website of “Arsenal” JsCo collects data in log files. This information comprises your IP, browser used (such as Mozilla, IE, Chrome and others), operating system (Linux, Windows, iOS), when our website was visited, pages visited. A user’s IP address is used to reveal their identity only in the cases when this is necessary for law enforcement purposes. This information is stored on our web Hosting, which is located on the servers of SuperHosting.BG LTD.

14. Changes to the confidentiality policy

We herein reserve the right to make changes to our confidentiality policy.

Shall you have any questions concerning the processing of your personal data by “Arsenal” JsCo, please contact us on the following e-mail address: **admin_zld@arsenal-bg.com** or phone number: +359 431 57030.

I, the undersigned Romyana Kirilova Stoyanova in my capacity of official translator, hereby certify that the above instrument, consisting of 7 (seven) pages is a true and complete translation into English language of the attached official document – Confidentiality Policy, originally composed in Bulgarian language. **No. 00301-1** in the register of authorized translators.

Translator: Romyana Kirilova Stoyanova