

Terms of privacy of personal data

1. Introduction

1.1 Purpose of the document

The document is intended to provide mandatory information to the subject of the data in connection with ensuring transparency in the processing of personal data.

The provision of the notification to the subject of the data is made upon the time of the collection of the personal data or at the earliest opportunity and is free of charge.

1.2 Scope

The description includes what personal data is collected and how they are processed, to whom they are disclosed and transmitted, as well as the rights of the subject of the data.

1.3 Audience

The privacy notice is intended for subjects of data who appear in their capacity as customers and contractors of "WASTEELS-Bulgaria" EOOD.

1.4 Concepts and conventions used

"Company" refers to "WASTEELS -Bulgaria" EOOD

"You" refers to the subject of the data.

1.5 Grounds

Art. 13 and 14 of Regulation (EU) 2016/679

2. Information on the subjects of the data

"WASTEELS-Bulgaria" EOOD, in its capacity of personal data controller, meets the requirements of the General Data Protection Regulation (GDPR) - Regulation (EU) 2016/679.

2.1 Personal data administrator

Information for contact with "WASTEELS -Bulgaria" EOOD as administrator of personal data:

Name: "WASTEELS -Bulgaria" EOOD

UIC: 831246157

Address: Sofia 1612, 44 Acad. Ivan E. Geshov Blvd.

mail: GDPRsupport@wasteels.bg

Phone: +359886199322

Representative: Data Protection Officer

2.2 Categories of personal data

The categories of personal data that are processed by "WASTEELS -Bulgaria" EOOD are:

- Names
- Identification number (PIN /PNF)
- Date of birth
- Identity document
 - o Identity document number
 - o Date of issue and validity
 - o Copy of the document

- Communications
 - o Address
 - o Phone number
 - o Mail
- Travel insurance
- Professional identity
 - o Profession
 - o Specialty
 - o Place of work
 - o Membership in trade unions
- Bank account number
- Travel preferences and requirements.

“WASTEELS-Bulgaria” EOOD does not collect or process data that reveals racial or ethnic origin, political, religious or philosophical beliefs, membership in political parties or organizations, membership in associations with religious, philosophical, political or trade union goals, as well as data relating to health, sex life or the human genome.

2.3 Processing of personal data

The personal data are subjected by “WASTEELS-Bulgaria” EOOD to the following processing:

- Collection (from individual customers or receipt from another source)
- Storage
- Use
- Transfer to service providers
- Disclosure to a third party (professional organization, state institution, etc.)
- Destruction.

“WASTEELS-Bulgaria” EOOD does not perform automated decision-making when processing personal data.

2.4 Categories of subjects of data

This notification is valid for subjects of data who are individuals or employees and representatives of companies acting as clients and contractors of “WASTEELS-Bulgaria” EOOD.

A separate privacy notice is provided for the employees of the Company, who are also data subjects and “WASTEELS-Bulgaria” EOOD is a personal data administrator.

2.5 Legal basis for data processing

“WASTEELS-Bulgaria” EOOD processes the personal data of individuals legally - only if there is a legal basis for it.

2.5.1 Execution of a contract

Contract means any order/request for reservation for provision, as well as provision of services for the purposes of trips and events by “WASTEELS-Bulgaria” EOOD, namely:

- reservation of services for business trips (accommodation, transport, meetings, etc.)
- organizing events
- providing tickets
- making of insurance
- visa facilitation.

Legal basis for performance of a contract includes: preparation for the conclusion of a contract, performance of a contract and obligations of “WASTEELS-Bulgaria” EOOD after the performance of the service under the contract.

2.5.2 Consent of the subject of the data

The consent of the subject is required for the following processing:

- receiving information about the services provided by “WASTEELS-Bulgaria” EOOD, related to travel and events.
- transfer of Personal Data to a non-EU country with a lack of adequate level of personal data protection in order to be able to perform the service.

The subject of the data has the right to withdraw the consent, which can be exercised at any time after submitting a request to “WASTEELS-Bulgaria” EOOD.

It is the duty of the personal data controller to provide the necessary consent for the processing of Personal Data.

2.5.3 Legitimate interest of “WASTEELS-Bulgaria” EOOD

Upon realization of the services (travel, events, visas, tickets) and occurrence of obligations or claims to or between the data subject and the service provider and in order to protect the interest of “WASTEELS-Bulgaria” EOOD or a third party, personal data may be stored after the performance of the service.

2.5.4 Legal obligation of “WASTEELS-Bulgaria” EOOD

“WASTEELS-Bulgaria” EOOD processes personal data in order to comply with obligations arising from regulations. Such processing and personal data are related to:

- financial and accounting reporting
- records for management of personal data arising from the GDPR.

2.6 Disclosure of personal data to a third party

The personal data processed by “WASTEELS-Bulgaria” EOOD are disclosed only when necessary and in compliance with the legal requirements to:

- reservation systems
- service providers (accommodation, transport and other related main activities)
- professional organizations (BMA, BDA, BPU, BAHP)
- state institutions (NRA, NSSI).

“WASTEELS-Bulgaria” EOOD does not disclose personal data to other third parties, unless otherwise provided in a normative act or if the data subject does not give explicit consent to this. Exceptions are made in cases where information is:

- provided to lawyers, government or other law enforcement agencies to combat potential / actual breach of contract or illegal conduct
- required in court or in another legal manner
- required in order to prevent possible damage to persons or property.

2.7 Transfer of personal data to other countries

In certain cases, when performing the services, it is necessary to transfer personal data outside the territory of the Republic of Bulgaria. In these cases, “WASTEELS-Bulgaria” EOOD follows the approved list of countries providing an adequate level of personal data protection.

When transferring to a recipient in the US, it is checked whether he is registered in the "Privacy Shield" of personal data between the EU and the US.

If the provision of the service requires the transfer of personal data to countries outside the list approved by the EU, the following must be observed:

- the use of appropriate safeguards from the recipient and provided that there are applicable and effective remedies for the protection of individuals, such as
 - o binding corporate rules,
 - o standard contractual clauses approved by the European Commission,
 - o compliance with a code of conduct or a certification mechanism, together with the recipient's binding and enforceable commitments to apply appropriate safeguards to protect the transferred data;
- an explicit consent should be given to the Board of Directors for the proposed transfer, after having been provided with all the necessary information on the risks associated with the transfer.

2.8 Use of personal data

The personal data are used by "WASTEELS-Bulgaria" EOOD only for the purposes for which they are collected, namely:

- provision of services related to travel and events
- marketing of services related to travel and events.

2.9 Period of data storage

"WASTEELS-Bulgaria" EOOD will keep the personal data as long as it is necessary for the provision of the services and/or as long as a normative act requires it. Specific terms or criteria for storage of personal data are set out in the "Privacy Policy".

2.10 Rights of the subject of the data

The processing of personal data is in accordance with current legislation and the data subject has the right to:

- access the personal data being processed and obtain a copy of it
- correction in case of incompleteness or inaccuracy of personal data
- restricting the processing of personal data
- objection to the processing of personal data
- blocking the processing of personal data
- withdrawal of consent, if any
- portability of personal data
- deletion of personal data
- filing a complaint to the supervisory authority.

Information on a complaint to the supervisory authority (CPDP) can be found at:
<https://www.cpdp.bg/?p=pages&aid=6>

2.11 Obligations of the subject of the data to provide personal data

Each individual provides the necessary personal data to perform the service. Otherwise, its implementation by "WASTEELS-Bulgaria" EOOD may be denied, due to objective impossibility to perform it.