

INFORMATION ON PRIVACY AND PROTECTION OF PERSONAL DATA IN CONNECTION WITH SUBMISSION OF REPORTS ABOUT COMMITTED BREACHES

I. Categories of entities

STROYRENT EOOD, having UIC 131550089, with registered office and address of management: Bulgaria, City of Sofia, Poduyane district, Botevgradsko Shose Blvd. No. 273, acting in the capacity of Administrator of personal data (hereinafter the "**Administrator**") processes personal data in connection with the established process of submitting reports about committed breaches, including reasonable suspicions of actual or potential breaches under the Act on Protection of Persons, Reporting Information, or Publicly Disclosing Information about Breaches (Whistleblowers Protection Act) and Directive (EU) 2019/1937 of the European Parliament and the Council on the protection of individuals who submit reports about breaches of the Union Law, as in connection with the application of Regulation (EU) 2016/679 of the European Parliament and the Council on the protection of individuals in connection with the processing of personal data and the free movement of personal data (hereinafter: "**Regulation (EU) 2016/679**"), the Personal Data Protection Act and the applicable legislation:

The categories of entities whose personal data will be processed in connection with the process of submitting reports about committed breaches include:

- **Persons who submit a report**

The person who submit a report may include personal information (such as name, address for correspondence, place of residence, place of employment, department, job title, age, financial information etc.). Information provided by the submitter of a report may also contain special categories of personal data (such as a person's health information, biometric data, beliefs, sexuality, criminal convictions), which are not relevant for submission of reports regarding irregularities and such data should not be provided. In any case, STROYRENT EOOD will process this data only for purposes strictly related to and contributing to the verification of the authenticity of reports about irregularities or to the fulfillment of specific legal obligations. Reports may contain data on current, former or candidate employees of STROYRENT EOOD and external stakeholders, such as service providers, distributors и business partners.

- **Other persons who are related to or are entities of a submitted report**

Reports submitted may contain information about misconduct and information for other relevant persons (e.g. name, correspondence address, place of residence, place of employment, department, position, financial information, photos or other information), their behavior and circumstances as well as other personal information. Exceptionally, observations may contain special categories of personal data.

- **Responsible persons for reporting**

The person responsible for receiving, registering and reviewing the report receives the information contained in the report. These persons are employees specifically assigned to investigate the case. Their personal data (e.g. name, department, position, user name and registration data) is being processed.

II. Data categories

STROYRENT EOOD processes personal data collected directly from you or from third parties, which include but are not limited to personal data (respectively your name, address, phone number, as well as your email address; the name of the person against whom the report is submitted, and its workplace, if the report is submitted against specific persons and they are known; signiture, etc.) according to the rules of data minimization and if strictly necessary. Only the personal data necessary to fill out the form for registering the report will be processed. If special categories of personal data (respectively data that is subject to disclosure, such as racial or ethnic origin, political views, religious or philosophical aspects, membership of trade unions and data related to health or sex life and data of a criminal record) are not relevant for submission on reports of irregularity, such data should not be submitted. In any case,

STROYRENT EOOD will process this data only for a purpose strictly related to the verification of the authenticity of the reported irregularities or the fulfillment of specific legal obligations.

III. Purposes of processing data

STROYRENT EOOD will process personal data of the entities for the purposes of reception, registration and review of the submitted reports about committed breaches, including the investigation and verification of the actual or alleged breach as well as for taking the necessary measures in the execution of this process.

IV. Basis for processing

In the context of the purpose stated above, STROYRENT EOOD processes personal data in accordance with the imputed legal obligations. In this case, the legal basis of processing of personal data is a legal obligation, which is contained in: Whistleblowers Protection Act, Anti-Money Laundering Measures Act, Directive (EU) 2019/1937 of the European Parliament and the Council from 23 October 2019 regarding the protection of persons who submit reports about breaches of EU law, which requires STROYRENT EOOD to establish an appropriate policy and procedure for reporting breaches within the organization itself.

In addition, the processing of personal data relating to the entities of observation, the submitters of the reports and the responsible persons, is based on the legitimate interest of STROYRENT EOOD as an administrator of personal data to prevent, detect, investigate and deal with wrongdoing.

V. Terms of storage of personal data

The data and the received reports are stored no longer than 5(five) years after the end of each investigation of submitted report. Longer storage periods may be required due to mandatory legal provisions arising from, for example, criminal proceedings, legal claims, etc. If the report is unfounded or follow-up actions are not required, the storage period is 60 (sixty) days.

VI. Provision of the data

STROYRENT EOOD may provide the relevant competent authority or institution with personal data of reporting individual, in accordance with Regulation (EU) 2016/679, Directive (EU) 2019/1937 and current Bulgarian legislation, if during the inspection it is found out that the reporting individual has provided an information of essential importance and in connection with that there is a reasonable assumption that a crime or other breach of the law has been committed, or that damage or other violation has been caused.

VII. Rights of the data entities

The individual who submitted the report, respectively the individual to whom the report relates, has the right:

- to receive confirmation from the Administrator as to whether the processed personal data is related to him/her and if so, to be provided with access to the personal data.
- to request from the Administrator to make corrections of personal data;
- to ask the Administrator to limit the processing of personal data under the circumstances specified in Article 18 of Regulation (EU) 2016/679;
- to request deletion of his/her personal data processed by the Administrator;

- to object to the processing of his/her personal data under the circumstances specified in Article 21 of Regulation (EU) 2016/679. These rights may be limited under certain circumstances, according to Regulation (EU) 2016/679.

Before complying with any of the data entity's requirements, STROYRENT EOOD needs to investigate this request to determine exactly what information or data processing it relates to. STROYRENT EOOD must inform the data entity about the actions taken in connection with the request for exercising rights no later than one month from the date of its submission. If necessary, this period can be extended by another two months, taking into account the complexity of the request. In case of reasonable doubt about the identity of the data entity who submitted the request for the exercise of rights, the Administrator has the right to request additional information to confirm his/her identity. If STROYRENT EOOD is unable to find out the identity of the data entity who submitted the request to exercise rights, STROYRENT EOOD has the right not to satisfy it. The administrator has the right to charge fees when requests to exercise rights are manifestly untenable or excessive, according to Regulation (EU) 2016/679.

VIII. Administrator for the protection of personal data

I am informed that the addresses for correspondence with STROYRENT EOOD regarding the processing and storage of personal data are:

Bulgaria, City of Sofia, Poduyane district, postal code 1839, Botevgradsko shoes Blvd 273,

E-mail: dpo@stroyrent.bg

Phone – 0700-1-9988

More information about the processing and storage of personal data by STROYRENT EOOD and you as an entity of personal data can be found in the Privacy Policy of STROYRENT EOOD at <https://stroyrent.bg/en/privacy/40>.