

# Privacy Policy

*This Privacy Policy describes the type of personal data which FICOSOTA, in its capacity as a controller, collects about you, the purposes, reasons and methods for their processing, the cases in which sharing of personal data with third parties is possible, as well as your rights regarding processing of your personal data.*

*The policy also describes the measures of personal data protection, which are being taken. This policy has been developed based on the principles laid down in Regulation (EU) 2016/679 – the General Data Protection Regulation.*

## Basic concepts

**"Personal data"**, within the context of this policy, shall mean any information through which a natural person could be identified, including information which can be protected pursuant to the applicable national and European legislation.

**"Sensitive personal data"** are the data revealing racial or ethnic background, political opinions, religious or philosophical beliefs, or trade union membership, and the processing of genetic data, biometric data, only for the purposes of identifying a natural person, data concerning health or data concerning a natural person's sex life or sexual orientation.

**"Controller"**, within the context of this policy, shall mean a legal person, which on its own or together with other persons sets the purposes and means for processing personal data.

**"Processor"** shall mean a natural or legal person, public authority, agency or other organization which processes personal data on behalf of the controller;

**"Third party"** shall mean a natural or legal person, public authority, agency or body other than the data subject, controller, processor and the persons who, under the direct guidance of the controller or processor, are entitled to process personal data;

**"Processing of personal data"** of a Customer is each operation involving a Customer's data, including the collecting, recording, structuring, storing, altering, using, disclosing a Customer's information, carrying out verifications, using, forwarding, connecting, closing, deleting or destroying customer data or several of the above operations, irrespective of the way they are performed or the means used for their performance.

**"Data Subject"** shall mean a natural person who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, psychic, mental, economic, cultural or social identity of that natural person;

**"Personal data breach"** shall mean an action/ circumstance in breach of security, which leads to accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, personal data transmitted, stored or otherwise processed;

## **What are the personal data we process?**

The personal data usually collected and processed through a registration in relation to participation in our games and raffles are the following:

- Given name and surname
- Telephone
- Email
- Delivery address – only for those who have won

## **What is the reason for processing your personal data?**

- Your unambiguous consent to our processing of your personal data, expressed through voluntary completion of a registration form for participation in the game/ raffle/ product campaign.
- Our legitimate interest in identifying and exercising our rights in relation to any potential dispute with you or dispute, which has already begun, and in sharing the data with software companies, for the purpose of website supporting.
- Fulfilment of a legal obligation

FICOSOTA protects the collected personal data from unreasoned use and sees to their processing.

## **What are the purposes of using your data?**

We need your personal data in order to be able to:

- Register your for participation in the games/ raffles/product campaigns and send you an individual participation code, generated specially for the game;
- Get in touch with you to inform you that you have won;
- Send you the prize if you are one of the winners;
- Publish your name and your individual participation code on our website and Facebook account, for the purpose of announcing the winners and ensuring transparency and equality for all participants.

The personal data which we collect from you will be used only for the purposes stated as reason for collection.

We would also like to improve the service we provide to you by receiving information on your part. To help us fulfil this goal, when logging onto our website, you will be asked to grant or refuse to grant your consent to store cookies on your device. Detailed information is provided in our Cookies policy.

## **Who has access to your information?**

FICOSOTA respects and protects the privacy of your personal data. In order to comply with the legal requirements FICOSOTA may disclose your personal data to the following parties:

The third parties, with whom we might share your information are:

- Software companies in charge of the website support and/or its separate features.
- Outside consultants, with regard to identifying or exercising rights.
- **Marketing agencies**
- Providers of courier services
- State or municipal authorities or other public bodies, which may receive information based on their statutory powers to require and receive such information, as well as other state bodies in the cases provided for in law, in relation to fulfilment of any legal obligations or with regard to any court proceedings.

## **For what period do we store your personal data?**

Your personal data will be stored for the period necessary for achievement of the above purposes. Nevertheless, in case of a legal or other type of dispute, we might store your personal data for a period of 5 years after a request has been made.

Detailed information concerning the period of storage is provided in the Policy for documents storage and destruction.

## **The rights you have regarding your personal data**

You have control over your personal data, which you share with us.

You may exercise the following rights pertaining to the personal data processed by FICOSOTA:

- to access your personal data which FICOSOTA processes and receive a copy thereof;
- have your personal data rectified in case of inaccuracy or incompleteness;
- to request erasure of your data, whenever the relevant conditions exist;
- to request restriction of your personal data processing in the cases provided by law;
- to object to the processing of your personal data in the cases provided by law;
- to exercise your right to data portability and to request that your data be provided in a structured, commonly used and machine-readable format;
- where processing is based on your consent, to withdraw your consent at all times, without having to pay any fees
- to file a complaint to the Commission for Personal Data Protection
- to withdraw your consent where the processing of your personal data is consent-based.

We do our best to keep your data up-to-date. Nevertheless, if you notice any inaccurate data or other irregularities, you may rectify, update, change, delete or exercise any other right of yours by reaching us on [privacy@ficosota.com](mailto:privacy@ficosota.com). We will respond to your request as soon as possible, usually within 30 days of its receipt. For more information concerning our Data Subjects Rights Policy click here ([an active link](#)).

You are also entitled to file a complaint to the Commission for Personal Data Protection if the relevant prerequisites therefor exist.

## **How do we protect your personal data?**

Your data security is important for us. Whenever you provide your data to us, we will take all necessary measures and will make all-out efforts to ensure that your data are processed securely in our systems.

FICOSOTA maintains appropriate administrative, technical and organisational measures, designed to ensure the security and privacy of the personal data of website users and prevent their accidental or unlawful destruction, accidental loss, unauthorised rectification, disclosure or access, misuse and any other illegal form of processing. FICOSOTA maintains reliable computer systems used for the personal data processing. Adequate control mechanisms for data separation and data management are employed in our systems.

For the purpose of fulfilling its obligations to protect your personal data FICOSOTA duly takes into account the technological advances made.

We provide training to our employees regarding the policies and procedures for personal data protection, in order to facilitate information storage and restriction of the access to your personal data, only to those of our employees who need such access in order to fulfil their duties.

We have adopted procedures for effective establishing, reporting and investigating personal data breaches. In case of personal data breach the Company will take immediate measures to limit the effect of the breach and to inform the affected data subjects and the regulatory body in charge of personal data protection.

### **Changes to this policy**

The last time we updated this policy was on 25/06/2018. In case of subsequent changes we will timely publish information thereof on our website.

### **How to contact us?**

If this policy does not provide the answers to all your questions or if you have another request, please contact us directly. You may contact us at the following address:

For FICOSOTA: Bulgaria, the town of Shumen 10, Trakiyska Str., email: [privacy@ficosota.com](mailto:privacy@ficosota.com)

You may contact our data protection officer at: [dpo@ficosota.com](mailto:dpo@ficosota.com)