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1.	Organization's Data:	
1.01	Company name	UNIQA Software-Service Bulgaria EOOD
1.02	UIC	175359908
1.03	Managing director	Elina Pavlova
1.04	Head office and registered office address of the company	Kamenitza Office Park, Bul. Iztochen 59, Plovdiv, 4000, Bulgaria
1.05	Correspondence address	Kamenitza Office Park, Bul. Iztochen 59, Plovdiv, 4000, Bulgaria
1.06	Website	https://uss.bg
2	Data Protection Officer (DPO):	
2.01	Name, surname of the DPO	Radmil Pandev
2.02	Work phone number	(+359) 884 910062
2.03	Mobile phone number	(+359) 884 910062
2.04	Email address	radmil.pandev@uss.bg

PRIVACY POLICY

In accordance with Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (General Data Protection Regulation) and the applicable national legislation

I. INTRODUCTION

This policy aims to clarify why and how we process your personal data. Our policy fully complies with the requirements of Regulation (EU) 2016/679 of the European Parliament and of the Council regarding the protection of natural persons with regard to the processing of personal data and on the free movement of such data, repealing Directive 95/46/EC (General Data Protection Regulation). It provides detailed information on the rights of data subjects and the principles of data protection that we adopt in their processing.

II. DATA CONTROLLER

UNIQA Software-Service Bulgaria EOOD, referred to hereinafter as USS
UIC 175359908

Kamenitza Office Park, Bul. Iztochen 59, Plovdiv, 4000, Bulgaria;
represented by Elina Pavlova

Contact Information for the Data Controller regarding personal data:

Data Protection Officer (DPO):


Name: Radmil Pandev

Correspondence address: Kamenitza Office Park, Bul. Iztochen 59, Plovdiv, 4000, Bulgaria

Email address: radmil.pandev@uss.bg

Work phone number: (+359) 884 910062

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DPO:	Radmil Pandev	(+359) 884 910062

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III. INFORMATION ABOUT THE SUPERVISORY AUTHORITY

The Commission for Personal Data Protection (CPDP)

Address: 2 Prof. Tsvetan Lazarov Blvd., Sofia, 1592, Bulgaria

Phone number: 02/91-53-518 ;

Email address: kzld@cpdp.bg

IV. PURPOSES AND SCOPE OF THE POLICY

This policy aims to explain why and how we process your personal data. We provide information about the personal data we process, how we process it, the purposes of processing, the principles, legal grounds, our obligations, and your rights. We also outline the technical and organizational measures we take to ensure adequate protection of your data.

V. DEFINITIONS

‘Personal data’ means any information relating to an identified or identifiable natural person (‘data subject’); an identifiable natural person is one 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, mental, economic, cultural or social identity of that natural person;


‘Processing’ means any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction;

‘Controller’ means the natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of personal data; where the purposes and means of such processing are determined by Union or Member State law, the controller or the specific criteria for its nomination may be provided for by Union or Member State law;

‘Consent’ of the data subject means any freely given, specific, informed and unambiguous indication of the data subject's wishes by which he or she, by a statement or by a clear affirmative action, signifies agreement to the processing of personal data relating to him or her;

‘Recipient’ means a natural or legal person, public authority, agency or another body, to which the personal data are disclosed, whether a third party or not. However, public authorities which may receive personal data in the framework of a particular inquiry in accordance with Union or Member State law shall not be regarded as recipients; the processing of those data by those public authorities shall be in compliance with the applicable data protection rules according to the purposes of the processing;

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‘third party’ means a natural or legal person, public authority, agency or body other than the data subject, controller, processor and persons who, under the direct authority of the controller or processor, are authorised to process personal data;

VI. PRINCIPLES RELATING TO PROCESSING OF PERSONAL DATA

USS has adopted the following principles for processing personal data:

- lawfulness, fairness and transparency
- purpose limitation / for specified, explicit and legitimate purposes/.
- data minimisation.
- keep data accurate and up to date.
- storage limitation for no longer than is necessary for the purposes for which the personal data are processed
- integrity and confidentiality ensuring appropriate security of the personal data

VII. PURPOSES FOR WHICH WE PROCESS THE DATA


To carry out our core activities and fulfill our obligations as an employer, we require certain data. Without this data, we do not have a basis to engage with you. These are the details necessary for us to perform the following activities:

- Organization management
- Financial and accounting activities
- Human Resources management
- Hardware consulting
- Software consulting
- Data processing
- Business and management consulting
- Information and software services
- Delivery, servicing, and development of software products

USS processes personal data for the following purposes:

- Identifying a client or supplier for:
 - Entering into a new or modifying an existing contract, including informal agreements, for the purposes of the company's core activities.
 - Regulatory obligation of the controller to provide this data to government bodies and institutions.
 - Payments via bank transfer or cash between the company and the data subject.
 - Updating your personal data upon your request for correction/change of data.
 - Sending a courier package.
 - Conducting correspondence and collecting receivables through extrajudicial or judicial means.
- Identifying individuals for the purpose of recruiting personnel or hiring under labor relations in:

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- Entering into a new or modifying an employment contract for the purposes of employment relations.
- Regulatory obligation of the controller to provide this data to government bodies and institutions.
- Regulatory obligation of the controller to provide this data to third parties.
- Payment of wages in cash or by bank transfer, including deductions and transfers to judicial executors.
- Updating your data upon your request for correction or change of data.
- Conducting correspondence and conducting extrajudicial and judicial proceedings.

VIII. LAWFULNESS OF PROCESSING

USS processes your data only if and to the extent that at least one of the following applies:

- the data subject has given consent to the processing of his or her personal data for one or more specific purposes.
- processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract.
- processing is necessary for compliance with a legal obligation.
- processing is necessary in order to protect the vital interests of the data subject or for the performance of a task carried out in the public interest.
- processing is necessary for the purposes of the legitimate interests pursued by the controller.

IX. DATA WE COLLECT AND PROCESS


USS collects and processes personal data, including:

- Personal data directly collected from data subjects, such as when a data subject contacts the controller via email, phone, mail, or when a user registers on a form on the website.
- Personal data provided by third parties.
- Personal data collected from public records.

Based on the specific purposes and grounds, USS processes the following categories of personal data:

- Physical identity - names, personal identification number, data from an identity document, address, phone number, email address, image, sick leave certificate, decision of the Medical Expert Commission, etc.
- Social identity - marital status, data about children, education, document for acquired education, professional history, professional qualification, for acquired professional competence, for proficiency in foreign languages, etc., labor contract number, position.

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- Personal data regarding judicial past
- Economic identity – labor remuneration, banking information, participation in commercial companies, size of shareholding, partners, information related to insurance products, other information in case of damage and in relation to claims.

The company may process different parts of the mentioned data of the person for various purposes. Data on legal representatives are also collected, as well as contact persons in order to establish communication with the data subjects. Some of the personal data are collected personally from the data subject, while others are collected by the company independently from publicly accessible registers and information sources. Regarding the personal data processed in the software developed and maintained by the company, the focus of the data processing is not on the content of the personal data, but on the technical preparation and the primary processing of the data for this purpose. In almost all cases, anonymized data are used to protect personal information. Anonymization is a data processing technique in which information that allows personal identification is removed or altered; as a result, anonymized data are obtained, which cannot be linked to a specific person, but can be used in connection with the development and maintenance of services. However, in some cases, certain employees may have access to a real database, for which the appropriate authorizations are given, and strict accountability of the activities and the people who have had access is maintained.


X. RETENTION PERIOD OF YOUR PERSONAL DATA

The company stores personal data on paper and/or technical data carriers. Databases are maintained in various software applications protected with strictly limited access.

The storage period of your personal data depends on the processing purposes for which they were collected:

- Personal data processed for the purpose of concluding/modifying and performing a contract are stored for the duration of the contract and until the final settlement of all financial relations between the parties. When processed for the purpose of issuing accounting/financial documents for tax-insurance control, which qualify as documents for tax control, audit, and subsequent financial inspections, they are stored for 10 years after the expiry of the accounting period following the period to which the data relate, according to the Accountancy Act or for a longer period if applicable legislation provides for it.
- Personal data processed for the purposes of concluding, implementing, amending and terminating employment relationships are stored for the duration of the employment relationship and the final settlement of all financial relationships between the parties and for a period of 50 years after the termination of the legal relationship, when they are part of payroll sheets, employment contracts (appointment orders), reassignment orders, orders for unpaid leave over 30 working days, orders for termination of employment relationships, employment records, and other documents establishing insurance experience and income of persons who have worked in the enterprise.

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- Personal data of job applicants are stored for a period not longer than 6 months from the moment of final completion of the recruitment procedure.

XI. METHOD OF PROCESSING AND CATEGORIES OF THIRD PARTIES RECEIVING AND PROCESSING YOUR PERSONAL DATA:

USS fulfills its obligations according to the applicable personal data protection legislation by:

- storing personal data kept up to date;
- storing and destructing them securely;
- not collecting or retaining excessive amounts of data;
- Protecting personal data from loss, misuse, unauthorized access and disclosure, and ensuring that appropriate technical measures are taken to protect personal data.

We take the necessary technical and organizational measures to ensure the protection of your personal data against accidental or unlawful destruction or loss, alteration, unauthorized disclosure or access, especially, but not only, when processing involves data transfer over a network, as well as against all other illegal forms of processing.

In this regard USS uses data access at different levels, ensuring that only an authorized person can access the data, and that such person needs to know these data to fulfill their obligations related to their work.


We pay special attention to the secure transfer of personal and financial data. These data are transferred through encrypted channels. The principles of data protection are detailed and supplemented in documents: USS.3.02.Internal rules for data protection and USS.6.01 Information Security Policy.

Recipients of personal data, who may have access to them, are as follows:

- Companies from the Uniqa group;
- Personal data processors who, based on a contract with USS, process your personal data on behalf of the company or have direct/indirect access to your personal data.
- Logistic/courier companies for the fulfillment of our contractual obligations for the delivery of goods or services.
- Persons authorised to support the equipment and software, processing personal data under the direct authority of USS;
- Banks serving our payments.
- Persons providing consultancy services in various fields;
- Competent authorities authorized by law who have the power to require the company to provide information, including personal data, such as - Bulgarian court or court of another country, various supervisory/regulatory authorities - Consumer Protection Commission, General labour inspectorate, authorities with powers for national security and public order protection;

Your personal data may be disclosed by the company, based on law, in connection with corporate restructuring, sale, transfer of assets, merger or another form of transformation, or other form of change in the corporate or financial structure of the company or related legal entities.

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Personal data of the individual may also be disclosed to protect the vital interests of the data subject, the legitimate interests of the controller, provided that the interests or the fundamental rights and freedoms of the data subject are not overriding, taking into consideration the reasonable expectations of data subjects based on their relationship with the controller or when it is necessary for the company to comply with applicable law or fulfill its legal obligations or respond to requests or questions from competent supervisory authorities.

The company ensures and maintains appropriate technical and organizational measures to protect the personal data of individuals against unauthorized access or unlawful use and/or against their accidental loss, alteration, disclosure, access and/or damage or copying. These measures aim to ensure continuous protection and privacy of personal data. The company makes regular assessment of these measures to achieve constant security of your personal data.

XII. YOUR RIGHTS


As our client, supplier, or employee you have the following rights as data subject:

- To access your personal data and information of the type we have included in this Policy. You may request information whether, for what purposes, and on what basis we process your personal data;
- To request rectification, erasure or restriction of processing of your personal data;
- To withdraw consent on which the processing is based, where there is no other legal ground for the processing of your personal data;
- To object to the processing of your personal data;
- To receive the personal data concerning you, which you have provided to a controller, in a structured, commonly used and machine-readable format and have the right to transmit those data to another controller (data portability)
- Not to be subject to a decision based solely on automated processing, including profiling.
- To lodge a complaint with a supervisory authority - Commission for Personal Data Protection, Address: Boulevard "Professor Tsvetan Lazarov" 2, 1784 Sofia, phone. 02/91-53-518 ; email: kzld@cpdp.bg as well as to seek a judicial remedy of your rights.
- To be informed about the actions taken regarding your request without undue delay and in any event within one month of receipt of the request;

The order for exercising the right of access, the right of erasure, rectification or restriction of processing is through the submission of a written request to the controller in a special form. The controller provides information on action taken on a request to the data subject without undue delay and in any event within one month of receipt of the request. That period may be extended by two further months where necessary, taking into account the complexity and number of the requests.

In case of a significant change in the way USS processes your personal data and/or in the types of personal data it processes, the company will notify you of the relevant change

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immediately personally or on the website.

Last change date: 04.10.2023

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