

## Privacy Policy

**Introduction.** Bulgarian Energy Trading Platform AD (BETP) makes all necessary efforts to protect your personal data. Data protection and information security form integral part of BETP's policy.

BETP carries out its operations in conformity with the laws and regulations in the area of personal data protection, including 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), with respect to any access to our website and any communication with us.

BETP observes the following principles, when processing personal data:

- lawfulness, fairness and transparency;
  - limitation and relevance of the purposes of processing;
  - accuracy and currency of the data;
  - storage limitation with view of the fulfilment of the purposes;
  - integrity and confidentiality of the processing;
- ensuring reliable data protection.

This Privacy Policy contains information regarding: the type of personal data that we collect

- the purpose of such collection
- the period of storing the personal data provided
- sharing the personal data provided
- notification of any changes to the Privacy Policy
- rights, regarding the personal data provided
- measures for fulfilment ensuring the personal data protection

„**Personal data**“ means any information relating to an identified or identifiable natural person.

The types of personal data that we collect about you are necessary to provide you with access to our web page, to provide you with our services, for your communication with us, as well as to improve our services.

The personal data may include your Personal Identity Number, telephone number, mailing and/or email address, banking and accounting information, required for the purposes of payment, invoicing and

accounting. Data, required to create a user account, user name, password etc, related to the using of a personal account on Company's electronic platform and the software products used, facilitating the relevant activities, including information, regarding the IP address, browser, computer system, etc., required for accessing BETP's web page, in case of using third-party cookies, collecting information on the use of our website, etc.

**Purposes, for which we collect personal data:**

- individualization of a party to the agreement and the contact persons for its implementation;
- creating an account for access and a user name;
- ensuring the performance of the agreement for the provision of the respective service or product, including sending short messages (sms) or emails, forming part of the functionality of the service that you are using, etc.;
- providing technical support and training in working with the software products, used for BETP's operations;
- accounting purposes;
- marketing and statistical purposes – sending information messages, including messages of advertising and promotional nature;

**Storage period of the personal data**

BETP stores your personal data only for a period, required for the fulfilment of the purposes, for which these are processed. When determining the appropriate storage period, both the legal requirements and the nature of the personal data and the respective purposes of processing are taken into consideration. BETP shall erase or otherwise securely destroy your personal data, after the need for their storage disappears.

**Sharing personal data for processing**

BETP does not disclose your personal data without your express consent, to any third parties, unless this is required for fulfilling obligations towards you or in compliance with a legal requirement.

BETP may share your fulfilment personal data with service providers and third-parties – data processors, involved in the supporting of our software products, mobile apps, technical processing of the data and storage and other related services.

BETP may share your personal data with partners, with respect to the provision of a specific service and in compliance with legal requirements.

BETP guarantees that in any case of sharing your personal data with any third parties, all necessary measures for the proper protection of your personal data shall be taken, by including appropriate contractual clauses and guarantees with respect to the parties, to whom such personal data is disclosed.

When your express consent is required for disclosing personal data, BETP shall inform you in advance and request your consent. In any case, you reserve your right not to take part in the sharing of data.

### **Amendments to the Privacy Policy**

BETP may amend and supplement this Privacy Policy at any time, strictly observing the requirements of the applicable legislation in the area of personal data protection.

BETP shall notify any and all amendments of the Privacy Policy, expressly specifying the effective date of such amendments.

Your rights regarding the personal data provided.

You are entitled to exercise the following rights with respect to your personal data, collected and processed by our Company:

**right of access and change** – to request information, regarding the types of personal data stored, regarding you, as well as to request the rectification of the personal data and/or supplementing incomplete personal data, stored about you.

**right of restriction** – to request the restriction of the processing of your personal data, where the accuracy of the personal data or the lawfulness of their processing is contested by you, where such personal data are not necessary for the purposes, for which they are collected.

**right to data portability** – to request the provision of your personal data in a suitable electronic form or their transfer to another person of your choice, if this is technically feasible.

**right to be forgotten** – to request the erasure of your personal data in certain cases, when these are no longer necessary in relation to the purposes for which they were collected or otherwise processed. If you have withdrawn your consent on which the processing is based. In case of a legal obligation to do so.

**right to object** – to object to the processing of your personal data, including in case of processing of your personal data for direct marketing purposes;

**automated processing** – you have the right not to be subject to a decision based solely on automated processing, including profiling, which produces legal effects significantly affecting your interests.

**right to Notification** – to be notified as soon as practicable of any data breach and the measures that have been or will be undertaken in such cases.

**right to complain** – to file a complaint with the competent data protection authorities.

If you decide to exercise any of the aforesaid rights, please contact us, submitting a free-form request at: 25, Hristo Smirnenski Blvd, Lozenets District, Sofia or by email at: [office@betp.bg](mailto:office@betp.bg).

Should you have any doubts, as to the method of storage and processing of your personal data, you can contact BETP's data protection officer.

### **Personal Data Protection Measures**

BETP applies security procedures, when storing your personal data and for their protection against unauthorized access, accidental loss, destruction or damage. The security of your personal data is among our Company's key priorities.

BETP implements organizational, physical, IT and other necessary measures, to ensure the security and protection of your personal data and monitor the process of personal data processing. The access of BETP's employees to the personal data and personal data processing is restricted, depending on the relevant data collection and processing purposes.

The control authority, responsible for the monitoring of the observation of this this Privacy Policy is the Commission for Personal Data Protection, address: 2, Tsvetan Lazarov Blvd, 1592 Sofia, telephone No. 02/91-53-518, email: [kzld@cpdp.bg](mailto:kzld@cpdp.bg), This Privacy Policy has become effective on 17.03.2021.