



**GENERAL TRANSPARENCY NOTICE
ON PERSONAL DATA PROCESSING
AT BULGARIAN ENERGY HOLDING EAD**

1. Data controller

BULGARIAN ENERGY HOLDING EAD, UIC 831373560, having its seat and registered address in the city of Sofia, 1000, 16 Veslets Street,(hereinafter referred to in this transparency notice as **BEH** or **the Company**), if required, processes personal data of natural persons (data subject categories) in the course of the Company's operations.

To the extent that BEH sets the purposes and means of personal data processing, the Company is a data controller and as such it complies with the rules and requirements of Bulgarian and European personal data protection legislation.

On this General transparency notice

- 1.1 This General transparency notice on personal data processing of Bulgarian Energy Holding EAD (**Transparency notice** or the **Notice**) aims at providing clear and transparent information to natural persons (data subjects) on how and why BEH processes their personal data, what purposes their personal data are processed for as well as whom their personal data are provided to in the cases stipulated by the law or in compliance with BEH's legal interests.
- 1.2 The Transparency notice supplements and does not replace the other internal deeds and notices adopted by BEH on personal data processing and protection. BEH has published the transparency notices on personal data processing of job applicants; of persons who have sent corruption signals or signals of general nature and on relations and exchange of information with investors (investor relations) on the website of the Company-<https://www.bgenh.com>- in the specially dedicated sections, in accordance with the transparency requirements, at an accessible and easily visible place.
- 1.3 BEH aims at securing the lawful, transparent and secure processing of your personal data in compliance with the requirements of applicable Bulgarian and European personal data protection legislation, the technical and organizational measures for data protection adopted by the Company, including but not limited to, providing transparent, complete and easily accessible information on the personal data processed by BEH.
- 1.4 This Transparency notice in no way restricts or negatively affects your rights related to your personal data being processed by BEH. The Notice aims only at providing you information which guarantees that your data are processed in a transparent and fair manner.

- 1.5 This Notice is published and freely available in the specially dedicated part of the website of BEH: <http://www.bgenh.com>. The Notice may be amended and/or supplemented at any time by BEH, if required or in the event of a change in the circumstances declared therein. Should you need further information and/or you have any questions on processing of your personal data, you may contact the Company using the contact details below.

The Company will assist you and respond to your inquiries and requests without undue delay.

2. What personal data does EAD process

- 2.1 BEH processes the personal data provided by you in its capacity of a data controller. The Company collects and processes personal data in compliance with the principles for personal data processing stipulated in the General Data Protection Regulation, in particular, BEH processes personal data in compliance with the 'data minimization' principle, i.e the personal data which BEH collects and processes are relevant, related to and limited to what is required in connection with the purposes for which they are processed.
- 2.2 The personal data categories which BEH processes are determined by the purposes for which personal data are processed. Depending on the natural person categories (data subjects), personal data may differ and in some cases provided for by the law, the Company is obliged to process a certain personal data category.
- 2.3 Depending on the purposes of personal data processing and the legal basis for their processing as well as depending on the natural person categories (data subjects) whose personal data are processed, e.g.(i) contractual parties (legal representatives, proxies, employees); (ii) current and former employees of the Company; (iii) job applicants in the Company; (iv) persons who have sent signals to the Company; (v) visitors to the premises of the Company and other natural/legal persons, BEH can process personal data related to your physical, physiological, economic, social or other type of identity such as:
- 2.3.1 Names, national identification (PIN, foreign national personal number), date of birth;
- 2.3.2 Contact details- address (permanent/company), phone number: (personal/company), e-mail;
- 2.3.3 ID document data (to the extent it is required to achieve the purposes of processing);
- 2.3.4 Data on education, work experience, professional qualification and expertise;
- 2.3.5 Data on job title and place of work.
- 2.3.6 Other data provided by you in view of your particular situation.

3. Purposes of processing your personal data

The purposes of personal data processing are related to the operations of BEH; its capacity of a holding company and a sole owner of the capital of a group of companies performing operations in the energy sector; management and administration of the human resources of the Company; interaction of the Company with state bodies and institutions, other legal and natural persons.

Depending on the relations established between you and BEH, the purposes of processing your personal data may be for example:

- Management and administration of the human resources of the Company, including job applicants;
- Management and administration of the relations between BEH and its contractual parties;
- Handling signals, complaints and inquiries of natural and legal persons addressed to BEH;
- Management and administration of contacts and relations with investors and other stakeholders;
- Internal audits and inspections in the companies within the holding group of BEH;
- Financial and accounting purposes;
- Protection of the property and assets of BEH and the companies within the holding group of BEH;
- Exercising your rights stipulated in the personal data protection legislation.

Please note that the specific purposes of personal data processing are listed in the respective transparency notices available on the website of BEH.

4. Legal basis (conditions) for personal data processing

Depending on the purposes of processing your personal data, there being or not a regulatory obligation to process your personal data, there being a legal interest of BEH to process personal data and/or other specific circumstances related to your specific situation with respect to BEH, the Company can process your personal data if there is at least one of the following legal bases stipulated in the General Data Protection Regulation:

- ✓ For compliance with regulatory obligations of BEH for which your personal data need to be processed;
- ✓ If you have agreed personal data related to you to be processed (when no other legal basis to process your personal data by BEH is applicable);
- ✓ To take actions required to conclude an agreement with you or in performance of a contract concluded;

- ✓ For the legal interests of the Company or a third party, except where the interests or the main rights and freedoms of the natural person (the data subject) prevail over these interests;
- ✓ For protection of your vital interests;
- ✓ Processing is required to perform a task of public interest or when exercising official powers conferred to BEH (to the extent applicable and relevant to the operations of the Company);
- ✓ Processing is required to establish, make or protect legal claims, regardless whether in court, administrative or other out-of-court procedure.

5. Period for storing your personal data

- 5.1 BEH will store and process your personal data only for the period required to achieve the purposes of processing personal data referred to above or in compliance with a regulatory obligation. BEH processes and stores your personal data only for the period required to achieve the purposes of processing personal data referred to above ('storage limitation principle').
- 5.2 Your personal data will be stored for a limited period of time which is determined by (i) there being a legal basis to store your personal data in such a way; (ii) there being a regulatory minimum period for storage of a certain personal data category, (iii) achieving the purposes in view of which your personal data are processed, (iv) the legal interests of the Company to the extent such storage of your personal data does not affect your rights and interests for protection of your personal data.
- 5.3 When there is no longer a basis to process your personal data, upon expiry of the regulatory minimum period for storage of personal data, after achieving the purposes of processing your personal data and/or there being another circumstance which makes storage of your personal data unnecessary, BEH will take the actions and measures required to erase or destroy your personal data (depending on where your personal data have been stored- hard copy and/or electronic copy).

6. Who your personal data will or may be disclosed to

- 6.1 In connection with achieving the purposes referred to above, your personal data may be disclosed to a certain category of recipients but in strict compliance with the requirements of the personal data protection legislation and to the extent this is required to achieve these purposes.
- 6.2 BEH does not disclose and provide your personal data which it processes to other natural or legal persons (data recipients) without there being legal basis and a need for this.
- 6.3 Depending on the particular relations established between you and BEH, on the occasion of and under which your personal data processing is required, your personal data may be disclosed to the following categories of recipients:
 - Employees of BEH- Your personal data are disclosed to employees of BEH in compliance with the 'need to know' principle and to the extent this is required to perform their duties and the operations of the Company.

- State bodies, institutions, agencies and other administrative bodies, when this has been stipulated in a law or a regulation or when an approval, authorization or another type of sanction by such a body/ies is required and within the specific operations performed by BEH and the holding group;
- Suppliers of services, professional advisors and other contractual parties of BEH (if and to the extent it is applicable in the particular case, for example suppliers of IT, hardware maintenance, hosting or the website of BEH, provision of legal, financial and other type of advice);
- To other persons or bodies when this is stipulated in a law or a regulation or when required in view of the specific operations BEH performs in the energy sector.

6.4 BEH will provide (disclose) your personal data to the personal data recipients referred to above only when required and to the extent it is required in view of achieving the purposes of personal data processing, in compliance with a regulation or an internal deed of the Company without affecting your rights and legal interests for protection of your data.

6.5 BEH shall not provide (disclose) your personal data to persons not established in the European Union (EU) or the European Economic Area (EEA).

7. Your rights related to protection of your personal data and further information

7.1 With a view to complying with regulatory obligations of BEH in its capacity of data controller, it is important for the Company to process and keep your personal data correct and up-to-date; if required, you can request your personal data to be updated, revised and/or supplemented by sending a request for this to the Company in compliance with the terms and procedure stipulated in the personal data protection legislation.

7.2 You have certain rights stipulated in the personal data protection legislation related to BEH processing your personal data, as follows:

- ✓ Right to information and access to your personal data, right to request a copy of your personal data stored or otherwise processed by BEH and
- ✓ Right to request your personal data to be revised in the event that they are not correct, up-to-date or complete and
- ✓ In the event that you suspect that your personal data is not processed lawfully, you are entitled to file a complaint to the competent supervisory personal data protection authority referred to below in this Notice and
- ✓ Where the provisions and conditions stipulated in the personal data protection legislation apply , you shall also have the right to request that your personal data be erased or to request that their processing be restricted as well the right to portability of your personal data (if there are the prerequisites and conditions for this), and
- ✓ Right to object as well as rights related to automated decision-making- in the cases stipulated by law you are entitled to object at any time, on grounds related to your particular situation, against your personal data being processed, including where your data is used for profiling.

Please note that BEH does not process and does not use the personal data provided by you for profiling or automated decision-making.

It is important that you know that the particular terms and procedure to exercise your rights related to personal data protection are regulated in detail in the General Data Protection Regulation and the Bulgarian Personal Data Protection Act. BEH will provide the assistance required to exercise the rights conferred to you by the law.

- 7.3 If you wish to obtain further information on how BEH processes your personal data or have questions related to the effect and application of this Transparency notice on personal data processing of Bulgarian Energy Holding EAD, you can contact the Company at the following e-mail: hq@bgenh.com or the registered address of BEH in Sofia city, 1000, 16 Veslets Street.

8. Protection of your personal data

BEH seeks to guarantee the protection and security of your personal data by providing appropriate technical and organizational means for personal data protection.

The Company has adopted and implemented personal data protection policies which aim at protecting your personal data from unauthorized access and unlawful use; securing information systems and information protection, including encrypting.

9. Competent supervisory body on personal data protection

In the event there are questions on the lawfulness of processing your personal data or further information is required on how you can exercise your rights related to the personal data processed by BEH, please contact the Company directly through the contact forms at the web site of BEH, at the registered seat of the Company or the telephone numbers provided.

In the event that you are of the opinion that BEH processes your personal data unlawfully, please contact us so that we can settle the issue quickly and provide to you the assistance required in order to arrive at a solution satisfactory to you.

You can file a complaint with the Commission for Personal Data Protection:

Commission for Personal Data Protection (CPDP)

Address: 2 Profesor Tsvetan Lazarov Blvd., Sofia 1592

Phone number: +3592/ 91 -53 -594

e-mail: kzld@cpdp.bg

Website: www.cdpd.bg