



## TRANSPARENCY NOTICE ON PERSONAL DATA PROCESSING

### 1. On this transparency notice

- 1.1 **BULGARIAN ENERGY HOLDING EAD**, UIC 831373560, having its seat and registered address in the city of Sofia, 1000 16 Veslets Street, (hereinafter referred to as **BEH** or the **Company**) is a data controller and as such it complies with the rules and requirements of Bulgarian and European personal data protection legislation.
- 1.2 This Transparency notice on processing personal data of natural persons (data subjects)- investors or representatives of legal persons- investors, state bodies, agents, advisors and other persons that have sent a request, application or a similar type of request to BEH for information by using the e-mail - [investorrelations@bgenh.com](mailto:investorrelations@bgenh.com) in the section Contacts, Investors on the website of the Company ([www.bgenh.com](http://www.bgenh.com)) aims at providing transparent, complete and clear information on processing personal data of this category of natural persons by BEH.
- 1.3 BEH provides the opportunity for any stakeholder to subscribe and receive e-mail alerts for new publications and important information in the Investors section on the website of the Company. This Transparency notice shall also be respectively applied to this means of communication between stakeholders and BEH.
- 1.4. Persons who submit a request, application or a similar type of request to BEH by sending an e-mail to the e-mail [investorrelations@bgenh.com](mailto:investorrelations@bgenh.com) provide to the Company certain information which, inter alia, may also contain their personal data, whereby these persons can be identified by BEH.
- 1.5. In your capacity of natural persons whose personal data BEH processes you are entitled to be informed how and why BEH collects, processes, stores and protects your personal data which you have provided to the Company in connection with the inquiries, requests and questions made personally by you or on behalf of the stakeholder represented by you using the e-mail of the Company: [investorrelations@bgenh.com](mailto:investorrelations@bgenh.com).
- 1.6. 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. By sending an e-mail to [investorrelations@bgenh.com](mailto:investorrelations@bgenh.com) you declare and state that you are familiar with the provisions of this Transparency notice. 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 respond to your inquiries without undue delay.
- 1.7. This Notice in no way restricts or affects your rights related to processing your personal data by BEH. The Notice aims only at providing you information which guarantees that your data are processed in a transparent and fair manner.

## 2. Main terms used in the Transparency notice

2.1 Some main terms used in this Transparency notice are explained below:

- **Personal Data Protection Act** shall mean Bulgarian and European personal data protection legislation which BEH is obliged to comply with when processing personal data of natural persons (data subjects), including your Personal data in you capacity of natural persons, such as the Bulgarian Personal Data Protection Act and the by-laws on its application ( ordinances, rulebooks, mandatory instructions and guidelines of the competent supervisory authority), including the General Data Protection Regulation (**GDPR**).
- **Data controller** shall mean any person that individually sets the purposes and means for personal data processing. In the relations between BEH and natural persons who have sent requests and questions via the e-mail - [investorrelations@bgenh.com](mailto:investorrelations@bgenh.com) the Company is a data controller.
- **Personal data** shall be any information related to a natural person who has been identified or can be identified via one or more specific features. This information can be of various kinds and to be related to different aspects concerning the natural person, for example data related to physical, physiological, mental, intellectual, economic, cultural and/or social identity of this natural person.
- **Personal data processing** is a very general term and in practice it may include different operations that may be performed with personal data. For example collecting ( receiving), recording or storing personal data; including organizing them per some criterion or for the needs of the company; change in personal data; availability and use of personal data; disclosure through transmission, dissemination or in any other way whereby the personal data become available; erasure or destruction of personal data.

## 3. What personal data does BEH EAD process

3.1 BEH processes the personal data provided by you in its capacity of a data controller.

3.2 The Company collects and processes only such categories of personal data which have been provided personally and voluntarily by you when sending a message (e-mail) to the e-mail of BEH for investor relations -[investorrelations@bgenh.com](mailto:investorrelations@bgenh.com) or via the special form for receiving alerts in the section Investors, Contacts on the website of the Company. BEH processes your personal data in strict preservation of their confidentiality with a view to protection of your rights and interests.

3.3 BEH processes a limited category of personal data provided voluntarily by you and required by the Company to establish and have communication with stakeholders:

- ✓ Identification data- names and contact details such as an e-mail, actual address- company address;
- ✓ Other personal data which you have voluntarily submitted such as phone number (company phone number); employer, organization or another stakeholder that you represent or on whose behalf you address the request or the inquiry;

BEH does not require and does not process your special (sensitive) personal data unless for some reason they have been voluntarily provided by you in connection

with the question/request addressed to the Company. In the event that such special personal data have been provided , this category of personal data will be erased/destroyed without undue delay provided that they are not required in view of the purpose of the section Investor relations , in particular for communication purposes and handling incoming requests and questions.

#### **4. For what purposes does BEH process your personal data**

4.1 BEH processes your personal data only and to the extent that the latter are required for the Company to handle the questions and requests for information addressed by you which are related to current operations and financial standing of the Company as well as to communicate with you or the stakeholder represented by you. In particular, BEH processes the personal data provided by you for the following purposes:

- Administrating, processing and handling the question or request addressed by you;
- Identifying the sender of the inquiry or the request;
- Taking actions related to drafting responses and providing the information required;
- Communication and correspondence.
- Establishing and maintaining a database for contact with stakeholders- investors.

#### **4.2 BEH can process your personal data if at least one of the following legal grounds stipulated in the General Data Protection Regulation applies:**

- ✓ To protect the legitimate interests of the Company in its capacity of an addressee of the inquiry or request sent;
- ✓ 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);
- ✓ Processing is required to establish, make or protect legal claims, regardless whether in court, administrative or other out-of-court proceedings;
- ✓ In compliance with a regulatory obligation of BEH;

#### **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. Your personal data will be stored for the period from receiving the inquiry or the question until the purpose of their processing has been achieved and/or there is no longer a legal basis for your personal data to be processed.

#### **6. Who your personal data may be disclosed to**

6.1 In connection with 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.

Recipients of your personal data may be:

- BEH employees nominated to participate in the process of handling, managing and drafting a response to the inquiries or requests for information addressed by you. Your personal data are disclosed to employees of BEH in compliance with the 'need to know' principle in view of the nature of the inquiry/request only to the extent this is required to perform their duties.
- Other persons or bodies but only 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.

## **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 law.

7.2 You have certain rights stipulated in the Personal Data Protection Act related to your personal data being processed, including:

- ✓ 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 in item 9 below in this Notice and
- ✓ Where the provisions and conditions stipulated in the Personal Data Protection Act 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 of portability of your personal data, and

Please note that the 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 processing personal data of natural persons (data subjects)- investors or representatives of legal persons- investors, state bodies, agents, advisors and other persons , you can contact the Company at the following e-mail: [[hq@bgenh.com](mailto:hq@bgenh.com)] or the registered address of BEH in Sofia city, 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**

**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](mailto:kzld@cpdp.bg)

Website: [www.cdpd.bg](http://www.cdpd.bg)