

schönherr

Advokatsko druzhestvo
Stoyanov & Tsekova
in cooperation with
Schönherr Rechtsanwälte GmbH
BG-1000 Sofia, Alabin 56
17374/2007 (Sofia City Court)
Ident. № 175404723
VAT BG 175404723

**SCHOENHERR
DATA PRIVACY STATEMENT
FOR BULGARIA**

1 Preamble

Advokatsko druzhestvo Stoyanov & Tsekova in cooperation with Schön herr (hereinafter: "Schoenherr", "we" or "us") gives the highest priority to the protection of your personal data. Due to our professional duty of confidentiality, in accordance with the Bar Act, we are committed to the utmost secrecy. When using your personal data, we therefore naturally observe all data protection regulations, including but not limited to the provisions of the EU General Data Protection Regulation (hereinafter: "GDPR"). In this statement we set out which of your personal data we will process, disclose the purposes for which data is processed and how you can exercise your rights under the GDPR.

2 Personal data and data processing purposes

We process your personal data in reliance on our engagement, thus based on the contractual or pre-contractual relationship between us.

We also process your personal data for the purpose of sending you newsletters on current legal developments and inviting you to certain events ("Business Breakfast", "Schön herr Abend" etc.) only with your consent, which you can revoke at any time.

We will process your contact details (your name, phone number, email address, your company name and your position) also to optimise our contact management (Client Relationship Management "CRM"). Of course, you are entitled to object to any further processing of your data for the optimisation of our contact management at any time. If you exercise your right to object, we ask you to give us the reasons for doing so. If you send us a reasoned notice of objection, we will examine the facts and either cease or adjust the processing operations or inform you of compelling and legitimate reasons why it is necessary to continue the data processing operations.

Furthermore, we process your personal data in reliance on any other legal basis in accordance with GDPR and in compliance with data protection and civil law provisions.

We collect only personal data, which is necessary to carry out and execute our legal services, or data which you have provided to us on a voluntary basis. Please note that, under certain circumstances, we might abstain from accepting an engagement if you fail to provide, or provide incomplete personal data, which is necessary to execute and implement our legal services, or for execution of another of our obligations (e.g. in compliance with Measures Against Money Laundering Act).

Personal data that we process may be different and may vary depending on specifically assigned tasks. Personal data means any information containing details of personal or material circumstances such as name, address, e-mail address, phone number, date of birth, age, sex, social security number, video recordings, photos, voice recordings of individuals, and biometric data such as fingerprints. Personal

data can also include special categories of data such as health data or data relating to criminal proceedings.

3 Your rights in connection with your personal data

As a client, or generally as a data subject according to GDPR you have the *right to information* on your stored personal data, on their origin and recipients of this data, the duration of storage, and the purpose of data processing, but only to such an extent that this is not violating our duty to keep a legal secret in the lawyer – client relationship.

If we process inaccurate or incomplete personal data, you have the *right to rectification* or completion of such data.

You may also request us to *erase* data, which has been processed unlawfully. Please note that you may exercise this right only in respect of inaccurate, incomplete or unlawfully processed data.

If it is unclear whether your personal data is inaccurate, incomplete, or unlawfully processed, you may request us to *limit* the processing of your data until this issue has been resolved.

As indicated in Section 2, you have the *right to object* to the processing of your personal data if we have a legitimate interest in such data processing. If you exercise your right to object, we ask you to give the reasons for doing so. Please note that these rights complement each other; you can therefore request us only to either rectify or complete, or to erase your data. In certain cases, you also have the right to receive your personal data processed by us in a machine-readable format of our choice, or to instruct us to transmit such data directly to a third party of your choice; in this context, data portability must not be precluded by unreasonable efforts or legal or other obligations or requirements of confidentiality.

We ask you to address all inquiries in connection with the processing of your personal data to us, along with an electronic copy of an identity document to verify your identity. Our contact details can be found in Section 13 of this Data Privacy Statement.

We ask that you notify us of any change in your personal data.

Despite our best efforts to guarantee the protection and integrity of your data, we cannot fully rule out that disagreements will arise on the nature of use of your data. If you consider us to be unlawfully using your data, you may lodge a complaint with the Bulgarian Data Protection Authority. However, we hope that you will contact us first and we can address and dispel any doubts you may have.

4 Website and events

4.1 Website

You may use the website of Schönherr Rechtsanwälte GmbH ("Website") and access its public content generally without having to disclose your personal data. Schönherr Rechtsanwälte GmbH only records information provided by your internet provider, including but not limited to your IP address and the duration and time of your visit. This information is saved during the time of your visit and analysed solely for statistical purposes under strict protection of anonymity (for details see our cookie policy: <https://www.schoenherr.eu/cookie-policy/>).

We also collect your personal data, if you disclose such data voluntarily or explicitly when you visit our website in connection with using the services offered on the website (e.g. press releases and newsletter, career portal). We only use this information for the specific purpose of the individual service and in compliance with applicable laws.

4.1.1 Press releases and newsletters

You can subscribe to our press releases or newsletters at <https://www.schoenherr.eu/subscription/>.

Our press releases provide the latest updates and information on Schoenherr deals. Our newsletters allow you to access information on the latest legal developments and update you on our annual Roadmap and other Schoenherr publications.

This service simply requires you to disclose your e-mail address and to decide if you want to receive our press releases or our newsletters.

4.1.2 Career portal

You can use our career portal to submit an application for a job opening. We are happy to receive your application. We require certain information from you to assess whether we can offer you a suitable position.

We collect only personal data, which you disclose in your job application: academic degree, name, contact details, interests, CV, letter of motivation, reference letters and any other information and documents you have sent in.

Please use the following link to submit your application: <https://www.schoenherr.eu/careers/>

4.2 Events

Our popular events, workshops and lectures (collectively: "Events") provide detailed information on latest developments in different areas of law and allow you to network with industry participants and meet the Schoenherr lawyers personally. You are therefore welcome to attend these Events at any time. We will use only your contact details to send out invitations and, in our legitimate interest, process your name, your company, and your position to optimise contact management.

5 Data security

We have taken appropriate organisational and technical measures to ensure the protection of your personal data in particular against unauthorised, unlawful or accidental access, processing, loss, use and tampering.

In spite of our efforts of ensuring an appropriately high standard of diligence requirements at all times, it cannot be ruled out that information you have provided via the internet will be accessed or used by other persons.

Please note that we can therefore not assume any liability whatsoever for the disclosure of information due to errors in the data transfer and/or unauthorised access by third parties not caused by us (e.g. hacking of e-mail accounts, or telephone, interception of fax messages).

6 Use of data

When concluding a client-attorney relationship or a contractual relationship with us, you will disclose your (or your relatives', co-workers' or other third parties') personal data and business or trade secrets. In all these cases, we generally assume that you are authorised to disclose this data. We use your data and data of third parties nominated by you only to the extent this is necessary for the proper establishment and processing of our mandate or contractual relationship with you.

We will not process data made available for purposes other than those covered by your consent or otherwise by a provision in accordance with GDPR, except for statistical purposes, provided that data made available was anonymised.

7 Transfer of data to third parties

7.1 Mandate

The execution of your mandate may require us to transfer your data to third parties (e.g. to your opponent, to substitute lawyers, to insurance companies and service providers we may use and to which we provide data, etc.), and to courts or authorities. Also, an international issue arising in connection with a mandate may require us to exchange data within the Schoenherr group. Data will be transferred only in

reliance on data protection laws and in particular to execute your mandate or based on your prior consent.

Furthermore, we would like to inform you that information relating to the specific circumstances of your case may regularly also be sourced from third parties (e.g. search engines, social networks, your company website) in connection with our legal services. We may also have to disclose your personal data to courts or authorities on request. However, in all these cases, we will always ensure that we comply with legal regulations and protect your data.

Some of the above recipients of your personal data are located abroad or outside the EU/EEA and process your personal data there. The level of data protection in other countries may not be exactly equal to the level of protection in Bulgaria. We will ensure that the European level of data protection and the European data security standards are maintained. For this reason, we will transfer your personal data only to countries which the EU Commission decided have an appropriate level of data protection, or we will take measures to ensure that all recipients maintain an appropriate level of data protection; for this purpose we will conclude standard contractual clauses (2010/87/EC and/or 2004/915/EC).

7.2 Website

Due to the complexity of today's data processing operations, we may sometimes have to appoint processors for the processing of your data. Some of these processors are located outside the territory of the EU/EEA. However, whenever we use processors, we always ensure to maintain the European level of data protection and the European data security standards.

Should you have submitted a job application via our career portal, we may also source data about you from third parties (e.g. search engines, social networks).

8 Notification of data incidents

We aim to ensure that data incidents are detected at an early stage and immediately reported to you or to the competent supervisory authority, including the respective data categories concerned.

9 Storage of data

We will store data no longer than is necessary to fulfil our contractual or legal obligations and to defend liability claims, if any.

Usually we store the data for a period of 5 (five) years after the execution of your mandate. Should a legal dispute has emerged, a tax inspection is performed or there is another similar special situation, we will store your data until the end of the respective situation.

Your data related to a job application that has been sent via e-mail or via our Career portal shall be stored for a period of 3 years.

10 Cookies

This website uses "cookies" to ensure that our services are user-friendly and more effective for our clients.

A "cookie" is a tiny text file that is downloaded by our web server on the hard drive of your computer via your browser and allows our website to recognise you as a user if a connection is made between our web server and your browser. Cookies help us to establish the frequency of use and the number of users who visit our website. The content of the cookies we use is confined to an identification number and does not allow us to personally identify a user. The main purpose of cookies is to recognise the user of a website.

Our website uses two types of cookies:

- Session cookies: These are transient cookies stored in temporary memory, which are automatically erased when you close your browser.
- Permanent cookies: Cookies are stored on your hard drive to enhance user friendliness and allow us to recognise you when you visit our website again.

You can adjust the settings on your browser (i) to activate functionality which notifies you on the setting of cookies and to allow cookies only in a particular case, (ii) you may disable cookies for certain cases or in general, and (iii) you can also activate functionality which will automatically delete cookies when you close your browser. Disabling cookies may result in disabling certain functionality and features of this site.

11 Server-log-files

For optimised system performance, user friendliness and the provision of useful information on our services, the website provider automatically collects and stores so-called server log files, which your browser automatically transmits to us. This information includes your IP address, browser and language settings, operating system, referrer URL, your internet service provider, and the date/time of your visit.

These data are not pooled with sources of personal data. We reserve the right to examine these data later on if there is solid evidence, which suggests unlawful use.

12 Legal basis

12.1 Client-attorney-relationship

Our mandate as a law firm requires us to represent your interests zealously, faithfully and conscientiously. We are therefore legally required in our clients' interest to collect any personal data about our clients needed for conscientious representation of our clients. Furthermore, we process your personal information based on the engagement contract, your consent or any other purposes covered by data protection laws. We use your personal data for statistical purpose only when anonymised.

12.2 Relations with job applicants

We process the data of the job applicants on the basis of pre-contractual relationship.

12.3 Website

All personal data collected via our website are voluntarily provided by you. You thereby express your consent to the processing of such data.

12.4 Events

We will invite you to our events if you have signed up for an event, workshop or lecture. In this case, your invitation is sent out based on your consent, which you may revoke at any time.

If you are or were a client, it is in our legitimate interest to invite you to events. You can notify us at any time that you do not wish to receive any further invitations.

Staying in touch with our former lawyers and co-workers is a matter of particular concern to us. We will send you these invitations also in reliance on your consent, which you can revoke at any time.

12.4 Client Relationship Management ("CRM")

If you have contacted us, we will be in possession of your contact details. It is in our legitimate interest to process your contact details. However, you may certainly object at any time to any further processing of your data for the optimisation of our contact management.

12.5 Video surveillance

We have a legitimate interest in monitoring our premises by video surveillance to ensure that our property and our clients' data are protected and to establish sufficient evidence that can be submitted when necessary.

13 Contact details

Controller of all your personal data is:

Advokatsko druzhestvo Stoyanov & Tsekova

in cooperation with Schoenherr

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17374/2007 (Sofia City Court), ID № 175404723

Please address any queries or your notice of withdrawal to

dataprotectionbg@schoenherr.eu.