

Personal data protection rules

I. Name and address of the administrator

The Administrator, within the meaning of the Personal Data Protection Act and the General Data Protection Regulation /GDPR/ is, as follows:

BULGARIAN – HELLENIC CHAMBER OF COMMERCE AND INDUSTRY /BHCCI/

Mr. Savvas Karafyllidis

157A G. S. Rakovski Street, Floor 1, Apartment 2

Sofia 1000, Bulgaria

Tel.: 00359 2 980 01 62

E-mail: admin@bhcci.bg

www: www.bghcci.bg

II. Name and address of contact person on data protection related matters

The general coordination and control of measures for data protection and storage are performed on part of the following person:

BULGARIAN – HELLENIC CHAMBER OF COMMERCE AND INDUSTRY /BHCCI/

Mrs. Ivelina Mihaylova

157A G. S. Rakovski Street, Floor 1, Apartment 2

Sofia 1000, Bulgaria

Tel.: 00359 2 980 01 62

E-mail: admin@bhcci.bg

www: www.bghcci.bg

Pursuant to the provisions of Article 37 of the GDPR, no prerequisites are at hand for the appointment of an official.

III. General information

1. Scope:

The personal data of clients/users of our website www.bghcci.bg are processed solely for the purposes of improving our website's functionality, with the objective for generating a working website, containing the contents published on our part and providing our services. For processing personal data of clients/users of our website, we require the clients'/users' consent and only in cases, when preliminary receipt of consent is impossible, the data processing is executed based upon the provisions of other regulations.

The clients/users decide alone the nature and amount of personal data they provide, after contacting us. The forms utilized for personal data collection clearly state the responsibilities and the voluntary nature regarding the provision of data. The data marked as obligatory represent data without which provision of the respective Service or part/s thereof becomes impossible.

2. Legal grounds:

The data is processed pursuant to the provisions of 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).

Personal data provision to third persons/parties: Your personal data shall not be provided to third persons/entities in any other manner, save for the specified in this Policy, the Terms and Conditions and in cases envisioned by the legal provisions.

3. Deletion /Right to be forgotten/ and data storage term

All personal data are deleted; eliminating the possibility for access, at the time the reason and purpose for their storage cease to exist. The storage is implemented in line with the provisions of the European and National legislation of Republic of Bulgaria. Access to the data is blocked or they are deleted after expiration of the term envisioned in the specified norms regarding the storage term, unless further storage of data is required for the conclusion or performance of a contract.

I. Provision of the website and creation of log files

1. Description and scope of data processing

Upon each paging of our website, our system automatically registers data and information from the paging computer's system. The following data are collected during this process:

- (1) information regarding the browser type and utilized version;
- (2) client's/user's operating system;
- (3) client's/user's Internet provider;
- (4) client's/user's IP address;
- (5) date and time of paging;
- (6) web pages, addressed by the client's/user's system via our website.

2. Legal grounds for data processing

The legal grounds for temporary storage of data and log files are stipulated in Article 6, Paragraph 1, Item e) of the GDPR.

3. Data processing objective

Temporary storage of the IP address in the system is required for providing website paging capabilities to the client's/user's computer system. For this purpose, the client's/user's IP address must be stored during the duration of the session.

The log file storage is required for providing the website's functionality. In addition, the acquired data serve for the website's optimization and for guaranteeing our information systems' security. The specified data are not subjected to analysis for marketing purposes.

4. Storage term

The data are deleted, immediately after the need for their collection ceases to exist. In the case related to data collection pertaining to the website's provision, this moment sets in at the end of the respective session.

When data storage in log files occurs, they are deleted at the latest after seven days. Storage after the expiration of this term is also possible. In this case the user's/client's IP addresses are deleted or modified, so they may not be traced to the user/client having executed the paging.

5. Possibility for rejection and termination

Data collection related to the website's provision and data storage in log files is absolutely necessary for maintaining the website. Hence, the client/user does not possess the possibility for specifying rejection.

II. Use of „cookies“

a) Description and scope of data processing

We use „cookies“, facilitating the use of our website. Some elements of our website require identification of the browser, initiating the paging process, and after each webpage change. In this case, personal data are not collected.

In this case the „cookies“ are stored and transmit the following data:

(1) fonts = standard cookie with variable, used on our part upon updating for new loading of fonts in the browser.

(2) fullcss = standard cookie with variable, used on our part upon updating for new loading of CSS files in the browser.

Maximum life of „cookies“: 730 days

We use „cookies“ on our website also for the purposes of analyzing the behavior of clients/users while surfing on the Internet.

The following data may be transmitted in this manner:

`_ga` = unique identifier of Google Analytics for client/user identification (comprised of `Client_ID` + time stamp) | standard term 2 years `_gat` = parameter, forcing Google Analytics to reduce the paging frequency.

`_gid` = unique identifier of Google Analytics for client/user identification (comprised of `Client_ID` + time stamp) | standard term 24 hours. User/client data collected in this manner are pseudonymised via technical markers.

This is why connecting of the data to the client/user having performed the paging is impossible. The data are stored together with other personal data of the client/user.

Upon visiting our website, an information banner notifies the clients/users regarding the use of „cookies“ for analysis purposes, redirecting them to this Personal data protection statement. In this case, instructions are also issued regarding the termination of cookie „storage“ in the browser settings.

If you do not desire the enabling of tracking, you can deactivate this setting heading Google Analytics of these Personal data protection rules.

b) Legal grounds for data processing

The legal grounds for personal data processing in view of the technically required „cookies“ are stipulated in the provisions of Article 6, Paragraph 1, Item e) of the GDPR.

The legal grounds for personal data processing in view of the use of „cookies“ for the purpose of analysis, upon received consent of the clients/users, are stipulated in the provisions of Article 6, Paragraph 1, Item a) of the GDPR.

c) Data processing objective

The technically required „cookies“ are used in order to facilitate the utilization of webpages on part of the clients/users. Some functions of our website cannot be provided without the use of „cookies“. The offering of said functions requires the browser be recognized after navigation away from the webpage.

We require „cookies“ for the following applications:

(1) fonts = standard cookie with variable, used by us for updating purposes with the objective of reloading the fonts in the browser.

(2) fullcss = standard cookie with variable, used by us for updating purposes with the objective of new loading of CSS files in the browser.

Maximum life of „cookies“: 730 days

Data collected from the clients/users via the technically required „cookies“ are not used for the creation of client/user profiles.

The analytical „cookies“ are used for improving the quality of our website and its contents. The analytical cookies assist our understanding of how our website is used, providing constant optimization possibilities for the offered product.

The following data may be transmitted in this manner:

_ga = unique identifier of Google Analytics utilized for identification of clients/users (comprised of Client_ID + time stamp) | standard term 2 years

_gat = parameter, forcing Google Analytics to reduce the paging frequency

_gid = unique identifier of Google Analytics utilized for identification of clients/users (comprised of Client_ID + time stamp) | standard term 24 hours

e) Storage term, possibility for rejection and deletion /right to be forgotten/

The „cookies“ are stored in the client's/user's computer and are subsequently transmitted to our website. This is why, in the capacity of client/user, you possess full control over the use of „cookies“. By changing the settings of your internet browser you may deactivate or limit the transmittal/transfer of „cookies“. Cookies already stored may be deleted at any time. This may also be executed automatically. If you deactivate the „cookies“ for our website, complete use of some of its functions may no longer be possible.

III. Information bulletin

1. Description and scope of data processing

On our website you can subscribe free of charge for the information bulletin. Upon subscription for the information bulletin data transmittal takes place from the input iFrame mask for subscription to the engaged on our part e-mail marketing software supplier.

The following data are subjected to registration

- Title
- Name
- Surname
- E-mail address
- Telephone

In addition, the following data are subjected to collection during the subscription:

- Date and time of the registration

Within the frameworks of the subscription process your consent is requested for data processing indicating the link to this Personal data protection statement. Data processing for the purposes of directing the information bulletin is not connected with respective data transmittal to third persons/parties, save for the e-mail marketing software supplier. Data are used solely for directing the information bulletin.

2. Legal grounds for data processing

The legal grounds for data processing, in the presence of received consent of client/user, after relevant subscription for the information bulletin are based upon the provisions stipulated in Article 6, Paragraph 1, Item a) of the GDPR.

3. Data processing objective

The provision of the e-mail address is required for delivery of the information bulletin.

4. Storage term

The data are deleted as soon as their collection requirement becomes obsolete. Hence, the user's/client's e-mail address is stored, until the information bulletin subscription is active.

5. Information bulletin tracking

In order to ensure optimization of the information bulletin offered on our part, we utilize personalized tracking. In addition to the e-mail address, we collect data related to the activities connected to the information bulleting delivery (click related behavior).

6. Possibility for rejection and termination /Right to be forgotten/

The information bulletin subscription may be terminated at any time. For this purpose, each information bulletin contains the respective link. You can direct notifications to us at the following e-mail address: admin@bhcci.bg

IV. Registration

(Membership application and events notification)

1. Description and scope of data processing

On our website we provide clients/users the possibility for registering via personal data provision. During this process, data are stored in a mask for introduction, after which they are transmitted to us and stored. No data transfer to third persons/parties is performed.

The following data are collected during the course of the registration process:

The respective data are specified hereinafter below.

The following data are also stored during the time of registration:

- Date and time of the registration
- Used browser
- Operating system

Client/user consent is required during the course of the registration process related to the specific data processing.

2. Legal grounds for data processing

The legal grounds for data processing, in the presence of received consent of client/user are based upon the provisions stipulated in Article 6, Paragraph 1, Item a) of the GDPR. In the event the registration is required for performing of contract, to which the client/user is a party or for measures prior to contract conclusion, the supplemental legal grounds for data processing are based upon the provisions stipulated in Article 6, Paragraph 1, Item b) of the GDPR.

3. Data processing objective

The client's/user's registration is required for contract performance with said client/user or for performance of measures prior to contract conclusion. Your registration may be in the form of membership application or event notification.

4. Storage term

The data are deleted, immediately after the need for their collection objective ceases to exist. The moment for deletion of data collected within the frameworks of the registration process for contract performance or contract conclusion measures sets in when the need for this data required for contract performance becomes obsolete. The data storage requirements pertaining to a party to a contract may also remain in place after contract conclusion, if this is required for performing contractual or statutory obligations.

5 Possibility for rejection and termination /Right to be forgotten/

In the capacity of client/user, you may cancel your registration at any time. You can also modify your stored data at any time. For matters related to data modification or deletion use the following e-mail address: info@ahk.bg

If the data are required for contract performance or for contract conclusion measures, the preliminary deletion of data shall only be possible if the deletion does not contradict contractual or statutory obligations.

V. Contacts form and e-mail address

1. Description and scope of data processing

Our website contains a contacts form, which may be used for contacting us by electronic means. In the event the client/user uses this possibility, the data specified in the mask for inputting information are transmitted and stored.

The following data are also subjected to storing during the time of the message's transmittal:

- Date and time of the registration
- Used browser
- Operating system

During the registration process, your consent is required for data processing, with subsequent display of link to this Personal data protection statement.

In the event of desire for contacting us, you can use the provided e-mail address.

In this case storage takes place of the transmitted along with the e-mail personal data of the client/user. These data are not subjected to transfer to third persons/parties. These data are solely used for processing in connection with establishing contact.

2. Legal grounds for data processing

The legal grounds for data processing, in the presence of received consent of client/user are based upon the provisions stipulated in Article 6, Paragraph 1, Item a) of the GDPR. The legal grounds for processing of data, received via the transmittal of an e-mail, are based upon the provisions stipulated in Article 6, Paragraph 1, Item f) of the GDPR.

If the e-mail contact aims contract conclusion, then the supplemental legal grounds for data processing are based upon the provisions stipulated in Article 6, Paragraph 1, Item b) of the GDPR.

3. Data processing objective

The processing of personal data indicated for completion in the mask serve the sole purpose of contacting you. In the event of contacting you via e-mail, this contact also appears as the legal interest, required for data processing. The other processed data during the process of personal data transmittal serves for preventing misuse of the contacts form and for guaranteeing the security of our information systems.

4. Storage term

The holder of the personal data respectively intends to store your personal data during the term of validity of the objective for personal data processing specified herein above, guaranteeing that each participating person/party processing personal data, performs this in the same manner as the Holder of the personal data, guaranteeing that neither the personal data Holder, nor any of the participating personal data processors shall process or store personal data longer than required.

The personal data Holder has introduced internal rules regarding personal data processing and security and guarantees that the processed personal data shall only be accessible to duly authorized employees of the personal data Holder. Pursuant to the contracts, which the personal data Holder has signed with the persons/parties processing personal data, specified herein, your personal data shall be processed in line with the requirements of Regulation (EU) № 2016/679 (General Data Protection Regulation), and where applicable in other countries, protection measures are adopted of equal force with the one required by the Regulation specified herein above.

5. Possibility for rejection and termination /Right to be forgotten/

The client/user may retract his/her consent for personal data processing at any time. In case the client/user establishes e-mail contact with us, he/she may object at any time against the storing of his/her personal data. In this case, the communications cannot be continued. You can inform us in writing regarding your desire for retracting your consent and objecting to the storing of personal

data at the following e-mail address. Then all personal data stored within the frameworks of establishing contact shall be deleted.

VI. Personal data transmittal to third persons/parties

1. Website operators

Within the frameworks of personal data processing assignment, personal data are transmitted to the agency engaged with maintaining the website and the technical services suppliers. The processing assignment is regulated via the use of suitable agreement.

2. Share button for social media

General instructions: The sharing plug-ins for social media usually leads to the registration of each visitor of specific website/webpage for these services by his/her IP address, leading to the recording of his/her further actions regarding the browser. This may occur even without the button's activation. For preventing this, we use the Shariff method. In this manner our social media sharing buttons establish a direct link between you and the social network, only after clicking on the respective button. If you are already registered on a specific social network, entering Facebook and Google+ takes place without the opening of a new window. Entering Twitter prompts the appearance of a pop-up window, where the text of the tweet may be edited. In this manner, you can publish our content on the social media, excluding the possibility for their preparation of complete surfing profiles.

Facebook

Our website uses plug-ins of the social network Facebook Inc., 1 Hacker Way, Menlo Park, California 94025, USA. The Shariff method, however, permits Facebook to learn your IP and the fact that you have visited our website, only after button activation. If you use a plug-in, while you are in your Facebook profile, Facebook may link the contents used on your part with your user profile.

In this case, information does not reach us, hence we have no control regarding the eventual collection and processing of your personal data by Facebook. You can find more detailed

information in the Personal data protection statement of Facebook at the following address: de-de.facebook.com/policy.php. In addition, regarding the principle use of „cookies“ and their deactivation, we redirect you to our general description in this Personal data protection statement.

Twitter

Our website uses plug-ins of the social network Twitter Inc., 795 Folsom Street, Suite 600, San Francisco, CA 94107, USA. The Shariff method, however, permits Twitter to establish your IP and the fact you have visited our website, only after activation of the Re-Tweet button.

In this case, the information does not reach us, hence we do not possess control regarding the eventual collection and processing of your data by Twitter. In the event of need, you can find more detailed information in the Personal data protection statement of Google at the following address: twitter.com/privacy. In addition, regarding the principle use of „cookies“ and their deactivation, we direct you to the general description of this Personal data protection statement.

LinkedIn

Our website uses LinkedIn plug-ins for sharing on the social network of LinkedIn at LinkedIn Ireland Unlimited Company, Wilton Place, Dublin 2, Ireland. If you activate this button, for activation of the functions of the plug-in, your browser connects to the LinkedIn plug-in. In this case, however, your personal data are not stored by LinkedIn, and registration does not take place of the contents you use via a „cookie“. You can find more detailed information in the Personal data protection statement of LinkedIn at the following address:

www.linkedin.com/legal/privacy-policy. In addition, regarding the principle use of „cookies“ and their deactivation, we redirect you to our general description in this Personal data protection statement.

3. Videos on YouTube

Our website contains separate videos of YouTube, stored on the servers of the supplier YouTube, which can be reproduced/played by our website via the incorporated link. The link to the videos is implemented by way of the activated option for extended settings in connection with the data

protection. When you play these videos, your computer stores „cookies“ of YouTube and DoubleClick, creating further possibility for their subsequent transmittal to Google Inc., Amphitheater Parkway, Mountain View, CA 94043, USA in its capacity of YouTube operator.

Upon playing the videos stored on YouTube of Google Inc., in its capacity as YouTube operator and operator of the DoubleClick network, transmittal takes place as a minimum of the following data: IP address and ID of the cookie, the specific address of our webpage you visited, the system generated date and time of the visit, and your browser's code. These data are transmitted irrespective of the fact whether you have a user profile in Google, which you have used in attaining access, or not. If you have entered your profile, the possibility exists for these data to be attributed directly to it. If you do not desire direct attribution of data to your profile, you must unsubscribe, prior to activation of the button for playing the video.

YouTube, respectively Google Inc., store these data as user profile and eventually use them for the purposes of advertising, market surveying, and/or in line with the needs for designing their websites/webpages. Such surveying (also valid for unregistered users) is performed more specifically for the provision of advertising coordinated in line with the specific needs and for informing other users regarding your actions on our website. You have the right to object against the creation of these user profiles, and for exercising said right you must address Google in its capacity as YouTube operator.

4. Google Maps

This internet function uses the map software Google Maps of Google Inc. Via the use of this website, you express consent for eventual automated data collection by Google and its representatives for subsequent registration, processing, and use in line with the terms and conditions for using Google Maps. More detailed information regarding the objectives and scope of data collection and their subsequent processing by Google can be obtained on this information page.

5. Webpage analysis by Google Analytics

This website uses the service „Google Analytics“, provided by Google Inc. (1600 Amphitheatre Parkway Mountain View, CA 94043, USA) for analyzing the webpage usage by the client/user. The service uses „cookies“ – text files, stored in your end device. By way of rule, the information collected by the „cookies“ is directed to the Google server in the USA, where it is stored. This webpage uses anonymization of IP addresses. Within the framework of the EU Member States and the members of the European Economic Area, the IP address of the clients/users is curtailed. This curtailment makes tying in of the IP address with your identity impossible. The website operators conclude a data processing agreement with the Google Inc. Company, within the frameworks of which, via the assistance of the collected information, its analyzes website/webpage usage and usage related activities, providing services connected to the use of the Internet.

You possess the capability to prevent the storing of „cookies“ on your device by undertaking execution of the respective setting in your browser. The unrestricted access to all functions on this website is not guaranteed, if your browser disallows the use of „cookies“.

In addition, via the use of a browser plug-in you may prevent the transmittal of the information collected by the „cookies“ (including your e-mail address) to Google Inc., as well as its subsequent use by Google Inc. The following link shall lead you to the respective plug-in: tools.google.com/dlpage/gaoptout

Please prevent the registration executed on part of Google Analytics by clicking/following this link. Installation takes place of the Opt-Out „cookie“, preventing registration of your data during your visit to this webpage.

Here you can find additional information regarding the use of data by Google Inc.: <https://support.google.com/analytics/answer/6004245?hl=de> <https://support.google.com/analytics/answer/6004245?hl=de>

VII. Rights of the data subject

The personal data subject possesses the following rights, **in line with the provisions of** REGULATION (EU) 2016/679, more specifically:

- Right to be informed – *with this Policy we wish to inform you in detail regarding the processing of your personal data in connection with the services provided on our part.*
- Right to request access to your personal data – *You have the right to receive confirmation whether processing of your personal data takes place, along with access thereto and information regarding the relevant processing and the your related rights.*
- Right to require correction, deletion, or restriction of data processing - *You have the right to correct your personal data, in the event said data are incomplete or imprecise.*
- Right to object to data processing - *You have the right to object in connection with data, processed based upon legitimate interest.*
- Right to transfer data - *You have the right to receive the personal data, which you have provided, pertaining to you, in structured, popular format, machine readable, as well as to used said data for another administrator, based upon your own judgment.*
- Right to object to profiling - *You have the right not to be the subject of decision, based only and solely upon automated processing.*
- Right to withdraw consent – *You have the right, at any time, to withdraw your consent for the processing of personal data, based upon consent provided on your part. Such withdrawal does not affect the lawfulness of processing based upon the provided consent, up to the moment of its withdrawal.*

Right to object before a supervisory authority – *You have the right to file a complaint with a supervisory authority, if you believe that the processing of personal data, pertaining to you, is performed in breach of the applicable personal data protection legislation.*

In the event you wish to file a complaint in connection with the personal data protection, you can address the competent supervisory authority: Commission for Personal Data Protection of Republic of Bulgaria: www.cpdp.bg

- The desire for exercising the specified rights must be expressed in writing, addressed to the personal data protection officer/official, by one of the specified modes of contact:
 1. To the following e-mail address : admin@bhcci.bg
 2. Via the query form provided on the website
 3. Via correspondence directed to the Company's address, located at: City of Sofia 1000, 157 A G. S. Rakovski Street, Floor 1

Representative: Ivelina Mihaylova

The Holder of personal data would like to inform you that a copy of and/or access to your personal data may be provided to you, insofar as this access does not represent a breach of the rights of other personal data subjects, due to which the Holder of personal data may provide you with access to the following level of your personal data, rights and interests.

The Holder of personal data would like to inform you that it does/does not adopt automated decisions regarding you, nor does it execute profiling of your personal data.

A security breach was not committed in respect of the personal data or, as far as the Holder of personal data is aware, this has not taken place unconsciously. We would like to inform you that we have adopted the strictest organizational measures in connection with the provision of technical, physical, and software protection of the processed and stored on our part personal data.

Controlled and monitored access is provided to the office and server premises.

We have concluded contracts of long standing with specialized security enterprises.

We have provided all technical safety and security measures specified in the Regulation, including: Pursuant to the Regulation's provisions, suitable technical and organizational measures for protection of your processed personal data, such as:

1. Pseudonymization of personal data („Pseudonymization“ shall mean the processing of personal data in a manner disallowing further connection of personal data to a specific data subject, without the requisite use of supplemental information, under condition that the said information is stored separately and is subject to technical and organizational matters, with the objective of guaranteeing, that the personal data are not connected to the identified natural person or with a natural person, which can be identified);
2. Encryption of personal data;
3. Guaranteeing of ongoing confidentiality, completeness, availability, and sustainability of the systems and services for processing;
4. Keeping records (log files) of activities related to data processing in the automated processing systems;
5. Training of employees – we constantly train our employees;
6. At the design stage: implementation, at the time of determining the processing means, as well as at the time of processing itself, of suitable technical and organizational measures,

developed in view of effective application of the data protection principles, such as reducing the data down to a minimum, along with integration of the necessary guarantees in the course of processing;

7. By default: implementation of suitable technical and organizational matters, guaranteeing by default only processing of personal data takes place, which are required for each specific processing objective. This obligation pertains to the volume of collected personal data, the processing level, the storage term, and the data's accessibility. More specifically, such measures guarantee that by default, and without the intervention of a natural person, the personal data are inaccessible to an unlimited number of natural persons.