

Personal Data Protection Policy

1. Introduction

- 1.1. This Personal Data Protection Policy describes how “Realto Group” EAD collects, processes and stores personal data according to the requirements of “General Data Protection Regulation “ – Regulation (EU) 2016/679, The Personal Data Protection Act of the Republic of Bulgaria and other Bulgarian or international law.
- 1.2. “Realto Group” EAD in its capacity of personal data administrator and in accordance with the legislation and good practices applies the required technical and organizational measures for personal data protection.
- 1.3. This policy gives information on how and what kind of personal data is collected by “Realto Group” EAD, the purpose of the collection, to whom it can be provided or disclosed and the way it is protected.

2. Information about “Realto Group” EAD in its quality of personal data administrator.

- 2.1. In regards of the processing of your personal data you can contact us at the specified contact details:

Personal data administrator identification			
Name:	“Realto Group” EAD	Country:	Bulgaria
Address:	St. Nedelya sqr. 4, fl. 6	Telephone:	+3592 445 00 06
City:	Sofia	Email:	office@realto.group
Zip code:	1000		

- 2.2. In case you believe “Realto Group” EAD violates your rights related to your personal data processing in accordance with the requirements of the “General Data Protection Regulation “ – Regulation (EU) 2016/679 you have the right to file a complaint to the personal data administrator.
- 2.3. In case you would like to file a complaint regarding your personal data processing, done by “Realto Group” EAD, or regarding the way “Realto Group” EAD has considered your complaint, you have the right to file a complaint to the Commission for Protection of Personal Data.

You may file a complaint by one of the following ways:

1. **Personally**, on a paper hard copy at the Commission for Protection of Personal Data registry office at: Prof. Tsvetan Lazarov blvd. 2, 1592 Sofia.
2. **With a letter to:** Prof. Tsvetan Lazarov blvd. 2, 1592 Sofia, Commission for Protection of Personal Data.
3. **Via fax:** 029153525.
4. **Via email** to the Commission for Protection of Personal Data (kzld@cpdp.bg). In this case your complaint should be formatted as a digital document, undersigned with a electronic signature (not scanned).
5. **Via the Commission for Protection of Personal Data official website** at <https://cpdp.bg> following the way described on the webpage. In this case your complaint should be formatted as a digital document, undersigned with a electronic signature.

Regardless of the way chosen for filing the complaint, it should include:

- **Applicant information – names, address, telephone number, email address**
- **Nature of the complaint**
- **Other information or documentation, you consider relevant to the complaint**
- **Date and signature (for digital documents – electronic signature, for paper hard copy document – manual signature)**

The Commission for Protection of Personal Data provides a complaint form to the Commission (for supporting and guiding citizens) in connection to violation of personal data processing in the voter lists supporting the registration of political entities. The complaint form can be downloaded from the following web link: https://cpdp.bg/userfiles/file/Documents_2017/Forma_jalba_politicheski_subekti.doc.

3. Legal basis

- 3.1. This Personal Data Protection Policy (“Policy”) is based on the “General Data Protection Regulation“- Regulation (EU) 2016/679 („GDPR”) Personal data protection law and relevant regulations.
- 3.2. The Bulgarian legislation and GDPR foresee rules on how “Realto Group” EAD should collect, process and store personal data.
- 3.3. In order to process personal data in accordance with the legislative requirements, all personal data are legally collected and used, necessary security is provided to the processing operations and “Realto Group” EAD undertaken the needed measures, so no processed personal data is improperly disclosed. In accordance with the basic principles, followed by “Realto Group” EAD, your personal data is:
 - 3.3.1. processed lawfully, fairly and in a transparent manner in relation to the data subject (‘lawfulness, fairness and transparency’);
 - 3.3.2. collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes (‘purpose limitation’);
 - 3.3.3. adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed (‘data minimisation’);;
 - 3.3.4. accurate and, where necessary, kept up to date; ; “Realto Group” EAD has taken every reasonable step to ensure that personal data that are inaccurate, having regard to the purposes for which they are processed, are erased or rectified without delay (‘accuracy’);
 - 3.3.5. kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed („storage limitation”);
 - 3.3.6. processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures (‘integrity and confidentiality’);
 - 3.3.7. “Realto Group” EAD is responsible and able to prove that keeps the basic principles related to processing personal data („accountability”).

4. Policy objectives

- 4.1. With the adoption and application of this “Realto Group” EAD’s policy, in accordance with Regulation (EU) 2016/679 and Bulgarian legislation, are being determined the rules for the protection individuals related to processing personal data, as well as the rules for the free movement of personal data.

- 4.2. With the adoption and application of this “Realto Group” EAD’s policy, in accordance with Regulation (EU) 2016/679 and Personal Data Protection law, are being protected fundamental rights and freedoms of individuals, more specifically their right for personal data protection.
- 4.3. With this policy “Realto Group” EAD aims to guarantee:
 - 4.3.1. The legal processing of personal data, performed by “Realto Group” EAD;
 - 4.3.2. The rights of individuals, subjects to personal data;
 - 4.3.3. The compliance with the requirements of “Realto Group” EAD’s regulation in its capacity of Administrator and/or Processer, including:
 - 4.3.3.1. Data protection;
 - 4.3.3.2. Registers of processing activities;
 - 4.3.3.3. Appropriate technical and organizational measures;
 - 4.3.3.4. Risk assessment measure for personal data processing;
 - 4.3.3.5. Compliance with the requirements when assigning the processing to third parties (Processers);
 - 4.3.3.6. Obligations of officials processing personal data, and/or persons with access to personal data and work under the supervision of the personal data processers, their responsibility in case of neglect of these obligations.
 - 4.3.4. Taking into consideration the achievements of technical progress, expenses for application and the nature, scope, context and purposes of the processing, as well as the risks with different probability and weight for the rights and freedoms of individuals, “Realto Group” EAD in its capacity of Administrator and/or Processer of personal data applies appropriate technical and organizational measures ensuring a level of security appropriate for this risk.
 - 4.3.5. Guarantees the compliance with the basic principles when transmitting personal data to third countries or international organizations outside of the EU.

5. Scope

- 5.1. Definitions:
 - 5.1.1. ‘personal data’ means any information relating to an identified or identifiable natural person (‘data subject’); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person;
 - 5.1.2. ‘processing’ means any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction;
- 5.2. The personal data protection policy is applied to the processing of employees’ personal data which have become known to partners, suppliers, as described in the registers of processing activities, established in accordance with article 30 from the “General Data Protection Regulation “- Regulation (EU) 2016/679 („Registers of Processing Activities”).

6. Purposes of personal data processing

- 6.1. In accordance with the requirements of Съгласно изискванията на Section I - Transparency and conditions of the GDPR - Regulation (EU) 2016/679, “Realto Group” EAD provides transparent

information, communication and conditions for exercising the rights of the data subjects according to article 12 from the Regulation.

- 6.2. The purpose for collecting and processing, as well as the measures for personal data protection in “Realto Group” EAD, are provided in accordance with the „Personal data protection procedure”.

7. Transparency. Individuals’ rights, whose personal data is being processed by “Realto Group” EAD

Information on the rights related to the personal data processing, according to Regulation (EU) 2016/679

Right	Basis	Right description
Right of access	article 15	Approval right for processing and access to your personal data.
Right to rectification	article 16	Rectification of inaccurate personal data.
Right to erasure	article 17	To request the erasure of your personal data.
Right to restriction of processing	article 18	To request processing restrictions to your personal data.
Notification obligation	article 19	To request to be notified for any rectification or erasure of personal data or restriction of processing.
Right to object	article 21	To object at any time the processing of your personal data: <ul style="list-style-type: none"> ✓ for the performance of a task in the public interest or on the basis of official authority, or for the purposes of legitimate interests, including profiling; ✓ processing for direct marketing purposes; ✓ processing for scientific or historical research purposes or for statistical purposes.
Automated individual decision-making	article 22	You have the right to object being the subject of decision based solely on automated processing, including profiling which produces legal effects concerning you or significantly affects you.
Right to data portability	article 20	You have the right to receive your personal data.
Right of a complaint and effective juridical protection	articles 77, 78 и 79	You have the right to lodge a complaint to the Commission for Protection of Personal Data in case of infringements of the Regulation (EU) 2016/679 on April 27 th 2016 and the right for effective protection against Commission for Protection of Personal Data, the administrator or the processor of your personal data.
Right for compensation	article 82	You are entitled to compensation for material or non-material damage suffered as a result of a breach of the Regulation (EU) 2016/679.

8. Transmission of personal data to third countries or international organizations

- 8.1. Transmission of personal data that is being processed or is intended for processing after its transmission to a third country or an international organization outside the EU, is executed by “Realto Group” EAD exclusively under the conditions of the General Data Protection Regulation – Regulation (EU) 2016/679, stated in Chapter V of the Regulation.
- 8.2. “Realto Group” EAD applies all the provisions of the Regulation, in a way not to put at risk the necessary level of protection for individuals, provided by the Regulation.

9. Breach and Notification of breach

- 9.1. Personal Data Breach means a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, personal data transmitted, stored or otherwise processed by “Realto Group” EAD.
- 9.2. In case of personal data security breach, in which exists a probability to create risk for the individual’s rights and freedoms, without further delay and when feasible – no later than 72 hours after discovery, “Realto Group” EAD informs the Commission for Protection of Personal Data for the breach.
- 9.3. In case a specific breach poses a risk to the individuals’ “Realto Group” EAD undertakes measures to inform the affected persons with the objective to minimize possible adverse effects.
- 9.4. “Realto Group” EAD undertakes actions in accordance with the Personal Data Protection Procedure.

10. Changes to the Privacy Policy

“Realto Group” EAD has the right to update by amending and supplementing the personal data protection policy at any given time, when circumstances require it.

The current version of this document is up to date by 25.09.2020 and is accessible to all members of the staff of the Directory /.....

Signature:

Georgi Pavlov

Representing “Realto Group” EAD

Signature:

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Representing “Realto Group” EAD