

PRIVACY POLICY

Your privacy is important to the Group Companies of Sunotec Holding GMBH and we are committed to treating your Personal Information lawfully, fairly and transparently.

This Privacy Policy discloses the privacy practices of Sunotec Group with respect to the collection, use, retention or other processing of personal data, including in connection to its website, email contacts/correspondence or forms (contact forms or other).

INTRODUCTION:

- Under the name SUNOTEC GROUP and any mention of "we", "us", "our" in this policy is considered to refer to SUNOTEC HOLDING GMBH and its controlled companies.
- The protection of your personal data is of paramount importance. With this policy, we would like to inform you on what grounds, for what purposes, in what terms and by what means your data is collected and processed.
- Sunotec Group collects, processes and stores personal data in accordance with the General Data Protection Regulation (EU) 2016/679, Personal Data Protection Act and other regulations in Bulgarian and European legislation.
- In this policy is provided information about how and what personal data is collected, processed and stored, to whom it may be disclosed, how it may be protected and etc.
- Kindly be informed that your personal data, no matter it is provided on paper or electronically, will be processed according to this document and the practices described in the Sunotec Group Personal Data Protection Policy.

WHO PROCESSES YOUR PERSONAL DATA?

- Your data is processed by Sunotec Group, contact details:

Email: dpo@sunotec-group.com;

Contact address: Republic of Bulgaria, 1407, Sofia city, 14 B Filip Kutev Str.; Atelierstraße 12 | Werk 3 81671 München | Germany

- In any cases for questions and requests related to the processing of your personal data, please contact us by email: [**dpo@sunotec-group.com**](mailto:dpo@sunotec-group.com)

DEFINITIONS:

- “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;
- **“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, organization, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction;
 - **“Recipient”** means a natural or legal person, public authority, agency or another body, to which the personal data are disclosed, whether a third party or not. This definition does not cover public authorities which may receive personal data in the framework of a particular inquiry in accordance with Union or Member State law.
 - **“Consent”** of the data subject means any freely given, specific, informed and unambiguous indication of the data subject's wishes by which he or she, by a statement or by a clear affirmative action, signifies agreement to the processing of personal data relating to him or her;
 - **"Other Definitions"** - When other definitions are used in this Policy, the meaning of which is not clarified in this section and there is doubt regarding their meaning, they will be interpreted according to the applicable legal acts, including the General Data Protection Regulation (EU) 2016/679.

CATEGORY, PURPOSE AND BASIS OF THE PROCESSING OF PERSONAL DATA:

- **We collect personal data as follows:**
 - Resume (CV) and the information included in it received through The Employment Form on our career page on www.sunotec-group.com, online questionnaire or in other appropriate way;
 - Identification data – full name, date of birth, personal identification number/social security number, ID card number, contact details (phone number, address, email) in connection with identification of the person and/or conclusion of contracts, and/or establishment of business relationships. Please, be informed that we are obliged to collect, process and store some of these data according to Employment and other relevant legislation;
 - Passport data, in case the data subject will carry out activities (will work) abroad and such data is needed on a lawful basis;
 - Information required in connection with the issuance of work visas;
 - Availability of vehicle driving licenses (if such are necessary in connection with the performance of the subject's work duties and taking into account the legal requirements in this regard);
 - Data regarding professional status and education;
 - Information for a specific transaction and for the preparation of a financial and legal analysis of the relevant legal entity.

1. The purposes of the processing related to the job candidates:

- Processing of personal data provided by the candidate in the context of an employment process at the employer (e.g. a CV, the information you provide to us through the Questionnaire upon applying for a job) in order to select the appropriate candidate for a vacant post;
- Processing of personal data submitted by the candidate through the Employment Form on the career page, in order to determine whether the candidate is suitable for the published job vacancy or if the candidate could potentially be employed in the near future (in the latter case, we will ask for your consent for the retention of data);
- Processing of personal data submitted by the candidate in writing to the address of the company and/or via email, and/or internal platform related to the current job vacancies published by the employer, in order to determine whether the candidate is suitable for the published job vacancy or if the candidate could potentially be employed in the near future (in the latter case, we will ask for your consent for the retention of data if this the appropriate legal basis for processing);
- The retention of documents (CV, cover letter and etc.) of candidates is possible only for six months without prior consent of the candidate (if you give your consent the retention period is 3 years and your data and documents will be used only in relation to future recruitment). You can withdraw your consent any time by sending email to dpo@sunotec-group.com. In any case your personal data (only the necessary ones) filled in our internal recruitment documents will be stored for 3 years in relation to our legitimate interest in relation to specific legislation. After these periods, the data shall be permanently deleted.

2. The purposes of the processing related to the employees:

- Entry into and execution of an employment contract concluded with the employer and the fulfilment of other obligations of the employer arising from the employment relationship (for example, accounting and payroll preparation, payment of taxes and social security contributions etc.);
- Supervision of the fulfilment of the obligations arising from the employment relationship for a particular worker and the conduct of disciplinary proceedings, procedures for the termination of an employment contract and legal proceedings against an employee;
- Entry into and execution of other contracts with employees (e.g. education contract, contract for the use of a company cars or company equipment) and the keeping of records arising from such contracts (e.g. a register of company cars);
- Transfer of employee's personal data to third parties where there is a legal basis for this;
- Collection and storage of photos for the purpose of compiling a company file (if you give consent);
- Publication of a photo in the presentation of new employees (if you give consent);

- Publication of photos taken at events (if you give consent or if we have legitimate interest)
3. The purposes of the processing related to the conclusion of contracts
 - Processing of personal data for the purposes of meeting lawful obligations (e. g. Accountancy Act, tax regulations, Labor Code, VAT Act, etc.).
 - For the purposes of the performance of the contract. It follows from that contract which data we must process to be able to fulfill everything that we have agreed and what the law (e. g. Accountancy Act, tax regulations, Labor Code) imposes on us in relation to such contract. Such purpose and lawful reason of processing applies also to the preparation of the contract and negotiations about the conditions of the contract.
 4. The purposes of whistleblowing procedures – there is safe channels for staff or other informants to report fraud, corruption, illegal practices or serious wrongdoings in organization. During such a procedure, the processing of personal data will be necessary. For instance, information relating to those suspected of wrongdoing as well as that of the informants and/or other third parties such as witnesses.
 5. The purposes of safety and risk management – in cases when a legal relation imposes an obligation on us or for the reason of protecting our justified interests, we process your personal data in necessary extent for the purpose of securing safety within our company 's premises, the protection of our property, preventing and detecting deceptive or harmful actions, etc.
 6. The purposes of establishing new business relations and potential conclusion of contracts – on a basis of legitimate interest between parties there may be stored identification information such as names, business email addresses, telephone numbers, job position and company name.
 7. The purposes of exercising or defending our legal claims – if we are made to exercise our rights or to defend them in a court, legal or administrative proceedings, we use necessary personal data. The legitimate reason of processing is our company 's justified interest.

Consider that if you do not provide the required personal data, we will not be able to enter into contractual relations and/or establish business relationships.

In certain cases, the Company and its service providers use cookies and web beacons and other technologies to automatically collect certain types of data when you visit us online and through the emails we exchange. The collection of this data enables us to tailor the site to you, to improve the operation, usability and effectiveness of the online presence of Sunotec Group, as well as to measure the effectiveness of our marketing initiatives.

Sunotec Group **does not** collect, process or store personal data revealing racial or ethnic origin, political views, religious and philosophical beliefs, membership in trade unions, as well as the processing of genetic data, data on the sex life or sexual orientation of individuals.

All personal data you provide to us will be treated confidentially and will be used only for the purposes for which they were provided. If there is a need for further processing of your data for any other purpose, we will contact you in advance and ask for your consent.

We must inform you that any consent to the processing of your personal data can be withdrawn at any time, both by submitting a request in writing to the Sunotec Group contact address or to the following email address: dpo@sunotec-group.com

In order to respond to you, we may need to perform an additional review of the information in our systems that may contain your personal data. It is possible that the processing and/or storage of your personal data is not based on your consent, but on regulatory requirements that lead to a legal obligation for Sunotec Group to process and/or store your data for a certain period of time.

WHO MAY WE SHARE YOUR PERSONAL INFORMATION WITH?

- We do not disclose your personal data unless the provision of certain information is mandatory by law or in connection with the performance of contractual relations (and if such sharing/disclosure is lawful). In exceptional circumstances, we may provide your personal data to competent public authorities and/or supervisory authorities in proceedings before them, or to another person when it is required by law.
- In certain cases, we are required to disclose information: in compliance with a judicial, regulatory or other official act or decision; based on an agreement between us and another controller/s or processor/s of personal data, in accordance with the requirements of the current legislation; upon instructions given by you or instructions of a person authorized by you according to the terms of the contract concluded between you and Sunotec Group.

HOW WE PROTECT YOUR PERSONAL DATA?

- a. Your personal data will be processed by us in accordance with the applicable data protection applications.
- b. We apply organizational, physical and technical measures to ensure data security. We have adopted the necessary internal policies. Processing is reduced to the minimum of data required to achieve the cost price.
- c. We have introduced numerous measures to effectively implement the principles of General Data Protection Regulation, including but not limited to:
 - Ensuring ongoing confidentiality, integrity, reliability and resilience of processing systems and services;
 - Measures, in the event of a physical and technical incident, to promptly restore availability and access to personal data;
 - An internal process of regular evaluation of the effectiveness of technical and organizational measures to ensure the security of processing;

- Technical and organizational measures to prevent accidental or unlawful destruction, loss, alteration, unauthorized disclosure or access to personal data.
- To ensure adequate technical data protection of Sunotec Group and its employees, partners and customers, we apply the necessary organizational measures and measures provided in the Personal Data Protection Act and the General Data Protection Regulation (EU) 2016/679.
- Sunotec Group has created a structure to prevent abuse and ensure the security of your data. For maximum security during processing, transfer and storage of your data, you can use additional protection mechanisms such as encryption, pseudonymization and others.

PRINCIPLES RELATING TO PROCESSING OF PERSONAL DATA:

- Personal data is processed **lawfully, fairly and transparently** by us based on legal grounds provided in Art. 5 of the General Data Protection Regulation (EU) 2016/679 and in accordance with all applicable legislation, ensuring that the individuals whose data are processed are not affected in a negative way and in accordance with morality and good manners. All personal data we process is provided to us exclusively on a voluntary basis, and in this policy, we expressly indicate to our employees, partners and customers the rights they have in relation to the provision of their personal data, the measures we have taken to ensure confidentiality of the data, the purposes and rules for their processing.
- **Limitation of purposes** - personal data is processed only for specified, explicit and legitimate purposes;
- **Minimizing data** - we strive to collect data that is sufficient to achieve the purpose for which it is collected, without processing additional, unnecessary information;
- **Accuracy** - we keep the data up-to-date, and with each change that we are notified of by the data subject, we make corrections in the relevant registers and databases and notify the third parties to whom this data has been provided for the correction that is made;
- **Limitation of data storage** – we store personal data for periods in accordance with the purpose for which they were collected and taking into account legally defined storage periods. We follow the principle that the data is stored and processed only as long as necessary. When the need to process the data for the purposes for which it was collected cease to exist, we will destroy or delete this data (unless we are required by law to keep them for a longer period).
- **Accountability** – Sunotec Group keeps accounts for all needed registers regarding personal data processing activities it carries out and has the necessary documentation in fulfillment of the requirements of the General Data Protection Regulation (EU) 2016/679.
- **Integrity and confidentiality** – we process the personal data in a manner that ensures appropriate security of the data, including protection against unauthorised or unlawful

processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures.

HOW LONG DO WE KEEP YOUR DATA?

Your personal data will be stored for a period necessary to fulfill the purpose for which it is collected/processed or until you withdraw your consent, if the processing is based on such.

In general, we will not keep your personal data longer than is necessary for the purposes for it is collected/processed.

When the data is no longer needed, it is permanently deleted/destroyed or crypted, unless its retention is legally required.

WHAT ARE YOUR RIGHTS?

According to the personal data legislation you have the right to:

- **Right to information:** As a subject of personal data, you have the right to receive information about the processing of your personal data, including but not limited to the purposes, terms and grounds, recipients, and categories of recipients of personal data and others. According to the applicable legislation in the field of personal data, we undertake to respond to each of your requests within 1 month of receiving the request. If there are any difficulties in the timely implementation of such requests, the deadline for implementation can be extended by another 2 months, for which you will be notified within 1 month of receiving the request.
- **Right of access:** You have the right to receive confirmation from us as to whether your data is being processed and, if so, to receive access to the data and information about the processing. As a controller, we could provide you with a copy of your personal data undergoing processing. Please note that for additional copies requested by you, we may charge a reasonable fee for our administrative costs in this relation.
- **Right to rectification:** If your data is incomplete or inaccurate, you have the right to request its rectification.
- **Right to restriction of processing:** In some cases, you may have the right to ask us to restrict the processing of your personal data.
- **Right to data portability:** You have the right to receive your personal data that you have provided to Sunotec Group in a structured, commonly used and machine-readable format, and you have the right to transfer this data to another controller without hindrance from Sunotec Group.
- **Right to withdraw consent:** If the processing is based on your consent, you have the right to withdraw it at any time.
- **Right to object:** You have the right to object at any time to the processing of your personal data if the data is processed on the basis of legitimate interest pursued by us or by a third

party or if the processing is necessary for the performance of a task in the public interest or in the exercise of official powers which are provided to us. Upon objection, we will stop processing your personal data unless it is demonstrated that there are compelling legal grounds for the processing that override your interests, rights and freedoms as a data subject, or for the establishment, exercise or protection of legal claims.

- **Right to erasure** ("right to be forgotten"): In some cases, you may have the right to ask us to delete your personal data. Such, for example, will be the cases in which the data are no longer necessary for the purposes for which they were collected.
- **Right to complaint:** If you consider that the processing of your personal data violates the provisions of current legislation, you have the right to file a complaint to Sunotec Group or to The Commission for Personal Data Protection.

Please note that in some cases your rights are limited and if there is a legal basis for processing some of them may not be applicable.

The applications regarding your rights should be submitted to us in one of the following ways:

- a. In person at the address of Sunotec Group specified for contact above;
- b. Electronically – by sending an email to: [**dpo@sunotec-group.com**](mailto:dpo@sunotec-group.com)

We may need to request additional information from you in connection with your request so that we can confirm your identity and that you have the relevant right. This is an additional security measure to ensure that your personal data is not disclosed to third parties who do not have the right to receive it.

In occasion that you want to file a complaint in connection with the processing of your personal data by Sunotec Group, as well as the way in which we have considered your complaint, you have the right to file a complaint to The Commission for Personal Data Protection (CPDP), at: 1592, Sofia city, No. 2, Blvd. "Prof. Tsvetan Lazarov" or in the ways described on the commission's website <https://www.cpdp.bg/>

We usually do not transfer personal data to a third country or international organization. If required, we will organize it according to personal data legislation and taking necessary security and organizational measures.

Personal data processed by Sunotec Group are not subject to automated decisions or profiling.

UPDATE OF THE PRIVACY POLICY:

Sunotec Group reserves the right to modify this policy to ensure its compliance with applicable legislation and regulations.

Therefore, the Data Subject is invited to consult this Privacy Policy regularly to be informed of the latest changes.

Any changes to this Policy will become effective upon its publication on the website.