

INFORMATION PURSUANT TO ART. 13 OF THE EU REGULATION 2016/679

Data controller, data processor managers and persons authorized to process personal data

Volantec OOD (hereafter, Company, Organization or Data Controller), with registered office in Sv.Sv. Kiril i Metodi 149, Sofia, informs you hereby that the data provided by you in relation to existing and/or future legal relationships (user/data subject) will be processed in compliance with the aforementioned legislation.

The aforementioned processing will take place in a lawful way and according to the principles of art. 5 of the EU Regulation 2016/679. Further communications may be disclosed later either written or verbal.

The updated list of external data processor officers and persons authorized to process the data is kept by the Company in its archives, at the Operational Headquarters of the Company.

Data subject to processing

“Personal data processing” means any operation or set of operations performed with or without the aid of automated processes and applied to personal data or sets of personal data, such as collection, recording, organization, structuring, storage, adaptation or modification, extraction, consultation, use, disclosure by transmission, dissemination or any other form of making available, comparison or interconnection, limitation, deletion or destruction. Specifically, these are data voluntarily provided by you for the execution of the legal relationships in place with the Data Controller.

Article 4, paragraph 1, of EU Regulation 2016/679 defines “personal data” as any information concerning an identified or identifiable natural person (“data subject”); it is considered identifiable the natural person who can be identified, directly or indirectly, with particular reference to an identifier such as the name, an identification number, location data, an online identifier or one or more characteristic elements of his physical, physiological, genetic, psychic, economic, cultural or social identity.

The data subject to processing, summarized below, in a completely exemplary but certainly not exhaustive form, will be voluntarily provided by you for the execution of existing and/or future legal relationships:

- Name and surname, registered residence or tax domicile, telephone number, fax number, mobile phone number, e-mail address, VAT number.

Added to this are the navigation data, the IT systems and the software procedures used to operate this website, which could acquire during their normal operation your personal data, and the transmission of which is implicit in the use of the Internet communication protocols. However, this is information that is not collected with the intent of associating it with identified users, but by its very nature, it might lead to the identification of users through processing and association with data held by third parties. This category of data includes the IP addresses or domain names of the computers used by persons who connect to the site, the addresses in notation URI (Uniform Resource Identifier) of the requested resources, the time of the request, the method used in submitting the request to the server, the size of the file obtained in response, the numerical code indicating the status of the response given by the server (successful, error, etc.) and other parameters regarding the user's operating system and computer environment. These data are used for the sole purpose of obtaining anonymous statistical information about the use of the website and to check its correct functioning and are deleted immediately after processing. The data could be used to ascertain responsibility in case of hypothetical cyber crimes to the detriment of the website or requests from the authorities.

Purpose of the data processing

The personal data provided by you will be processed for the following purposes:

- management of existing and/or future legal relationships;
- fulfilments related to the obligations deriving from the aforementioned legal relationships;
- organizational management of any existing legal relationship or in definition phase;
- fulfillment of regulatory, accounting and/or tax obligations;
- protection of contractual rights;
- purposes related to the conduct of statistical analyzes; and
- promotion of marketing and commercial communication activities by e-mail, or by telephone, regarding the services provided by the Data Controller, also through partners.

Legal basis of the processing

With reference to the purposes referred to in points 1 to 6 of paragraph C, the processing is necessary for the performance of a legal relationship which you are or

may be a part of or the execution of pre-contractual measures adopted at your request. The processing is therefore lawful (art.6, co. 1, letter b), EU Regulation 2016/679). With reference to the purposes referred to in point 7 of the paragraph, the processing is optional and therefore subject to your consent in order to be lawful (art.6 co. 1 lett. A).

Duration of the data processing

The personal data collected for the purposes referred to in points 1 to 6 of paragraph C, will be processed for a period of time not exceeding the achievement of the purposes for which they are processed and for the subsequent ten (10) years for legal requirements . The data relating to the purposes referred to in point 7 will be processed for two (2) years, from the date of their acquisition, unless requested by the interested party. Such data, upon expiry of said term, will be destroyed.

The personal data contained in documents relevant for administrative-accounting purposes will in any case be kept in compliance with legal obligations.

Nature of the provision of data

The provision of data is mandatory in relation to the purposes from 1 to 6 of paragraph C, i.e., to fulfill the legal obligations regarding an established legal relationship and for any other purpose connected to legal obligations, regulations and community legislation; the refusal to communicate the data will prevent the Data Controller from fulfilling these obligations and consequently the inability to provide you with information and/or services requested by you. The provision of your data and consent to the processing for the purposes referred to in point 7 are completely optional. Failure to provide the conferment or rather the consent to the processing of your personal data for the aforementioned purpose will make it impossible to perform promotional activities within marketing and commercial communication by e-mail or telephone regarding the services provided by the Data Controller including also through any partners.

Data processing methods

The data will be processed and stored exclusively for the purposes indicated above through the use of both paper and computer media, inserted in relevant databases and processed with suitable tools to guarantee the integrity, security and confidentiality of the data, in accordance with the provisions of the EU Regulation 2016/679. All the appropriate technical and organizational measures will be taken to

ensure a level of data protection compliant with the provisions of the EU Regulation 2016/679. Access will be allowed only to persons authorized in writing to process personal data. The data may also be communicated and/or collected for/by third parties (as in the case of data acquisition from processing centers or from other companies). They will be appropriately designated as Data Processors and will be involved in the fulfilments required by the existing legal relationship as well as by specific legal obligations.

Social platforms

The website may offer access doors to so-called services and platforms – Social Network.

Volantec OOD recommends exercising caution regarding the dissemination of personal information on telematic channels through “comments” or “public posts” when using the aforementioned platforms. The terms of use and the privacy policies applicable to each of these social media, published on the respective sites, regulate the information provided. Volantec OOD does not perform any form of control over the use of personal information communicated in a public forum, a comment area, a message board, making the user solely responsible for any disclosure.

Cookies

The website www.volantec.it uses only technical cookies, necessary and functional for the provision of the same and third parties, which **do not allow** to collect information about visitors (profiling). For more specific information about the above, please visit the *cookie policy* section of the website at the web-address www.volantec.it

Communication to third parties and/or dissemination of data

For the purposes referred to in numbers from 1 to 6, Volantec OOD informs you that your data could be communicated to external subjects, designated in writing, if this is necessary to fulfill an obligation under the law, for the performance of obligations deriving from a contract of which you are/will be a part, as well as to fulfill, before the conclusion of the contract to your specific requests.

The recipients to whom the personal data of the data subject may be communicated can be identified in the following categories :

- Supervisory bodies, judicial authorities, bodies, professionals, companies, public administrations or other structures designated for the execution of

processing related to the fulfillment of the administrative, accounting and management obligations related to the ordinary performance of the economic activity of the Data Controller (legal obligations);

- banks, financial institutions, freelancers, professional firms and consultants to whom the communication of the aforementioned data is necessary for the performance of the Data Controller's activity and, in particular, in relation to the fulfillment of the contractual obligations assumed towards the interested party (contractual obligations).

The collected data will not be disclosed in any way.

Intention to transfer data abroad

The data will be transmitted exclusively in Bulgaria and within the European Union.

Rights pursuant to the EU Regulation 2016/679

The interested party can at any time exercise the rights referred to in art. 7, par. 3, and articles 15 and subsequent amendments of the EU Regulation 2016/679:

- right of access to personal data;
- right to obtain the rectification or cancellation of the same or the limitation of the processing of data;
- right to object to the processing;
- right to data portability;
- right to withdraw the consent, where applicable (the withdrawal of consent does not affect the lawfulness of the treatment based on the consent given before the withdrawal); and
- right to lodge a complaint with the supervisory authority.