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INFORMATION ON THE PROCESSING OF PERSONAL DATA

Your data privacy is important to us. We have initiated the needed organizational and technical measures, in order to process your personal data in a lawful, appropriate and transparent manner. The present information document of Kuehn and Partners BG on the processing of personal data clarifies what personal data of yours we are going to process, for what reasons and on what grounds, to what recipients we could provide those and over what periods we store such data.

We recommend that you should read the present information document carefully, in order to learn more details about the manner, in which your personal data is being processed in your capacity as a client, potential client, person, related to a client of ours, co-counterparty, lessee, employee of a client of ours, contact person, representing a legal entity or another interested party. Regardless of the reasons and grounds for processing your personal data, Kuehn and Partners BG shall treat those with equal diligence. This document also contains information about your rights and the ways you could exercise those.

Kuehn and Partners BG may update this information on the processing of personal data, as its recent version is available at http://www.kuehnleasing-bg.com/1.1.Kuehn&P_Privacy_statement_clienti_BG.pdf, and in the offices of Kuehn and Partners BG EOOD. Kuehn and Partners BG shall inform you of all essential amendments to the information herein on its website or through another communication channel.

More information about the Bulgarian legislation on data privacy is available on the website of the Commission for Personal Data Protection: www.cpdp.bg

1. About the company

Kuehn and Partners BG EOOD, Company ID 131008996, Sofia 1000, 10, Vitosha Bld., floor 4, off.16 . For issues, pertaining to the processing of personal data, please contact our Data Protection Officer at the contact details, stated at the end of this document. Kuehn and Partners BG EOOD in its capacity as Personal Data Controller conducts its activities in strict compliance with the requirements of the Personal Data Protection Act and Regulation (EU) 2016/679 of the European Parliament and of the Council on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, in order to ensure confidentiality and lawful collection and processing of your personal data.

2. Definitions

a. "Personal data" shall mean any information, relating to a natural person /data subject/, who is identified or identifiable, directly or indirectly, through an identifier, such as: name, personal identification number, location data, sex, address, telephone number, online identifier or through one or more features, specific to the physical, physiological, genetic, psychological, mental, economic, cultural or social identity of that individual.

b. „Processing of personal data “ shall mean any act or set of actions, performed with personal data through automated or other means, such as collection, recording, organizing, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making the data available, alignment or combination, blocking, erasure or destruction.

3. Rights of Data Subjects:

If you are a person, whose data is being processed by Kuehn and Partners BG, pursuant to the General Data Protection Regulation, in effect from 25.05.2018, you are entitled to the following rights, which you may exercise by visiting an office of Kuehn and Partners BG EOOD or by sending a written request at the address of the Broker or at the contact details of our Data Protection Officer, stated at the end of this document.

a. Right to access - Upon your request in your capacity as data subject, the Broker shall be obliged to provide you with information about the categories of personal data, relating to you, which are being collected and processed by it, as well as about the purposes of the processing, the recipients or categories of recipients to whom your personal data is being disclosed, the sources of this data and other personal information, which you are entitled to access pursuant to the legislation on data privacy. If you have wished so we are going to provide you with access to your personal data, which are being processed, under the form of a copy of those. The copy shall be provided to you free of charge. Should you wish additional copies, we may determine a reasonable fee for you, in order to cover our administrative expenses for their preparation. If you have filed your request electronically, we shall provide you the information in a widely used electronic form, if possible, unless you have requested us otherwise. In case we do not process your personal data we are going to inform you thereof. If we reject your request for a copy of the data, we are going to inform you of the reasons for such a decision. In case we process large volume of information about you, we may ask you to state precisely the information or the processing activities, to which your request relates. Thus you are going to help us find it better and quicker and you are going to receive the data you need sooner.

b. Right to rectification, restriction of processing and/or obliteration (deletion) – upon your request the Broker shall be obliged to rectify, delete or restrict the processing of your personal data, if there is a case in which their processing is unlawful. In such cases the Broker shall inform any third party, to which your personal data has been disclosed, of all rectifications and deletions it has made, as well as the cases of restricting the processing of your personal data.

In the cases when you wish that we should **rectify** your personal data you may ask us to also inform the third parties, to which such data has been disclosed, except the cases when this is impossible or involves excessive effort.

In order to exercise your **right for restricting the processing**, the following conditions should be fulfilled: You dispute **the accuracy** of personal data;

- The processing is being made **without legal grounds**, however instead of deleting those, you demand that we should restrict their processing;
- We no longer need your personal data for processing purposes, however you **demand** those for ascertaining, exercising or protecting legal claims.
- **You have objected** to the processing on grounds of „*legitimate interest*“

When the processing of your personal data has been restricted, we could still continue processing those in two cases:

- Upon your explicit **consent** or
- for the purpose of ascertaining, exercising or protecting of **legal claims or for protecting the rights of another natural person** or due to important grounds of **public interest** for the EU or a member state.

You are entitled to request **deletion** of your personal data, when they are no longer needed for the purposes, for which they have been collected or otherwise processed; when you withdraw your consent to the processing of your personal data and there are no other legal grounds for the processing; when you object to processing based on legitimate interest and such legitimate interest does not have preference over your rights, freedoms and interests; upon processing without legal

grounds or deletion of your personal data is our legal obligation, stipulated in the laws of the Republic of Bulgaria or of the European Union. By virtue of the currently effective legislation, we are **entitled to continue the processing notwithstanding your request for deletion**, in order to comply with our legal obligations, envisaged in the laws of the Republic of Bulgaria or of the European Union, which require processing of your personal data, or in the cases when such processing is needed for ascertaining, exercising or protecting of legal claims.

c. Right of personal data portability – in your capacity as a data subject you are entitled to request to receive the relating to you personal data, which you have provided to Kuehn and Partners BG, in a routinely used, structured and machine-readable format and you are entitled to request direct transmission /transfer of those data to another Controller, without hindrance on the part of Kuehn and Partners BG, in the latter's capacity as a Personal Data Controller, to which you have provided your data. **The right of portability** exists and may be exercised, **only when** the following **two conditions** have been fulfilled: (1) the issue is about processing in an **automated way** (i.e. This right does **not** pertain to processing of data in the form of paper records) **and** (2) apart from being performed in an automated way, the processing of your personal data is being made based on **(a) your consent or (b) an agreement, to which you are a party or for initiation of steps upon your request prior to conclusion of an agreement.**

You should know that when you exercise your right of data portability, this shall not entail obliteration of your data from our systems. You will be able to continue using our services even after the data portability operation. Also, data portability shall not affect the initial storage period, pertaining to the delivered data. You may exercise the other rights of yours, stipulated in the legislation or listed by us herein, while we continue processing your data.

d. Right to object – in your capacity as data subject you are entitled to file an objection to the processing of your personal data, when the processing of your data is based on a lawful (legitimate) interest of the Broker or of a third party, including also that you are entitled to object at any time to the processing of personal data for direct marketing purposes. Kuehn and Partners BG shall consider you objection and shall provide you with its opinion in writing within a 30-day period, unless extension of such period is needed, of which the Broker shall inform you in due time. After considering the objection, the Broker shall, in principle, discontinue the processing of your personal data, as well as shall inform all interested parties, to which the personal data has been delivered, of the received objection and of the measures, initiated to this end. In some cases, however, the Broker could have indisputable legitimate grounds to continue processing your personal data, even after receiving your objection (for example in cases of litigation, suspected fraud monitoring, etc). If you have objected to the processing of your personal data, based on our legitimate interest or a legitimate interest of a third party, we may continue the processing notwithstanding your objection, if we can prove that there are convincing legitimate grounds for the processing, which have preference over your interests, rights and freedoms, or for ascertaining, exercising or protecting legal claims. Within these assumptions Kuehn and Partners BG shall contact you, in order to clarify the reasons, due to which it is going to continue processing your personal data. In case your objection concerns processing of personal data for *direct marketing purposes*, the Broker shall unconditionally discontinue their processing for such purposes.

e. Right to withdraw your consent to the processing of personal data for the purposes, indicated in the Declaration of Consent - in the cases when the processing of your data is based on the consent, provided by you. The withdrawal may be made upon submitting a Declaration for Withdrawal of Consent according to a sample form, provided in the offices of the Broker, or by writing to us at the contact details, stated herein.

f. **Right to complain before the Commission for Personal Data Protection (CPDP) or to the court** – in your capacity as data subject you are entitled to file a complaint with the Commission for Personal Data Protection (CPDP) at the following address: *Sofia city, postal code 1592, 2, Tsvetan Lazarov Blvd.* against acts of Kuehn and Partners BG in line with the processing of your personal data. You may also seek protection of your rights through a court procedure.

Should you disagree with the opinion of Kuehn and Partners BG on the submitted inquiry or should you wish to obtain more information, you may visit the website of the Commission for Personal Data Protection: www.cdpd.bg.

The exercising of your rights shall not be binding upon the provision of your personal data to the competent authorities for the purpose of prevention, investigation and disclosing of crimes.

IMPORTANT INFO UPON EXERCISING YOUR RIGHTS

How to state your rights? In order to exercise your rights as per the Regulation you may write to our email or send a letter to the Broker's postal address or to our Data Protection Officer. You may ask in writing questions of various natures, pertaining to the processing of your personal data by the Broker, both on site at your servicing office, as well as electronically at office@kuehnleasing-bg.com. Requests in line with the exercising of your rights shall, in principle, be submitted personally or by a person, explicitly authorized by you. In the cases when there are regulatory procedural rules, relating to the exercising of your rights (in the Regulation, Personal Data Protection Act or other acts) these shall also be complied with.

In what format are we going to reply to you? In the format you have sent your inquiry to us – in writing on paper or in electronic form. In the cases when you have submitted a request through electronic means, if possible the information shall be provided to you in a widely used electronic form (word, pdf, excel), unless otherwise requested by you.

Within what period are you going to receive a reply? Within **one month** of receiving your request you shall be provided with information about the actions, initiated by us with regard to it. Upon need this period **may be extended with another two months**, while taking into account the requests' complexity and number. Should such extension become necessary, we shall inform you within a one month period of your request's submission, as we shall explain you the reasons for such extension.

Doubts regarding your identity. In the cases when you exercise your rights in data subject's capacity you need to prepare a detailed description of your request in the application, submitted to the Broker. Upon exercising your rights Kuehn and Partners BG shall have to verify your identity, to eliminate cases when somebody else pretends to be you. For the purpose the Broker may ask you for an ID card or for another identification document, when providing you with the information, requested by you. When we have well-grounded misgivings in line with the identity of the natural person, submitting the request to us, we may require the provision of additional information, needed for confirming the identity of the data subject. Should we fail to receive such information and should we be unable to identify the data subject we may reject the initiation of acts based on a request, submitted to us, for exercising some of the rights, stated in that notification.

When a certain individual has submitted to us requests, which are apparently ill-founded or excessive, namely due to their recurrence, we shall be entitled to either: a) charge a reasonable fee, by taking into account the administrative expenses for provision of the information or communication, or the initiation of the requested acts, or b) reject the initiation of the request-related acts.

4. Categories of personal data that are being processed

Kuehn and Partners BG may process various categories of personal data, relating to your physical, social or economic identity. The data may be obtained from you in your capacity as a data subject, or may be generated by the Broker in line with servicing you as a client.

4.1. Kuehn and Partners BG may process various types of data, depending on the purpose of the processing, such as:

A) Basic data

In order to offer you standard products and services, similar to or relating to those, used by you /the so called basic marketing - for more information see Item 6.3.κ hereof/: - Full name

- Telephone number – mobile / fixed line
- Email address
- Domicile
- Residence or mailing address
- Information about the products, used by you

The stated data is the basic data, processed by Kuehn and Partners BG, in order to verify your identity in its capacity as your servicing broker. The Broker shall use only your contact data, in the cases when you are a client of ours, in order to send you proposals for purchasing our similar products, as it is interested in sending you offers in its Broker capacity.

B) Extended data:

The Broker may process some or all of the below stated Extended Data categories, for the purpose of achieving the objectives, described below, only and solely when it has grounds for that.

a) in order to verify your identity:

- Full name
- Place of birth/Country
- Date of Birth
- Nationality (citizenship)
- Driving license category
- Domicile
- Residence or mailing address
- ID card data
- Client number
- Number from a national registration database / Personal ID Number/ Foreign National's ID Number - Number with tax authorities
- Place of employment

b) in order to reach you:

- Telephone number – mobile / fixed line
- Email address
- Domicile
- Residence or mailing address

c) in order to provide you with appropriate consultation and services:

- Your products
- Your potential interest in the services of Kuehn and Partners BG
- History of the consultation data, we provided you with in the past
- Data about your property status and vehicle ownership for particular leasing enquiries types, such as M&E leasing, real estate leasing, cars or Heavy vehicles leasing etc.
- Your qualification, knowledge and professional experience, position/ job title

- Feedback, comments and proposals, past complaints. These could definitely help Kuehn and Partners BG in offering you better service in the future.
- Financial information – incl. data about your bank account upon payment of a premium via a bank transfer.
- Identification data in implementation of obligations of ours under the Measures Against Money Laundering Act (MAMLA) – incl. ID card data and a photograph (from a photocopy of an ID card); date and place of birth, data about related persons, holding positions as senior civil servants, citizenship, country of domicile; professional activity; ultimate owners of a client-legal entity; origin of funds
- Other information, which is required by law; it is needed for conclusion of a contract and is required by the Lessor or is being voluntarily provided by you.

4.2. Publicly available data and such, acquired through third parties

We also collect particular personal information about you in your capacity as representatives of our clients - legal entities - at various stages of our business relations: names; position in the organization you work for; telephone and e-mail (for contact purposes); Personal ID Number (if required for certain document types). For example, we collect personal data directly from you, in the cases when you provide us with those for the purposes of agreement with the company you represent, and also from publicly available sources, for example a commercial register for reference purposes as regards your representative powers. We may obtain your personal data also from your employer or from your colleagues, for example in the cases when they have stated you as a contact person in view of the implementation of an agreement, concluded with us, or when you have been listed as lessee under contract, concluded by an employer in favor of employees and their relatives. We may obtain your personal data in your capacity as an employee of a client of ours, who is a lessee under a vehicle lease agreement in line with lodging of claims before the lessor upon an occurred insured event and damage on a driven by you company vehicle, which is subject of lease.

Kuehn and Partners BG sometimes processes publicly available information, such as:

- Information, which should be disclosed in a public database, such as, for example if you have been appointed as a director or proxy in a company, or if you are a company owner;
- Kuehn and Partners BG may also obtain your personal data from third parties:
 - As well as from official public registers, bearing responsibility for the lawful storage of such information, for example the Commercial Register with the Registry Agency, or

Such data may be processed for the purposes, listed by Kuehn and Partners BG herein, as well as in order to verify the accuracy of the information in the Broker's database.

5. Personal data recipients

Personal data in general is being processed by employees of Kuehn and Partners BG. The processing of personal data may also be carried out by other processors, with which the Broker has a concluded contract for the purpose and who perform activities, representing part of the services, rendered by the Broker. Upon availability of lawful grounds your personal data may be provided to other data controllers, which will use those for their lawful purposes.

a. Personal data controllers, to whom Kuehn and Partners BG may provide personal data:

- Guarantee funds and financial institutions, as well as other bodies of the European Union, having auditing and controlling functions.
- Lessors, banks, factoring companies, stock exchange brokers, other financial institutions etc., involved in the servicing and/or the execution of rights and obligations under your lease

agreement, which you have chosen with our assistance for receipt of offers or conclusion of lease contract.

- Assisting companies, external expert witnesses and experts, involved in the servicing and/or execution of rights and obligations under your lease agreement;
- Courier companies;
- State regulatory and other authorities – Financial Supervision Commission (FSC), Commission for Personal Data Protection (CPDP), the National Revenue Agency (NRA), Ministry of Interior, the court, Prosecutor's office etc.

In case of any changes in the list of personal data controllers, to whom personal data is being provided, Kuehn and Partners BG shall update this document.

b. Personal data processors are:

Individuals or legal entities, public authorities, agencies or any other body, which processes personal data on behalf of the controller.

Kuehn and Partners BG may directly or indirectly use other processors, with which it has concluded agreements, such as:

- Entities, rendering assistance to the Broker in line with the servicing and collecting of receivables
- Companies, providing information and communication technologies for facilitating the work of operational systems and services (IBM, Microsoft etc.) as well as other service providers, with the help of which we render you our services (car repair services, etc.)
- external lawyers and law firms, which have concluded contracts with Kuehn and Partners BG
- External auditors, which have concluded contracts with Kuehn and Partners BG
- Companies, specialized in archiving of digital information and access
- In all cases we conclude agreements in writing with our partner merchants, by requiring them to initiate the needed measures, in order to guarantee the protection of your personal data. We are going to provide those counterparties of ours only with the information, which is needed by them in order to render us the contractual services, without permitting them to use your information for their own needs. We shall not provide your personal data to third parties, in order to send you unsolicited marketing messages, unless you have provided the needed consent for that. Should you receive unsolicited commercial messages from our partner merchants, please, inform us at our contact address or email, stated at the end of this document.
- Also, please bear in mind that our webpage may contain links to other web pages, which are not owned or operated by us. We cannot control and we shall not bear responsibility for the practices of processing personal data, nor for the content of those other web pages. We insistently recommend that you should read the policies and the privacy info on every webpage that collects personal data. This Notification only refers to the personal information that we collect about you.

c. Recipients outside the European Economic Area (EEA)

We do not deliver your personal data to other persons/entities abroad, nor to third countries, nor to international organizations.

6. Purposes and lawful grounds of personal data processing

Personal Data, collected by the Broker in its capacity as Personal Data Controller, may be processed for various **purposes** and on various **lawful grounds**, as follows:

6.1. Purposes, where the grounds for processing personal data is a statutory obligation:

- a. **Verifying your identity as a client of the Broker and the authenticity of your personal data**
- b. **Risk assessment and exerting control with the aim to prevent money laundering, embargo and antiterrorist acts upon lease contract** - grounds for processing of data for such purposes are obligations of the broker to identify its clients as per the Measures Against Money Laundering Act and the Regulation on its implementation, the Measures Against Financing of Terrorism Act and the Regulation on its implementation. The processing of your data is related to initiated by the Broker measures and acts for preventing, disclosing, investigating and reporting of suspicious transactions to the Financial Intelligence Directorate under the above-stated enactments
- c. **Reporting before government and controlling authorities** – Kuehn and Partners BG EOOD may share your data with regulatory, government and judicial bodies, which by virtue of an enactment are empowered to require the provision of information, among which also personal data, for example – courts of law, prosecutor's office, various regulatory bodies, such as the Consumer Protection Commission, the Commission for Personal data Protection, the Financial Supervision Commission, the National Revenue Agency, authorities with powers to protect the national security and public peace etc.

In line with the requirements to financial institutions, incl. leasing companies, banks, factoring companies etc. pursuant to the Foreign Account Tax Compliance Act (FATCA) and the changes in the Tax Procedure Code, linked to the automated exchange of financial information in the field of taxation (CRS=Common Reporting Standard), the collected personal data of yours, incl. under certain lease agreements, may be provided to lessors in certain cases, determined by law, for accounting and tax purposes in implementation of reporting requirements, to the National Revenue Agency and to the competent authorities.

6.2. Purposes, where the processing of your personal data is being made on contractual grounds

- a. **Sending of messages for the used products and services** – the Broker processes your personal data for the purpose of sending messages for the products and services, used by you by means of telephone calls, emails, SMS, letters and others (for example, reminding of an expiring policy deadline or an installment maturity date). The messages only refer to already used by you products and services, they are not related to achievement of particular marketing objectives and do not contain offers for new services.
- b. **Statistics, reports and references**, related to the particular lease agreement, the lease contract type and the target market
- c. **Settling of recourse claims and legal disputes**
- d. **Use of products/services** – Kuehn and Partners BG processes the personal data of clients in its various channels with the aim to ensure the use of the Broker's products and services that have been purchased by the client

6.3. Purposes, where the processing of personal data is being made based on safeguarding the Controller's lawful (legitimate) interests:

- a. **Historical, statistical or scientific purposes** - Kuehn and Partners BG has lawful interest in the processing of your personal data for the purpose of preparing statistical references and reports, carrying out of scientific, research and development activity, performing of historical reviews and forecasts for development of the economy, the financial industry, clients' needs, etc. For these purposes aggregated data is being used, obtained on the basis of entries of specific personal data of clients.
- b. **Legal disputes – ascertainment, exercising and safeguarding the rights of Kuehn and Partners BG** - Kuehn and Partners BG shall process its clients' data in order to defend its rights in

court/ in litigation procedures, when settling claims with the help of external solicitors / lawyers etc. This pertains to situations where your personal data is being processed in line with administering information, related to legal disputes, court orders, petitions and court rulings.

c. Testing of changes in software applications, demo platforms and internal gateways for delivery of trainings – The Broker shall use your personal data in the process of work on the creation or updating of software applications for work with operating systems of the Broker with the aim to:

- Test software code changes of applications in different testing/acceptance environments (e.g. Improvement of the distribution channels or ensuring more reliable protection of the collected personal data).
- incident resolving – incident replaying
- Training of employees

d. Internal reporting and analysis – Kuehn and Partners BG uses the personal data of its clients with the aim to analyze the activity and optimize its processes.

e. Risk assessment as a measure for preventing and disclosing of frauds – Kuehn and Partners BG processes the personal data of clients with the aim to protect itself against fraud or criminal acts on their part. Kuehn and Partners BG has the right not to service high-risk clients, who expose the former's reputation at risk. Based on certain facts (e.g. a forged ID card, certain client behavior) the Broker shall assess the risk of potential fraud. Certain indicators, as well as any other information (like a stolen ID card, the choice of a country for e-banking), representing an indicator for a potential fraud, could serve as a basis for such assessment. The measures for preventing and uncovering fraud are being taken in the context of compliance with the internal rules for security, exerting of control, ensuring reliable protection of the information, stored on both physical and electronic media, as well as in online banking (incl. computer "cyber" crimes).

f. Direct marketing of standard products and services of Kuehn and Partners BG: Offering products and services of the Broker, as well as your inclusion in surveys on products and services, offered through any of the channels incl. the Broker's offices, the contact center, email, SMS, telephone, online channels. The Broker shall offer you its products and services and shall include you in surveys on those only in case you are its client and to this end you could reasonably expect that it shall process your personal data, in order to offer you new and better products and services, similar to or related to those, used by you. In such cases the broker shall use only your Basic Data as per Item 4.1. A above in the present document. The materialization of these purposes is needed for the protection of the lawful interests of Kuehn and Partners BG as a personal data controller, as these interests are related to its main activity as a Broker.

6.4. Purposes for which the processing of personal data is carried out on the grounds of protection of the legitimate (legitimate) interests of a third party (your employer) - claiming insurance claims from your employer for compensation for damages, such as a company-owned car provided to you, in which case we may process your personal data in your capacity as an employee such as name, personal identification number, position, profession, license / license data, etc.

7. Personal data storage period

The documents and the information, containing Personal Data are being stored by Kuehn and Partners BG in accordance with the Policy on the storage and destruction of personal data and the applicable legislation. All trade contracts and pertaining correspondence and documentation, which are needed for financial -accounting and tax control purposes shall be stored over a period of 12 years as from the contract's expiry or termination. Documents, which are not needed for financial and tax control purposes, shall be stored over a period of 5 years following the termination of

business relations. We shall neither delete, nor anonymize your personal data, if those are needed for a pending litigation or administrative proceedings or such for consideration of your complaint against us. Everywhere in the present Information document of Kuehn and Partners BG EOOD on the processing of personal data and in the declaration on the client's consent, where there is reference to Kuehn and Partners BG or the Broker, "the Broker" shall mean Kuehn and Partners BG and its eventual legal successors in cases of reorganization. The Privacy Statement of Kuehn and Partners BG EOOD is accessible at the following addresses: http://www.kuehnleasing-bg.com/1.1.Kuehn&P_Privacy_statement_clienti_BG.pdf or may be provided to you upon request.

8. How to reach us

You may submit an application in writing or an inquiry in line with the present document to Kuehn and Partners BG EOOD at the following address: 1000 Sofia, 10, Vitosha Bld., fl. 4, off. 16. Our Data Protection Officer, to whom you may refer questions on this document or to exercise your rights in line with that is Ana Todorova, with contact data:

E-mail: office@kuehnleasing-bg.com

Tel.: + 359 2 937 7971
