

## Personal Data Protection Policy of TANDER CORPORATION

### **INTRODUCTION**

The management of TANDER CORPORATION EAD, UIC 175409608, headquartered at Sofia 1618, Boyana Housing Estate, 15A Prohlada Str. (hereinafter referred to as the “company”, “enterprise”, or “organization”) undertakes to provide conformity with the laws of the EU and the Republic of Bulgaria in relation to the processing of the personal data and protection of the “rights and freedoms” of the people, whose personal data the enterprise collects and processes in accordance with the General Data Protection Regulation (Regulation (EU) 2016/679).

The website [www.tanderbg.com](http://www.tanderbg.com) is in possession of Tander Corporation EAD and is managed by the Company in accordance with the provisions of the Personal Data Protection Act and the related legislation, including but not limited to Regulation (EC) 2016/679 (“GDPR”).

Regulation (EU) 2016/679 and this policy apply to all functions related to the processing of personal data, including those performed in relation to personal data of customers, employees, suppliers, and partners, and any other personal data that the organization processes from different sources.

The goal of this Policy is to inform you about the way we process your personal data as an administrator, as well as about your rights. The company strives for providing you with accessible and useful information on its website.

The personal data protection is of extreme importance to us. Our goal is to protect the “rights and freedoms” of the individuals and to ensure that the personal data are not processed without your knowledge and, where possible, that they are processed with your consent.

That policy is applied to all employees/workers (and interested parties) of TANDER CORPORATION EAD, as well as for the external suppliers. Each breach of the General regulation will be considered as a breach of the labour discipline, and if there is a presumption of a malfeasance performed, the matter will be submitted to the relevant public authorities as soon as possible.

The observance of the data protection act is a responsibility of all employees of TANDER CORPORATION EAD, who process personal data.

### **WHAT IS PERSONAL DATA?**

„**Personal data**” is any piece of information related to an identified natural person or a natural person that may be identified (“subject of data”); natural person, who may be identified, is a person that may be identified, directly or indirectly, in particular by an identifier such as name, identification number, location data, online identifier or by one or more signs, specific for the physical, physiological, genetic, psychological, mental, economic, cultural or social identity of that natural person;

“**Special categories of personal data**” are personal data revealing racial or ethnic origin, political views, religious or philosophical beliefs, or membership in trade unions and the processing of genetic data, biometrics for unique identifying of a natural person, data concerning the health or data concerning the sexual life of a natural person or sexual orientation.

## ***COLLECTION AND USE OF PERSONAL DATA***

We process your identification data, traffic data and other personal data to provide you with the products and services you have requested and that you use with us, both for performing the contractual and pre-contractual obligations and exercising the rights under the contracts concluded with you. They can also be used for statistical purposes of the Group, which are related to improving the quality of our services, as well as marketing activities of Tander.

It is listed below examples of the types of personal information that Tander can collect, as well as the ways, in which we can use it. Detailed information about the different types of data that is collected you will find when you use the relevant service and provide information to the Company.

### ***WHAT PERSONAL INFORMATION DO WE COLLECT?***

- ❖ In case of creating an Account, registering on our website, buying a product, signing a contract - your names; your email address; address for delivery of the ordered by you goods;
- ❖ For managing of access and identifying your account - email address and password;
- ❖ Details for payment and protection of your data concerning payment - email address, customer's number, phone number, invoice address, delivery address, information concerning the means of payment, purchase amount, and frequency of the purchases made;
- ❖ For issue of an invoice and its processing - your names, invoice address, delivery address, email address, used means of payment, payment amount and product(s), purchase date;
- ❖ Participation in online research and other marketing activities - different types of information, including but not limited to your name, your post address, your telephone number, your e-mail address, preferable way for contacting you, your purchase and search history;
- ❖ For ensuring safety against defective products and related to goods, complaints and claims - your names, your e-mail address, the products that are purchased; e-mail address, information related to the complaint/claim and the product(s) concerned;

### ***FOR WHAT PURPOSES AND ON WHAT GROUNDS DO WE USE YOUR PERSONAL DATA?***

The whole processing of personal data is performed in accordance with the principles for data protection, specified in article 5 of the Regulation (EU) 2016/679. The goal of the policies and procedures of TANDER CORPORATION EAD is to guarantee the observance of these principles.

Tander Corporation processes your personal data for us to provide you with the products and services requested by you and which you use with us in case of execution of both pre-contractual and contractual legal relations in connection with purchase, assignment, reporting, acceptance and payment.

The personal information we collect allows us to keep you updated about our latest products and upcoming events. It also helps us to improve our services, content and advertising. If you do not want to appear in our list of addresses, you can unsubscribe at any time by updating your preferences in the account and on the website.

We may periodically use your personal information to send important messages such as notifications about your purchases and changes in the rules, terms and our different policies.

We may also use your personal information for internal purposes such as checks, data analysis, and researches for improvement of our products, services and communication with the customers of Tander Corporation EAD.

If you participate in events, a lottery, a competition or a promotion, we may use the provided by you information to administer these programs.

In addition, your data is also processed by the Company for the purposes of:

- + Establishing anomalies, claims, related to the products and services of the Corporation on the grounds of legitimate interest;
- + Questions toward us related to products on the grounds to your consent;
- + Application and Registration in Tander Club for receiving of preferential terms on the grounds of your consent.

## ***COOKIES AND OTHER TECHNOLOGIES***

### **USE OF COOKIES**

#### **WHAT ARE COOKIES?**

Cookies are small files containing information saved in your internet browser (data about the used language, connection time, websites visited) or on your hard disk drive when you visit the site. We can consult them in connection with your recent visits to improve and facilitate your search. The goal of the paragraphs below is transparency for providing you with the necessary and comprehensive information about the cookies Tander uses on its website. We draw your attention to the fact that if you share the use of your device with other people, it is possible the personalized nature of functioning of the cookies to be changed.

#### **WHAT TYPES OF COOKIES ARE USED BY TANDER CORPORATION?**

The website uses cookies for facilitating your navigation. The following cookies are used:

- Cookies needed for the functioning of your search that enable you to use the basic features like “shopping bag” management and support possible identification throughout the search;
- Customizing cookies that allow you to visit websites in a customized way based on your previous visits, purchases, etc. They allow you to find the offers that suit you the best;
- Advertising cookies that allow you to receive offers from the Company on websites of external partners.

You may adjust your internet browser so that it not to save cookies or you can delete the ones that have already been saved. If you want to use these functions, please contact the manufacturer of your internet browser.

Tander Corporation is not responsible if the internet browser that you use does not have functions for control of the use, rejection, or deletion of saved cookies. In case you disable the saving of cookies or delete already saved ones, depending on their type, it is possible the functioning of the site to be disturbed.

#### ***SOCIAL NETWORKS***

Your access to the social networks like Facebook, Google +, YouTube, Twitter, etc. provides separate registration and acceptance of the general conditions of those websites. Tander

Corporation is not responsible for the protection of your personal data in case of acceptance of those general conditions. Please review in detail the general conditions of those websites.

### ***DISCLOSURE OF YOUR PERSONAL DATA***

TANDER CORPORATION EAD shall provide conditions, according to which the personal data is not disclosed to unauthorized third parties, including family members, friends, public authorities, even investigating ones, if there is a reasonable doubt that they are not required by the established order. All employees/workers should be cautious when they are requested to disclose stored personal data of another person to a third party. It is important to be considered whether or not the disclosure of information is related to the needs of the activity performed by the organization. Employees shall pass a special training and periodic briefings for avoiding the risk of such a breach.

All requests from third parties for data providing should be supported by appropriate documentation and any such data disclosure shall be specifically allowed by the data protection responsible person.

### ***TRANSFER TO THIRD COUNTRIES***

Each export of data outside the EU to non-EU countries (specified in the General regulation as “third countries”) is illegal, except if there is not an appropriate “level of protection of the main rights of the subjects of data”. TANDER CORPORATION EAD does not transfer personal data to non-EU countries.

### ***PERSONAL INFORMATION PROTECTION***

TANDER CORPORATION EAD takes precautions - including administrative, technical and physical measures - to protect your personal information from loss, theft and misuse, as well as from unauthorized access, disclosure, alteration, or deletion.

When you publish in forums, chat rooms, or services of social networks, the personal information that you share is visible by other users and may be read, collected, or used by them. You are responsible for the personal information, which you choose to provide in those cases.

All employees of TANDER CORPORATION EAD are obliged to protect the confidentiality of your information and observe the applicable organizational and technical measures for its protection. The access to your data is limited under the principle of necessity of performing their duties.

In the cases when TANDER CORPORATION EAD shares information about you with third parties - suppliers, partners, subcontractors of TANDER CORPORATION EAD, the Company has mechanisms with which to ensure that they provide a level of data protection according to the agreed standard for this.

### ***STORAGE AND DELETION OF PERSONAL INFORMATION***

TANDER CORPORATION EAD does not store personal data in a form that allows the identification of the subjects for a longer period than it is necessary with respect to the purposes for which the data were collected.

The storage period for each category of personal data is specified in the **Schedule of collecting and deletion of the data categories**.

The personal data must be securely deleted in accordance with the principle of ensuring an appropriate level of security - including protection against unauthorized or illegal processing and against accidental loss, deletion or damage, by applying appropriate technical or organizational measures (“integrity and confidentiality”).

## ***YOUR RIGHTS AS A SUBJECT OF DATA***

If you have submitted your personal data to TANDER CORPORATION EAD, you as a subject of data have the following rights in relation to the processing of data, as well as to the data, which are saved about you:

- To request confirmation for verification if personal data related to you are processed and, if so, to obtain access to the data, as well as information about the recipients of that data;
- To request a copy of your personal data from the administrator;
- To request the administrator to correct personal data when they are inaccurate and when they are no longer up to date;
- To request the administrator to delete personal data (the right “to be forgotten”);
- To request the administrator to restrict the processing of personal data, in which case the data will be only stored, but not processed;
- To object to the processing of your personal data;
- To object to the processing of personal data related to you for the purposes of direct marketing;
- To appeal to a supervising authority if you believe that any of the provisions of the CRPD is breached;
- To request the personal data to be provided to you in a structured, widely used and machine-readable format;
- To withdraw your consent for the processing of personal data at any time with a separate request addressed to the administrator;
- Not to be a subject of automated decisions affecting you to a significant degree without the possibility of human interference;
- To oppose to automated profiling, which happens without your consent.

TANDER CORPORATION EAD provides conditions, which guarantee the exercise of these rights by the subject of data:

- Subjects of data may request data access as described in the **Subject’s Requests Management Procedure**. The mentioned procedure also describes how TANDER CORPORATION EAD will ensure that the response to the data subject's request meets the requirements of the General Regulation.
- Subjects of data have the right to submit complaints to TANDER CORPORATION EAD related to the processing of their personal data. The processing of a request from the subject of data and the appeal on the part of the subject of data in relation to the way complaints are processed shall be conducted in accordance with the **Procedure for the ways of communication in case of complaints and requests from the subjects of data**.

## ***CHILDREN***

When TANDER CORPORATION EAD processes children’s personal data, it shall be received the permission of the individuals exercising parental rights (parents, guardians, etc.). This requirement is applied in connection with children under the age of 16.

## ***POLICY VALIDITY AND UPDATE***

We may periodically update our personal data protection policy. In case of a change in the current policy, a notice will be published on our website, as well as the updated personal data protection policy.

***CONTACT DETAILS***

**IF YOU'D LIKE TO CONTACT US ON MATTERS, CONCERNING THIS POLICY OR THE PERSONAL DATA PROTECTION IN TANDER CORPORATION EAD, PLEASE CONTACT US BY THE FOLLOWING WAYS:**

Via e-mail address: [gdpr@tanderbg.com](mailto:gdpr@tanderbg.com)

By post: Sofia 1618, Boyana Housing Estate, 15A Prohlada Str., Tander Corporation EAD, to the Data Protection Responsible Person