

APPROVED BY:

Dr. Eng. B. Manchev, Executive Director

PERSONAL DATA PROTECTION POLICY

I. General

I.1. In carrying out its activities, GCR JSC acts in its capacity of personal data administrator according to Art. 4, para. 7 of Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of individuals with regard to the processing of personal data and on the free movement of such data and repealing Directive 95/46 / EC (General Data Protection Regulation) ¹ and performs actions for collection, processing and storage of personal data, determining the purposes and means for processing personal data in accordance with the Regulation and the Personal Data Protection Act.

I.2. This Policy determines the order in which GCR JSC collects, records, organizes, structures, stores, adapts or modifies, retrieves, consults, uses, discloses through transmission, distribution, or other way in which personal data becomes available, arranges or combines, restricts, deletes, destroys or otherwise processes for the purposes of its activities personal data of job applicants, workers, employees and members of their families, as well as contractors².

I.3. This Policy has been agreed and prepared in accordance with the provisions of the Personal Data Protection Act and the Regulation, which is directly applicable in all Member States of the European Union, as of May 25, 2018.

II. Basic Concepts

1. **Personal data** - any information relating to an identified natural person or an identifiable natural person ("data subject"), as an identifiable natural person is an identifiable person, directly or indirectly, in particular by an identifier such as a name, identification number, location data, on-line identifier or one or more characteristics specific to the physical, physiological, genetic, mental, intellectual, economic, cultural or social identity of that individual.
2. **Personal data subject** - any living natural person who is the subject of personal data stored by an administrator.
3. **Processing of personal data** - any operation or set of operations performed with personal data or a set of personal data by automatic or other means such as collection, recording, organizing, structuring, storing, adapting, or modifying, retrieving,

¹ Hereinafter referred to as the "Regulation".

² Natural persons or legal / authorized representatives of legal entities.

consulting, using, disclosing by transmission, disseminating, or otherwise making the data accessible, arranging, or combining, restricting, deleting, or destroying it.

4. **Administrator** - a natural or legal person, public authority, agency, or other structure that alone or jointly with others determines the purposes and means for the processing of personal data.
5. **Personal data processor** - a natural or legal person, public authority, agency, or other entity that processes personal data on behalf of the administrator.
6. **Register of personal data** - any structured set of personal data accessed according to certain criteria, whether centralized, decentralized or distributed according to a functional or geographical principle.
7. **Recipient** - a natural or legal person, public authority, agency, or other entity to which personal data are disclosed, whether a third party or not.
8. **Third party** - any natural or legal person, public authority, agency, or other body other than data subject, administrator, personal data processor and persons who, under the direct supervision of the administrator or the processor, have the right to process personal data.

III. Related Documents

The preparation and adoption of this Policy is consistent with the overall activities of GCR JSC for the protection of individuals in connection with the processing of personal data. These principles are directly related to and consistent with:

1. Charter of the rights of job candidates and persons employed in relation to the protection and processing of their personal data.
2. Rules and internal order for the processing and storage of personal data.
3. Internal procedure for exercising rights by personal data subjects.
4. Internal procedure for responding to breaches of personal data security, notifying the supervisory authority and personal data subjects.

IV. Principles of Personal Data Protection

In all activities for the collection and processing of personal data GCR JSC follows the principles established in Art. 5 of the Regulation:

- a) **legality, good faith, and transparency** - the processing is carried out when there is a legal basis according to Art. 6 of the Regulation, ensuring good faith regarding the persons whose data are processed. All information and communication in connection with the processing shall be presented to the data subjects in an accessible and comprehensible form.
- b) **limitation of purposes** - personal data are collected and processed for specific, explicitly stated, and legitimate purposes, and are not processed in other ways incompatible with these purposes.
- c) **minimization** - personal data are not collected, processed, and stored in a volume larger than necessary for the purposes for which they are processed.
- d) **accuracy** - necessary measures are taken to ensure the accuracy and relevance of the collected personal data, creating the necessary organization to ensure the timely deletion or correction of inaccurate personal data with the resulting consequences.

e) **limitation of storage** - personal data are stored by virtue of the applicable legislation according to the stipulated deadlines. Personal data, the storage period of which is not regulated by law or by-laws, shall be stored until the actual necessity disappears.

f) **integrity and confidentiality** - personal data are processed with an adequate level of security and protection against unlawful processing, loss, destruction, alteration, or damage.

g) **reporting** - **GCR JSC** is responsible for compliance with the principles of personal data protection of entities and can demonstrate at any time compliance with regulatory requirements.

V. Categories of Personal Data

GCR JSC collects and processes personal data of job candidates, workers, employees and members of their families, as well as of contractors described in item III.1 of the Charter of the Rights of Job Candidates and Employees with regard to the protection and processing of their personal data "and in item III.1 of the" Rules and Internal Order for Processing and Storage of Personal Data ".

The amount of data that is collected and processed for each specific personal data subject is different depending on the respective legal grounds and purposes of processing described in **Item VI**. No personal data is collected in a larger volume than necessary for the fulfillment of the regulatory obligation and / or achievement of the respective goals.

VI. Legal Grounds and Purposes for Personal Data Processing

VI.1. To comply with the principle of legality of processing, **GCR JSC** shall process personal data only and to the extent that any of the following conditions are applicable:

(a) the data subjects have given their consent to the processing of personal data for one or more specific purposes;

b) the processing is necessary for the performance of a contract to which the data subject is a party, respectively for taking steps at the request of the personal data subject before the conclusion of a contract;

c) the processing is necessary for the observance of a legal obligation of GCR JSC;

(d) the processing is necessary for the protection of the vital interests of the data subject or of another individual;

e) the processing is necessary for the purposes of the legitimate interests of GCR JSC or a third party, except when the interests or fundamental rights and freedoms of the data subject that require protection of personal data take precedence;

f) the processing of special categories of data within the meaning of Art. 9, para. 1 of the Regulation shall be carried out only when there is an applicable ground according to Art. 9, para. 2.

VI.2. The main activities, goals and grounds that are related to the processing of personal data are:

VI.2.1. Personnel recruitment and human resource management, these activities include:

- a) collection of documents of job candidates, selection of candidates suitable for vacancies;
- b) preparation of orders for appointment and dismissal, and job descriptions, maintenance and storage of labor files, conducting periodic attestations, organization of trainings and qualifications;
- c) concluding, amending and terminating employment contracts; provision of employment;
- d) payment of labor and non-labor remunerations, premiums, bonuses, compensations, health and social security contributions, tax contributions;
- e) organization of business trips and other trips for the purpose of performance of labor and official functions;
- f) organizing the use of paid / unpaid leave;
- (g) gathering evidence in the course of labor disputes and disciplinary proceedings;
- h) creation and organization of healthy and safe working conditions;
- i) organization and improvement of social services,
as well as any other activities intended for human resources management, communication with employees, protection of their interests and implementation of provisions of labor and social security law.

VI.2.2. Relationships with contractors (suppliers of goods and services), including:

- (a) pre-contractual relations;
- b) conclusion, execution and termination of contracts and legal relations;
- c) sharing information about changes in policies, rules and general conditions created and applied by GCR JSC;
- d) processing and sending requests to suppliers;
- e) issuing invoices and fulfilling other obligations according to the Accounting Act, the Tax and Social Security Procedure Code and other related regulatory acts - for the purposes of keeping accounting records.

VI.2.3. Assistance to public authorities - in case of requirements for provision of personal data and presentation of relevant documents to public authorities in accordance with their legal obligation to perform their public functions and public tasks. Public authorities mean including, but not limited to: National Revenue Agency, National Social Security Institute, Commission for Personal Data Protection, Commission for Protection against Discrimination, Executive Agency "Labor Inspection", Ministry of Interior, local authorities, judicial authorities, and others.

VI.2.4. Exercise and protection of legal claims - actions for establishing, exercising, or defending legal claims, including collection of receivables, before a competent court and / or arbitration, filing complaints, signals, claims and others to the competent state and judicial authorities.

VI.2.5. Ensuring network, information, and physical security, which activities may include preventing unauthorized access, stopping network attacks and / or distributing malware requiring the processing of personal data by public authorities, computer emergency response teams, teams responding to computer security incidents, providers of electronic communications and security networks and services.

VII. Obligations of GCR JSC as Personal Data Administrator

When processing personal data as an administrator, **GCR JSC** has the following obligations:

1. To define the policy, procedures, and rules for personal data protection in compliance with regulatory requirements.
2. To carry out an analysis of the need for appointment of a data protection official according to Art. 37 of the Regulation and to appoint such an official if necessary.
3. To ensure organization for keeping registers of the processing activities according to Art. 30 of the Regulation.
4. To implement, introduce and update appropriate technical and organizational measures for personal data protection.
5. To follow the principles of personal data protection at the design stage and by default when implementing new technologies, systems, or applications.
6. To ensure exercising the rights of individuals for personal data protection.
7. To carry out constant control for observance of the requirements for the protection of registers, to undertake measures for elimination of breaches in the personal data security.
8. To maintain personal data in a form that allows the identification of the relevant personal data subjects for a period not longer than necessary for the purposes for which these data are processed.
9. To conduct training and assist in raising the awareness of the personnel for the protection of personal data.
10. To assist in the implementation of the control functions of the Commission for Personal Data Protection.
11. To determine the type and order of access to personal data in the used information systems according to the purposes of processing.
12. To establish legal relations only with personal data processors who can provide sufficient guarantees for the implementation of appropriate technical and organizational measures for lawful processing and protection of the rights of personal data subjects.
13. To notify the Commission for Personal Data Protection in case of breaches of personal data security - in case of established risk for affected persons.
14. To inform affected persons in an appropriate manner about the breach of personal data security - in case of high risk.
15. To register any breach of personal data security, circumstances related to the breach, its consequences and the actions taken to deal with it.
16. To carry out an assessment of impact according to the requirements of Art. 35 of the Regulation.

The provisions of Regulation (EU) 2016/679, the Personal Data Protection Act and the bylaws on its implementation shall apply to the issues not settled in this Policy.