

***Transparency notice when processing personal data of job applicants
in Spasov & Bratanov Lawyers' Partnership***

1. Concerning this transparency notice

Spasov & Bratanov Lawyers' Partnership (hereinafter also referred to as "**the Lawyers' Partnership**"), with UIC 130087001, address: Office Center "Slavyanska", floors 2/3, 29A Slavyanska Street, Sofia 1000, Republic of Bulgaria, tel: (+359 2) 980 18 08, fax: (+359 2) 980 25 10, is an administrator of personal data and as such complies with the rules and requirements of the Bulgarian and European legislation for personal data protection.

- 1.1. The Transparency Notice for the processing of personal data of job applicants with the Lawyers' Partnership (hereinafter also referred to as the "**Transparency Notice**" or only the "**Notice**") aims to provide transparent and clear information on the processing of personal data to individuals (or other "data subjects") who have voluntarily and on their own initiative submitted their job application for the Lawyers' Partnership.
- 1.2. In your capacity of individuals - job applicants, whether you are applying for a vacancy specifically announced by the Lawyers' Partnership or submit your application without the Lawyers' Partnership announcing a current vacancy, you have the right to be informed about how and why the Lawyers' Partnership as an administrator of personal data collects, processes, stores and protects your personal data that you have provided in connection with your job application.
- 1.3. This Notice may be amended and / or supplemented at any time by the Lawyers' Partnership in case of change of the specified circumstances.
- 1.4. By submitting your job application, you state and declare that you are informed with the terms of the Transparency Notice. In case you need additional information or have questions, you can contact the Lawyers' Partnership at the contacts below.
- 1.5. This Notice does not in any way limit or affect your rights related to the processing of your personal data by the Lawyers' Partnership. The notification aims to provide you information guaranteeing the transparent and conscientious processing of your personal data by the Lawyers' Partnership.

2. What personal data does the Lawyers' Partnership process

- 2.1. The Lawyers' Partnership processes the personal data provided by you as an administrator of personal data. The Lawyers' Partnership collects and processes only those categories of

personal data that have been provided to it voluntarily and directly by the applicants or such personal data that have been or may be additionally requested by the Lawyers' Partnership within the procedure of evaluation of your application and the process to deciding whether to be hired by the Lawyers' Partnership as your potential employer/assignor.

2.2. Depending on the specific situation, the Lawyers' Partnership may process the following categories of personal data related to your job application:

- ✓ **Identification data** (names, address, contact details - telephone, e-mail address), date of birth, photo (but only when you have voluntarily provided such);
- ✓ **Information on education and acquired qualifications** - completed education, additionally acquired professional qualification, scientific degree, trainings, completed courses and / or other information related to acquired education and qualification; knowledge of foreign languages, professional experience and practice;
- ✓ **Information on current and/or previous labor and/or professional activity** - data of labor/professional activity; positions held; functions and responsibilities; current and previous employers; work/professional experience; references and recommendations from the employer/s;
- ✓ Information on the existence of a driving license or other **certificates of acquired legal capacity** (when and to the extent necessary to fulfill the obligations covered by the position for which you are applying, or when you have voluntarily provided such information);
- ✓ **Remuneration information**, including expected remuneration bonuses, social benefits and / or other financial and economic data related to the position you are applying for;
- ✓ **Information that you have provided voluntarily on your own initiative in the process of your application** (for example, information that has been provided through a CV, cover letter or other document that you have provided or has additionally requested from the Lawyers' Partnership and not listed above);
- ✓ **Other information** related to your application that you provided during the oral interviews and interviews with employees of the Lawyers' Partnership, which can be done within the process for borrowing the respective position.

Special ("sensitive") personal data are processed only and to the extent necessary for the evaluation of your application, the decision to appoint you to a certain position, to fulfill certain statutory obligations which must be observed by the Lawyers' Partnership in his

capacity as a potential employer/assignor or under the presence of your explicit consent for their processing.

3. For what purposes does the Lawyers' Partnership process your personal data

3.1. As your potential employer/assignor, the Lawyers' Partnership processes your personal data only to the extent that they are necessary for the Lawyers' Partnership to conduct the procedure for recruiting potential employees, evaluating the application, making a decision to conclusion a contract with you. In particular, the Lawyers' Partnership processes the personal data provided by you for the following purposes:

- Administration, processing and management of your job application in the Lawyers' Partnership, including identification and evaluation of your application and making a decision to conclude a contract with you for the position you are applying for;
- Upon approval of your application for preparation of a formal job offer, preparation of a draft contract and other documents necessary for the completion of the process of holding the position;
- Communication with the candidates during the procedure, as well as thereafter in case of expressed interest in future vacancies that the Lawyers' Partnership considers may be suitable.

3.2. **The Lawyers' Partnership may process your personal data if it has at least one of the following legal causes provided for in the General Data Protection Regulation:**

- ✓ In the presence of your consent for the processing of personal data related to you;
- ✓ To take the necessary actions to conclude a contract, in case the Lawyers' Partnership has chosen your application and you want to start working in the Lawyers' Partnership.

4. Term of storage of your personal data

4.1. The Lawyers' Partnership will store and process your personal data only for the period necessary to achieve the purposes of personal data processing specified above. In particular, your personal data will be stored for the period from their receipt until the final decision on whether to be appointed to the position for which you are applying, but for no more than 6 (six) months from taking the position.

- 4.2. Please note that the retention period for your personal data provided in the course of your application may exceed the expiry date of the advertisement published by the Lawyers' Partnership for the position you are applying for. This is because after receiving the applications of the interested candidates, technological time is needed to carry out additional actions such as, but not limited to, internal evaluation of the received applications, conducting interviews with the candidates, discussion and making a decision by the Lawyers' Partnership of the most suitable candidate and concluding a contract with the selected candidate.
- 4.3. For the purpose of holding future vacant positions, it is possible for the Lawyers' Partnership to store your personal data even after the completion of the procedure for occupying the position for which you are specifically applying. In these cases, the Lawyers' Partnership will store your personal data for a period not longer than 6 (six) months.
- 4.4. In case you wish to keep in mind your application for a future vacant position, respectively to continue to store the information and personal data provided by you, you should provide us with your voluntary explicit written consent.
- 4.5. In case your application is approved, when concluding a contract between you and the Lawyers' Partnership, the personal data provided by you (or part of them, as the case may be) will continue to be stored by the Lawyers' Partnership and will become part of your file. When concluding a contract, the Lawyers' Partnership will provide you with a detailed notice of transparency regarding the processing of your personal data in your capacity as an employee of the Lawyers' Partnership.
- 4.6. In case your application is not approved and you have not given your consent the Lawyers' Partnership to store and process your personal data for future vacant positions, then your personal data will be exterminated/deleted (depending on the information holder) after the final completion of the procedure, but not later than the expiration of 6 (six) months.
- 4.7. If in the course of the application procedure you have provided originals or notarized copies of documents certifying physical and mental fitness, qualification degree and length of service required to hold the position for which you are applying, and your application will not be approved, the Lawyers' Partnership will ensure the return of the documents provided by you as soon as possible, but not later than 3 months from the final completion of the procedure, unless a special law provides otherwise.

5. To whom your personal data may be disclosed

Your personal data may be disclosed by the Lawyers' Partnership to a certain category of recipients, but in strict compliance with the requirements of personal data protection legislation and to the extent necessary to achieve these goals. Recipients of your personal data can only be:

- Employees/partners of /in the Lawyers' Partnership, appointed to participate in the process of management and administration of your application, who directly participate in the process of analysis and evaluation of candidates for the position.

6. Your rights related to the protection of your personal data and additional information

6.1. In order to fulfill the obligations of the Lawyers' Partnership as an administrator of personal data, it is important for it to process and maintain your personal data accurate and up-to-date; if necessary, **you can request that your personal data be updated, corrected and/or supplemented**, for which purpose you should send an application/request to the Lawyers' Partnership in compliance with the terms and conditions provided in the legislation on personal data protection.

6.2. You have certain rights related to the processing of your personal data provided in the General Data Protection Regulation, including:

- ✓ Right to information and free and open access to your personal data, the right to request a copy of your personal data stored or otherwise processed by the Lawyers' Partnership, and
- ✓ The right to request the correction of your personal data in case they are inaccurate, out of date or incomplete, and
- ✓ If you suspect that your personal data is not being processed legitimately, you have the right to file a complaint to the competent personal data protection supervisory authority shown below in this Notice or to seek protection of your rights in court, and
- ✓ Right to objection, as well as rights related to automated decision-making - you have the right to object at any time, on grounds related to your specific situation, against the processing of your personal data, including in case your personal data is used for profiling.

In the process of accepting, analyzing and evaluating your application, the Lawyers' Partnership does not use the personal data provided by you for profiling or automated decision-making.

Please note that the terms and conditions for exercising your rights related to personal data protection are regulated in detail in the General Data Protection Regulation and the Bulgarian Personal Data Protection Act. If necessary, the Lawyers' Partnership will assist you in exercising the rights granted to you.

- 6.3. If you wish to receive additional information on how the Lawyers' Partnership processes your personal data or you have questions related to the operation and application of this Notice on Transparency in the processing of personal data of job applicants, you can contact the Lawyers' Partnership at the following address: Office Center "Slavyanska", floors 2/3, 29A Slavyanska Street, Sofia 1000, Republic of Bulgaria, tel: (+359 2) 980 18 08, fax: (+359 2) 980 25 10.

7. Competent supervisory authority for personal data protection

Commission for Personal Data Protection (CPDP)

Address: 2 Professor Tsvetan Lazarov Blvd., Sofia 1592

Phone number: + 3592 / 91-53-594

E-mail: kzld@cpdp.bg

Website: www.cdpd.bg