

Policy for processing and protection of personal data
of Spasov & Bratanov Lawyers' Partnership

1. Why should you become aware of the policy of personal data processing and protection, which is applied by Spasov & Bratanov Lawyers' Partnership?

The Lawyers' Partnership processes personal data in its capacity as administrator of personal data and processor of personal data on behalf of other controllers. This means that your personal data - for example: name, address, telephone, e-mail for contact, etc. can be stored with us.

In the pursuit of our commitment to ensure maximum guarantees for the protection of your personal data, we have drawn up our internal rules and follow strict control procedures with regard to the processing of personal data in accordance with the General Data Protection Regulation (GDPR). The objective of this policy is to clarify all major issues related to our processing of personal data, i.e. for what purposes, on what grounds, and within what time frame we process personal data. Here you can check your rights relating to the personal data we process and the ways to contact us so that to exercise these rights.

2. Why and how does Spasov & Bratanov Lawyers' Partnership process personal data?

The Lawyers' Partnership and the lawyers in its team perform their function set out in the Constitution of the Republic of Bulgaria to assist the protection of the rights and legitimate interests of individuals and legal entities. In order to carry out this function we need to process the personal data of our clients and third parties. These data include some sensitive information, such as financial and health status, trade union membership, biometric data, or details of ethnic origin.

All these data are necessary to provide the best possible protection. In many cases, if we have no access to them, the services we provide would not be adequate to the client's needs or they might even prove impossible.

When performing this function, we adhere to the highest standards of confidentiality, which conform to or exceed the requirements of the Bar Act and the lawyer's code of ethics.

Personal data may be processed also in connection with the activities that are needed to provide protection of our clients with technical support, contracts with lawyers and staff, etc. These relationships are not regulated in the Bar Act but we apply the same care and high standards to the protection of personal data in their implementation as well.

We do not engage in profiling and we do not use automated decision-making procedures which might affect your rights in the processing of your personal data.

On the other hand, it might become necessary to provide access to a limited amount of your personal data to a third party, such as our accounting office or the software maintenance team. In these cases, we guarantee that the third parties we involve will apply the same high standards of personal data protection.

We might process your personal data on behalf of our client - in such cases, this policy has a limited scope of application, as it covers only your rights. Should you have any further questions, we undertake to transmit them to our client and to ensure that you will receive the reply within the statutory time limits.

3. What does the term “personal data” include?

The Lawyers’ Partnership applies its high standards of confidentiality to any information that becomes known to us in the course of our activities. Nevertheless, this policy is focused specifically on the protection of personal data and the guarantees for the rights of the data subjects.

The personal data within the scope of this policy include any information relating to a specific natural person and may include: a name, address or contact details. In some cases, the personal data that we process might be insufficient to identify the person, such as: e-mail address, records of our CCTV system, or details of the visits to our website. As far as such data is concerned, we apply the same protection standards which are applicable to any other information but, with a view to exercising the rights outlined below, we would need your assistance to identify you.

The information about contacts with legal entities, e.g. name, address for correspondence, office telephone numbers, e-mail addresses and others, does not represent personal data and therefore the rules under Section 5 do not apply to such information.

4. For what purposes do we process personal data?

When the Lawyers’ Partnership sets out the objectives of the personal data processing policy, the following purposes are taken into consideration:

- 4.1. In relation to the legal services assigned to us** – the Lawyers’ Partnership provides legal services on the basis of individual contracts with each client. For the purposes of the conclusion and performance of the legal services contract, we process the personal

data of our clients and/or the persons who represent them (attorneys, managers, executive directors, administrators, etc.).

In this case, the legal grounds for the processing of data lie precisely in the performance of the contract within the framework of which the processing in relation to the provision of certain information and/or services prior to the conclusion of the contract are also included.

For this purpose, we will process the personal data of our client until the termination of the contract and for a certain period of time afterwards, as some additional rights and obligations might occur under the contract subsequently. Typically, this period of time is 6 /six/ years after the termination of the contract. Still, it might be longer in some cases due to the following reasons:

- warranty periods, terms for compliance with the obligation of confidentiality, time frame for additional services to be provided under the contract;
- representation in court proceedings – terms for the implementation of extraordinary defence means other than appeals, such as repeal proceedings, appeals under the European Convention for the Protection of Human Rights and Fundamental Freedoms.

The legal grounds for the processing of your personal data can be found in the existence of the contract for the provision of legal services.

4.2. Information collected in connection with the implementation of the Measures against Money Laundering Act of the Republic of Bulgaria ("MAMLA"):

As obligated persons under the MAMLA, the lawyers in the The Lawyers' Partnership are obliged in the statutory cases - specified in art. 4, item 15 of the MAMLA, to identify our clients before entering into business relations with them. In fulfillment of this obligation and according to art. 83, para. 3 of the MAMLA, we provide you with information about the purposes for which your personal data is processed, the type and capacity of personal data that are collected, as well as the terms in which they will be stored.

4.2.1. The identification of individuals is done by presenting an official identity document and taking a copy of it. When identifying individuals, data are collected on:

- a.) the names;
- b.) the date and place of birth;
- c.) an official personal identification number or other unique identifier;
- d.) any nationality you hold;
- e.) country of residence and address;
- f.) data on your professional activity;

4.2.2. When identifying legal entities and other legal formations, data are collected on the type and constitution of the collective management body, the legal representatives and the beneficial owners of the legal entity or legal formation. With regard to the legal representatives of a client - legal entity or other legal formation, proxies and other natural persons who are subject to identification in connection with the identification of a client - legal entity or other legal formation, the data under item 4.2.1 shall be collected. For each natural person who is the beneficial owner of a client - legal entity or other legal formation, the data under item 4.2.1., letters "a" - "e" shall be collected.

4.2.3. In some cases, we may collect data about your marital status, the origin of the funds, business partnerships and other data required for the purposes of the MAMLA, the Measures against Financing of Terrorism Act ("MFTA") and the UN and EU sanctions policy.

The personal data collected by the Lawyers' Partnership under the terms and conditions of the MAMLA and the MFTA are used only for the purpose of prevention of money laundering and terrorist financing.

According to art. 67, para. 1 of the MAMLA, we are obliged to store for a period of 5 years all documents, data and information collected and prepared in accordance with the MAMLA and the regulations for its implementation. After the expiration of the specified storage period, your personal data will be deleted or exterminated.

4.3. In relation to contracts for the provision of goods/services which are concluded by the law firm.

4.4. For the purposes of existing employment agreement, full-time service agreements and internship agreements.

4.5. To fulfill obligations laid down by law – the Lawyers' Partnership has obligations prescribed by the law to keep accounts and to implement measures against money laundering. Your personal data will be used with a view to the fulfillment of our obligations under the Accountancy Act and the Act on the Measures against Money Laundering, as well as all statutory provisions which are in force within the territory of the Republic of Bulgaria as of the time of processing.

In accordance with art. 12 of the Accountancy Act, the following information is stored on hard copy and/or electronic records for the following periods of time: accounting ledgers and financial reports, including documents concerning tax control, audits and follow-up financial inspections – 10 /ten/ years; all other documents containing accounting information – 3 /three/ years. The Act on the Measures against Money Laundering obligates the law firm to keep data until it is no

longer necessary to prove compliance with the requirements to identify the beneficial owner of the client or any other details of a specific operation.

4.6. To protect the legitimate interests of the Lawyers' Partnership – we might need your personal data to prove compliance with the statutory requirements before the relevant control authorities and in relation to the settlement of claims filed by or against the Lawyers' Partnership.

4.7. For the purposes of providing summarized legal information, legislative amendments and solutions of legal issues – in these cases, insofar as we send our newsletter and communications via e-mail, we ask for your explicit consent to have your personal data processed.

When your personal data is processed on the basis of your consent, you are entitled to withdraw it at any point of time. Then we will immediately discontinue the data processing for the relevant purposes but this will not affect the processing on other grounds, e.g. when we have a contractual or legal obligation to do so. You can always object to the processing of your personal data for the purposes of providing information on our part and then we will immediately discontinue the relevant provision of information.

In some cases, other purposes might warrant the processing of your personal data and then we will inform you explicitly.

5. What are your rights in relation to the personal data that we process?

You have the following rights at any point of time when we process your personal data:

5.1. To obtain information on what personal data concerning you we process and for what purposes

Generally, we provide this information when we conclude contracts with our counterparties but you can make inquiries into this matter at any time.

5.2. To request rectification of untrue or inaccurate personal data concerning you.

5.3. To request erasure of your personal data

When there are no grounds to continue the processing of your personal data, you may request, at any point of time, erasure of all the information concerning you, which we store. If we have terminated our partnership relations and we have no statutory obligation to store this information, it will be erased.

5.4. To request storage of your personal data without processing in any other way

If there exist no grounds to continue the processing of your personal data but you do not want it to be erased, e.g. in view of possible future partnership, you may request us, at any point of time, to stop any other form of processing and only store your personal data. In this case, we may process your data only on the basis of your consent or by virtue of law.

5.5. To request access to your personal data

You may always ask for a copy of all your data which we process. In this case, you should specify whether we can provide the data on a hard copy or electronic means in a standard file format (.pdf, .doc).

5.6. To object to the processing of your personal data

When we process your personal data for the purposes of protecting the interests of the Lawyers' Partnership, you may object to the processing at any time. The processing will be discontinued immediately in case it is done for the purpose of sending commercial communications or similar information. If the processing is intended to protect another legitimate interest of ours, we will assess whether we are in a position to discontinue the processing or not.

Notwithstanding all this, you may request information on how we store your personal data at any point of time. We undertake to reply to your questions without undue delay.

If you cannot find the answer to any of your questions about the processing of personal data within the framework of this policy or you need further information, please do not hesitate to contact us in any of the following ways:

SPASOV & BRATANOV LAWYERS' PARTNERSHIP

**Office Center "Slavyanska", floors 2/3
29A Slavyanska Street
Sofia 1000
Bulgaria**

**Tel: (+359 2) 980 18 08
Fax: (+359 2) 980 25 10**

E-mail:

**office@sbn-law.com
Georgi.Spasov@sbn-law.com
Boyko.Bratonov@sbn-law.com
Vassil.Hadjov@sbn-law.com**