



# Privacy notice for processing personal data in Axpo Bulgaria

This privacy notice explains how we handle your personal data in connection with your business or other kind of relationship with the Axpo Bulgaria EAD, having its registered office at 51 Cherni Vrah Blvd., Business Garden Office X, Building 1, floor 5, Lozenets district, Sofia, 1407, Bulgaria.

## 1. Data controller and contact details

Axpo Bulgaria EAD (also referred to as 'Controller', we' or 'us' below) as data controller is responsible for processing personal data in accordance with this privacy notice. If you have any questions relating to this privacy notice or how we handle your personal data, or if you wish to exercise your associated rights, please contact us using contact details below.

## 2. Purpose and Personal data processed by us

### ***Business relationship***

When we establish business relationships with suppliers, customers and partners, we process and store personal data of their representatives, employees and assistants to initiate and process contracts for purposes in connection with the contract itself, and with our legal obligations.

In the case of potential contractors and representatives of potential contractors we process and store personal data of their representatives, employees and assistants to make or accept an offer, to take action at your request before entering into a contract. With regard to persons contacting us who are not contractors, we process personal data to address the questions or requests submitted.

Depending on the field of activity we are also obligated to audit the respective company and its representatives/employees. In this case, we might collect and process additional data, if necessary, from third-party providers.

Personal data processed within business relationship is as follows:

name, contact details, telephone number, email address, personal identification number, date of birth, nationality, passport and ID card information, etc.

In the case of collecting personal data directly from you - the provision of personal data by you is voluntary, while the refusal to provide it may result in the inability to conclude or perform a contract with us, or to process your questions or requests. In case you have not provided personal data directly to us- personal data may have been provided to us by a third party.

### ***Recruitment process***

We process and store personal data in order to carry out the recruitment process with potential employees. This is the case when an applicant provides the respective job application documents. We process the personal data that you make available to us in the application in order to carry out the respective recruitment process in so far as this is necessary to review your application file for the vacant position, and upon successful recruitment to prepare the employment contract.

Personal data processed within recruitment process is as follows:

name, contact details, telephone number, email address, date of birth, nationality, any other personal information provided in CVs, information on education, training, qualifications, etc.

In case you submit your application electronically, please check [Privacy Policy - Axpo Group](#)

## **Whistleblowing process**

We process and store personal data in order to carry out the whistleblowing process, filing and handling of reports and investigations, to ensure the protection of whistleblowers, persons assisting in the making of a report, witnesses and persons affected by reports.

Personal data processed according to the whistleblowing process, may include as follows:

- identification data of the persons making the report (whistleblowers), persons assisting in making the report, witnesses, and persons subject to the report such as name and surname; contact information of whistleblowers and persons subject to the report;
- information related to the violation, including: (i) description of the violation: detailed information about the reported incident, violation or suspected violation; (ii) indication of the person subject to the report, i.e., identification data of the person whose conduct is the subject of the report; (iii) indication of persons with knowledge of the violation: names, positions and other identifying data of persons who may have information about the reported incident; (iv) documents constituting evidence in the case: any material that may be attached to the notification, such as files, documents, photos, audio/video recordings, electronic correspondence, which may confirm the violation; (v) additional information that makes it probable that a violation has occurred or is suspected: any other information provided by the whistleblower that may facilitate the verification of the report or the investigation; (vi) information on previous reports on the same matter: whether the violation has been previously reported to others in the organization, such as supervisors, and the details of those reports.
- data on the workplace, position, responsibilities of the persons indicated in the report, and other information related to the performance of official duties;
- data on investigation or disciplinary proceedings: information related to any investigation conducted on the basis of the report, including the results of the investigation, decisions and actions taken by us;
- special categories of personal data, if relevant to the notification and investigation;
- other personal data included in the content of the notification, if they are relevant to the investigation of the notification.

## **3. Legal basis for processing**

We may process your personal data on the basis of the following legal principles:

- The processing is required in order to negotiate, conclude and execute contracts with suppliers, subcontractors, customers and partners or to process your job application at pre-contractual stage.
- Processing is necessary to meet our legal obligations, for instance as per Whistleblowing legal act.
- Processing is based on your consent (only when required and permitted by law)
- Processing is necessary to protect legitimate interests, such as our customer support and business relations (e.g. contact, communication with our business partners), improvement and development of our products and services (e.g. IT security), to ensure timely and effective response to questions raised and handling of submitted requests, the prevention of misconduct and crime and investigations related to wrongdoing (incl. whistleblowing) and other misconduct, handling of claims and actions brought against us, participation in legal proceedings and the enforcement, exercise or defence of legal rights in general; corporate governance and other corporate transactions;
- In the case of processing of special categories of personal data disclosed during the Whistleblowing process the processing will be carried out on the basis of Article 9 GDPR, according to each specific case.

## **4. Disclosure of data**



As a general rule, only employees in a given position have access to your personal data. These employees are subject to a duty of confidentiality and have been trained in data protection and data security.

Your data may also be forwarded to other Axpo Group Companies, where applicable, to the following third parties outside Axpo Group with which we work or are required to disclose this data for the purposes stated in this Notice;

- providers of services, e.g. courier service providers, banks, consultants, lawyers, auditors, etc.
- suppliers, subcontractors, customers and business partners that come into contact
- with your personal data as part of our business relationship;
- public authorities and agencies;
- buyers or prospective buyers of business units, companies or other transactions;
- other parties to potential or actual legal proceedings;

We may also disclose your information to service providers that process this data on our behalf and in accordance with our instructions, such as in-house or external service providers, help desk services, recruiting agencies, etc.

Personal data may be transferred to the headquarter of the Controller's parent company – AXPO Holding AG in Switzerland, which, in accordance with decision of the European Commission as of 2000, confirmed in 2024, ensures an adequate level of protection for personal data transferred from the European Union.

As the Axpo Group's business activities also take place outside the territory of Switzerland, the EU and the EEA, your data might be sent to recipients outside your country of residence. In the event that we transfer personal data to such a country, we are required to ensure your personal data is adequately protected; e.g. by entering into data transfer agreements with recipients, including the standard contractual clauses, if the transfer is not permitted in individual cases on another legal basis.

## 5. Data storage

As a general rule, we store your personal data for the duration of the relationship and usually for some years following its termination. Exceptions apply if other statutory retention periods are in place in individual cases, if storage is necessary for evidentiary purposes, or if there are other grounds for exemption under the applicable law. In the case of data processing based on the legitimate interest of the Controller, your personal data will be kept until the existence of the Controller's legitimate interest, in particular, until the expiration of the statute of limitations for potential claims. Exceptions also apply if earlier erasure or anonymisation is indicated; e.g. because we no longer require the data or are required to erase or anonymise it.

Short statutory retention period apply to job recruitment personal data (in case of unsuccessful employment), namely 6 months.

In relation to whistleblowing process, personal data is kept for a period of five (5) years following the completion of the investigation of the whistleblowing report, except in the presence of criminal, civil, labour law and / or administrative proceedings in connection with the submitted report. After expiry of the retention period, we will anonymise or delete the relevant data and documentation.

Business documents are retained as long as we have a legitimate interest in their retention (e.g. evidentiary purposes in the event of claims, for documentation of compliance with certain statutory and other requirements) or as long as we are legally obliged to do so.

## 6. Your rights in relation to the processing of personal data

Within the scope of and under the requirements of the rights that apply to you as the data subject, you have the following rights in relation to the processing of your personal data:

***Right to information:***

You have the right to request information about your stored data at any time, free of charge. In individual cases, the right to information may be restricted or excluded, in particular if your identity is in doubt or where it is necessary for the protection of others.

***Right to rectification:***

You have the right to have incorrect or incomplete personal data rectified and to be informed of that rectification.

***Right to erasure:***

You have the right to request that your personal data is erased if the personal data in question is no longer required for the purposes pursued, if you have effectively revoked your consent or effectively objected to the processing of your data, or if your personal data is being processed unlawfully.

***Right to restriction of processing:***

Under certain conditions, you have the right to request that the processing of your personal data is restricted.

***Right to data portability:***

You have the right to receive from us the personal data that you have provided in a structured, common and machine-readable format free of charge, provided that the specific data processing is based on your consent or is necessary for the performance of the contract, and the processing is carried out by automated means.

***Right of withdrawal of consent:***

You have the right to withdraw your consent to processing granted earlier at any time. Withdrawal of your consent applies only to the future. Processing activities undertaken in the past based on your consent are not affected by your withdrawal of consent and remain lawful.

***Right to object:***

You can object to data processing at any time.

If you wish to exercise this right, please use the contact details provided in section one.

***Right to lodge a complaint:***

You are also free to lodge a complaint with the competent supervisory authority if you believe that certain data processing activities have infringed your rights. The competent supervisory authority in Bulgaria is the Bulgarian Commission on Personal Data Protection. Full details regarding the requirements and the form of the complaint may be accessed on the complaints section of the Commission on Personal Data Protection website: <https://www.cdpd.bg/>

**7. Contact us**

For any questions concerning the processing and protection of personal data you have provided to us, as well as for the exercise of your rights as a data subject, you may contact us at Axpo Group data protection officer e-mail address: [dataprotection@axpo.com](mailto:dataprotection@axpo.com) or contact us at the our business address: 51 Cherni Vrah Blvd., Business Garden Office X, Building 1, floor 5, Lozenets dis-trict, Sofia, 1407, Bulgaria

**8. Changes**

This privacy notice may be revised at Axpo's discretion and modified if circumstances change. We will inform you about any significant changes, provided this does not require a disproportionate amount of effort. As a general rule, the current version of the privacy notice, as amended from time to time, applies. This is available on [axpo.com/bg](https://axpo.com/bg)