
DATA PROTECTION POLICY

of

Metal Technology Group A.Balevski Holding AD, Sofia

and its subsidiaries: Alucom AD, Pleven

Ossam AD, Lovech and Centromet AD, Vratsa

Adopted on 25.05.2018

DATA PROTECTION POLICY

PREAMBLE

Metal Technology Group A.Balevski Holding AD, Sofia and each of its subsidiary companies, Alucom AD in Pleven, Ossam AD in Lovech and Centromet AD in Vratsa, hereinafter referred to as “the Company”, is a data controller and is responsible for the compliance with the provisions of the General Data Protection Regulation 2016/679.

This Data Protection Policy aims to inform you of what personal data the Company processes and for what purposes, to whom it provides them, what are your rights regarding your personal data processed, and how you can exercise them.

PRINCIPLES IN THE PROCESSING OF PERSONAL DATA

Compliance with the provisions of the Regulation

Company policy aims to ensure compliance with the provisions of the Regulation.

Personal data are collected and processed lawfully and fairly

The Company collects and processes personal data lawfully, fairly and in accordance with the principles and rights of data subjects with regard to the processing of their personal data.

Personal data are processed in a transparent manner

The company ensures transparency in the communication of collected and processed personal data the information about it being in a short, transparent, intelligible and easily accessible form and using clear and plain language.

Personal data are collected and processed only for specific purposes

The Company processes personal data of data subjects only in the following cases:

1. processing is necessary for compliance with a legal obligation to which the Company is subject;
2. processing is necessary for the performance of a contract (incl. an order) with the Company to which a data subject is a party, or to take steps at the request of a data subject before concluding a contract when his/her identification is required;
3. a data subject has given its unambiguous consent to a clear and transparently defined purpose by the Company which requires the processing of his/her personal data;
4. processing is necessary in order to protect the vital interests of a data subject whose personal data are processed or of another natural person;
5. processing is necessary for the legitimate interests of the Company or a third party, in accordance with the provisions of the Regulation;
6. other cases provided for in the Regulation.

There are not collected and processed personal data unnecessary for the business

The Company does not collect or process personal data of data subjects which exceed its obligations under law or needs of doing business.

Collected personal data are processed for other purposes only with the consent of data subjects

In all cases where it is necessary to collect and process personal data of data subjects for purposes other than the original, the Company notifies the data subjects concerned, request their consent and proceeds to process their personal data for other purposes only after their explicit consent.

The minimum necessary personal data are collected for processing

The Company collects and processes only the minimum required personal data of data subjects who:

1. are provided for in a law;
2. are necessary for performing a contract;
3. are necessary for fulfilling the purposes for which they are collected.

Personal data processed are accurate and up-to-date

The Company ensures that the processing of personal data of data subjects is carried out with maximum accuracy and, whenever possible, always up-to-date.

Personal data are processed by the minimum required number of people

The Company ensures that the access to and processing of personal data of data subjects is carried out by the minimum required number of persons (operators) who have the required competences for processing them and the necessary commitment to their preservation.

Personal data are stored for the minimum required time

The company stores personal data for the minimum required time:

1. by law;
2. necessary for performing a contract (incl. an order) and the liability under the same;

3. necessary for fulfilling the purpose for which data are collected and processed; or
4. on demand of the data subject for their erasure, after which they should be destroyed without undue delay.

In any case, the Company provides at least once a year to review the collected and processed personal data, and those of it that fall under any of the above hypotheses are erased without undue delay.

RULES FOR PROCESSING PERSONAL DATA

Personal data are processed with the necessary levels and protection measures

The Company provides the necessary levels of physical, organisational and technological protection with respect to:

1. the nature, scope, context and purpose of personal data processed;
2. the likelihood, the levels of impact and the severity of the risk for the rights and freedoms of data subjects in the event of a security breach of personal data processed;
3. its financial and organisational capabilities.

The Company also provides all necessary measures for the timely recovery of collected and processed personal data on their loss as a result of accidental, malicious or force majeure events.

Personal data are processed with controlled and traceable access

The Company provides the necessary and appropriate technical, organisational and technological measures for controlled and traceable access to the personal data of data subjects.

Personal data are handled with the required accountability to comply with the Regulation

The Company provides the necessary accountability and registers to be able to demonstrate that the provisions of the Regulation have been complied with.

Respecting the rights of data subjects whose personal data are being processed

The Company ensures compliance with the rights of data subjects whose personal data are collected and processed, that includes:

1. the right to information about the processing of personal data;
2. right of access to personal data - what data are available;
3. the right to correct inaccurate personal data;
4. the right to erase personal data - the right to be forgotten;

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5. the right to restriction of personal data processed;
 6. the right to information about actions as a result of a request to correct, erase or restrict the processing of personal data;
 7. the right to data portability;
 8. the right to object to the processing of personal data;
 9. the right not to be subject to automatic decision making involving profiling.

PERSONAL DATA PROCESSED

Personal Data Processed in the Capacity of a Controller:

- of Employees;
- of Clients Natural Persons;
- of Suppliers Natural Persons;
- of Visitors Natural Persons;

PURPOSES FOR PROCESSING PERSONAL DATA

The Company in its capacity as a Controller performs the following operations and processes only the necessary personal data for the following purposes:

- for Concluding, Execution and Termination of Labour Contracts and Calculation of Salaries and Benefits of Employees;
- For Servicing and Selling Products to Customers, including Natural Persons;
- For Delivery of Services by Suppliers, including Natural Persons;
- For Implementing a Control-Checking Mode;

RECIPIENTS AND CATEGORIES OF RECIPIENTS

In connection with the fulfillment of the abovementioned purposes, the Company submits the personal data of data subjects to the following recipients:

- the National Revenue Agency (NRA), in connection with calculating salaries of the staff;

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- the National Social Security Institute (NSSI), in connection with calculating benefits of the staff;
 - the Commercial Bank, in connection with paying the remuneration to the staff;
 - an Insurance company, for the purposes of concluding health insurance (Life Insurance, etc.) of the staff;
 - the Occupational Health Service, in connection with an obligation to maintain an updated health status of the staff and to carry out periodic medical examinations;
 - Providers of social services under a contract with the Company or with its employees, in connection with food vouchers provided;
 - the General Labour Inspectorate, the National Social Security Institute and the Ministry of Interior, in connection with accidents at work;
 - Other state and municipal institutions, in connection with legal obligations towards them or in connection with legal requests from them for information that contains personal data.
 - Subcontractors for performing contractual obligations;

COMPANY CONTACT DETAILS

If you have any questions or uncertainties regarding the processing of your personal data or wish to exercise one of your rights, you can contact:

- email: mtg@mtgbg.com; hr@mtgbg.com
- telephone: +359 2 818 5959; +359 2 818 5915
- address: Bulgaria, 1404 Sofia, Bulgaria Blvd, 18, Bokar

COMPETENT SUPERVISORY AUTHORITY

The Commission for Personal Data Protection (CPDP) is the independent state authority which assures the protection of individuals in the processing of their personal data and the accessing to these data, and it also monitors the compliance with the Law for Protection of Personal Data on the territory of the Republic Bulgaria.

In case of doubt that your personal data protection rights have been violated, you may report to CPDP at:

- Address: 1592 Sofia, 2 Prof. Tsvetan Lazarov Blvd.
- E-mail: kzld@cpdp.bg
- Website: www.cdpd.bg
- Telephone: +359 02 91-53-518