

**PRIVACY NOTICE**

**of**

**group of enterprises, including:**

**“METAL TECHNOLOGY GROUP - ANGEL BALEVSKI HOLDING” AD**

**“ALUCOM” AD**

**“OSSAM” AD**

**“CENTROMET” AD**

**„MTG logistics“ EOOD**

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## 1. Who are we?

### The present privacy notice regards a “group of enterprises”

(“Group/The Group”) which includes the following companies, administrators of personal data (“The Companies”) and in the following roles:

1) **“METAL TECHNOLOGY GROUP - ANGEL BALEVSKI HOLDING” AD**, UIC: 121501396, registered office and headquarters: city of Sofia, P.C. 1404, Triaditsa region, Bulgaria Blvd., complex Bokar 18, contact information: phone number: +359 2 8185959, email: [mtg@mtgbg.com](mailto:mtg@mtgbg.com)

- as a “controlling undertaking” within the meaning of Regulation (EU) No 2016/679 of the European Parliament and the Council from 27<sup>th</sup> April 2016, regarding the protection of natural persons in relation to the processing of personal data and regarding the free movement of such data and repealing Directive 95/46/EC (“The Regulation”),

and

2) **“ALUCOM” AD**, UIC: 114056800, registered office and headquarters: town of Pleven, P.C. 5800, INDUSTRIALEN KVARTAL Blvd./str., contact information: phone number: 064 827 997, email: [alucom@mtgbg.com](mailto:alucom@mtgbg.com),

**“OSSAM” AD**, UIC: 110001541, registered office and headquarters: town of Lovech, P.C. 5500, SEVERNA INDUSTRIALNA ZONA Blvd./str.; contact information: phone number: 068 601176, email: [ossam@mtgbg.com](mailto:ossam@mtgbg.com),

**“CENTROMET” AD**, UIC: 106021454, registered office and headquarters: town of Vratsa, P.C. 3000, INDUSTRIALNA ZONA Blvd./str.; contact information: phone number: 092 661 425, email: [centromet@mtgbg.com](mailto:centromet@mtgbg.com),

**„MTG logistics“ EOOD**, UIC: 206814773, registered office and headquarters: city of Sofia, P.C. 1404, Triaditsa region, Bulgaria Blvd., complex Bokar 18, email: [mtg@mtgbg.com](mailto:mtg@mtgbg.com),

all as “controlled entities” within the meaning of the Regulation.

The controlling undertaking/company “METAL TECHNOLOGY GROUP - ANGEL BALEVSKI HOLDING” AD is an industrial holding with established positions in the machinery sector of Bulgaria. The controlled companies are specialized in the production and mechanic processing of details from aluminum, cast iron, and steel, and their production is solely export-oriented.

Contact information regarding questions related to the protection of personal data, processed by the Group: [mtg@mtgbg.com](mailto:mtg@mtgbg.com).

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## 2. Your personal data and our obligation to you

The Group complies with all applicable laws, including the legislation for the protection of personal data.

The protection of personal data is a subject of growing importance, and we highly appreciate and understand this.

The aim of this document is to explain to you in a clear way the details about collecting and storing personal data, why we process the data, and whether and with whom we share it, so that you can be assured that your privacy is in good hands, and the data about you is stored and processed by us with utmost care and attention.

## 3. What kind of personal data do we collect from you, on what basis and why?

A) The companies in the Group process personal data in relation to the following activities:

- Personnel selection – personal data, identifying the job candidates (for example, names), data about their education, experience, other skills and qualifications, and contact information of the candidates (email, phone number), is collected with the aim of making the selection and choosing adequate personnel. The data is processed by the Companies on a pre-contractual basis, on the basis of legitimate interest, and in some cases on the basis of consent (when the candidate has given their consent for storing their data for a period of time longer than 6 months).

If during the selection you have provided us with copies or originals of documents, we store them for a period up to 6 months, and after that period they are destroyed. Within this period, you have the right to request for us to return them to you.

- Human resource management – generally, the data that is collected and stored about the employees of the Companies is stated in the Bulgarian labor and insurance legislation. This also includes the processing of special categories of data (such as data about health conditions). In certain cases, we can collect and process data due to our legitimate interest – for example, security and management of the property of the Companies, and advertisement of the activities of the Companies/the Group. For the organization of an effective work process, data about employees, related to confirming schedules and shifts, is collected and processed.

The storage period, the measures for their protection as well as other important details about our employees' data are described in detail in internal documents – *Privacy notices for the employees* of each of the Companies, and each of these notices is available only to the employees of the relevant company from the Group.

- Relations and concluding contracts with counterparties (partners) – If you are our partner, counterparty, in this case, and in relation to the formation and development of our relationship, we collect from you certain data. Within this activity, the data is limited to your identifying information, your contact information, and data about your employees that work with us. These usually are names, PIN (if it is required for a certain aim), addresses, and phone (email) for contact. The data is stored for a period not longer than the maximum

limitation period, as of the end of the implementation of the contract in question, with the aim of protecting your and our interests.

- Collecting data in relation to the access control in the building/establishments of the Companies - with the aim of implementing controlled access to the building/establishments of the Company and on the basis of legitimate interest the Companies process data about external visitors (for example, their names) and in some cases also data about their personal motor vehicle (reg. number) with which the visitors come “in” and “out” of the establishments/territory of the Companies.

- Accounting – the data is collected and processed based on law, for the purpose of accounting services and accounting of the activity and protection of legitimate interests of the Companies. Only data required according to the legal requirements, related to the accounting operation and accounting is processed, this is data concerning employees/representatives of organizations/companies – clients of the Companies/Group, about clients who are natural persons: names, PIN, address. The data is stored within periods in accordance with the accounting, tax, and financial legislation and other relevant legislation.

- Video surveillance – at our establishments video surveillance is carried out for the purpose of protecting the establishments and assets as the tapes from it are being stored for a limited period. The necessary technical and organizational measures have been taken to protect your privacy and for the tapes to be stored and destroyed while complying with all legal and our own internal instructions and rules, in compliance with the legislation. Access to the data is severely restricted and is given according to our internal rules for video surveillance.

B) The companies can process personal data also in relation to their not-so-regular activities such as:

- Processing of data in relation to managing the capital of the Companies and companies in which they participate – the Companies process data about their shareholders, natural persons in their personal capacity, or natural persons representing legal entities, for members of the governing bodies of the Companies. The data is processed on a legal basis for the purpose of compliance with regulatory requirements, identification, and participation in relation to common gatherings of the shareholders, etc.

- Sending commercial communications, direct marketing – in case you have explicitly agreed to that, we will use your data for the purpose of direct marketing/ for sending commercial communications to you. You can unsubscribe from receiving emails from us at any time by clicking on a special link at the bottom part of each letter that you receive from us.

- Corporate and social responsibility – part of the strategy of the Group is adopting and following the policy for corporate and social responsibility. For the implementation of the policy and the realization of programs in implementing the policy, for each specific project collecting various amounts of data might be necessary. The certain quantity and amount of data comply with the requirements of the program. Only the necessary data is collected and processed. The participants in the relevant programs are informed before the actual collection of data by providing the necessary data according to Article 12 – 14 of the Regulation (EU) 2016/679 by means of a certain document part of the application documents.

- Security logs and “cookies” – during each visit to our site <http://mtgbg.com/> data about usage is transmitted from the relevant internet browser and log files, the so-called server log files, for example, date and time of extraction, name of the accessed page, amount of transferred data and the searched provider, which is stored. This data cannot be related to a certain person and serve only for ensuring the smooth operation of the website.

The Companies from the Group are not involved in profiling or automated decision-making.

#### **4. Who do we share your data with?**

Your data is shared with external parties only in the following cases:

1. if a law requires that

or

2. if these parties are our service suppliers, for example, parties that provide services in relation to accounting services for the Companies, in relation to the technical support of software solutions, etc. These suppliers are carefully selected by us, and we require them to apply the same data protection that we apply. The data that we provide them with is at a strictly minimum amount and do not exceed the purpose for which we do so.

Generally, the Companies do not store personal data outside the European Union and do not transmit (transfer) data outside the European Union. If needed, such transfer of data (for example, the secondment of employees of the Companies in counties outside the EU, as in that case data is shared for the purpose of organizing the travel and accommodation), the Companies are required to hand over personal data that is processed or is meant for processing after the transfer of a third country or of an international organization, to be carried out only under the condition that the provisions of the Regulation are complied with, including in relation to onward transfers of personal data by the third country or by the international organization of another third country or of another international organization, in order to ensure the necessary level of protection of natural persons according to the Regulation and for it not to be at risk.

#### **5. What security measures are we taking?**

We collect, process, and store your personal data and comply with all legal requirements as we implement the appropriate technical and organizational security measures.

For maximum security purposes, when processing, transferring, and storing personal data, we use and implement protection such as encryption, restricted access, secure archiving, destruction, etc.

Outside the technical measures, the employees of the Companies are obliged during the processing of personal data to comply with internal policies and procedures of the Companies for the protection of personal data, and along with that observe the rules in the Policy for the protection of personal data and other similar documents accepted at the level of the Group.

#### **6. How long do we store Your personal data?**

We store your personal data for the period necessary for the implementation of the contract or the purposes for which the data is collected, except if by law or for the protection of our legitimate interests or your rights, a longer period for storing is necessary.

When defining the periods and criteria for storing your personal data we take into consideration the natural development of our partnership.

When the personal data which we collect is no longer necessary for the purposes that they were collected for, and the periods for their storing have passed, we delete it or destroy it in another proper way.

## 7. What are your rights in relation to your personal data?

You can request for us to provide you with access to your personal data processed by us, to correct it or add to it, to limit its processing, to receive it in a machine-readable format, to object to the processing, to withdraw your consent for processing when your data was collected on this basis as well as for us to delete all data about you,

Part of your rights depends on a specific reason for processing your personal data. We will assist in their implementation; we will review your demands within the statutory deadline and will respect them when they are admissible and when there are grounds for that.

In the rare cases that we cannot meet your demands within 1 (one) month, it is possible that this period might need to be extended, but not by more than the admissible and maximum allowed by law period, and we are going to list the reasons why.

You can exercise your rights by making a demand to us through the above-mentioned email for contact regarding questions, related to the processing of personal data. [\*You can use this form.\*](#)

To protect your rights and the rights of other subjects of data (our partners, counterparties, employees), whose personal data we process, before providing you with access to certain data or performing another activity by your request, we need to verify the identity of the sender of the request. Because of this, we might have to ask you to provide us with additional data about you, to come in person, to send your request signed with a digital signature, or to take other reasonable measures, depending on the nature of the request, data, and context of its processing.

If you believe your rights have been violated, you can contact us so we can check the matter and take the relevant actions in relation to that.

You also have the right to turn to Commission for Personal Data Protection (as a supervisory authority) and to file a complaint to the Commission. For more data about the supervisory authority visit: <https://www.cpdp.bg/>.

## 8. Update

In the case of changes in the policies, procedures, and methods for collecting and processing personal data by us and in the measures that we implement for the protection of data, we will revise and update the present privacy notice.

Date of the last update of the document: June 2023.