



# Privacy Policy

We, Kammarton Bulgaria declare that we work in accordance with General Data Protection Regulation (EU) 2016/679 (GDPR) and we are committed to protecting your privacy. It is important to us to ensure that your personal data is being processed in a secure and lawful way. Accordingly, we have adopted this privacy policy in order to inform you about how we process your personal data.

## Who is responsible for the processing of your personal data?

Kammarton Bulgaria LTD (ID No. 040201751) is the data controller and is consequently responsible for ensuring that the processing of your personal data is performed in accordance with applicable data protection laws, including the EU General Data Protection Regulation (EU) 2016/679 and the EU Data Protection Act (2018:218), and this privacy policy. If you have any questions or if you would like to exercise your rights under the EU General Data Protection Regulation, please contact us by using the following contact details:

### **Kammarton Bulgaria LTD**

2, "Veselin Hanchev" Str., 1360 Sofia

Phone: +359 (0)2 926 60 60

E-mail: [info@kammarton.com](mailto:info@kammarton.com)

## What personal data do we collect and where from?

We only collect your personal data to the extent necessary in order to fulfil certain purposes, which are set out below. We collect your personal data when you, among all other cases, send us a request for quotation, place an order for any of our products or services, sign a contract, subscribe for our on-line shop [www.toolsshop.com](http://www.toolsshop.com), or when you apply for employment at Kammarton Bulgaria. Furthermore, we collect your personal data if/when you voluntarily fill out customer surveys or contact forms and provide us with feedback.

## The types of personal data that we collect may include the following:

- Name, position, and contact information including e-mail address, telephone/mobile number and contact-address;
- job application documents, such as your resume and cover letter;
- purchase history;
- delivery information, billing information and payment information; and
- other information which you may provide to us in connection with correspondence with our employees.

## We may collect your personal data from the following sources:

- Kammarton's and Toolsshop websites, e.g. when you place an order, subscribe to our newsletter, register and download information or when you contact us using our contact forms;
- when you contact us by email or by phone;
- when you meet our employees and voluntarily exchange information, business cards in this number;
- through contracts, invoices or other business contacts, if you are a representative of any of our business partners;
- from third parties (as regards different registers and address providers); and
- through certain activities, such as fairs and events.

## Why do we collect and process your personal data?

We collect and process your personal data for the purposes and based on the legal grounds set out below:

Purpose of processing	Legal ground
Managing your orders and purchase returns Communicating delivery notes or information regarding delivery and or financial issues Executing recruitment processes	Performance of contract
Sending general information and targeted messages <ul style="list-style-type: none"><li>○ Sending invitations to events</li><li>○ Sending quotations</li><li>○ Replying to questions by email or via customer service</li><li>○ Sending customer surveys</li></ul>	Legitimate interest
Sending newsletters	Consent

## CONSENT

Sometimes we might need your consent in order to be able to process your personal data, e.g. with respect to subscription of our newsletter. In these situations you will be provided with information about this and you will also get the possibility to accept or decline that your personal data is processed in the described way.

You may withdraw your consent at any time by contacting us using the contact information above. Such withdrawal may be made in whole or in part. If you do not wish to receive newsletters from us you may, in addition to using the contact information above, withdraw your consent by clicking a link in the relevant email.

## Transfer of personal data

Your personal data may be transferred to third parties who act as Kammarton's data processors, so that we can carry out our obligations in relation to you as a customer or a representative of a customer. We do not disclose and we do not sell personal data to third parties for any other purposes.

We always observe great caution when transferring your personal data and your personal data is only transferred in accordance with this privacy policy and after taking appropriate security measures. Your personal data may be disclosed in order for Kammarton to comply with certain legal obligations and it may be transferred to relevant public authorities when permitted and required by law.

Under certain circumstances, personal data may be transferred to countries outside of the EU/EEA. The data protection laws in some of these countries may not provide as strong protection with respect to your privacy as the EU ones do. If so, Kammarton will take all appropriate measures in order to ensure that your personal data is adequately protected and that all processing is performed in accordance with this privacy policy. You can always be confident that all transfers of your personal data to countries outside of the EU/EEA are carried out in compliance with applicable data protection laws, as Kammarton will ensure that at least one of the following conditions are fulfilled in relation to each of those transfers:

- the receiving country ensures an adequate level of protection;
- Kammarton has collected your consent prior to the transfer;
- the applicable data protection laws provide legal grounds for the transfer;
- an agreement including certain standard contractual clauses issued by the European Commission (2010/87/EU) have been entered into between Kammarton and the recipient, without any conflicting changes or amendments;
- the recipient has adopted binding corporate rules for the processing which have been approved by the relevant supervisory authority and the recipient of the personal data in the third country is bound by these rules; or

## HOW DO WE PROTECT YOUR PERSONAL DATA?

Kammarton is continuously working to ensure an adequate organizational and technical level of security in relation to the processing of personal data which fulfils the conditions set out in applicable data protection laws.

### For how long is your personal data retained?

Your personal data will never be stored for longer than what is necessary to fulfil the purposes stated above, or than what is permitted by applicable law. Your personal data will be processed by us during the time periods set out below, and thereafter erased.

- **Representatives of companies:** Your personal data is saved for as long as you are listed as the contact person for a company with which Kammarton has business relations.
- **Communication:** If you are in contact with Kammarton, your personal data is saved for as long as it is necessary to fulfil the purpose of the correspondence.
- **Employment applicants:** Kammarton will save your job application documents, including your resume and cover letter, during the recruitment process and for years later according to the Bulgarian legislation, in order to defend potential legal claims.
- **Legal obligation:** Kammarton saves any documentation that constitutes accounting information in accordance with applicable accounting legislation.
- **Consent:** Where we process your personal data based on your consent, we will only save your personal data for as long as we have your consent to do so.

### What rights do you have?

- You have the right of access to the personal data regarding you that we process. You may request information regarding what personal data we have retained about you and the purposes of the processing of this personal data.
- Should your personal data be inaccurate or incomplete, you may request rectification of the relevant personal data.
- In certain situations, you have the right to have your personal data erased, e.g. if the processing of your personal data is no longer necessary in relation to the purposes for which they were collected.
- In certain situations, you have the right to request that Kammarton's processing of your personal data be restricted, e.g. if you have objected to any processing carried out based on Kammarton's legitimate interests.

- You have the right to withdraw or alter the consents that you have given to us at any time.
- You may, in certain situations, request that your personal data be transmitted in an electronic format, in some cases to another data controller (data portability).

Should you want to exercise any of your rights, you are welcome to contact us by using the contact information above. For the protection of your privacy and your personal data, we will require that you identify yourself in connection with our assistance. If you, for the purpose of exercising the above-mentioned rights, choose to contact us by mail, we kindly ask that you include a copy of your ID and ensure that the letter is signed. If you choose to contact us by email, please include a scanned copy of your ID and signature.

You may at any time file a complaint with the EU Data Protection Authority if you believe that Kammarton's processing of your personal data is not carried out in accordance with applicable laws.

### Changes to the privacy policy

Please, note that the terms of the privacy policy may be changed or amended. Any new version will be published on Kammarton's website. Consequently, you should review these terms on a regular basis to make sure that you are satisfied with the changes. In case of any material changes we will, however, email you, if you have given us your email address, to make you aware of any changes made.

If the changes concern processing of personal data that we carry out based on your consent, we will give you the opportunity to once again give your consent to the processing on the new terms presented.