

Privacy Policy

Considering the provisions of the Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of individuals with regard to personal data processing and on the free movement of persons of these data, Brighters AD (“Brighters” and/or “Company” and/or “we”) fully complies with the legislation applicable to the data protection.

This Privacy Notice describes how and what personal data the Company collects, holds and uses when you visit Brighters website or have any kind of interaction with us via the website, and the conditions under which we may disclose the personal data and the way we keep it safely.

For any queries or additional information on how Brighters processes your personal data, as well as for exercising your data protection rights, you may contact our **Data Protection Administrator** by email at sales@brighters.bg or by post at Brighters AD, 5 Panorama Sofia Str., Sofia 1766, Bulgaria

Obtaining your personal data directly from you

We obtain personal data (any information relating to an identified or identifiable natural person) directly from you.

We will obtain your personal data (such as name, surname and e-mail address) if you wish to be an Brighters client, customer, supplier or employee and, thus, you fill the Contact Us or Work with Us Forms.

Using your personal data only for identified purposes of processing

Depending on our relationship, we process your personal data if we have your consent, if necessary for the performance of a contract, if necessary to comply with the legal obligations or in order for us to satisfy certain legitimate interests that do not prevail over your rights and fundamental freedoms.

If we process your personal data based on your consent you have the possibility to withdraw your consent.

The Company may process your personal data in relation to a contract execution between you and Brighters, compliance with our legal obligations, or cooperation with competent authorities in certain cases. Brighters may also process your personal data to meet certain legitimate interests such as commercial or other analysis, in relation with any claim, action or procedure (including, but not limited to, drafting and reviewing documents, drafting necessary documents for the conclusion of a transaction, obtaining legal advice and facilitating settlements) and/or protection or exercise of contractual and legal rights and obligations, cooperation with public authorities.

What we do with your data

We may disclose your personal data to our collaborators or partners, such as IT partners, auditors or legal consultants, public authorities or bodies.

Any transfer of personal data outside the European Economic Area will be conducted with the observance of the legal provisions, by applying appropriate safeguards, such as standard contractual clauses approved by the European Commission, and notifying you, as the case may be.

Our Website does not collect or compile personally identifying information for sale to non-Brighters parties for consumer marketing purposes.

Security of your personal data

Brighters processes personal data in a manner that ensures appropriate security of the personal data, including protection against unauthorized or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organizational measures.

Your rights

In regard to personal data processing through this website, you have following rights:

- **right of access:** to obtain a confirmation from our part as to whether or not your personal data is processed, as well as access to personal data and information on the processing;
- **right to rectification:** to have, without undue delay, the rectification of inaccurate personal data and/or the completion of incomplete personal data;
- **right to erasure/right to be forgotten:** to erase personal data without undue delay if these data are no longer necessary in relation to the purposes of processing for which they were collected and there is no other legal ground for processing, if personal data were unlawfully collected or they must be erased for compliance with a legal obligation;
- **right to restriction of processing applicable** if (i) the accuracy of the personal data is questioned by you, (ii) processing is unlawful and you oppose the erasure of the personal data, requesting in exchange the restriction of their use, (iii) we do not longer need the personal data, but you require them for the establishment, exercise or defense of legal claims, (iv) you objected to the processing pending the verification whether our legitimate grounds override yours;
- **right to object to the processing**, except for the cases where we prove that the Company have legitimate reasons for your personal data processing, reasons that override your interests, rights and freedoms or for the ascertaining, exercise or defense of **a * right in front of a court of law;**
- **right to withdraw your consent at any time**, without affecting the lawfulness of processing based on consent before its withdrawal;
- **right to data portability**, meaning the right to receive your personal data that you provided us with for the purposes stated in the hereby notice, in a structure, commonly used and machine-readable format, as well as the right to transmit these data to another controller;
- **right to lodge a complaint with Commission for Personal Data Protection**, 2 Prof. Tzvetan Lazarov Blvd., Sofia 1592. Bulgaria, <https://www.cpdp.bg/>;
- **right not to be subject to a decision based solely on automated processing**, including profiling, which produces legal effects or similarly affects you, except for the case where such processing is necessary for the performance of a contract or authorized by law.

With the exception of the case where you exercise your right to lodge a complaint with the supervisory authority as shown above, you may exercise any right by sending a request by email at sales@brighters.bg; by post: Brighters AD, 5 Panorama Sofia Str., Sofia 1766, Bulgaria, or at www.Brighters.bg/contact

For how long we will keep your personal data

Depending on our relationship, we will store your personal data for the period of time necessary for us to comply with the specific legal obligations in our business area or in accordance with the applicable statute of limitation (for example, **5 years** from the termination of the contractual relationship) or for the

observance of the archiving obligations imposed by the applicable legislation (for example, the legislation specific to financial area).

Minors

This website is not designed or intended for use by children under the age of 16. We do not knowingly collect any Personal Data on this website from anyone under the age of 16 without the prior, verifiable consent of a parent or guardian. Such parent or guardian may have the right, upon request, to view the information provided by the child and require that it be deleted. Moreover, all minors should seek their parent's or guardian's permission prior to using or disclosing any Personal Data on this website or online resource.

Changes to privacy notice

We keep our Privacy Notice under regular review and we will place any updates on this page, without prior notice. However, processing of your personal data shall follow the directions notified within the applicable Privacy Notice, in effect upon the collection date.