

PRIVACY NOTICES OF “FORTON” AD

In relation to the new General Data Protection Regulation (EU) 2016/679 and considering Forton’s aim to follow strictly its legal obligations especially considering the personal data protection rules, we would like to inform you about the following:

Forton AD is a company registered under the Bulgarian legislation in the Commercial Register and the Register of the legal entities with non-commercial purpose at the Registry Agency of Republic of Bulgaria with UIC 202485860, having its registered address located at Republic of Bulgaria, Sofia, 47A “Tsarigradsko shosse” Blvd. The Company is registered as personal data controller with ID number 384436. You can contact us at: phone: +359 2 805 90 90; e-mail cwforton@cwforton.com

Forton’s day-to-day business activity requires processing of personal data for the following subjects:

1. Employees (current and former);
2. Job applicants;
3. Clients and suppliers – individuals and/ or employees and representatives of companies.

With these Privacy Notices we would like to inform you about the personal data processed by us, for which purposes and about your rights in this respect.

1.1. Privacy Notice for Employees

Forton processes its employees’ (current and former) personal data in its capacity of employer and as described herein below.

Employees’ personal data which we process include: names, ID number, ID document data, banking information, address, marital status and family relationships, photos health status, education and professional qualifications, job position, professional experience, wage, contact details – phone number, e-mail, address.

Your personal data about health status are sensitive data which we process only when it’s legally required, in order to protect the vital interests of the data subject or of another natural person or when the data subject has given his/ her consent.

In your capacity of Forton’s employee we could process your data for one or more of the following purposes:

- ✓ To fulfill our legal obligations;
- ✓ For the purposes of the legitimate interests of Forton;
- ✓ When the data subject has given his/ her consent.

Forton shall not store your data for a period longer than the required for the processing purpose. We hold your data following the legally defined prohibited periods as well as considering the volume, specifics and sensitivity of the data, the processing purposes and whether we could complete them with different means.

Once we have no legal obligation and/ or legitimate interest, we shall erase or delete your data in a secure way.

Forton has the right to share your personal data only with:

- ✓ Its employees, whose professional obligations require processing of personal data on our behalf;
- ✓ Public bodies when it’s legally required or for the purposes of our legitimate interests;
- ✓ Authorized third party agents, service providers of legal, IT bank services, etc. and/or subcontractors when needed for fulfillment of contractual obligations or for protecting our legitimate interests.

You shall be informed that we shall not share your data with other external organizations, companies and/ or individuals except of the ones described herein above or only when it's legally required or you have given your consent in advance.

Forton has implemented all appropriate technical and organizational measures with the objective of protecting your privacy and will update these measures as appropriate.

In case your data has been shared with third parties, we require that the adequate levels of protection have been implemented by them as well in order to safeguard the personal data as prescribed by the law.

You shall be informed that you have the right to require from Forton access to your data, as well as rectification and erasure of your personal data, restriction of processing, to object the processing, right to data portability, as well as not to be a subject of an automated individual decision-making. You can exercise any of these rights through a written notification sent to the following e-mail: cwforton@cwforton.com or to the following address: Bulgaria, Sofia, postal code 1124, 47A "Tsarigradsko shosse" Blvd., floor 2.

In those cases where processing is based on a consent, you have the right to withdraw your consent at any time. The withdraw can be done by a written notification sent to the following e-mail: cwforton@cwforton.com or to the following address: Bulgaria, Sofia, postal code 1124, 47A "Tsarigradsko shosse" Blvd., floor 2. It shall be noted that this will not affect the validity of the processing prior to the withdrawal of consent.

In case you assume that Forton as a controller of your personal data is not protecting your rights, you can contact the Commission for personal data protection and the competent courts as you have a right to file a complaint in which you can submit your complaints.

1.2. Privacy Notice for Job Applicants

Forton processes job applicants' personal data within recruitment procedures and as described herein below.

Job applicants' personal data which we process include: names, education and professional qualifications, photo, contact details and other data shared by the applicant.

We could process your data for one or more of the following purposes:

- ✓ For completion of the recruitment procedure under which you are applying;
- ✓ To fulfill our legal obligations;
- ✓ For the purposes of the legitimate interests of Forton;
- ✓ When the data subject has given his/ her consent.

Forton holds personal data of unsuccessful applicants for no longer than one year after the recruitment process was completed. We shall not store your data for a period longer than the required for the processing purpose. We hold your data following the legally defined prohibited periods as well as considering the volume, specifics and sensitivity of the data, the processing purposes and whether we could complete them with different means.

Once we have no legal obligation and/ or legitimate interest, we shall erase or delete your data in a secure way.

Forton has the right to share your personal data only with:

- ✓ Its employees, whose professional obligations require processing of personal data on our behalf;
- ✓ Public bodies when it's legally required or for the purposes of our legitimate interests;
- ✓ Authorized third party agents, service providers of legal, IT bank services, etc. and/or subcontractors when needed for fulfillment of contractual obligations or for protecting our legitimate interests.

Failure to provide us with the information requested, including your personal data which is limited to that required for these purposes will be an obstacle for you to be included in the recruitment procedure and it will negatively affect your chances of being selected for the applied position.

You shall be informed that we shall not share your data with other external organizations, companies and/ or individuals except of the ones described herein above or only when it's legally required or you have given your consent in advance.

Forton has implemented all appropriate technical and organizational measures with the objective of protecting your privacy and will update these measures as appropriate.

In case your data has been shared with third parties, we require that the adequate levels of protection have been implemented by them as well in order to safeguard the personal data as prescribed by the law.

You shall be informed that you have the right to require from Forton access to your data, as well as rectification and erasure of your personal data, restriction of processing, to object the processing, right to data portability, as well as not to be a subject of an automated individual decision-making. You can exercise any of these rights through a written notification sent to the following e-mail: cwforton@cwforton.com or to the following address: Bulgaria, Sofia, postal code 1124, 47A "Tsarigradsko shosse" Blvd., floor 2.

In those cases where processing is based on a consent, you have the right to withdraw your consent at any time. The withdraw can be done by a written notification sent to the following e-mail: cwforton@cwforton.com or to the following address: Bulgaria, Sofia, postal code 1124, 47A "Tsarigradsko shosse" Blvd., floor 2. It shall be noted that this will not affect the validity of the processing prior to the withdrawal of consent.

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1.3. Privacy Notice for Clients and Suppliers

Forton processes Clients' and Suppliers' personal data for the fulfilment of its contractual obligations and as described herein below.

Clients' and Suppliers' (individuals and/ or employees and representatives of companies) personal data which we process include: names, ID number/date of birth; company affiliation, role, professional qualifications, contact details – phone number, e-mail, address, financial and/ or property possession status, bank accounts.

We could process your data for one or more of the following purposes:

- ✓ For entering and/or fulfilment of our contracts/ agreements;
- ✓ To fulfill our legal obligations;
- ✓ For the purposes of the legitimate interests of Forton and/ or third party;
- ✓ When the data subject has given his/ her consent.

Providing your personal data is voluntarily and at the same time necessary for entering into an agreement between you and Forton. Considering the above, you shall be informed that we can provide you with a service only when we process your personnel data. In case you do not wish to provide us with your personal data, Forton shall not be able to provide you with the respective service.

The provided data will be stored by Forton as long as the concluded agreement is in force. After its termination your personal data will be deleted or erased in a secure way unless there is a legitimate interest and/ or legal ground which requires Forton to proceed with personal data processing or holding.

Forton has the right to share your personal data only with:

- ✓ Its employees, whose professional obligations require processing of personal data on our behalf;
- ✓ Public bodies when it's legally required or for the purposes of our legitimate interests;

✓ Authorized third party agents, service providers of legal, IT bank services, etc. and/or subcontractors when needed for fulfillment of contractual obligations or for protecting our legitimate interests.

You shall be informed that we shall not share your data with other external organizations, companies and/ or individuals except of the ones described herein above or only when it's legally required or you have given your consent in advance.

Forton has implemented all appropriate technical and organizational measures with the objective of protecting your privacy and will update these measures as appropriate.

In case your data has been shared with third parties, we require that the adequate levels of protection have been implemented by them as well in order to safeguard the personal data as prescribed by the law.

You shall be informed that you have the right to require from Forton access to your data, as well as rectification and erasure of your personal data, restriction of processing, to object the processing, right to data portability, as well as not to be a subject of an automated individual decision-making. You can exercise any of these rights through a written notification sent to the following e-mail: cwforton@cwforton.com or to the following address: Bulgaria, Sofia, postal code 1124, 47A "Tsarigradsko shosse" Blvd., floor 2.

In those cases where processing is based on a consent, you have the right to withdraw your consent at any time. The withdraw can be done by a written notification sent to the following e-mail: cwforton@cwforton.com or to the following address: Bulgaria, Sofia, postal code 1124, 47A "Tsarigradsko shosse" Blvd., floor 2. It shall be noted that this will not affect the validity of the processing prior to the withdrawal of consent.

In case you assume that Forton as a controller of your personal data is not protecting your rights, you can contact the Commission for personal data protection and the competent courts as you have a right to file a complaint in which you can submit your complaints.

2. Changes to the Privacy Notices

These Privacy Notices of Forton are effective as of 25th May 2018 and may be amended over time for which you shall be informed through e-mail or notifications published at our website (<http://cwforton.com/>).