

## Privacy policy

### Receive a newsletter

You can subscribe to the newsletter on our website. The data provided during the subscription will be used only for sending the newsletter. You can unsubscribe at any time through the opt-out option.

In order to confirm your consent to receive it and to process your personal data for this purpose, find out in detail who we are and what are the purposes and deadlines for which we process your personal data.

By agreeing to register to receive the newsletter, you agree to **Think East Business Consulting OOD**, UIC: 205432368; with registered office and address of management Plovdiv, post code: 4000, 103 Vasil Levski Blvd., fl.13, app.96. In order to send you a newsletter with up-to-date information about new and / or current services and / or activities provided by the site owned by Think East Business Consulting Ltd., you will be able to withdraw your consent to receive a newsletter at any time by unsubscribe from the subscription via the "Unsubscribe me" link at the bottom of each message or by writing to us at

When processing personal data, the Administrator complies with the laws and regulations applicable in Bulgaria in connection with the protection of personal data, including, but not limited to, Regulation (EU) 2016/679 ("Regulation").

Grounds for and purposes of processing personal data collected for sending the newsletter:

Your personal data will be processed and stored by the Administrator on the following grounds: your explicit consent to the processing of your personal data for the purposes and within the time limits specified in these rules, as well as communication to send a newsletter.

Your personal data will be used by the Administrator on the territory of the Republic of Bulgaria and the same will not be passed on to third parties, except to: the automated marketing platform MailChimp in order to send the newsletter; the companies running the respective plugin or social network that you decide to use yourself; as well as Google, in order to perform web analysis. The latter are provided with information only about IP address and log, in order to perform the analysis.

Your personal data will be stored in accordance with the legal requirements for personal data protection in electronic format in the following electronic register maintained by the Administrator: "Electronic Newsletter Register" for no more than the minimum required for this purpose after your unsubscription

**Purpose: Legitimate interest:**

These are goals related to the legitimate interests of, such as: ensuring the proper functioning and use of the Site by you and other users; maintenance and administration of the Services; resolving disputes; detection and prevention of malicious actions; detection and resolution of technical or functionality issues; development and improvement of the Services; communication with you, including electronically, on important issues related to the Services; realization and protection of the rights and legal interests of "Think East Business Consulting" Ltd., including in court. For these purposes, it may be necessary to process some or all of the above categories.

**Purpose: Legal obligations:**

The objectives related to compliance with the legal obligations of "**Think East Business Consulting**" Ltd. include: fulfillment of obligations under the law to retain or provide information upon receipt of a relevant order from the competent state or judicial authorities; providing an opportunity for exercising the control powers of the competent state authorities in fulfilling the legal obligations of "**Think East Business Consulting**" Ltd., to inform you about various circumstances related to your rights, the Services provided, the protection of your data, etc.

The period for which your data will be processed is not more than the minimum required for this purpose after the completion of all activities for the implementation of your order. In order to ensure the reliability of the services and prevent data loss for technical reasons, the Site applies a policy of data backup (backup). The maximum period for updating (including deleting data) of all backups is 60 days

Your personal data will be processed entirely on the territory of the Republic of Bulgaria and will not be provided to third parties, unless: you have requested delivery of the goods ordered by you outside the territory of the Republic of Bulgaria; for web analytics performed by Google; if you use plugins or social networks, under the conditions set out below.

Other cases in which your personal data may be disclosed to third parties are: only when this is provided by law; if duly requested by a competent state or judicial authority; when we have received your explicit consent to this; when this is necessary for the protection of the rights and legitimate interests of "**Think East Business Consulting**" Ltd.

**Your rights:**

You can receive information from the Administrator about your personal data stored by him at any time and you have the right to access them.

You may request that your personal data be corrected at any time in the event of inaccuracies and / or inconsistencies.

I am aware of my obligation to notify the Administrator of any change in my personal data.

You can request the deletion of your personal data or request the Administrator to restrict processing.

You have the right to object and complain in connection with the processing and storage of your personal data before the Commission for Personal Data Protection, address: Sofia, Blvd. "Prof. Tsvetan Lazarov "Nº 2., which is a supervisory body in the Republic of Bulgaria.

You have the right at any time and on the grounds of a specific situation to object to the processing of personal data on the basis of a legitimate interest.

In the event of a breach of the security of your personal data, if the breach is likely to pose a high risk to your rights and freedoms, according to the internal rules of the Administrator, you will be notified.

You have the right to request that you receive your personal data, which you have provided and which relate to you, in a structured, popular machine-readable format, and to use this data for another administrator at your discretion.

In the event that we process your personal data due to your consent when subscribing to receive a newsletter, then you can withdraw the same at any time.

In order to exercise each of these rights, it is necessary to send a request by e-mail, formulated in free text and addressed to the Data Protection Officer of "Agree" **Think East Business Consulting Ltd., UIC 205432368, with registered office and address of Management in Plovdiv, Post code 4000, 103 Vasil Levski Blvd., 13th floor, apartment 96 or by e-mail at: [mpenchev@thinkeast.eu](mailto:mpenchev@thinkeast.eu)**

The wording of the request is free, but should contain the following information:

1. name, address and other data for identification of the respective natural person;
2. description of the request;
3. preferred form of communication - by e-mail or on paper, as well as actions under Art. 15-22 of Regulation (EU) 2016/679.

### **Use your cookies**

To make the visit to our website attractive and to enable the use of certain functions, we use so-called cookies on various pages. These are small text files that are stored on your device. Some of the cookies we use are deleted at the end of the browser session, ie. after you close it (so-called session cookies). Other cookies remain on your device and allow us or our partner companies to recognize your browser the next time you visit (so-called persistent cookies). Cookies do not allow you to access other files on your computer or learn your email address. The legal basis for the processing of personal data when using cookies is Art. 6 paragraph 1 para. 1 f) of the GDPR.

Cookies are stored on your device and you can fully control their use. By changing your browser settings, you can disable or restrict the use of cookies. Already saved cookies can be deleted at

any time. This can also be done automatically. If cookies are disabled for our website, you may not be able to use all features in their full range.

### **Control cookies in the browser**

If you subsequently do not wish us to collect and analyze information about your visit, you can opt-out at any time.

For the technical implementation of this failure, the corresponding marker is set to Off in your browser. This cookie is for registration purposes only. Please note that for technical reasons, cookies can only be used for the browser from which they are set. If you delete cookies or use another browser or device, you must reset the selection you want.

### **Transfer of personal data to third parties**

We use MailChimp as our automated marketing platform. By agreeing to this information be forwarded to MailChimp for processing following the MailChimp Privacy Policy. To date, The Rocket Science Group LLC is the organization that owns the email campaign management platform we use. It is based in the United States. This means that your data is stored and processed on servers on the platform located in the United States, which is accepted by the EU as a country that guarantees an adequate level of protection for personal data transmitted to organizations in the United States, listed by the EU-US Privacy Shield. The Rocket Science Group LLC is included in this list, which ensures the protection of your data in the United States following all applicable requirements of European law.

### **Web analysis with Google Analytics**

This website uses Google Analytics - a web analytics service provided by Google Inc., 1600 Amphitheater Parkway, Mountain View, CA 94043, USA ("Google"). Google Analytics uses the so-called cookies, i.e. text files stored on your computer to allow the analysis of your use of the website. The information collected through cookies about your use of this website is usually transmitted to a Google server in the United States and stored there.

Our site uses Google Analytics with the "anonymized IP" extension. This means that in the Member States of the European Union or in other countries that are parties to the Agreement on the European Economic Area, your IP address collected by Google Analytics cookies will be cut off by Google before it is transmitted to the United States. Only in exceptional cases will the full IP address be transmitted to a Google server in the United States and truncated there. When you visit our site, Google uses this information to evaluate your use of the website, to compile reports on website activity, and to provide website operators with additional services relating to your use of the website and the Internet. The IP address sent by your browser in the context of Google Analytics will not be merged with other data from Google.

You can prevent cookies from being saved by setting them in your browser software; please note that in this case, you may not be able to use all the features offered by this website. You can prevent the collection and processing of data obtained through cookies and related to your use of the website (including your IP address) by downloading and installing a browser plug-in from the following link: <http://tools.google.com/dlpage/gaoptout?hl=de>.

Detailed information on terms of use and data protection can be found at <https://marketingplatform.google.com/about/analytics/terms/us/>

The legal basis for the processing of personal data when using cookies is Art. 6 paragraph 1 para. 1 f) of the GDPR.

Use the Google Inc. feature remarketing or "Similar target groups"

We use the remarketing or "Similar Target Groups" feature of Google Inc., 1600 Amphitheater Parkway, Mountain View, CA 94043, USA ("Google") on this website. When they visit other websites on the Google Display Network, Google uses so-called cookies to analyze website usage, which is the basis for creating interest-based advertising messages. Website browsers, which record website visits as well as anonymized website usage data, do not store the personal data of website visitors. Inserted advertising messages will be displayed, which will most likely be taken because of the previously visited product and information sections. Additional information about Google remarketing, as well as the Google Data Protection Statement, can be found at <http://www.google.com/privacy/ads/>.

You can permanently disable the use of cookies by Google by following the link below and downloading and installing the plugin provided there: <https://www.google.com/settings/ads/plugin>. Alternatively, you can disable the use of third-party cookies by going to the Network Advertising Initiative deactivation page at <http://www.networkadvertising.org/choices/> and submitting additional opt-out information.

The legal basis for the processing of personal data when using cookies is Art. 6 paragraph 1 para. 1 f) of the GDPR.

### **DoubleClick from Google**

DoubleClick by Google is a service of Google Inc., 1600 Amphitheater Parkway, Mountain View, CA 94043, USA ("Google"). Google's Doubleclick uses cookies to provide you with important advertising messages. In doing so, your browser receives a pseudonymous identification number (ID) to verify which advertising messages are included in your browser and which are called up. Cookies do not contain personal information. The use of DoubleClick cookies enables Google and its partner websites to display advertising messages based on previous visits to our website or other websites. The information collected through cookies is transmitted by Google for evaluation to a server in the United States and stored there. Data transmission through Google

to third parties is carried out only based on legal provisions or within the framework of a data processing order. Google will never combine your data with other data collected by Google.

You can prevent the storage of cookies by setting the browser software accordingly; We would like to draw your attention to the fact that in this case, you may not be able to use all the features offered by our website. More information about DoubleClick's data protection can be found here: <https://www.google.com/intl/de/policies/> You can prevent the collection and processing of data obtained through cookies by following the link <https://support.google.com/ads/answer/7395996?hl=de> download and install the available browser plug-in under the message setup, DoubleClick Disable Extension.

The legal basis for the processing of personal data when using cookies is Art. 6 paragraph 1 para. 1 f) of the GDPR.

### **Social networks and social plugins**

Through our pages on social networks, we offer comprehensive personal assistance. If you send us an inquiry through one of these social networks, we forward it to the competent department. The data is used only to answer your query and is not forwarded to third parties. The legal basis for the processing of personal data in the framework of the processing of your request is Art. 6 paragraph 1 para. 1 f) of the GDPR. To be able to contact us through social networks, you must be registered in them. To this end, the companies behind each of them process personal data as needed. We do not influence the type, scope and processing of this data.

### **Using Facebook plugins**

Our website uses the social plugin (s) of the social network Facebook, as the administrator for Facebook of personal data of EU persons is Facebook Ireland Ltd., 4 Grand Canal Square, Grand Canal Harbor, Dublin 2 Ireland, and the processor is Facebook Inc. 1601 S. California Ave, Palo Alto, CA 94304, USA ("Facebook"). Information about Facebook plugins and what they look like can be found here: <https://developers.facebook.com/docs/plugins>.

When you link to a page on our website that contains such a plugin, your browser will establish a direct connection with Facebook's servers. Plugins transmit their Facebook content directly to your browser and integrate it with the web page. Through this integration, Facebook receives information that your browser has called up the relevant page from our website, even if you do not have a Facebook account or if you are not currently logged in to Facebook. This information (including your IP address) is transmitted from your browser directly to a Facebook server in the United States and stored there. If you are logged in to Facebook, Facebook may link your visit to our website directly to your Facebook account. When you interact with plugins, such as writing a comment, this information is also transmitted directly to a Facebook server and stored there. In addition, the information is published in your Facebook profile and displayed to your Facebook friends. Please note that as a provider of the website, we do not receive information about the

content of the transmitted data, as well as their use by Facebook. Information on the purpose and scope of this data collection, the further processing and use of this data by Facebook, as well as your respective rights and options for the protection of your privacy, can be found in the data protection guidelines of Facebook: <https://facebook.com/policy.php>.

If you do not want Facebook to link the data collected through our website directly to your Facebook profile, you must log out of Facebook before visiting our website. You can completely prevent the loading of Facebook plugins with Add-Ons for your browser, e.g. with Facebook Blocker (<http://webgraph.com/resources/facebookblocker/>).

As far as the above-described data are concerned personal data, the legal basis for their processing is Art. 6 paragraph 1 para. 1 f) of the GDPR.

### **Use YouTube plugins**

Our website uses YouTube social plugins. The service is owned by Google Inc., 1600 Amphitheater Parkway, Mountain View, CA 94043, USA ("Google").

When you link to a page on our website that contains such a plugin, your browser will connect directly to Google's servers. Plugins transmit their content from Google directly to your browser and integrate it with the web page. Through this integration, Google receives information that your browser has retrieved the relevant page from our website, even if you do not have a YouTube account or are not currently logged in to YouTube. This information (including your IP address) is transmitted from your browser directly to a Google server in the USA and stored there.

If you are signed in to YouTube, Google may associate a visit to our website directly with your account. Please note that as a provider of the website, we do not receive information about the content of the transmitted data, as well as their use by Google. Information on the purpose and scope of this data collection and the further processing and use of this data by Google, as well as your respective rights and options for the protection of your privacy, can be found in the data protection guidelines of Google: <http://www.google.com/intl/de/policies/privacy/>.

If you do not want Google to link the data collected through our website directly to your YouTube account, you must sign out of YouTube before visiting our website. You can also completely prevent Google plugins from loading with Add-Ons for your browser, e.g. by blocking "NoScript" scripts (<http://noscript.net/>).

The legal basis for the processing of personal data when using plugins is Art. 6 paragraph 1 para. 1 (b) or (f) of the GDPR.

### **Use Twitter plugins**

Our website uses the social plugins (plugins) of the Twitter microblogging service, owned by Twitter Inc., 1355 Market St, Suite 900, San Francisco, CA 94103, USA ("Twitter"). Information

about Twitter plugins and what they look like will find it here: <https://twitter.com/about/resources/buttons>.

When you link to a page on our website that contains such a plugin, your browser will establish a direct connection to Twitter's servers. Plugins transmit their Twitter content directly to your browser and integrate it with the web page. Through this integration, Twitter receives information that your browser has called up the relevant page from our website, even if you do not have a Twitter account or if you are not currently logged in to Twitter. This information (including your IP address) is transmitted from your browser directly to a Twitter server in the United States and stored there.

If you are logged in to Twitter, Twitter may link your visit to our website directly to your Twitter account. In addition, the information is published in your Twitter account and displayed there to your contacts. Please note that as a provider of the website, we do not receive information about the content of the transmitted data, as well as their use by Twitter. Information on the purpose and scope of this data collection, the further processing and use of this data by Twitter, as well as your respective rights and settings to protect your privacy, can be found in Twitter's privacy policy: <https://twitter.com/privacy>.

If you do not want Twitter to link the data collected through our website directly to your Twitter account, you must sign out of Twitter before visiting our website. You can completely prevent the loading of Twitter plugins with Add-Ons for your browser, e.g. by blocking "NoScript" scripts (<http://noscript.net/>).

Legal basis for the processing of personal data when using plugins is Art. 6 paragraph 1 para. 1 (b) or (f) of the GDPR.

### **Use Instagram plugins**

Our website uses the so-called social plugins (plugins) of Instagram, owned by Instagram LLC., 1601 Willow Road, Menlo Park, CA 94025, USA ("Instagram"). Plugins are marked with an Instagram logo, e.g. in the form of an Instagram camera. Information about Instagram plugins and what they look like can be found here: <http://blog.instagram.com/post/36222022872/introducing-instagram-badges>

When you link to a page on our website that contains such a plugin, your browser will connect directly to Instagram's servers. Plugins transmit their Instagram content directly to your browser and integrate it with the web page. Through this integration, Instagram receives information that your browser has called up the relevant page from our website, even if you do not have an Instagram account or if you are not currently logged in to Instagram. This information (including your IP address) is transmitted from your browser directly to an Instagram server in the United States and stored there.

If you are logged in to Instagram, then Instagram can link a visit to our website directly to your Instagram account. When you interact with plugins, such as activating the Instagram button, this information is also transmitted directly to an Instagram server and stored there. In addition, the information is published in your Instagram account and displayed there to your contacts.

Information on the purpose and scope of this data collection and the further processing and use of this data by Instagram, as well as your respective rights and options for the protection of your privacy, can be found in Instagram's privacy policy: <https://help.instagram.com/155833707900388/>

If you do not want Instagram to link the data collected through our website directly to your Instagram account, you must sign out of Instagram before visiting our website. You can completely prevent the loading of Instagram plugins with Add-Ons for your browser, e.g. by blocking "NoScript" scripts (<http://noscript.net/>).

Legal basis for the processing of personal data when using plugins is Art. 6 paragraph 1 para. 1 (b) or (f) of the GDPR.

### **Technical protection measures**

We make every effort to protect our customers, as well as the subscribers of our e-newsletters, from unauthorized access or unauthorized alteration, disclosure or destruction of their data. To this end, we take several technical and organizational measures, such as:

We use secure websites through which we collect your data;

We collect your data by confirming in two steps (entering data on our website and confirming the subscription, respectively your personal data, via a link sent to the email address you specified);

We review our practices for the collection, storage and processing of personal data, including physical security measures, to prevent unauthorized access to the systems we use;

Access to your data within our organization has only persons whose employment functions require access to data to carry out the activities for which the data were collected; the data are processed or passed on to third parties to whom you are informed and who adhere to the highest standards of information security and personal data security, demonstrated both by the availability of relevant certifications and by the ability to conduct regular audits of compliance.

We include contractual confidentiality clauses in all contracts we enter into with employees and third parties to whom we assign the processing of your data.

**Last revised on January 2, 2022**