### PRIVACY POLICY

Data protection is very important to us and we want the processing of your personal data to be completely open and transparent to you. That is why we have a policy that defines how your personal data will be processed and protected.

The Privacy Policy explains how ILPA DEVELOPMENT EOOD would collect and process your personal data. Personal data means any information or set of information that identifies or could be used to identify the user. This includes information such as name and surname, home address, email address, ID card number, IP address, cookie ID. This policy explains how your personal data are being processed, what your rights are as a user and how the law protects you and your data.

This Website is not intended for children and persons under 18 years of age. We do not have a policy to collect or keep information about people under the age of 18.

#### LEGAL FRAMEWORK OF THE PROTECTION OF PERSONAL DATA

Respecting your privacy and protection of your personal data is an important issue for us which we take into account in all our business relationships. We respect the privacy of your personal data and we always act in accordance with the provisions of the General Data Protection Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016.

There is a possibility that over time there will be other changes that we will have to make in the current Privacy Policy and in such case we will notify you whenever we make a change in it. We may have to ask you to accept the new changes or to re-consent to the use of your personal information.

### **DATA COLLECTION**

The information that you share with us is considered as personal data in the following cases:

- In emails or letters, addressed to us
- Completed and sent forms related to the Ellipse Center and our business activities
- Data you send to us in the form of feedback.

### **THIRD PARTIES**

Personal data may be provided to government and/or law enforcement authorities if required by applicable law.

We use cookies to store the settings and identifiers necessary to provide the services listed on this website. Some of these cookies are technically necessary for the proper functioning of the website.

More information about the policy of ILPA DEVELOPMENT EOOD regarding cookies can be found here.

### PERSONAL DATA PROCESSING

The personal data provided by you are processed and used by ILPA DEVELOPMENT LTD for specific and clearly defined purposec. These include, in particular:

1. Provision, improvement and maintaining of our services:

This includes data analysis, identifying trends in usage, as well as calculations and statistics metrics. This data is mainly quantitative, with no personalized information.

# 2. Contact Form usage:

In case you use the contact form for inquiries, the information you provide on the form, including contact details, is used to process the inquiry and is stored for further use if follow-up questions arise.

# **DATA PROTECTION**

In ILPA DEVELOPMENT EOOD we have introduced the necessary measures for information security to prevent accidental loss, use or access to your personal data in an unauthorized manner, alteration or disclosure. In addition, we restrict access to your personal data to those employees, external service providers, and other third parties who have a legitimate right of access to them. They are subject to a duty of confidentiality.

Given the nature of the Internet, we draw attention to the fact that there may be security gaps in the transmission of data online (for example, via e-mail) and that full protection of data from third party access is not possible.

### TERMS OF STORAGE OF YOUR PERSONAL DATA

We will only store your personal data for as long as necessary to meet the purposes we have collected it, including for the purposes of complying with statutory, accounting or reporting requirements.

In order to determine the appropriate period for the storage of personal data, we take into account the volume, nature and sensitivity of personal data, the potential risk of harm from unauthorized use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve these objectives by other means, as well as the applicable legal requirements.

#### YOUR RIGHTS

The General Data Protection Regulation guarantees a certain set of rights that you can exercise in relation to your personal data processed by us. Specifically, you have:

- Right to receive a copy of the information we store
- You may request a copy of the personal data we hold for you by sending us an email at office@ilpa-bg.com.

We will try to respond to all legitimate requests within one month. Sometimes it could take us more than a month and in such case we'll inform you in advance.

Right to inform us in case the information we store is incorrect

You have the right to question any information we hold about you that you consider wrong or incomplete. Please contact us by e-mail at office@ilpa-bg.com if you would like to do so and we will take reasonable steps to check the accuracy of the information and, if necessary, correct it.

• To inform us that you want to discontinue the use of your personal information

You have the right to:

- · Object against the use of your personal data;
- · Or ask us to delete your personal information;
- Or request limitation of processing:
- or ask us to stop using them if we do not need to do it (known as "the right to be forgotten")

Please, note that there may be grounds for us to keep or use your personal data which we will share with you when you exercise one of the above rights.

Withdrawal of consent

You may withdraw your consent to use your data at any time. Please contact us by email at <a href="mailto:office@ilpa-bg.com">office@ilpa-bg.com</a>, if you want to withdraw your consent. If you withdraw your consent, we may not be able to provide you with certain products or services.

## **CONTACTS**

In case any questions relating to this Privacy Policies arise, please contact us at:

ILPA DEVELOPMENT EOOD

BG175185934

Address: SOFIA, 19, Fr. J. Currie Str., fl. 1, app. 1

e-mail: office@ilpa-bg.com

tel: + 359 2 973 37 83; + 359 2 971 33 14

### **SUBMISSION OF A COMPLAINT**

Please if you are not content with the way we have used your personal data, please let us know by sending us an e-mail to office@ilpa-bg.com.

You have the right to complain to the Bulgarian Personal Data Protection Commission address: Bulgaria, 1592, Sofia, 2, "Prof. Tsvetan Lazarov " Blv., telephone: +359 2 91 53 518; fax: +359 2 91 53 525; e-mail address: <a href="mailto:kzld@cpdp.bg">kzld@cpdp.bg</a>, website: <a href="https://www.cpdp.bg/">https://www.cpdp.bg/</a>.

By reviewing and using the functions of our website, you expressly agree that your personal data will be collected and processed by us while ensuring its accuracy and credibility. You also declare that you have been informed of the type of personal data we collect and process for the purposes for which they will be used, and of your right to access, correct or delete the collected personal data.

26.07.2018 г.