


|  |  |  |  |
|--|--|--|--|
|  | <b>NOTIFICATION OF CONFIDENTIAL TREATMENT OF PERSONAL DATA (PRIVACY STATEMENT)</b> |  |  |
|  |  |  |  |
| Data controller: Geographic Information System – Sofia Ltd                       |  | Data Protection Officer: Ilina Hristova<br>Tel.: +359 888 434788<br>E-mail: <a href="mailto:ihristova@gis-sofia.bg">ihristova@gis-sofia.bg</a> |  |

## Who are we?

Geographic Information System – Sofia Ltd (GIS-Sofia Ltd) is one of the largest land surveying companies in Bulgaria. The company was established in 1999 as a trading company of Sofia Municipality.

For over 20 years now, we have been building, maintaining and managing the information system of the cadastral, regulation and construction plans for the territory of Sofia Municipality, named SOFCAR.

**Our main goal** is to provide quality services in the field of geodesy, cadastre, spatial planning and geographic information systems.

**Our mission** is to facilitate the users, providing easy and convenient access to the spatial information which they need and find useful.

**Our main priorities** are completeness, relevancy, accuracy, reliability and accessibility of the data.

**A guideline** of our investments is the development of technologies based on the global achievements of geographic information systems and database processing, increasing the range and quality of information and reducing the costs of its maintenance and provision.

## Contact details of GIS-Sofia Ltd:

**Location:** 5, Serdika Str., Floor 5, Sofia 1000

**Telephone:** + 359 2 923 82 80; + 359 2 930 79 21

**E-mail:** [dblajeva@gis-sofia.bg](mailto:dblajeva@gis-sofia.bg)

**Website:** [www.gis-sofia.bg](http://www.gis-sofia.bg)

## Contact details of the Data Protection Officer:

You can contact our data protection officer directly from here:

**E-mail:** [ihristova@gis-sofia.bg](mailto:ihristova@gis-sofia.bg)

**Telephone:** +359 88 843 47 88


## The personal data which we collect from you and process are:

### Personal data category:

1. Full name;
2. Personal ID number;
3. Permanent address;
4. Contact telephone numbers;
5. E-mail.

**GIS-Sofia Ltd does not process special categories of personal data.**

|   |  |   |
|---|--|---|
| Contact details of the Data Controller:                         |  |   |
| Website: <a href="http://www.gis-sofia.bg">www.gis-sofia.bg</a> | E-mail: <a href="mailto:ihristova@gis-sofia.bg">ihristova@gis-sofia.bg</a> | Telephone: + 359 2 923 82 80; + 359 2 930 79 21 |


|  |  |  |  |
|--|--|--|--|
|  | <b>NOTIFICATION OF CONFIDENTIAL TREATMENT OF<br/>PERSONAL DATA (PRIVACY STATEMENT)</b> |  |  |
|  |  |  |  |
| Data controller: Geographic Information System – Sofia Ltd                       |  | Data Protection Officer: Ilina Hristova<br>Tel.: +359 888 434788<br>E-mail: <a href="mailto:ihristova@gis-sofia.bg">ihristova@gis-sofia.bg</a> |  |

**We guarantee that the personal data which we collect, will only be used for the following purposes:**

1. Customization of our clients and contractors, of the stakeholders – owners and/or bearers of other real rights on real estates;
2. Establishment of contact with you by phone, mail and/or e-mail for the purpose of correspondence related to performance of our obligations in the most correct, meticulous and satisfactory way under submitted applications, petitions and complaints, including through the feedback form on the company’s website;
3. For all activities related to the establishment, existence, modification and termination of our contractual relations, as well as to the collection of receivables ensuing therefrom – for preparation of any documents in this connection (contracts, supplementary agreements, any commercial, accounting and other documents);
4. Protection of the legal rights and interests of the owners and bearers of limited real rights on the real estates – subjects of the cadastre, related to the inviolability of their belonging to the right of ownership in a procedure of preparation of a Cadastral map and cadastral registers (CMCR) or projects for modification of CMCR in connection with the maintenance of its updated status;
5. In the Vocational Training Centre (VTC) at GIS-Sofia Ltd, trainees’ personal data are collected for the purpose of most correct service of all legal and statutory needs and organizational activities accompanying the whole process of training and the final results thereof;

A number of the above goals are expressly preconditioned from the statutory requirements and directions of: the EU law; the international contracts to which the Republic of Bulgaria is a party; the Accountancy Act; the Tax and Social Security Procedure Code; the Ownership Act; the Cadastre and Property Register Act; the Geodesy and Cartography Act; the Spatial Development Act; the Act on ownership and the use of agricultural lands and the regulation for its application; the Legacy Act; the Civic Status Act; the Electronic Document and Electronic Signature Act; the Commercial Act; the Customer Protection Act; the Act on the Access to Public Information; the Vocational Education and Training Act; Ordinance No: 8/11 August 2016 on the Information and Documents for the System of the Pre-school and School Education; Ordinance No: 2 of 22 June 2018 on the Documents for Vocational Training of Persons over the Age of 16; Compliance with the requirements of international classifications of standardization, such as ISO 9001:2015, etc., as well as all statutory provisions related thereto.

|   |  |   |
|---|--|---|
| Contact details of the Data Controller:                         |  |   |
| Website: <a href="http://www.gis-sofia.bg">www.gis-sofia.bg</a> | E-mail: <a href="mailto:ihristova@gis-sofia.bg">ihristova@gis-sofia.bg</a> | Telephone: + 359 2 923 82 80; + 359 2 930 79 21 |

|  |  |  |  |
|--|--|--|--|
|  | <b>NOTIFICATION OF CONFIDENTIAL TREATMENT OF PERSONAL DATA (PRIVACY STATEMENT)</b>   |  |  |
|  |  |  |  |
| Data controller: Geographic Information System – Sofia Ltd                       | Data Protection Officer: Iлина Hristova<br>Tel.: +359 888 434788<br>E-mail: <a href="mailto:ihristova@gis-sofia.bg">ihristova@gis-sofia.bg</a> |  |  |

**The grounds giving us the right to process your data, are:**

1. Performance of a contract with you;
2. Compliance with statutory obligations;
3. Your consent only in cases where the above legal grounds are not available, the presence of an essential interest or a legitimate interest.

In such cases, by consenting to accept this Notification of confidential treatment of personal data (Privacy Statement), you give us the permission to process your personal data only for the purposes indicated by us. Your consent must be expressly given by signing a Declaration of consent under a template, which is available on desks No: 1 and No: 2 on the ground floor of the company's office.

For the clients of remote control services to "IsofMap" we have envisaged an opportunity, after filling in an online registration form as users, to declare their consent for the provision of their personal data for the purpose of rendering this type of services by means of special tick on the web page at the following address: [www.isofmap.bg](http://www.isofmap.bg), as well as by inserting an additional tick, confirming the given consent.

In response to inquiries through the feedback form on the company's website, we have envisaged giving of consent as of the time of sending of the relevant inquiry on the Data Controller's web page.

You can withdraw your consent at any time by filling in an Application with a request for withdrawal of consent under a template, which is available on desks No: 1 and No: 2 on the ground floor in the company's office, after showing an identity card.

**GIS-Sofia Ltd does not provide subjects' personal data to third parties, unless specifically required in the cases envisaged by the law by the competent state or municipal bodies and in the order and under the procedures described in the law.**


**Period of storage of data**

GIS-Sofia Ltd shall store your personal data for the following time periods and in the following manner:

1. **Personal data in Templates of filled in and submitted applications for rendering of services on a hard copy (entered into the electronic record-keeping system) and personal data of natural persons under contractual relations (entered into a specialized software product)** – pursuant to Art. 38 of the Tax and social security procedure code (TSSPC), i.e. 5 years as of 1<sup>st</sup> January of the reporting period following the reporting period they refer to.

2. **Personal data of clients – registered users of paid services through remote access "iSofMap"** - pursuant to Art. 38 of the Tax and Social Security Procedure Code (TSSPC), i.e. 5 years as of the last use of the account (login with username and password).

|   |  |   |
|---|--|---|
| Contact details of the Data Controller:                         |  |   |
| Website: <a href="http://www.gis-sofia.bg">www.gis-sofia.bg</a> | E-mail: <a href="mailto:ihristova@gis-sofia.bg">ihristova@gis-sofia.bg</a> | Telephone: + 359 2 923 82 80; + 359 2 930 79 21 |

|  |  |  |  |
|--|--|--|--|
|  | <b>NOTIFICATION OF CONFIDENTIAL TREATMENT OF<br/>PERSONAL DATA (PRIVACY STATEMENT)</b> |  |  |
|  |  |  |  |
| Data controller: Geographic Information System – Sofia Ltd                       |  | Data Protection Officer: Ilina Hristova<br>Tel.: +359 888 434788<br>E-mail: <a href="mailto:ihristova@gis-sofia.bg">ihristova@gis-sofia.bg</a> |  |

3. **Personal data of clients – registered users of unpaid services through remote access “iSofMap”** – the term pursuant to Art. 12 of the Accountancy Act i.e. 3 years as of the last use of the account (login with username and password).

4. **Personal data contained in the applications to the filled in and submitted templates of applications for services** – they are stored for the period of the service, described in details for each type of service in the company’s price list and are destructed within one week as of the time of performance of the service/manufacture of the final product for the client.

5. **Personal data in submitted applications or complaints on a hard copy** – they are stored for the period necessary for the provision of an answer, however not more than 1 month and are destructed within one week as of the time of response thereto.

6. **Personal data contained in the filled in feedback form and through the ‘Contacts’ section on the company’s website, as well as from the correspondence with e-mail addresses stated by clients** – they are stored for the period of provision of an answer by e-mail on each specific inquiry, from the last time of the correspondence, however not more than 1 month after which they are destroyed within one month as of the time of answer to the inquiry, or as of the time of the last correspondence respectively.


7. **Personal data contained in the executed Cadastral map and cadastral registers** – they are delivered to the Geodesy, Cartography and Cadastre Agency and copies of the sources of their collection (on a hard and technical bearer), as well as personal data contained in the executed digital files of CMCR are stored until expiration of the warranty period indicated in the specific contract for assignment of the execution of CMCR.

8. **Personal data contained in projects for amendment of CMCR under applications of clients for the performance of this type of service (contained in an electronic project in CAD files)** – they are stored for a period of up to one year as of the time of submission of the application for project execution.

9. **Personal data contained in records under item 60 of the price list for the services offered by GIS-Sofia Ltd** – they are stored for a period of up to 6 months as of the time of signing of the record.

10. **Personal data in documents for training in the Vocational Training Centre at GIS-Sofia Ltd** – 1. All personal data from documents necessary for the enrollment and launching of a training course for the relevant applicant; Personal docket for a conducted professional qualification course; Records of admission to exams and Records of examination results; Registry book for the issued documents for completed degree of education and professional qualification obtained are stored for a term of 50 years; 2. Order for formation of the groups, for the beginning and end of the course, for the curriculum of the educational process – 20 years; 3. Register of incoming and Register of outgoing correspondence – 10 years; 4. Training agreement between the company manager and the trainee; Course register (for attendance of the trainees and the material taught); Examination records – 5 years.

|   |  |   |
|---|--|---|
| Contact details of the Data Controller:                         |  |   |
| Website: <a href="http://www.gis-sofia.bg">www.gis-sofia.bg</a> | E-mail: <a href="mailto:ihristova@gis-sofia.bg">ihristova@gis-sofia.bg</a> | Telephone: + 359 2 923 82 80; + 359 2 930 79 21 |

|  |  |  |  |
|--|--|--|--|
|  | <b>NOTIFICATION OF CONFIDENTIAL TREATMENT OF<br/>PERSONAL DATA (PRIVACY STATEMENT)</b> |  |  |
|  |  |  |  |
| Data controller: Geographic Information System – Sofia Ltd                       |  | Data Protection Officer: Ilina Hristova<br>Tel.: +359 888 434788<br>E-mail: <a href="mailto:ihristova@gis-sofia.bg">ihristova@gis-sofia.bg</a> |  |

**Your rights as data subject are the following:**


At any time while we store or process your personal data, you as data subject, have the following rights:

- you have the right to request a copy of your personal data from GIS-Sofia Ltd and a right to access your personal data at any time;
- you have the right to request from GIS-Sofia Ltd correction of your incorrect personal data, as well as outdated data;
- you have the right to request from GIS-Sofia Ltd deletion of your personal data in the availability of any of the following grounds:
  - the personal data are no longer necessary for the purposes for which they have been collected;
  - if you have withdrawn your consent;
  - if you have objected the processing;
  - if the processing is unlawful;
  - if the personal data must be deleted for the purpose of compliance with a legal obligation under the EU law or the law of a member state which is applied towards us or by virtue of an international treaty, to which the Republic of Bulgaria is a party;
  - if the personal data have been collected in connection with the offering of services to the information society.

We can refuse to delete your personal data for the following reasons:

- in the exercising of the right of freedom of expression and the right to information;
- for the compliance with a statutory obligation on our side or for the performance of a task of public interest;
- for reasons of public interest in the field of public health;
- for the purposes of archiving in the public interest, for scientific or historical studies or for statistical purposes, as long as there is a probability the deletion to render impossible or to impede the achievement of the purposes of such processing; or for the establishment, exercising or defense of legal claims.
- You are entitled to request from GIS-Sofia Ltd to limit the processing of your personal data and in this case the data shall only be stored but not processed. Our refusal for limitation shall be expressly in writing and we shall be obliged to substantiate it with a lawful argument;
- you have the right to withdraw your consent for the processing of your personal data at any time with a separate request addressed to GIS-Sofia Ltd;
- you have the right to object certain types of processing, such as direct marketing (not requested advertising messages);
- you have the right to object against an automated processing, including profiling;

|   |  |   |
|---|--|---|
| Contact details of the Data Controller:                         |  |   |
| Website: <a href="http://www.gis-sofia.bg">www.gis-sofia.bg</a> | E-mail: <a href="mailto:ihristova@gis-sofia.bg">ihristova@gis-sofia.bg</a> | Telephone: + 359 2 923 82 80; + 359 2 930 79 21 |

|  |  |  |  |
|--|--|--|--|
|  | <b>NOTIFICATION OF CONFIDENTIAL TREATMENT OF<br/>PERSONAL DATA (PRIVACY STATEMENT)</b> |  |  |
|  |  |  |  |
| Data controller: Geographic Information System –<br>Sofia Ltd                    |  | Data Protection Officer: Ilina Hristova<br>Tel.: +359 888 434788<br>E-mail: <a href="mailto:ihristova@gis-sofia.bg">ihristova@gis-sofia.bg</a> |  |

- you have the right not to be subject to a decision only based on automated processing, including profiling;
- if we have to use your personal data for a new purpose which is not covered by the present data protection notification, we shall provide you with a new data protection notification and shall request your prior consent for the new processing whenever and wherever it becomes necessary.

All of the above requests may be made with the filling in of a Request from data subject under a template and provision of an identity document, which is available on cashdesks No: 1 and No: 2 on the ground floor in the company's office.

### **Right to complain before the supervisory body**

You have the right to submit a complaint directly to the supervisory body, and the competent authority to this end is the Data Protection Committee, address: 2, Prof. Tsvetan Lazarov Blvd., Sofia 1592 ([www.cpdp.bg](http://www.cpdp.bg)).

In case you are willing to submit a complaint with regard to the processing of your personal data through GIS-Sofia Ltd, you can do so using the contact data of GIS-Sofia Ltd or directly to the Data Protection Officer to the above indicated contact details.

|   |  |   |
|---|--|---|
| Contact details of the Data Controller:                         |  |   |
| Website: <a href="http://www.gis-sofia.bg">www.gis-sofia.bg</a> | E-mail: <a href="mailto:ihristova@gis-sofia.bg">ihristova@gis-sofia.bg</a> | Telephone: + 359 2 923 82 80; + 359 2 930 79 21 |