

**POLICY FOR CONFIDENTIALITY AND PROTECTION OF PERSONAL DATA PROCESSED IN
"VIVACOM BULGARIA" EAD DURING AND IN CONNECTION WITH THE PROVISION OF
ELECTRONIC COMMUNICATION SERVICES**

("Privacy Policy")

Vivacom Bulgaria EAD ("**Vivacom**") respects the privacy of its clients and guarantees to the maximum extent the protection of their personal data processed during and in connection with the provision of electronic communications services, insurance intermediation services and other related activities.

This Privacy Policy is based on the requirements of Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC ("**Regulation (EU) 2016/679**").

All amendments and additions to the Privacy Policy will be applied after the publication of its current content, available through our website: www.vivacom.bg

The Privacy Policy is applicable to your personal data if you are a natural person or a representative of a legal entity that uses or wishes to use prepaid and/or subscription electronic communications services provided by Vivacom, including those offered online through a specialized platform or mobile application; or participate in games, draws and/or other seasonal or promotional campaigns organized by Vivacom and addressed to an unlimited number of people, including through social networks; or you have assigned insurance mediation services to Vivacom; or use or wish to use a device under a leasing contract with Vivacom.

1. Who processes and is responsible for your personal data

Vivacom Bulgaria EAD ("**Vivacom**", "we") is a company registered in the Commercial Register at the Registry Agency with UIC 831642181, which collects, processes and stores your personal data under the terms of this Policy.

Vivacom is entered in the public register of the Communications Regulation Commission as an undertaking providing a wide range of electronic communications services.

Vivacom is an insurance broker entered in the public register of insurance brokers at the Financial Supervision Commission.

Vivacom is entered in the public register of the Bulgarian National Bank under art. 19 of the Payment Services and Payment Systems Act as a representative of Paynetics AD.

Vivacom is a personal data administrator within the meaning of Regulation (EU) 2016/679 and the Personal Data Protection Act.

You can contact us at our registered office:

G. Sofia 1784, bul. 115 Tsarigradsko Shose Str.

or by filling in the electronic contact form on our website: <https://www.vivacom.bg/bg/residential/kontakti>

For all matters related to the processing of your personal data, you can also contact Vivacom Data Protection Officer at the following contact details: email: dpo@vivacom.bg.

2. What data, for what purposes and on what legal basis we process

2.1. Depending on the specific purposes and grounds, Vivacom processes the following data individually or in combination with each other:

A) Data provided by you necessary for identification and fulfillment of the contractual obligations of Vivacom and the client:

- full name, personal identification number (PIN) or personal number of a foreigner, address, telephone and/or e-mail address for contact with you, or a contact person specified by you;
- three names, PIN, address and other data of your proxy, indicated in the document with which you authorized him to represent you before Vivacom;
- full name, PIN, address and other data of your legal representative;
- full name, PIN, address and other data of persons indicated as contact persons of legal entities;
- full name, PIN, address and other data of persons indicated as recipients of invoices;

- number, date of issue, validity and issuer of an identity document;
- Number and date of validity of a document from Territorial expert medical commission
- data collected upon payment made to Vivacom - credit or debit card number, bank account and other bank and payment information collected during and processed in connection with the payment by bank transfer, direct debit or through the online platform and other electronic trading channels of Vivacom;
- data from your account for access to our online platform – username, request and payment history;
- username for accessing the EON Mobile app;
- data about the services you use from the portfolio of Vivacom;
- data provided when participating in games, draws and/ r other seasonal or promotional campaigns organized by Vivacom and addressed to an unlimited number of persons, including through social networks;
- household information, marital status, demographic information and other data you provide to us when you voluntarily participate in our surveys or other feedback you provide to us in relation to the products and services used.

B) Data prepared and generated by Vivacom in the process of providing the services:

- service number, customer number, detailed reports to monthly bills/invoices and the amount of the obligations contained therein;
- traffic data – data necessary for the provision of electronic communication services, for billing, for the formation of subscribers' bills, as well as for proving their authenticity – number of caller and called end user, device identification number, card number for electronic payment, start and end of the call, volume of data transmitted, type of service provided, points of interconnection, data on the type of connection or zones – time and territorial, necessary to determine the cost of the service; location of a service user, including in the case of "roaming";
- data necessary for the preparation of subscriber accounts, as well as for proving their authenticity - type of service used, total number of units of measurement charged for the respective period of preparation of periodic accounts; value of the services used; information about your chosen method of payment, payments made and due; information about changes in the use of the Services, restrictions and restorations of the Services;
- location data – data processed to determine the geographical location of the terminal equipment;
- data about the end electronic communication device used, the type and brand of the device, the operating system used, IP address;
- voice recording of telephone conversations with a 123 operator in connection with requests for amendments or supplements to the service contract, requesting damages, receiving information and assistance in connection with the service used;
- voice recording of telephone conversations initiated by our contact center operator when offering services or concluding a distance contract;
- video recording during a visit to the shops and/or our head office of Vivacom, prepared with video surveillance equipment for security purposes and in order to provide undisturbed service to employees and visitors at Vivacom stores
- video recording or photography made in accordance with the previously announced conditions for participation in games, raffles and / or other seasonal or promotional campaigns organized by Vivacom and addressed to an unlimited number of persons, including through social networks;
- IP address when visiting our website, online service platform, or when using our mobile application, EON Mobile application, as well as when using Internet services;
- information about the type and content of the contractual relationship, as well as any other information related to the contractual relationship, including records of calls made by and to our contact centers, e-mail, letters, information about your requests for troubleshooting, complaints, requests, complaints and other feedback we receive from you;

- data in connection with a claim made in respect of an electronic communication device purchased by Vivacom;
- credit rating information;
- data on unpaid debts.

C) Data received from third-party partners – service providers:

data about the type of partner service and the mobile number with which it was registered and/or used, frequency or period of use of the partner service.

(D) Data received from other undertakings providing electronic communications services to the public:

data on the existence of unpaid debts from you to other undertakings providing public electronic communications services, when a device is provided at the conclusion of the contract with Vivacom.

2.2. Purposes and legal grounds for the processing of personal data:

A) Data processing that is necessary for the conclusion or performance of the contract for electronic communications services, the lease contract or the contract for insurance intermediation.

Vivacom processes your data for the following purposes:

- **Identification of a client when: conclusion, amendment and termination of a service contract, lease or insurance mediation contract or when registering a prepaid service;** execution of requests for information on consumption; clarifications about the services used and subscription plans, provision of a card for the "Loyal Customer" program, payment of bills and addressing a complaint / complaint. channels - store, single phone number for customer service 123, online platform, chat platform, distance selling, sites and telephone operators of contact centers, representatives and distributors of services, electronic contact form;
- **Updating your personal data** or information about the services used at your request for correction/modification of data/services;
- **Credit assessment performed by automated algorithms for initial and subsequent analysis, assessment and forecasting** of payment behavior and credit risk, analysis of customer payment history, names, PIN, address, verification of the validity of data, including through a card reader, when concluding contracts for electronic communication services, leasing contracts or when purchasing a device. The credit assessment determines the probability of paying regularly and on time the amounts due for products and services used. Depending on the result of the credit assessment, the conclusion of an agreement may be rejected, approved unconditionally or upon provision of collateral chosen by Vivacom in accordance with Vivacom's Credit Assessment Policy;
- **Analysis of customer history and preparation of a user profile** (volume and type of consumption, payment history) in order to determine an offer suitable for you in case of customer request to change the tariff plan, activation of roaming, change in the maximum limit of consumption;
- **Verification of volume and type of customer consumption** at your request/complaint/contestation or in order to protect customers and Vivacom from atypical traffic and shock accounts (fraud and abuse by third parties) - current account; remaining included services; invoice value. Clarification of invoices/monthly fees and provision of reports on used and terminated services;
- **Preparation of proposals for the conclusion of distance and off-premises contracts,** sending a courier shipment with pre-contractual information and a draft contract; servicing a refusal of a deal;
- **Service and response to customer complaints/inquiries/complaints; Corrections of amounts due,** if justified;
- **Technical assistance for** creating an account (s) and recovering a forgotten password for access to the platforms for electronic servicing of electronic invoices, detailed reports and forgotten PIN / PUK code; suspension / reactivation of lost / stolen / damaged card; activation of duplicate SIM card; enabling/disabling forwarding; call restrictions; disabling GPRS/LTE; restoring access to various applications (my.contact; VIVAONLINE; HBO GO; dr.);

- **Technical maintenance and troubleshooting** and any technical problems - on site and through remote access to the equipment for use of the service. Restoration of services suspended due to non-payment;
- **Number portability** - Verification of applications for number portage. Introduction/correction of applications portability;
- **Payment of bills**, rescheduling, remission, deferral of amounts due;
- **Verification of the technical feasibility** of providing a service;
- **Warranty and service** of devices;
- **Processing by data processors** - assignment, reporting, acceptance, payment;
- **Ensuring protection and security** of the Vivacom network;

B) In fulfillment of its legal obligations, Vivacom processes your data for the following purposes:

- Preparation of proposals for **the conclusion of distance and off-premises contracts**, sending a courier shipment with pre-contractual information and a draft contract; servicing a refusal of a deal;
- Offering price packages, other than those offered under normal commercial conditions, to people with disabilities and people with special social needs. Provision of information about the client and services used by him on request/ **request/inspection by a competent authority**;
- **Management of consents granted**;
- Coordination of sketches and projects before the implementation of investment projects;
- Issuing invoices, preparing a detailed report on the consumption of the Services;
- Carrying out **tax and social security control by the** relevant competent authorities;
- Providing information **to the Communications Regulation Commission, the Consumer Protection Commission and the Personal Data Protection Commission** in connection with fulfilling the obligations arising from the relevant laws;
- Provision of **information to the court** and third parties in court proceedings;
- Traffic management in accordance with the requirements of the current legislation;
- To certify **age in case such is required by law for online shopping**.
- **Provision of telephone directory service**;
- **Provision and updating of the telephone directory service**;
- Providing a legal guarantee to the end devices purchased from the commercial network of Vivacom.
- Sale of receivables from customers; providing information about the debt of the assignee - contracts, protocols, monthly bills / invoices;
- Reports of sold obligations under cession contracts for the purpose of confirming the assignment of receivables;
- Provision of data on the presence of unpaid debts under the terms and conditions specified in the Electronic Communications Act.
- Submission of a tax return under art. 55 of the Income Taxes on Natural Persons Act (ITNPA) and issuance of an official note for income from other sources under art. 45, para. 7 of ITNPA, winners of games, raffles and/or other seasonal or promotional campaigns organized by Vivacom and addressed to an unlimited number of persons through the company's social media profiles and on the website of the vivacom.bg.

C) Vivacom processes the relevant data provided with the explicit written consent of the client for their processing for the following purposes:

- Provision of external credit agencies for the purpose of determining the credit rating and credit assessment of a client and discretion to provide an opportunity for deferred payment / leasing;
- To include your name, photographs, videos and other forms of your presence in advertising and media publications of Vivacom as a result of your participation in draws and games organized in stores of Vivacom or our partners and / or in social networks;

- To receive and/or provide information/offers about products and services to third parties if such information is explicitly requested from you or if you have consented to receive such information.

D) Vivacom also processes your data for the purposes of the following legitimate interests:

- **Customer profiling for direct marketing purposes** – Vivacom uses partially automated algorithms and methods to evaluate and analyze some aspects of customer consumption, such as the duration of calls and their number within a certain period, services used and preferences expressed in order to:
 - making offers for the provision of new services and/or changing the terms of services already used by a client, such as: proposal to change the tariff plan, including more free minutes and / or adding an additional service in order to more effectively use them and optimize the costs for the client, and
 - measuring and evaluating the effectiveness of our advertising in order to adapt and optimize advertising content to the needs of our customers;
 - preparation of the information published on our website in the most appropriate way for you and your terminal in order to maximally facilitate and useful access to this content for the customers of Vivacom;
- Processing of your bill/invoice data for other purposes compatible with the original purpose of collecting them and providing both a reliable analysis of the variety of our products and services and an assessment of their usefulness for consumer demand.
- **Detailed analysis of data on consumption, preferences and customer behavior (automatic processing in encrypted form)** – Vivacom performs the specified analysis using the data anonymously and in a form that does not allow easy identification of the data subject or it is impossible in order to develop and improve its product range of services. The analysis of the behavior of certain types of customers, divided by different criteria, but not limited to gender, age, place of residence, could serve to develop new products / tariff plans that maximally meet the needs of current and future customers. This analysis can also be used to improve customer service by developing contact approaches, restructuring the internal functional units in the company that serve them, and sometimes in order to prevent fraud leading to financial losses for Vivacom.
- **Preparation and storage of statistical information and reports in aggregate form** - Vivacom performs the specified analysis in order to develop and improve its product range of services and to improve customer service;
- **Calculation of the number of users in television services** – Vivacom performs tracking of the viewership of TV channels by its customers for statistical purposes;
- **Preparation of depersonalized statistical information on the use of EON video library, ratings, opinions, preferences** - Vivacom performs the above analysis in order to identify the main trends, get to know the user behavior in the TV platform, which allows offering content adequate to the user needs, and improving the services.
- **Judicial and out-of-court collection of receivables** – in cases where it is necessary to collect the unpaid debts of subscribers to Vivacom.
- **Implementation of an audit** by the providers of television content – in connection with the performance of contracts for the supply of content Vivacom;
- **Securing by surety** or other means of servicing and collecting receivables;
- **Making a request to other undertakings providing public electronic communications services for the presence of unpaid debts** from you to them under the terms and conditions specified in the Electronic Communications Act.
- **Lawful conduct of games, raffles and / or other seasonal or promotional campaigns** organized by Vivacom and addressed to an unlimited number of persons through the company's social media profiles and on the website of the vivacom.bg.

3. Categories of third parties that access and process your personal data:

3.1. Personal data processors who, on the basis of a contract with Vivacom, process your personal data on behalf of Vivacom or have direct/indirect access to your personal data

- **Transport/courier companies** in order to fulfill our contractual obligations for the delivery of contracts on paper and / or purchased / repaired goods;

- **Distributors and agents of Vivacom** who conclude contracts with end customers on behalf of and at the expense of Vivacom;
- Persons assigned by Vivacom **maintain equipment and software** used to process your personal data;
- Persons providing **services for maintenance of terminal equipment**;
- **Business partners of Vivacom** in connection with the implementation of activities related to the provision of legal guarantee;
- Agencies collecting unpaid client debts, Agencies providing suretyship or other means of service and collection of receivables, lawyers and associations/offices from lawyers on behalf of Vivacom;
- Persons providing services such as **a contact center** for direct marketing or for providing technical assistance;
- Persons carrying out **installation and/or maintenance activities at the address for the provision of the service**;
- **The banks** servicing the payments made by you;
- **Security companies** holding a license to perform private security activities, processing video recordings from Vivacom sites and / or maintaining other registers in the process of ensuring the access regime in the same sites;
- Persons providing services for organizing, storing, indexing and destroying archives in paper and/or electronic form;
- Persons performing consulting services in various fields.

3.2. **Other personal data administrators to whom Vivacom provides your personal data, processing your data on their own grounds and on their own behalf**

Assignees – a party to assignment contracts with which Vivacom transfers (sells) your outstanding obligations;

Competent authorities which, by virtue of a statutory instrument, have the power to require Vivacom to provide information, including personal data, such as – a Bulgarian court or a court of another country, various supervisory/regulatory authorities – the Consumer Protection Commission, the Communications Regulation Commission, authorities with powers to protect national security and public order;

Insurers – when concluding insurance through Vivacom in its capacity of insurance broker;

Operators from the domain of portability – in carrying out the process of number portability;

Other electronic communications operators – in the provision of roaming electronic communications services and in the provision of interconnection between undertakings;

Other undertakings providing electronic communications services – upon request by them for the presence of unpaid debts from you to Vivacom, under the terms and conditions specified in the Electronic Communications Act .

Partners of Vivacom - third parties – service providers with whom Vivacom has concluded contracts for the provision of certain services.

3.3. **Joint personal data controllers, which together with Vivacom determine the purposes and means of processing your personal data**

Credit agencies – during a credit assessment, when determining the credit rating and when assessing a deferred payment/lease;

4. **How long your personal data is stored**

The duration of storage of your personal data depends on the processing purposes for which they were collected:

Personal data processed for the purpose of concluding and executing a contract for the provision of a Service, the lease contract and/or the sale of insurance are stored for the duration of the contract and until you finally settle all financial relations between the parties;

Personal data processed for the purpose of issuing accounting/financial documents for the implementation of tax and social security control, such as but not limited to invoices, debit, credit notes, handover protocols, contracts for the provision of Services, etc., shall be kept for at least 5 years

after the expiry of the limitation period for repayment of the public claim, unless the applicable legislation provides for a longer period.

Traffic data processed under the Law on Electronic Communications for the purposes of national security and for the prevention, detection and investigation of serious crimes, as well as for the implementation of search and rescue operations of persons, are stored by Vivacom for a period of 6 months.

Personal data processed in connection with a distance contract in respect of which a legal right of withdrawal has been exercised are stored by Vivacom for up to 6 months from the administration of the refusal.

Vivacom may store some of your personal data, including traffic data and for a longer period until the expiry of the relevant limitation period in order to protect possible claims of customers, as well as for a longer period in the event of a legal dispute already arising in connection with the above, until its final settlement by an enforceable court / arbitration award.

Personal data processed in connection with a received application for exercising rights under Regulation (EU) 2016/679 – 5 years from the preparation of the response.

Personal data processed in connection with customer complaints, requests and suggestions and their responses – 2 years from the preparation of the response.

Voice recording – phone calls – 2 years from the conversation;

Picture (Video recording) – up to 60 days from recording creation.

In the event of an incident, theft, encroachment on the inviolability of Vivacom's employees or property, as well as in order to preserve evidence in and in connection with the initiation or initiation of civil, administrative or criminal proceedings and their provision to the competent authorities, the video recordings may be stored for a longer period.

The personal data of participants in **games, raffles and/or other seasonal or promotional campaigns** organized by Vivacom and addressed to an unlimited number of persons through the company's social media profiles and on the website of the vivacom.bg are processed for up to 6 months from their provision

5. What are your rights in relation to the processing of personal data by Vivacom and what actions you should take to exercise them:

As our client and with respect to your personal data, you have the following rights:

5.1. to access your personal data and information of the kind we have included in this Privacy Policy with respect to the data in question. You may request from Vivacom information whether and for what purposes we process your personal data. You can exercise your right of access in one of the following ways:

5.1.1. by visiting a store from the Vivacom retail network and submitting a written request for access to your personal data;

5.1.2. by submitting an application with a request for access to your personal data, signed with a qualified electronic signature, through the electronic contact form for Vivacom on the official website of the company www.vivacom.bg.

5.1.3. by submitting an application with a request for access to your personal data, signed with a qualified electronic signature, to the e-mail of the Data Protection Officer at Vivacom dpo@vivacom.bg;

An application form is available on the website of Vivacom www.vivacom.bg and in the stores of Vivacom. An application may be submitted personally by you and by another person who provides a notarized power of attorney. Please note that in order to ensure the protection of your personal data, when submitting the request and upon receiving a copy of your personal data in a Vivacom store, you or your authorized representative must identify yourself with a document for identity;

In order for your access application to be processed, you must fill in the following information:

- ✓ Your full name;
- ✓ PIN/PNF/PN;
- ✓ Full name and PIN/PNF/PN of a proxy (if the application is submitted by such);
- ✓ Form for receiving the requested information;
- ✓ Method of obtaining the requested information;
- ✓ Signature of the applicant.

You can receive a response to the request for access to personal data at your choice: as a written reference or on a copy on a technical carrier provided by you or electronically to an e-mail address for correspondence specified by you.

The answer to your request for access to personal data can be obtained at your choice: in a Vivacom store specified by you or at an e-mail address for correspondence specified by you or at an address specified by you by courier at your expense.

If you request access to personal data contained in **video recordings**:

- ✓ in case the period of storage of the video recording has expired, Vivacom will provide you with information that the data is not processed;
- ✓ in the event that the video contains in addition to your data and data of third parties that cannot be anonymized, access to them may be denied to you in order to protect the rights, freedoms and data of these third parties;
- ✓ if you want access to your data contained in video recordings, you should specify the location and approximate time interval not exceeding 2 hours.

5.2. to request that your personal data be corrected when it is inaccurate or needs to be supplemented in view of the purposes of the processing;

5.2.1. to request to change your secret question and secret answer at a Vivacom store;

5.3. to request the deletion of your personal data only in any of the following cases:

- ✓ they are no longer needed for the purposes for which they are processed;
- ✓ you have withdrawn your consent / you have objected to their processing and there is no other basis for their processing;
- ✓ the processing of the data is recognised as unlawful;
- ✓ national or European legislation so requires;

5.4. to request to restrict the processing of your personal data in any of the following cases:

- ✓ in case of contestation, the accuracy of your personal data for the period necessary for Vivacom to verify the accuracy of the data;
- ✓ unlawful processing has been established, but you only want to restrict the processing of your data instead of erasing it;
- ✓ you want your personal data to be stored, although Vivacom no longer needs them for the purposes of the processing as they will use them for the establishment, exercise or defence of legal claims;
- ✓ in case of an objection to the processing of your personal data for the duration of the verification of its reasonableness;

5.5. to request the transfer of your personal data that concerns you and that you have provided to us, including receiving them from Vivacom in a structured, widely used and machine-readable format and **transferring them** to another personal data administrator. Your right to portability applies to personal data for which the following conditions are met:

- a) the data processing is based on your explicit consent or on a contractual obligation; and
- (b) the processing is carried out by automated means.

5.6. to express an opinion, to contest the decision taken as a result of the automated processing of your data when making a credit assessment, and to **request** human intervention in making a credit assessment upon your request to conclude a contract for electronic communication services, a lease contract or when purchasing a device. by submitting a written application in free text in a Vivacom store.

5.7. to object to Vivacom at any time and for your personal reasons in view of your particular situation, to the processing of personal data relating to you, which is based on the need to perform a task carried out in the public interest or in the exercise of official authority vested in us or for which we have indicated that we are processing for our legitimate interest.

When the objection is to the processing of your personal data for direct marketing purposes, including profiling for this purpose, Vivacom will cease their processing for the specified purpose.

When the objection is against the processing of your personal data for the other purposes, Vivacom will respond to you within a reasonable time, but not longer than one month, whether it finds the same reasonable and, accordingly, whether it will terminate the processing of the relevant personal data for these purposes.

5.8. at any time withdraw your consent to the processing of your personal data when their processing is based on your consent by declaring your explicit desire through the commercial network and communication channels with Vivacom.

5.9. send a complaint to the Commission for Personal Data Protection in case you believe that your rights in relation to the processing of your personal data have been violated.

You can call 123 at any time and get more information on how you can exercise your rights in relation to your personal data.

6. Can you refuse to provide personal data to Vivacom and what are the consequences of this

In order to conclude a contract with you and to provide you with the services you have requested, we need certain data that are necessary for the conclusion and performance of the relevant contract, as well as for the fulfillment of Vivacom's regulatory obligations.

Failure to provide the following data prevents Vivacom from concluding a contract with you:

- full name, personal identification number or personal number of a foreigner, address;
- three names, PIN, address and other data of your proxy, indicated in the document with which you authorized him to represent you before Vivacom;
- number, date of issue, validity and issuer of an identity document;
- data collected upon payment made to Vivacom - credit or debit card number, bank account and other bank and payment information in connection with making the payment by bank transfer through the online platform and other electronic commercial channels of Vivacom;
- data from your account for access to our online platform – username, request and payment history;
- username for accessing the EON Mobile app.

This policy was last updated at 25.04.2024.