

PRIVACY STATEMENT AND DATA PROTECTION

The present Privacy Statement and Data Protection of EASYPAY AD (Privacy Statement) is based on the requirements of EU Regulation 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 (EU Regulation 2016/679).

All amendments and supplements to this Privacy Statement shall be implemented after publishing of its current content accessible through our website: www.easypay.bg.

Information about the data controller

EASYPAY AD with UIC: 131344648, with seat and registered address: 16, Ivan Vazov St., Sofia, is a data controller and processes your data in compliance with the law, in good faith and in a transparent manner.

You can contact us at our registered address:

16, Ivan Vazov St., Sofia 1000

Telephone: 0700 20 787

The data protection officer at EASYPAY AD is **Ivan Bunevski**, with address: 16, Ivan Vazov St., Sofia 1000, e-mail: dpo@asypay.bg.

Personal data subject to processing

EASYPAY AD is a licensed payment service provider and carries out payment services in compliance with the Payment Services and Payment Systems Act (PSPSA). EASYPAY AD processes personal data independently or in conjunction with other data controllers, such as E-pay AD, while rendering electronic services to clients, banks and other payment service providers and system operators specified in PSPSA. Depending on the specific purposes and grounds, EASYPAY AD processes the below indicated data either independently or in combination with them:

1. Data provided by you and necessary for the identification, the performance of payment services or performance of contractual obligations of EASYPAY AD and the client.

- Names, personal identification number or foreigner identity number, date of birth for foreign citizens, address, telephone number, e-mail address, citizenship;
- Names, personal identification number, address and other data of your proxy, indicated in the authorization document for your representation before EASYPAY AD;
- Number, date of issue, expiry date of the identity document;
- Data collected upon payment – bank account number and other payment information, collected upon acceptance and processing of payment orders

submitted in an office within the network of EASYPAY AD or electronically, including subscription numbers, customer numbers, batch number and other information related to the payment services offered to registered traders and transfers to accounts with EASYPAY AD or with another payment service provider;

- Video record and/or photography provided by you as part of your identification as a client or on other occasions;
- Data provided in connection with participation in games, lotteries and/or other seasonal or promotional campaigns organized by EASYPAY AD and intended for an unlimited number of people, including through the social networks;

2. Data not obtained from the natural person to whom they relate but provided by third parties in connection with a specific service or product:

- Names, address, customer/subscription number, invoice number and other data related to payment obligations to traders (companies providing an opportunity to their clients to pay their bills for provided services/goods through EASYPAY AD);
- Names, personal identification number, date of birth, identity document number and other information about recipients of payments. The information is provided by the payer/ordering party who submits a payment order to EASYPAY AD or by another payment service provider;
- Information about bank account number, credit or debit card or other payment information in connection with transfers/payments from/to clients of EASYPAY AD.
- EASYPAY may receive data on the applications, browsers, type of device used for access to the ePay.bg system through which you use electronic services of EASYPAY AD. Such information includes device identification number, version number of the application, version of the operation system, information about the mobile network, including operator's name and telephone number, IP address, activity within the system.

3. Other data in the process of provision of services by EASYPAY AD:

- Video record of visits of offices of EASYPAY AD, made with a video surveillance equipment for security purposes and with a view of ensuring the undisturbed service of the employees and clients at the offices of EASYPAY AD, as well as in compliance with the statutory requirements;
- Records of telephone calls made from and to the contact center of EASYPAY AD, e-mails, letters, complaints, petitions, appeals and other feedback we receive from you;
- Video record or photograph made in compliance with previously announced terms and conditions of participation in games, lotteries and/or other promotional campaigns, organized by EASYPAY AD and addressed to an unlimited number of people, including through the social networks;

In case of refusal of voluntary provision of required personal data, EASYPAY AD shall not be able to provide its products or services.

Purposes and legal grounds for data processing:

EASYPAY AD processes your data for the following purposes:

1. For performance of activity as payment service provider and for management of its relationship with the clients demanding the payment services provided by EASYPAY AD:

- Receipt of preliminary information necessary for entry into a contract;
- Performance of operations for a particular payment transaction ordered by a client;
- Identification of a client while using payment services and products of EASYPAY AD, including the performance of single payment operations;
- Execution of orders for provision of information and clarifications about the services used;
- Update of your personal data provided upon registration/entry into a contract for use of the services and products of EASYPAY AD;
- Verification of the type of registered and used services at your request/complaint/dispute or for the purpose of protecting the clients and EASYPAY AD against frauds and misuse from third parties. Provision of summary of services used;
- Review of signals, objections, complaints, performance of checks, provision of feedback, reimbursement/refund of amounts under payment operations;
- Technical assistance in using payment services of EASYPAY AD, accessible electronically. Opening/closing of an account with EASYPAY AD;
- Blocking/unblocking of payment instruments and/or restriction of remote access to an account with EASYPAY AD, reactivation of access to an account, etc.;
- Resolution of disputes before the competent authority (court, arbitration, reconciliation commission, administrative bodies, etc.) in connection with the activity of EASYPAY AD;
- Management of anti-fraud activities. EASYPAY AD processes personal data during operations related to prevention, disclosure, investigation and management of frauds.

2. In pursuance of statutory obligations, EASYPAY AD processes your data for the following purposes:

On the grounds of EU Regulation 2016/679, EASYPAY AD processes personal data in order to comply with the statutory requirements applicable for the company in its capacity of data controller under the Payment Services and Payment Systems Act, Measures against Money Laundering Act, Anti-terrorist Financing Act, tax and accounting legislation and the rest of the applicable laws and regulations, governing the activity of EASYPAY AD.

3. EASYPAY AD processes the relevant data provided with the client's consent to their processing in cases where your express and particular consent is necessary. In cases where such consent is necessary for the processing of your personal data and you make an informed decision not to give it, EASYPAY AD may be unable to provide the relevant product/service for which the consent was necessary.

EASYPAY AD processes the relevant data provided with the client's consent to their processing, inclusion of your name, photographs, video and other forms of your presence in advertising and media publications of EASYPAY AD as a result of your participation in lotteries and games, or our partners and/or in the social network.

Where the processing of your personal data for a particular purpose is based on given consent, you may withdraw it at any time without prejudice to the lawfulness of the processing prior to its withdrawal.

4. EASYPAY AD also processes your data for the purposes of the following legitimate interests:

- Preparation and storage of statistical information and information summaries in the aggregate – EASYPAY AD carries out the above indicated analysis for the purpose of developing and improving the services offered and improving customer service;
- Where data are provided to third parties: in pursuance of legal or contractual obligations of EASYPAY AD or on other valid legal grounds.

Categories of third persons recipients of personal data:

- In compliance with the requirements of EU Regulation 2016/679 EASYPAY AD is entitled to disclose personal data processed by it, to the following categories of recipients:
- To natural persons to whom the data relate;
- To natural persons, legal entities, recipients of payments ordered by you, through the systems operated by EASYPAY AD;
- To third parties, natural persons, legal entities, public bodies, institutions and establishments, supervisory and regulatory authorities in pursuance of statutory or contractual obligations of EASYPAY AD or other valid legal grounds, e.g. disclosure, prevention or performance of other activities related to fraud, technical problems or security issues.
- To banks, payment service providers and/or system operators specified in the Payment Service and Payment Systems Act, servicing the payments made by you.
- Persons who at the request of EASYPAY AD maintain equipment and software used for processing of your personal data;
- Security companies holding a license for private security services, processing the video records from offices of EASYPAY AD in the process of ensuring the access control at the same sites;
- Persons providing services related to organization, storage, indexing and disposal of archives on a hard and/or soft copy;
- To subcontractors of EASYPAY AD who are data processors;
- The data processors carry out the processing in accordance with a contract/another legal act concluded with EASYPAY AD and in compliance with the instructions of EASYPAY AD. The subcontractors of EASYPAY AD provide sufficient guarantees

for the application of appropriate technical and organizational measures for compliance with Regulation 2016/679.

Transmission of personal data to a third country or international organizations

In case of need for transmission of personal data processed by EASYPAY AD to third countries or international organizations, the provisions of EU Regulation 2016/679 shall apply, including in case of possible subsequent transmission of the personal data from the third country or international organization to another third country or organization.

Term for storage of your personal data depends on the purposes of processing for which they have been collected:

- EASYPAY AD processes your personal data for the time limits specified in the effective legislation. Personal data for which there is no legal obligation for storage, shall be deleted after achievement of the purposes for which they have been collected and processed.
- EASYPAY AD may store some of your personal data for a longer period of time, until expiration of the relevant limitation period for the purpose of defense in case of possible claims of clients in connection with the performance of services/termination of registration / services agreement, etc., as well as for a longer term in case of already available legal dispute in connection with the above, until its final resolution with an effective judgment;
- Record of telephone calls – up to two years as of the call;
- Picture (Video record) of visits of own offices of EASYPAY AD – 30 days as of the date of creation of the record. For records made at the central office of EASYPAY AD – up to one year as of the date of creation of the record.

Security measures of EASYPAY AD for personal data protection

The protection of the clients' information and data is a paramount priority of EASYPAY AD. The company applies and permanently updates technical and organizational measures necessary for ensuring a high level of data security and protection.

What are your rights in connection with the processing of personal data by EASYPAY AD:

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

1. To receive information about your personal data processed by EASYPAY AD.
- about the data processed by EASYPAY AD in connection with electronic services of EASYPAY AD used by you and accessible through the site ePay.bg. Part of the personal data provided by you, such as personal ID/foreigner identity number/date of berth, identity document number and date of issue (if information about an identity document is required) are not accessible for review through your customer profile at ePay.bg. Such information

may be requested by submitting a written request under a model in certain offices of EASYPAY AD, after you identify yourself with an ID document;

- about the data processed by EASYPAY AD in connection with services used by you and provided in offices of EASYPAY AD, you should submit a written request under a model to certain offices of EASYPAY AD and after you identify yourself with an ID document.

2. You may request rectification of your personal data if they are incorrect or should be supplemented for the purposes of processing.

3. You may request deletion of your personal data only in any of the following cases:

- They are no longer necessary for the purposes for which they have been collected or processed;
- Upon withdrawal of the express consent in the cases when personal data are only processed on the grounds of an expressly given consent of a data subject;
- There are no legal or contractual grounds for their processing;
- Data processing is proven to be unlawful.
- This is required by the national or European law.

4. You may request restriction of the processing of your personal data in any of the following cases:

- Unlawful processing has been found but you request only restriction of data processing instead of deletion;
- In observation of the data subject's rights envisaged in the EU Regulation 2016/679.

5. You may request transfer of your data which concern you and which you have provided to EASYPAY AD in accordance with the data subjects' rights envisaged in EU Regulation 2016/679, in compliance with the rules and procedures of EASYPAY AD. Your right of portability refers to personal data for which the following conditions are available:

a) data processing is based on your express consent or contractual obligation; and

b) the processing is performed in an automated manner.

6. You may object EASYPAY AD at any time for your own reasons against the processing of data for which it has been indicated that they are processed by EASYPAY AD on the grounds of a legitimate interest of EASYPAY AD.

If the objection is against the processing of your data for the other purposes, EASYPAY AD shall answer you within a reasonable period of time, no longer than one month, whether it considers your objection reasonable and whether it would terminate the processing of the relevant data for such purposes.

7. You may withdraw your consent for data processing when the processing is only based on your consent.

8. You may file a complaint to the Commission for Personal Data Protection in case you believe that your rights in connection with your personal data processing have been violated.

Submission of a request

EASYPAY AD provides the following possibilities for submission of requests under the EU Regulation 2016/679:

- For information, in connection with the use of electronic services of EASYPAY AD, accessible through the website ePay.bg, which is not accessible or cannot be edited through the client's profile at ePay.bg – a request under a model is submitted on-site at certain offices of Easypay AD;
- For information in connection with services used at offices of EASYPAY AD – a request under a model from the information system of EASYPAY AD is submitted to certain offices of EASYPAY AD. Requests in a free text form on paper or e-mail are not accepted.

In order to be duly identified and in order for EASYPAY AD to be able to answer you correctly, you need to indicate in your request/application under a model, certain compulsory requisites, such as data from your identity document, telephone number, if you would like to provide an opportunity to be contacted, as well as the quality in which you would like to submit a request for exercising your rights under EU Regulation 2016/679 – e.g. a client/former client, legal representative, beneficial owner, etc. If the provided information is incomplete and/or incorrect, we may not be able to perform your request or a part thereof.