

## PRIVACY POLICY

We, Our Home is Bulgaria Foundation, consider the right to the protection of personal data our main commitment, and, therefore, we will use and make all necessary legal means and efforts to collect, store and process your data in full compliance with Regulation (EU) 2016/679 (the "**EU General Data Protection Regulation**" or "**GDPR**"), and in accordance with the applicable laws in the Republic of Bulgaria.

This policy is intended to make you familiar with how we collect, process, and protect your personal information when you interact with us for the services provided through our website <https://ourhomebulgaria.com/> (the "Website").

Our Home is Bulgaria Foundation reserves the right to periodically update and modify this Privacy Policy to reflect any changes to how your personal information is processed.

### 1. Information about the data controller

**Our Home is Bulgaria Foundation** is a non-profit organization registered in the Trade Register kept by the Registry Agency under number (UIC) 177112437, having its headquarters and registered office at: 46 Neofit Rilski Str., Sredets District, Sofia, represented by its manager, Plamen Plamenov Miryanov (hereinafter referred to as the "**Foundation**" or "**we**"). For the purposes of the personal data protection laws, we are the data controller for the processing of your personal information.

### 2. Personal data collected, stored and processed by the controller

We collect your personal information directly from you, so you decide what kind of information to provide to us. For example, the information we receive from you is the following:

When you provide us with the following information:

In addition, we may collect and subsequently process certain information about your browsing behavior on our Website in order to personalize your online experience and make suggestions tailored to your account. You can learn more about this in the section on the processing of personal data for this purpose below.

We may also store and collect information on our Website using *cookies*. A *cookie* is a small text file that is stored on the computer of a visitor to the Website to identify their browser while interacting with a Website.

Any website can send a *cookie* to the browser if the website settings allow it. The browser allows access to the stored information only to a website that has stored *cookies*. The website [www.ourhomebulgaria.com](http://www.ourhomebulgaria.com) uses *cookies* to store the preferences of each visitor to the Website,

to provide a summary analysis of the traffic, and to 'remember' your computer, not any personal information about you.

For more information on the *cookies* used, please read our [Cookie Policy](#).

### **3. Data processing reasons and purposes**

We will use your personal information for the following purposes:

#### **3.1. To provide services through the Foundation's Website**

This general objective may include, where appropriate, the following:

- processing of donations made through the Website;
- providing assistance, including answering your questions regarding donations made through the Foundation's website.

The processing of your personal information for the purposes stated above is necessary for you to be able to donate to the Foundation.

In addition, the achievement of these objectives requires processing in accordance with the legal provisions applicable on the territory of the Republic of Bulgaria, including compliance with the tax and accounting laws.

#### **3.2. Marketing**

It is our wish that you always stay informed of all upcoming events and of the best offers about the initiatives of the Foundation and our partner organizations. Therefore, we may send you information about other initiatives, free newsletters by email or telephone, may organize raffles and promotional campaigns, and/or may send you inquiries, for statistical or other purposes, only after obtaining your prior consent in the Consent section of the Foundation's Website.

To provide you with information that is of interest to you, we use certain information about your donor behavior (for example, initiatives you have reviewed or donated to) to create an account. We always guarantee that this processing is in strict compliance with your rights and freedoms, and that the decisions made in connection with them do not have any legal consequences for you.

#### **3.3. Protection of our legitimate interests**

There may be cases where we use or transmit information to protect the Foundation's rights. These may include:

- measures to protect the Foundation's Website against cyberattacks;

- measures to prevent and detect fraud attempts, including transmission of information to competent public authorities;
- measures to manage various other risks.

The main reason for these types of processing is the Foundation's legitimate interests in protecting its activities, and we guarantee you that all measures taken by us ensure a balance between our interests and your fundamental rights and freedoms.

#### **4. Data retention period**

You can always send a request to us to delete any of your personal information, and we will grant your request by retaining, if the applicable law or our legitimate interests so require, certain information about you as a donor (for example, initiatives you have reviewed or donated to) to create an account. We always guarantee that such processing is in strict compliance with your rights and freedoms and that the decisions made in connection with it do not have any legal consequences for you. The data retention period for money laundering and terrorist financing measures is 5 years.

#### **5. Personal data recipients**

Depending on the specifics of each case, we may transmit or give access to some of your personal information to the following categories of recipients:

- payment/banking service providers;
- IT service providers;
- courier service providers.

If we are required by law or if this is necessary to protect our legitimate interests, we may also disclose certain personal information to public authorities.

We guarantee that any third party access to your personal data is subject to the provisions of the data protection and privacy laws and the contracts signed with such third parties.

#### **6. Countries where your personal data is stored and processed**

We currently store and process your personal data on the territory of the Republic of Bulgaria.

However, there is a possibility that some of your personal data may be transferred to entities located inside or outside the European Union, including countries for which the European Commission has not recognized an adequate level of personal data protection.

We will always take steps to ensure that any international transfer of personal data is carefully managed in order to protect your rights and interests. Data transfers to service providers and

other third parties will always be protected by contractual obligations and, where appropriate, by other warranties, such as standard contractual provisions issued by the European Commission, or certification schemes, such as the Privacy Shield for the protection of personal data transmitted by the EU to the United States of America.

## **7. Protecting the security of your personal data**

We are committed to ensuring the security of your personal data by implementing appropriate technical and organizational measures.

All the information we receive about you is stored on secure servers while we constantly apply technical and organizational measures that are appropriate and necessary to protect your personal information. The Foundation is constantly evaluating the security of its network and the suitability of its internal information security program designed to:

- help protect your data from accidental or unlawful loss, access or disclosure;
- identify reasonably foreseeable security risks to our Website's network;
- minimize security risks, including through risk assessment and regular testing.

Despite the measures we take to protect your personal data, we are aware that, in principle, the transmission of information via the Internet or other public networks is not completely secure, as there is a risk that the data may be viewed and used by unauthorized third parties. We do not assume responsibility for such vulnerabilities of any system that is not under our control.

## **8. Rights you have as a data subject**

The General Data Protection Regulation recognizes a number of rights you have in relation to your personal data. You may request access to your data, correction of errors in our files, and/or raise objections to the processing of your personal information. You may also exercise your right of appeal to the competent supervisory authority or to the courts. In addition, you have the right to request the erasure of your personal data, the right to restrict the processing of your data and the right to data portability.

You can get more information about each of these rights by reading the text below.

To exercise their rights related to the protection of personal data, each data subject submits a signed [\*Request for the Exercise of Data Protection Rights\*](#) to Our Home is Bulgaria Foundation at the following e-mail address: <mailto:info@ourhomebulgaria.com> or at the Foundation's address shown herein above.

You should consider the following circumstances if you wish to exercise these rights:

**Response time.** We plan to respond to all valid requests within one month, except when the request is particularly complex, or if you have made more requests, in which case we will respond within not more than two months. We will duly notify you if we need more than a month.

**Third party rights.** We will not need to respond to a request if it adversely affects the rights and freedoms of any other data subject.

**Right to request access** to your personal data (commonly referred to as a "data subject's request for access"). This gives you the opportunity to obtain a copy of your personal information that we hold and to verify that it has been lawfully processed.

### **Correction**

You may ask us to correct or supplement your inaccurate or incomplete personal information.

We may try to verify the inaccuracy of such data before correcting it.

### **Erasure of data**

You may ask us to erase your personal data, but only if:

- it is no longer needed for the purposes for which it was collected; or
- you have withdrawn your consent (if the data processing is based on consent); or
- exercise a legal right to object; or
- it has been unlawfully processed; or
- there is a legal obligation in this regard.

We have no obligation to grant your request for erasure of your personal data if the processing thereof is required:

- to fulfill a legal obligation; or
- to establish, exercise or defend a legal claim.

### **Restriction of data processing**

You may request us to restrict the processing of your personal data, but only if:

- its accuracy is disputed so that we can verify its accuracy; or
- the processing is illegal, but you do not want the data erased; or
- it is no longer needed for the purposes for which it was collected, but we still need to establish, exercise or defend a legal claim; or
- You have already exercised your right to object and you check whether the domination of our rights still exists.

We may continue to use your personal information as a result of a restriction request:

- if we have your consent; or
- to establish, exercise or defend a legal claim; or
- to protect the rights of the Foundation or of any other natural person or legal entity.

### **Data portability**

You may request us to provide your personal data in a structured, widely used and machine-readable format, or you may request that it is "directly" transferred to another data operator, but only if:

- the processing is based on your consent or on a contract signed with you; and
- the processing is done using an automatic tool.

### **Right to object**

You may object at any time for reasons related to your particular situation, against the processing of your personal data based on our legitimate interests, if you believe that your fundamental rights and freedoms prevail over those interests.

In addition, you may object to the processing of your data for direct marketing purposes (including for the purposes of creating an account) at any time without giving any reason whatsoever, in which case the processing will be terminated as soon as possible.

### **Automatic decision-making**

You may ask us that you shall not to be subject to a decision based solely on automatic processing, but solely when such decision:

- has legal effects on you; or
- affects you in a similar way and to a significant degree.

This right is not applicable if the decision made after automatic decision-making:

- is needed by us to execute or perform a contract signed with you;
- is authorized by the law and adequate guarantees are in place for your rights and freedoms; or
- is based on your explicit consent.

### **Complaints**

You have the legal right to file a complaint with your local supervisory authority regarding the processing of your personal data. On the territory of the Republic of Bulgaria, the contact details of your data protection supervisor are as follows:

Personal Data Protection Commission

Address: 2 Tsvetan Lazarov Blvd., Sofia

Tel. +359 2 915 3580; Fax: +359 2 915 3525

Email: [kzld@cpdp.bg](mailto:kzld@cpdp.bg)

Website: <http://www.cpdp.bg/>

**Without limiting in any way your legal right to contact the supervisory authority at any time, we ask you to contact us in advance, stating that we will use our best efforts to resolve any issue that may arise by mutual agreement.**

You can find our most recent Privacy Policy on our Website.

This Privacy Policy was approved on 02.03.2020 and published on the Foundation's website on 02.03.2020

*Last updated on 02.03.2020*