



## **PRIVACY AND DATA PROTECTION POLICY of**

### **"VP BRANDS INTERNATIONAL" AD**

**Effective from: .....06.2022**

"VP BRANDS INTERNATIONAL" AD (hereinafter referred to as the "**Company**", the "**Administrator**", or "**We**") respects the privacy of your data and is committed to protecting your personal data in full compliance with Regulation (EU) 2016/679 (General Data Protection Regulation - GDPR) and the Personal Data Protection Act (PDPA).

This external Privacy Policy aims to inform you in a transparent, understandable, and easily accessible manner about how we collect, process, store, and protect your personal data when you interact with us—as customers, partners, users of our website, or visitors to our sites.

### **1. Who are we and how to contact us?**

**Personal Data Administrator:** "VP BRANDS INTERNATIONAL" AD

- **Personal Data Administrator:** "VP BRANDS INTERNATIONAL" AD
- **Contact Email:** office@vp-brands.com
- **Data Protection Officer (DPO):** Nedelina Apostolova
- **Direct Contact Email:** napostolova@vp-brands.com

### **2. What personal data do we collect about you?**

We collect and process only the minimum amount of data strictly necessary for the fulfillment of the relevant commercial, legal, or marketing purposes:

- **When entering into contracts and commercial relations:** Full names, PIN/EGN (for natural persons/sole traders), ID card data (only when explicit notarial or bank identification is required), address (official or delivery), phone number, email address, and bank account.
- **When using our website and online inquiries:** Name, email address, phone number (provided by you in contact forms), IP address, cookies, browser data, age (to determine adulthood and consent to an alcohol manufacturer's site), and your behavior on our site.
- **When visiting our administrative and production sites:** Full names, company represented, time of entry/exit (entry system logs), and your video image captured by security CCTV cameras.
- **For direct marketing (participation in games, promotions, or newsletter subscription):** Name, email address, phone, and explicit confirmation of your age (over 18 years, given the nature of our production).

**Important:** We **do not collect or request special (sensitive) categories of data**—such as health data, religious beliefs, political views, or sexual orientation. If such data is sent to us by mistake or without grounds, it is destroyed immediately.

### **3. On what grounds and for what purposes do we process your data?**



We process your data solely on one of the following legal grounds under the GDPR:

- **Performance of a contract or pre-contractual relations:** To process your order, deliver goods, prepare a commercial contract, or respond to your request for a quote.
- **Compliance with legal obligations:** For the purposes of tax and accounting legislation (issuing invoices), customs and excise legislation, and the requirements of the Private Security Act (PSA) for entry regimes.
- **Legitimate interest:** To ensure the physical security of our sites, assets, and personnel through video surveillance and access control, as well as for the establishment, exercise, or defense of legal claims.
- **Your explicit consent:** For sending marketing messages, promotions, newsletters, or for using targeting cookies on our site. You may withdraw this consent at any time

#### 4. How long do we store your personal data?

Data is stored only for the period necessary to achieve the purposes for which it was collected or according to the terms prescribed by Bulgarian legislation:

- **Accounting and commercial documents (invoices, contracts):** 10 years, starting from January 1 of the year following the year to which they relate (pursuant to the Accountancy Act).
- **Video recordings from security cameras:** Up to 30 days from the moment of recording, after which they are automatically deleted (pursuant to the PSA).
- **Visitor access registers (at checkpoints):** Up to 30 days from entry.
- **Data for marketing purposes:** Until your consent is withdrawn or until the end of the specific campaign/game (but no more than 2 years if there is no subsequent activity).

#### 5. To whom can we disclose your data?

The Company does not sell or provide your personal data to third parties for marketing purposes. We share data only with trusted partners who have provided strict guarantees for cybersecurity and confidentiality:

- **Service Providers:** Courier and transport companies (for deliveries), IT companies (software support, ERP systems, hosting), and licensed security firms.
- **State and Municipal Bodies:** NRA (National Revenue Agency), Customs Agency, Ministry of Interior, courts, and other regulatory bodies when we have a legal obligation to do so.

#### 6. What are your rights and how to exercise them?

According to European and Bulgarian legislation, you have the following rights regarding your personal data:

- **Right of access:** You have the right to request confirmation of whether we process your data and to receive a copy of it along with information about the processing.
- **Right to rectification:** You have the right to request that inaccurate or incomplete personal data be corrected in a timely manner.
- **Right to erasure ("Right to be forgotten"):** You have the right to request that your data be deleted if the grounds for its storage no longer exist (e.g., withdrawn consent, fulfilled contract). Note: Data cannot be deleted if the law obliges us to keep it (e.g., for tax purposes).



- **Right to restriction of processing:** You have the right to temporarily stop the processing of your data if you dispute its accuracy or the legality of its processing.
- **Right to portability:** You have the right to receive your data in a structured, commonly used, and machine-readable format to transfer it to another administrator.
- **Right to object:** You have the right to object to the processing of your data based on legitimate interest or carried out for direct marketing purposes.

**Procedure for submitting a request:** To exercise any of your rights, it is necessary to send a written application (request) to us:

- By email to the Data Protection Officer: [napostolova@vp-brands.com](mailto:napostolova@vp-brands.com).
- On paper by mail or in person at the Company's management address.

**🔒 For your security:** To prevent abuse and identity theft, actions on your request will be taken **only after we successfully verify your identity** (via QES for electronic letters or checking an ID document on-site).

**Response times:** We will provide a response without unnecessary delay and within **1 (one) month** of receiving your request. In cases of exceptional complexity or a large volume of requests, this period may be extended by another **2 (two) months**, and we will inform you timely of the reasons for the delay within the first month.

## 7. Right to lodge a complaint with the supervisory authority

If you believe that your rights under the GDPR or PDPA have been violated, or that we are processing your data unlawfully, you have the full right to lodge a complaint with the national supervisory authority:

- **Supervisory Authority:** Commission for Personal Data Protection (CPDP)
- **Address:** Sofia 1592, 2 Prof. Tsvetan Lazarov Blvd
- **Website:** [www.cdpd.bg](http://www.cdpd.bg)
- **Email:** [kzld@cpdp.bg](mailto:kzld@cpdp.bg)

## 8. Changes to the Privacy Policy

To ensure that this Policy meets the most current legal requirements and Company practices, we reserve the right to update it periodically. When significant changes are made, a notice will be published prominently on our website or made available at our commercial and administrative sites.