

# Data Privacy

Your data privacy is important to us. In our capacity as personal data controller we have initiated the needed organizational and technical measures, in order to process your personal data in a lawful, appropriate and transparent manner. The present info document explains as to what personal data of yours we will process, for what purpose and based on what grounds, to what recipients we could provide those, over what period we store them and how you could reach us should you have any additional queries.

## Your Data Controller

Controller of the data, processed via the platform EQS Secured Whistleblowing Channel (the "Platform", is UBB INTERLEASE, SIC 831257890, address: Sofia city, Mladost district, Tsarigradsko shoes boul., 135A, BULGARIA.

## Your rights and ways to reach us

This document aims at providing you with information about the manner, in which we process your personal data for Platform-related purposes. For additional queries as to the processing of your personal data, as well as for exercising your rights as a data subject, namely: right to access, correct or delete personal data or restrict the processing of personal data, pertaining to the data subject, or right to object to the processing, as well as the right to data portability, you can reach us at the following email address: [data\\_privacy@interlease.bg](mailto:data_privacy@interlease.bg) or at the above stated address.

Any request for exercising some of the above stated rights can be made in free text format, with sufficient information provided for identifying the requester in ordinary written form and with a handwritten signature or in electronic form and signed with a Qualified Electronic Signature (QES).

## Purposes for which we process your personal data

UBB Interlease processes a restricted set of personal data of Platform users for the following purposes:

- Investigation of alerts, submitted by you for irregularities and corruption practices
- Reporting purposes.

Should the alert be submitted by using the anonymous alert function, UBB Interlease is not able to identify the whistleblowing individual. In such cases restricted data such as IP address and a submitting device can still be accessible, however without information as to a particular natural person.

## Data categories, processed by us

For the above stated purposes the processed data categories could be the following:

- Whistleblower's identification data;
- Contact data;
- Others provided by the whistleblower.

## **Grounds, based on which we process your personal data**

We process your personal data based on a legal obligation stemming from art. 11 of DIRECTIVE (EU) 2019/1937 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL of 23 October 2019 on the protection of persons who report breaches of Union law

## **Period of storing your data with us**

The data of the persons, who have submitted alerts for breaches and/or irregularities via the Platform is being stored depending on the type of case (several retention periods are planned to be installed):

- a. **During investigation** on Breach (if Breach not confirmed)
- b. **3 years** (where **the violation of UBB Interlease rules and policies** was confirmed (but not a violation of legislation)
- c. **10 years** (where the **legislation was violated** and such an act can be labeled as a crime)

## **Data recipients, whom we could provide your personal data to**

In restricted cases and upon need it is possible that such data could also be accessed by third parties, while guaranteeing the lawful and secure processing of data in compliance with the applicable legislation on personal data privacy (for example, the Platform's preventive maintenance and support, in case a signal concerns unlawful act which may reasonably be considered a criminal offence, etc.).

## **What to do if you are dissatisfied with the way we process your personal data**

It is our priority to process your data in a secure and lawful way. Should you have well-founded concerns or should you be dissatisfied with the way in which we administer your data, we will gladly receive and discuss your feedback at the above stated addresses for correspondence. Please, bear in mind that our activity, related to personal data processing, is subject to control by the Commission for Personal Data Protection, which you have the right to contact in case you have not been fully satisfied with our activities and replies.

More information about the Bulgarian and European legislation on data privacy is available on the website of the Commission for Personal Data Protection: [www.cpdp.bg](http://www.cpdp.bg)