

Policy on privacy and personal data protection of Econt Express Ltd. customers

I. Introduction

Econt Express Ltd., UIC 117047646, with headquarters and registered address: Ruse 7000, 16 Slavyanski Blvd. ("EE"/"Econt"/"we"/"us") holds a licence for services included within the scope of the universal postal service, non-universal postal services and postal money transfers, and provides courier and related services according to its scope of activity on the territory of the whole country, as well as – through subcontractors – on the territory of Romania, Greece and Cyprus.

The EE business model is set up on the network structure principle – EE occupies a central place in it and assigns business objectives at a high level while carrying out business activities, as well as – in many cases – the means for their implementation, including the technical ones (software, hardware, transport, video surveillance and sound recording equipment, etc.). EE develops and maintains the Econt brand and the standards of service provision within the Organization (in this policy, Econt and the Partners' Network in the country are referred to as the "Organization" or the "Network").

Along with the above, EE has chosen a sourcing model to perform most of the administrative functions of the entire Organization. Several external companies participate in the model. The relations with any such company shall be regulated in writing according to the provisions under the General Data Protection Regulation (GDPR) and applicable law.

EE has entered into agreements on partnership (referred to in the Organization as "partnership" agreements with single companies ("partners")) for the management of separate access points - settled and mobile offices, and Econtomates. EE assigns the scheme of services to the partner offices, and their provision is equally determined by the detailed instructions developed for work in the Network, the unified customer relationship management system, the existing quality standards and – last but not least – by the concluded agreements on personal data processing to each of the partnership agreements.

Some of the partner offices also act as Logistics Centers – these are offices where groupage shipments are processed for the purpose of their redirection to the final destination of the shipments. With regard to the EE network processing related to working with customers, the relations with these partners are regulated according to the provisions under the General Data Protection Regulation ("GDPR") and the applicable legislation. The manner of carrying out the activities throughout the entire EE Network is determined in detail by Econt; the entire Network uses a common system for customer relationship management and resource control.

In its turn, if necessary, Econt uses the services of subcontractors – transport companies, in order to carry out its activities.

Some of the partner offices also act as Logistics Centers. Put together, the processing of personal data described in this paragraph is processing related to EE main activity.

This policy was approved by the CEO of Econt Express Ltd. on 23rd May 2018 and it encompasses all activities related to the processing of personal data of Econt customers.

II. Some concepts relevant to the better understanding of this Policy – explained

"Personal data" - means any information relating to an identified or identifiable natural person, directly or indirectly, in particular by means of an identifier such as name, identification number, location data, online identifier or one or more features specific to the physical, physiological, genetic, mental, intellectual, economic, cultural or social identity of that individual. In other words, this is any information that can identify you, such as your names, personal identification number (PIN), e-mail, telephone number, etc.

"Personal data subject" – this is you, the users of our services, as well as other individuals listed below in this policy, with whom we interact or who interact with us in connection with our services or for any other reason (for example, third parties – recipients of shipments and money transfers; persons who have made inquiries or otherwise entered into communication with us).

"Personal data processing" – this is any action that we perform or can perform with your personal data, including, but not limited to, their collection, storage, analysis or destruction.

"Personal data controller" – in terms of the services we offer, this is us, Econt. We determine the purpose of your data processing, on one of the grounds provided by law for that purpose. We also determine the means by which this processing is performed – for example, creation of standards and working instructions, the technical infrastructure and applications by which processing is performed. Obligations regarding the security and protection of your personal data arise for us.

"Personal data processor" – this is a third party who processes your personal data on our assignment, where Econt has strictly determined the purpose of processing, the means by which it occurs and has verified whether the person meets the requirements of the General Data Protection Regulation (GDPR). Such a processor is, for example, the local partner who manages the Econt office you use.

III. Objective of the Policy

Econt is obliged to protect privacy and ensure the security of personal data of visitors and users of its services. This privacy and personal data protection policy aims to provide in a clear and understandable way information on the processing of your personal data by Econt, in accordance with Regulation 2016/679 (General Data Protection Regulation - "GDPR") and applicable personal data protection legislation.

IV. Types of customers' personal data processed by Econt and persons whom the data processed by Econt refer to

The personal data we collect and process are determined by the nature of the various types of services we provide and by the way you interact with us.

1. We collect and process the following personal data:

voice data – when you visit an Econt office or contact us by phone, the calls are recorded and stored temporarily, for security purposes and to improve the quality of our service;

images of people – when you visit an Econt site, your image is saved and stored temporarily, for security purposes and to improve the quality of service. The installation of video surveillance systems in Econt offices is a legal obligation, according to Ordinance No. 6 of 1st November 2011 on the requirements for postal security;

specific identifiers – name, address of submission and receipt of a shipment or other service, personal identification number (PIN), telephone number, e-mail address; data according to an identity document. We need this data in order to perform the requested service, to draw up the necessary documents related to the movement of shipments, to contact you at any time, if this is necessary for the successful, quality and timely execution of the assignment, to respond to your inquiries, to consider your complaints and other requests; to compile an accounting or other document in which the legislation requires the indication of a personal identification number (PIN) or other data from the customer's identity document. In some cases, you may need to show our employee an identity document to verify that you are the person who should receive the relevant service. We will not copy your identity document, except when we are obliged to carry out an inspection under the Measures Against Money Laundering Act (MAMLA) – for example, when providing the Postal Money Transfer service, in which case we are obliged to make and keep a copy of your identity document in order to identify you. We can also process data on: actual owner of a legal entity, origin of funds, affiliation under Art. 36 of the Measures Against Money Laundering Act (MAMLA);

data regarding the services provided by us – data on the value of our respective service and its payment; data on the shipment status; shipment tracking data; numbers and other data from bills of lading, documents for cash on delivery/postal money transfer and the like; description of the shipment, number of packages, weight, content and value of the shipment; date and time of delivery of the shipment/receipt of the cash on delivery/postal money transfer; signature and **any other information** that is collected and/or generated in the course of the services we provide or in the course of your interactions with us, and which may contain personal data or which the special laws applicable to our business require us to collect and process;;

bank account data and other payment details – we collect and process such data when the service or the legislation applicable to our activity requires it (for example, when receiving or paying amounts for cash on delivery and postal money transfer services, when paying amounts for complaints and the like);

data for correspondence with us – when you send us inquiries, requests, signals, complaints, claims or other correspondence, or otherwise get in touch with Econt (whether in personal capacity or on behalf of another person), we save and process this information, as well as information on the correspondence status and the final result of this processing. The correspondence may contain personal data, which at your discretion you have included in it and which may relate to you or to third parties.

2. We process personal data for the following **data subjects**:

- individuals – EE customers whom we provide our services to;
- third parties (recipients – upon delivery of shipments/transfers, visitors to our offices, etc.). For the purposes of providing our services, we need to receive from you data of third parties – recipients of your shipments, postal money transfers, etc. We cannot control how you have obtained this information and what your relationship is with the third parties whose data you provide to us. It is your responsibility to have this information in your possession and to provide it to us in accordance with applicable laws. Furthermore, you agree to acquaint the persons whose data you submit to us with the content of this Policy; legal representatives (parents and guardians) of minors under 14 years of age – if a shipment or money transfer is addressed to such a person, we serve them to a parent or guardian after being provided with a document certifying such capacity (for example, a birth certificate or a court decision), and after our employee has made a check up the identity document of the parent or guardian;
- natural persons who address inquiries, requests, signals, complaints or other correspondence to Econt or otherwise get in touch with Econt (whether in a personal capacity or on behalf of another person)
- if you act on behalf of a legal entity, we will process the above data to the extent they are necessary for the provision of the relevant service, as well as information on the behalf of which legal entity you act and in what capacity (e.g. legal representative, proxy, employee and the like).

Econt cannot influence in any way and in order to guarantee the secrecy of the correspondence, it does not exercise control over the content of documents, information carriers and the like, carried by us through shipments. Shippers are fully responsible for the content of their shipments and the information delivered through them, as well as for their compliance with applicable legal requirements (including personal data protection rules).

V. What does Econt use your personal data for?

We process your personal data for the following purposes and on the following legal grounds:

1. To comply with our legal obligations, we process your data for the following purposes:
 - Financial and accounting activities in connection with the implementation of tax, accounting and other legal obligations;
 - Consideration of complaints in connection with the services we provide;
 - Fulfillment of obligations under the legislation on measures against money laundering;
 - Other activities related to the implementation of other legal obligations (regulatory ones, licensing, etc.) of Econt;
 - Storage, provision and reporting of information to the competent public authorities;
 - Responding to requests and assisting in carrying out inspections by the competent authorities.
2. Based on the **agreement** concluded with you, we process your data for the purposes of providing the services requested by you.

The personal data you provide in connection with courier and postal services are necessary for us to meet your need or the service requested by you, which Econt provides. In order to provide quality services, we need your identification data, and their scope varies depending on the type of service requested and the legal provisions applicable to it.

3. Based on the **legitimate interest** of Econt or third parties, we process your personal data as follows:
 - 3.1. Legitimate interest (1) to exercise and defend our legitimate rights and interests; and (2) to assist third parties such as our employees, managers, partners and the like in exercising and protecting their legal rights and interests:
 - establishing, exercising and defending legal claims, including in court and by submitting complaints, signals and the like to the competent authorities;
 - administration and servicing of received signals, complaints, requests and the like; addressing notarized letters of invitation; transfer of receivables (assignments/cessions);
 - collection of receivables, including through assignment to third parties;
 - ensuring security and control of access to the property, information systems, premises and equipment of Econt
 - 3.2. Legitimate interest in planning, developing, managing and changing our business, we process your personal data for the following purposes:
 - management of relations with current and potential customers;
 - organisation and business planning.

4. The purposes which we require your **consent** for are indicated in the appropriate consent form (for example, for marketing activities).

VI. What will happen if you do not provide us with your data

The provision of some of the above data categories is a necessary requirement for the conclusion of an agreement or, accordingly, it is a contractual requirement necessary for the existence and implementation of the agreement on the provision of our services. Failure to comply or refusal to provide the minimum data necessary for the conclusion of the agreement (such as identification data of the sender and recipient of a shipment or postal money transfer, data required by law for the conclusion of the relevant agreement – for example, for verification under the Measures against Money Laundering Act (MMLA, etc.) may make it impossible for us to enter into an agreement with you and provide you with the service you have requested.

VII. Terms of personal data storage

When determining the term of your personal data storage, we also take into account the periods in which we may need to store personal data in order to fulfill our legal obligations (for example, to respond to your complaint, in order to comply with applicable legislation in the field of postal services, in the field of the measures against money laundering, to fulfill a legal obligation to store accounting information for tax control purposes and the like).

In accordance with the internal rules of Econt and applicable law, we will process and store your personal data within the following time limits:

Personal data contained in or related to:	Data storage term or criteria for its determination:
Accounting documents on paper/hard copy or technical medium	Econt has a legal obligation to store them for 10 years, for tax control needs
The agreements concluded with you on the occasion of providing our services	For the term of existence of our contractual relationship with you and for a period of up to 5 years thereafter
Correspondence with you (for example, information about correspondence, request, complaint, signal, etc.; information about their status and the result of their completion)	For a period of up to 5 years from their completion. If they refer to an effective agreement, the 5-year period shall start expiring as of its termination Note: videos and sound recordings shall be stored for a term of up to 6 months
Court cases or other similar proceedings (for example, proceedings before administrative authorities)	For the period in which the case or the legal procedure is pending, as well as for a period of up to 5 years from the date of the final conclusion of the respective case or legal procedure before all instances
Information and documents required under the Measures against Money Laundering Act (MMLA)	Within the time limits provided for under the Measures against Money Laundering Act (MMLA)

When the processing of your data is based on consent, we may process your personal data for the purposes for which you have agreed, until they the latter are reached or until your consent is withdrawn.

If by law or according to other normative act the storage of relevant information and/or the relevant documents or other information carriers is required for a longer period than the one indicated above, the normatively established longer period shall be applied for their storage. The specified periods may be changed in case a different requirement for the information storage is established according to the effective legislation.

VIII. Information about which third parties and for what purpose they may access your personal data collected in connection with the services of Econt

- For the purpose of achieving the objectives set out in this Policy, your personal data may be disclosed by EE to:
- Public authorities such as the Ministry of Foreign Affairs (MFA), the State Agency for National Security (SANS), the Prosecutor's Office, the Court, the National Revenue Agency (NRA), the Customs Agency; Communications Regulation Commission and the like – in order to observe our legal obligations, including to comply with requests from these authorities to provide information regarding their powers;
 - Auditors;
 - Our trusted suppliers, subcontractors and partners, to the extent necessary to provide our services to you and to provide additional security and quality of our services (for example, for security purposes, for the maintenance of our servers and for providing technical connectivity with view of providing our services, for your servicing through logistics centers of our partners and the like). The transmission of data to such persons is only to the extent and volume necessary for the provision of the relevant service. The relations with such persons are settled in accordance with the provisions of the applicable legislation for personal data protection. When working with subcontractors and suppliers who process personal data on our behalf and on our assignment ("personal data processors" within the meaning of the General Data Protection Regulation), we require them to strictly follow our instructions and the processing must be in accordance with this Policy.
 - The following recipients, if it is necessary to protect the rights or legal interests of Econt or third parties such as our employees, managers, partners and the like:
 - public authorities;
 - public and private judicial enforcers;
 - attorneys;
 - recipients of receivables transferred from Econt (cessionaries);
 - notaries (for example, for serving notarized letters of invitation).

When the processing of your data is based on consent, the particular recipients/categories of recipients of your data are indicated under the specific consent form.

Apart from the above, personal data may be disclosed by Econt only in other cases provided by law.

EE maintains clear and updated accounting of the third parties - recipients of customers' personal data.

IX. Personal data processing outside the European Union (EU)/European Economic Area (EEA)

Your personal data will not be processed in third countries (outside the European Union or the European Economic Area).

X. Other data sources

In some cases, the personal data processed by Econt are not collected or got directly from the Data Subject they relate to, but from third parties such as:

- sender of a shipment, ordering party of a postal money transfer – regarding the addressee of the shipment or the transfer;
- public authorities;
- public and private judicial enforcers;
- official registers and other publicly available sources of information;
- our trusted suppliers, subcontractors and partners - for example, regarding the status and performance of a service requested by you.

XI. Rights of the Personal Data Subject

You, as a Data Subject, have rights in relation to their processing by us in accordance with the General Data Protection Regulation (GDPR) and the applicable data protection legislation. EE should consider and respond to requests for exercising these rights without delay, within 30 days of requesting.

EE ensures technically and organizationally the observance of the requests for exercising the rights within the specified time limit assisted by the partner Network.

Your right to be informed about the processing of your data, including, but not limited to, its purpose, term and grounds, about the recipients and categories of recipients of your personal data, the rights you have under the General Data Protection Regulation (GDPR), etc. is provided through this Policy, which aims to inform you about such processing.

Furthermore, Econt has taken the necessary measures to keep you informed about any processing of your data that takes place in the office or, in connection with the use of postal services, outside it.

For example, information about data processing through a video surveillance system is placed on the front door of each office.

You receive information about processing in connection with the use of postal services with each electronic statement that you sign upon acceptance or handing over of a shipment.

Information about what data we collect and process when you interact with us through our website www.econt.com is contained in a separate Personal Data Protection, Privacy and Inviolability Policy on www.econt.com (available on <https://www.econt.com/econt-ex-press/privacy-policy>).

According to the General Data Protection Regulation (GDPR) and applicable data protection legislation, you have the right to:

- access – the right to receive confirmation whether your personal data are being processed, as well as to access them and get >
- information about their processing and your rights in this regard;
- correction – the right to request the correction or supplementation of your personal data if they are inaccurate or incomplete;
- erasure – the right to request the erasure of your personal data, if there are grounds for this, stipulated under the General Data Protection Regulation (GDPR);
- restriction of processing – possibility to limit the processing of your personal data, if there are grounds for this, stipulated under the General Data Protection Regulation (GDPR);
- notification of third parties – to require us to notify the third parties to whom your personal data have been disclosed of any correction, erasure or restriction of the processing of your personal data unless this is impossible or requires a disproportionate effort on our part;
- portability of the data – to receive the personal data that you have provided to us and that relate to you, in a structured, widely used and machine-readable format and to transfer this data to another administrator without being hindered by us. The right to data portability applies when the following two conditions are met simultaneously: (1) the processing is based on consent or a contractual obligation; and (2) processing is performed in an automated manner. If technically feasible, you have the right to receive a direct transfer of personal data from us to another administrator. The right of data portability may be exercised in a way that does not adversely affect the rights and freedoms of other persons.
- objection – the right at any time and on grounds related to your specific situation to object to the processing of your personal data, which is based on public interest, exercising of official powers or the legitimate interests of Econt or a third party.
In the event such an objection is submitted, we will consider your claim and, if justified, we will comply with it. If we believe that there are compelling legal grounds for processing or that it is necessary to establish, exercise or defend legal claims, we will inform you about that.
- the right not to be a subject of an automated solution based solely on automated processing (i.e. processing without human intervention), including profiling, which has legal consequences for you or similarly affects you significantly unless there are grounds for this under the General Data Protection Regulation (GDPR) and appropriate safeguards are provided to protect your rights, freedoms and legitimate interests. We do not use such technologies in the processing of personal data subject to this Policy.
- withdrawal of consent – when your personal data processing is based on your consent, you have the right to withdraw it at any time. Such withdrawal shall not affect the lawfulness of the processing on the grounds of the consent given until the moment of its withdrawal.

You can exercise your rights related to the protection of your personal data by sending a written request (including by electronic means) to the Data Protection Officer (DPO) of Econt in accordance with the procedure under the applicable law. The contact details of the Data Protection Officer (DPO) are given in Section XIV below.

XII. Amendments under the Policy on privacy and personal data protection

Econt reserves the right to change the current Privacy and Data Protection Policy, and users will be notified of any changes via news on <https://econt.com> website.

XIII. Supervisory authority

Whenever you believe that your rights under the General Data Protection Regulation (GDPR) have been violated, you can lodge a complaint with the personal data protection supervisory authority. In Bulgaria, this is the Commission for Personal Data Protection, at address: 1592 Sofia, 2 Prof. Tsvetan Lazarov Blvd.; website: <https://www.cdpd.bg> It could be very constructive if you first contact our Data Protection Officer at dpo@econt.com in order to discuss the arising issue. We undertake to return a reply to you within 5 working days of your complaint or question receipt.

XIV. Personal Data Protection Officer's contact details

Ms. Ana Yosifova is the Personal Data Protection Officer of Econt – the responsible employee you can contact at e-mail: dpo@econt.com in case of uncertainties related to the implementation of this Policy or to exercising your rights. The correspondence address of the Personal Data Protection Officer is: Ruse 7000, 11 Tutrakan Blvd.