

PRIVACY POLICY

Services means any product, service, content, feature, technology or function, as well as any related website, application or service which we offer.

Platform means websites, mobile applications, mobile sites or other online properties whereby we offer our services.

- **Who are we?**

The data controller of the personal data concerning you for the purposes of providing our services is Veliko Tarnovo Municipality with registered address in Veliko Tarnovo, postcode 5000, 2, Maika Bulgaria Blvd.

- **What data about you do we collect?**

- **Data provided through direct interactions:**

Registration and other information about the user account.

Depending on the choices you make when logging in to our Services or during the process of participating in our Services, you may choose to provide any of the following additional personal information:

- Your name;
- E-mail address;
- GSM number.

Communication via the chat function of our platform.

When you use the chat function to communicate with other users of the Platform, we collect the information that you choose to provide to other users through this function.

- **Information that we collect automatically when you use our Services**

When you access our Platform or use our Services, we automatically collect the following information about you:

- **Information about the device**

We collect device-specific information such as operating system, version, unique identifiers like the name of the mobile network you are using. We associate unique identifiers with your account.

- **Information about the location**

Depending on the permissions of your device, if you publish a product on our Platform, we automatically collect and process information about your actual location. We use different technologies to determine your location, including IP address, GPS, Wi-Fi hotspots, and mobile hotspots. Location data lets you see products of other users near you and helps you post products in your location. If we need information about your location, a pop-up window will be displayed first, allowing you to allow or deny us access to your location. If you refuse to give us access to your location data, you will be able to use the Services but with limited functionality. If you allow us to have access to your location data, you can change your preferences through the settings in the website or the application and stop providing your location.

- **User and sign in data**

Technical details, including the IP address of your device, time zone, and operating system. We will also keep your Platform login information (date of registration, date of last password change, date of last successful login), type and version of your browser.

- **Data generated by users when browsing web pages**

We collect information about your activity in our Platform, which includes the sites from which you access our Platform, the date and time of each visit you make, the searches, ads or banner ads you click, your interaction with such ads or announcements during your visit and the order in which you visit the content of our Platform.

- **Cookies and similar technologies**

We use cookies to manage user sessions, store your language preferences, and provide you with relevant information. Cookies are small text files transferred from a

web server to your device's hard disk. Cookies can be used to collect the date and time of your visit to the website, your browsing history, your preferences and your username. You can set your browser to refuse all or some cookies or to alert you when websites you visit set or have access to cookies. Please note that if you disable or refuse cookies, some parts of our Services / Platform may become inaccessible or may malfunction. For more information on the cookies we use, please see our Cookies and Similar Technologies Policy.

○ **Third-party and publicly accessible sources data**

We receive personal data concerning you from various third parties (and public sources) as follows:

- Specific technical data and information about the use of the Services from analytics providers such as Google Analytics, Facebook, Google, etc.;
- Data collected from cookie readings, data from ad networks such as Programmatic Advertising, etc.;
- Publicly available, specialized information from search information providers such as public online catalogues and directories.

○ **Do we collect data from minors?**

Our Services are not intended for persons under the age of 14 years and we do not collect personal data of persons under the age of 14 years. If we receive information that a person under the age of 14 has provided us with personal data, we will delete the data immediately.

○ **Why do we process personal data concerning you?**

We will use the information and personal data concerning you only when the law so permits. We will most often use the personal information concerning you in the following circumstances:

- When this is necessary to protect your legitimate interests, improve our services and provide you with a safe and secure Platform;
- When we have to do so to comply with a legal or regulatory obligation.

In certain circumstances, we may process the personal data concerning you based on your consent. If we do so, we will notify you of the purpose and category of the personal data that will be processed as soon as we request your consent.

In the following paragraphs we describe how we use the personal information concerning you and what are the legal bases that we rely on to do so. We also identify our legitimate interests.

- **To secure user access and to provide Services through our Platform**

We use your email address to make proposals and recommendations for our Services that may be of interest to you.

We process the above information about the correct performance of services based on our legitimate interest in carrying out marketing activities in order to provide you with services that may be of interest to you.

- **To improve your user experience in the Platform**

We use data generated by users when browsing websites, in order to:

- Offer content that meets the requirements, such as providing you with more relevant search results when you use our Services.
- Determine how much time you spend in the Platform and how you use the Platform, in order to understand your interests and improve our Services based on this information. For example, we may offer you content to visit based on the content you have viewed.
- Monitor and report performance on our partners' campaigns and internal business analyses.

- **We use your location data for the following purposes:**

- To create anonymous and aggregated information about the characteristics and behaviour of Platform users, including for the purposes of business analysis, segmentation and disclosure of anonymous accounts.
- To improve the performance of our Services and personalize the content we target to you. For example, using your location data, we show you a list of ads that are near you to improve your user experience when buying products. To this end, Google Maps is integrated into our platform. Google Maps is provided by us and Google as our independent data controllers. This means that both Google and us are responsible for processing your location data through Google Maps. Our team will not process your location data for purposes other than those mentioned in this documentation. On the other hand, Google may process this data for its own purposes, in accordance with Google's privacy policy. The use of Google Maps through our platform is subject to the Google Maps Terms of Service.
- To evaluate and monitor your access to available third-party information visible in the Platform.

Using the Platform login information that you provide, including your email address, we reflect the various devices (such as desktops, mobile devices, tablets) which you use to access the Platform. This allows us to connect your activity in the Platform across devices and helps us provide you with a seamless user experience regardless of the device you use to access.

We process the above information, based on our legitimate interest, in order to enhance the user experience in the Platform and fully meet your expectations of us.

- **To provide you with a safe and secure Platform**
 - We use access form data and unique device identifiers to administer and secure the Platform (including troubleshooting, data analysis, testing, fraud prevention, system maintenance, support, reporting and data acceptance).
 - We analyse your communications made through our chat function in order to prevent fraud and to promote safety by blocking spam or offensive messages that may have been sent to you by any other user.
 - We process the above information towards full, accurate provision and improvement of our Services and based on our legitimate interest, in order to prevent fraud.

- **How we inform you of changes to the Privacy Policy?**

We may at times update this Privacy Policy. We will post the changes in this section and inform you via email or through the Platform. If you do not agree to the changes made, you have the right to delete your account by selecting "Account Settings", "Delete Account" function.
- **Your rights**
 - In certain circumstances, the applicable data protection legislation grants you certain rights in relation to the personal data concerning you.
 - If you would like to exercise any of the rights listed below, please select your account settings / privacy settings, or contact us at info@fairdeal.bg
 - Right to request access to the personal data concerning you (commonly referred to as a “data subject access request”). This right enables you to obtain a copy of the personal data concerning you which we hold and to verify that they have been lawfully processed.
 - Right to request rectification of the personal data concerning you which we hold. This right allows you to correct any incomplete or inaccurate information concerning you which we hold. However, we may need to verify the accuracy of the new information you provide to us.
 - Right to request restriction of the processing of personal data concerning you. This gives you the opportunity to contact us to request that the processing of the personal data concerning you be stopped in the following hypotheses: a) if you want to prove the accuracy of the data; b) when you believe that the use of the data by us is illegal; c) when you require us to store the data, even if we no longer need it, since you need to establish, exercise or prove your claims; d) when you have opposed to the use of your data, but we must check whether we have a legitimate reason to use them.

- Right to request deletion of the personal data concerning you. This right allows you to contact us to request the deletion or removal of the personal data concerning you when there is no compelling reason for us to continue processing it. In addition, you have the right to request that we delete or remove the personal data concerning you when you have successfully exercised your right to object to the processing, you have a suspicion that we may have processed your information not in accordance with legal requirements or when it is necessary for the personal data concerning you to be deleted in order for us to comply with legal requirements. Please note that for certain purposes, we may be legally required to store personal information concerning you.
- Right to object to the processing of personal data concerning you when it is based on a legitimate interest (or that of a third party) and is justified by your specific interests, which makes you oppose to the processing of personal data concerning you on that basis, as you consider that the processing violates your fundamental rights and freedoms. You have the right to object when we process personal data concerning you for direct marketing purposes. In certain cases, we can demonstrate compelling legitimate grounds to process information concerning you which override your right to object that revokes your right to object.
- Right to request transmission of the personal data concerning you to you or to a third party. We will provide the personal data concerning you to you or to a third party chosen by you, usually in a structured, commonly used and machine-readable format. Please note that this right applies only to automatic information to the use of which you have initially consented or which we have used under all the conditions.
- You may withdraw your consent to the processing of the personal data concerning you at any time. The withdrawal does not affect the lawfulness of processing which we have carried out based on your consent before its withdrawal.

Usually no fee is required: You have no obligation to pay a fee to access personal data concerning you (or to exercise any of your other rights). However, we may charge a reasonable fee if your request is manifestly unfounded, repetitive, or excessive. In these circumstances, we may refuse to comply with your request.

Response Deadline: We will do our best to respond to any legitimate request within two months of submission. If your request is particularly complex or you have made several requests, it may take us more than two months to fulfil them. In this case, we will notify you and keep you informed. In addition, you have the right to file a complaint at any time with the Commission for Personal Data Protection.

Before filing a complaint with the Commission for Personal Data Protection, we would appreciate to be able to review your grounds of complaint and claims and do our best to resolve them. Please contact us by writing to info@fairdeal.bg

- **Communications and marketing**

We will contact you by email or notification regarding our Services / Platform to confirm your registration, to inform you if your listing has become active / expired, as well as for other communications regarding our Services. Because it is imperative that we provide you with such messages, you may not be given the opportunity to decline receiving them.

You can request that we stop sending you marketing communications at any time by clicking the opt-out link in the email sent to you or by changing the communication settings in your account. If you have trouble changing the settings, please contact us using the contact form.

You may receive marketing communications from us if you:

- Have requested such information from us;
- Have used the Platform or the Services.

- **Who we share the data concerning you with?**

We may share personal data concerning you with the third parties listed below for the purposes set out in the relevant section.

Assisting in the provision of related information and processes such as product enhancements, customer support and fraud detection. Any sharing of personal data within the Platform will always be subject to safeguards or a data transfer agreement that clearly sets out the obligations of the parties and provides appropriate technical and organizational measures to protect the data concerning you.

We carry out checks on our third-party service providers and require them to respect the security of personal data concerning you and to treat them in accordance with the legal requirements. We do not allow third-party service providers to use personal data concerning you for their own purposes and we only allow them to process personal data concerning you for specific purposes and in accordance with our instructions.

Ad and Analysis Providers: In order to improve our Services, we will occasionally share non-personally identifiable information with our analysis providers to help us analyse how users use the Platform / Services. We share our information with them in a subject-non-identifiable form for monitoring and reporting on the effectiveness of our partners' campaigns. This information may include cookie identifiers, (shortened) IP address, referral URLs, as well as information about your browser and device. For more details, please see our Cookies and Similar Technologies Policy.

Law enforcement authorities, regulators, etc.: We may disclose personal information concerning you to third-party law enforcement, governmental or public authorities in order to comply with any legal or regulatory requirements.

Publicly Available Information: When you publish a product for sale through our Services, you may choose to make certain personal information visible to other users of the Platform. This may include your name, surname, email address, location and contact number. Please

keep in mind that any information you provide to other users can always be shared with third parties, therefore do so at your own discretion and at your own risk.

- **International transfers**

Whenever we transfer your personal data outside the European Economic Area (EEA), we guarantee that a similar level of protection is provided, ensuring that at least one of the following precautions is applied:

- We transfer your personal data only to countries for which the European Commission has determined that they have an adequate level of personal data protection. For more details see [European Commission: Adequacy of the protection of personal data in non-EU countries](#).
- When we use the services of certain service providers, we may conclude with them specific contracts, approved by the European Commission, that grant personal data the same protection they have in Europe. For more details see [European Commission: Standard contractual clauses for data transfers between EU and non-EU countries](#).
- You can obtain a copy on the guarantees in place by contacting us using the contact form.

- **Where do we store your data and for what period of time?**

The data concerning you which we collect will be stored and processed, both inside and outside the EEA, on secure servers in order to provide the best possible user experience to users.

We will only retain the personal data concerning you for as long as necessary to fulfil the purposes for which we have collected them, including for compliance with legal, accounting or reporting requirements.

To determine the appropriate retention period for the personal data concerning you, we take into account the amount, nature and sensitivity of the personal data concerning you, the potential risk of harm from unauthorized use or disclosure of the personal data concerning you, the purposes for which we process the personal data concerning you and whether we can achieve these goals through other means, and the applicable legal requirements.

If your account has not been active for a period longer than 24 months, we will delete your account, including all personal data concerning you stored in the account. This means that you will not have access to this account and will not be able to use it.

If you have any questions about how long the personal data concerning you will be stored, please contact us using the contact form.

- **Technical and organisational measures for security of processing**

All data concerning you which we receive are stored on secure servers and we have implemented technical and organizational measures that are appropriate and necessary to

protect the personal data concerning you. Our team continuously evaluates the security of their network and the suitability of their internal information security program, which is designed to: (a) help protect the data concerning you against accidental or unlawful loss, access or disclosure; (b) identify reasonably foreseeable security risks to the Platform's network; (c) minimize security risks, including through risk assessment and regular testing. In addition, we ensure that all payment information is encrypted using SSL technology.

Please note that despite the steps we have taken to protect the data concerning you, the transfer of data over the Internet or other open networks is never fully secure and there is a risk that the personal data concerning you may be made available to unauthorized third parties.

- **Links to third-party websites**

The Platform may contain links to third-party websites or applications. If you click on any of those links, keep in mind that each site has its own privacy policy. We do not control those websites / applications and are not responsible for their policies. When leaving the Platform, we recommend that you read the privacy notice of each website you visit.

- **Contact**

For further information or to exercise your rights, please check the settings of your account/privacy or contact us at info@fairdeal.bg or via the Helpdesk in our Platform.

- **Data Protection Authority**

Your supervisory authority for any matters concerning personal data protection is:

Commission for Personal Data Protection

Address: Sofia, 1592, 2, Tsvetan Lazarov Blvd.:

- For inquiries about complaints, alerts and questions received: 02/91 53 519; fax 02/91 53 525;
- For consultations on the implementation of Regulation (EU) 2016/679 and the national data protection regulation: 02/91 53 555

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

I, the undersigned, Ventseslava Mihailova Mishlyakova certify the truthfulness of the translation made by me from Bulgarian into English of the enclosed document. The translation consists of 9 pages.

Sworn translator:

Ventseslava Mihailova Mishlyakova