

# **PERSONAL DATA PROTECTION POLICY**

Please read our privacy policy carefully to get a clear understanding of what Personal data we collect, why we collect it, what we do with it and what rights you have in protecting your privacy. It applies when you visit ceoclub.bg/angels or send us information through gust.com or email. By using any of these channels you agree to have read and understood this Privacy Policy.

## **WHY WE NEED YOUR DATA**

The main activity of the Club is to review and select projects for financing. In order to provide this service, the Club may collect and process some personal data of the candidates for financing. This information is necessary for the Club to perform the required analysis, presentation, promotion and financing of projects, and without this data the Club cannot fulfil its commitments to the candidates.

The data will be processed by "CEO Business Angels" Ltd., a company incorporated and existing in accordance with the laws of the Republic of Bulgaria, registered in the Commercial Register and the Register of NPLP with the Registry Agency under UIC 204347979, represented by the Manager Milen Emilov Ivanov.

## **WHAT WE COLLECT**

In the process of selection for funding we process:

Email addresses, phone number of candidates, which are necessary for keeping in touch with them and for providing notifications on funding opportunities.

Name, birth date, education, qualifications, work experience, skills, and other information, which the candidates decide to provide, which are necessary for the evaluation of projects and the teams involved.

We may not fund projects immediately, so we shall keep the data for a period of 5 years.

## **RESTRICTIONS**

Each candidate shall be responsible and guarantees that he/she enters and provides us with information of third parties, only when such data has been acquired in compliance with legal requirements of the applicable data protection legislation and only when such candidate has all legal grounds for passing such information to the Club. All liability for any legal violations in case a candidate provides third party personal data shall be borne by such candidate.

## **SUBPROCESSORS**

We may use certain sub processors, but when we do so, we make sure your personal data is being handled with high level of integrity and security. Whenever they are based out of the EU and more specifically in the USA, we make sure that they are compliant with the EU-U.S. and Swiss-U.S. Privacy Shield Framework. European Commission has deemed the EU-U.S. Privacy Shield Framework adequate to enable data transfers to USA under EU law.

Such sub processors are MailChimp and Gust.

We do not sell, trade, distribute or otherwise transfer to outside parties your personal information.

## **MINORS**

We allow our network to be used only by persons aged 18 and over.

If we obtain actual knowledge that we have collected personal data from a person under the age of 18, we will promptly delete it, unless we are legally obligated to retain such data.

Please, contact us, if you believe that we have mistakenly or unintentionally collected information from a person under the age of 18.

## **YOUR RIGHTS**

You have the right to request a copy of your personal details at any time, to check the accuracy of the information held and/or to correct or update this information. You may ask your personal information to be deleted completely, if no enquiry from you is in progress. You also have the right to complain when your personal data protection rights have been violated.

We will make commercially reasonable efforts to provide you with reasonable access to any of your personal information we maintain or correct it within 30 days as of receipt of your request. We will comply with your instructions for deletion of personal data as soon as reasonably practicable and within a maximum period of 30 days, unless EU or Bulgarian law requires further storage. Please, note that we may keep that information for legitimate business or legal purposes or be required (including by contract or GDPR) to keep certain of information and not delete it (or to keep this information for a certain time, in which case we will comply with the deletion request only after we have fulfilled such requirements). Please, note that after deleting your information, you shall not be able to use our network any more.

If you wish to access, delete (when applicable) or correct your personal information please, address your requests and complaints to:

Address: Republic of Bulgaria, 1164, City of Sofia, 7 Christo Smirnenski Blvd., office 2. Email address

Please state clearly in the subject that your request concerns a privacy matter, and more specifically whether it is a request to access, correction, deletion or else. Bear in mind that we may ask for additional information to determine your identity.

We may reject requests that are unreasonably repetitive, require disproportionate technical effort, risk the privacy of others, or would be extreme. Where we can provide information access and correction, we will do so for free, except where it would require a disproportionate effort.

## **SUPERVISORY AUTHORITY**

If you think we have infringed your privacy rights, you can lodge a complaint with the supervisory authority of Bulgaria, which is the Commission for personal data protection.

More information can be found at: [www.cdpd.bg](http://www.cdpd.bg).

You can also lodge your complaint in particular in the country where you live, your place of work or place where you believe we infringed your rights.

## **PERSONAL DATA**

In connection with the requirements of the applicable legislation on the personal data protection, “CEO Business Angels” Ltd. provides to the Club’s members the following information:

The Company – Personal Data Controller is “CEO Business Angels” Ltd., a company incorporated and existing in accordance with the laws of the Republic of Bulgaria, registered in the Commercial Register and the Register of NPLP with the Registry Agency under UIC 204347979, having its seat and registered office in the Republic of Bulgaria, 1164, City of Sofia, 7 Christo Smirnenski Blvd., office 2, represented by the Manager Milen Emilov Ivanov.

“CEO Business Angels” Ltd. values extremely much the confidentiality and the right to inviolability of private life of its members and keeps the data that it processes, minimized and maximally protected. We process only data that we need to carry out our activity and only with your confirmation and on the basis of legally established grounds.

The data that we process about our members are:

Name, PIN, address, telephone number and email address.

Name and PIN are necessary for the preparation and issuance of the relevant accounting documents related to the payment of the membership fee by the members.

Address, email address and telephone number are necessary to contact you in fulfilment of our commitments and for provision of information concerning the Club’s initiatives as described in the Letter of Engagement, in response to your inquiries and requests and to provide the information or the assistance you need.

We process and use only data that our members have provided us voluntarily. This means that all persons, including the Club’s members, are responsible for not providing data to third parties in violation of their personal data protection rights.

We have taken a wide range of technical and organizational measures to protect your personal data against loss or other forms of illegal processing. Personal data is only available to those persons who need access to perform their work in connection with the provision of the services of the Club.

We process your data while you are a member of the Club and then we delete it from our database unless this is required by law or you make a request to continue to receive email notifications about the activity of the Club for a period of one year after termination of your membership.

You may request a copy of your personal data at any time, to check the accuracy of the stored information, to correct or update this information, to request your personal information to be deleted, if there are grounds for it, you may request to restrict the processing of your personal data, you have the right to complain when your personal data protection rights have been violated. You may be denied to erase your personal data in order to comply with our legal obligation or to the establishment, exercise or protection of legal claims.

You may use the most convenient for you way of communication by addressing all requests to: address: [CONTACT](#)

If you consider that we have breached your rights in relation to your personal data, you may file a complaint to the Bulgarian supervisory authority, which is the Commission for Personal Data Protection. More information you can find at the following website: [www.cpdp.bg](http://www.cpdp.bg).