



**Privacy Policy of
PROtegni Raka Non-Profit Association (NPA)**

This document presents the approach of PROtegni Raka NPA to the protection of personal data with a view to meeting the legal requirements and those set out in Regulation (EU) 2016/679 (General Data Protection Regulation), Articles 13 and 14. One of our main responsibilities as a charitable association is to ensure the security of the information we have been entrusted with. The privacy policy provides answers to significant questions related to the processing of personal data at PROtegni Raka NPA of recipients, donors and/or third parties.

Please, take the time to learn about our Privacy Policy.

1. Who are we?

Information about our activities:

PROtegni Raka Non-Profit Association is a charity fund established in 2004, the noble beginning of which was initiated by employees of ProCredit Bank (Bulgaria) EAD. Every year the bank itself organizes events in order to raise funds for PROtegni Raka. Our role is to donate funds for the treatment of socially disadvantaged sick children under the age of 18 (coming from poor families, orphans, etc.). We conduct our activities effectively on the basis of well-established humanitarian principles and independent decisions in accordance with all applicable laws, regulations and by-laws. Each application for assistance that has been received is considered by a collective body of PROtegni Raka comprised of employees of ProCredit Bank (Bulgaria) EAD.

Legal information:

PROtegni Raka NPA (the Association and/or the Controller) is an association registered as a data controller and entered in the Commercial Register at the Registry Agency under BULSTAT 131415294, with a seat and registered office in the city of Sofia, postal code 1303, 26, Todor Aleksandrov Blvd., tel.: *7000; email: protegniraka@procreditbank.bg. More information about the activities of PROtegni Raka NPA can be found on the official website of the Association at: <https://protegniraka.bg/english/index.html>.

Contact information at PROtegni Raka NPA regarding personal data protection:

26, Todor Aleksandrov Blvd., postal code 1303, the city of Sofia;
tel. *7000 (at the cost of 1 city call);
mail: protegniraka@procreditbank.bg

2. Why does the Association collect and use your personal information?

The security of the data you have entrusted to us is of utmost importance, as the faith you have put in us is crucial for the sustainability of our donation cause. Our Association collects, processes and stores personal information in connection with the achievement of the Association's objectives and on the basis of various legal grounds. We use the personal data you have provided to us in order to process your grant applications, to issue a document certifying your donation, as well as to help their administration, to ensure best possible service, to prevent unauthorized access to your data and to fulfill our legal and regulatory obligations.

Under Regulation (EU) 2016/679 and the effective Bulgarian legislation, we have the right to collect, process and store personal information on one or more of the legal grounds listed below:

- When applying for targeted financial support;
- When being a donor to the Association;
- By virtue of law;
- When having a legitimate interest;

- When having given your consent;

In case of a reason to use your information, which reason relates to our activities, we use “legitimate interest” as basis. Referring to it in the process of handling the information you have given us, we strive to ensure a fair balance between the Association’s legitimate interests and your lawful rights.

Regulation (EU) 2016/679 regards certain categories of sensitive personal data as special, the use of which is possible only upon your explicit consent. These data include information on racial or ethnic origin, political orientation, sexual orientation, religious beliefs, trade union membership, health data, photographs and criminal records.

The Association collects, processes and stores personal data on the following grounds:

2.1. To meet the legal obligations:

We, as a non-profit association, are required to process and store your personal data in compliance with certain legal requirements:

- To check the personal data provided to us and to fulfill our legal obligations.
- To respond to requests to provide data under the terms and conditions set forth in the Child Protection Act, the Accountancy Act, the Tax and Social Insurance Code, and other relevant regulatory framework;
- Upon payment of donations, to share data concerning the beneficiary with the host or the sending bank pursuant to the Payment Services and Payment Systems Act;
- To report/respond to inquiries made by regulatory authorities, law enforcement bodies and/or other government authorities requested in the course of investigations or legal proceedings. Examples of such authorities/bodies include: the police, judicial authorities, the State Agency for National Security, the National Investigation Service, the Commission on Prevention and Counteraction to Corruption, etc.

2.2. When applying for and/or performing a donation relation:

When considering an application for assistance rendered for the treatment of socially disadvantaged children under the age of 18, of whom you are the parent/guardian, we process the data you have provided voluntarily such as the identification data, medical information, the children’s personal data, a photograph of the children, thus developing the activities of our charitable cause in a transparent way.

We disclose information in public about the donation you have made only upon your written consent.

The main personal data we collect, process and store include data from a current identity document concerning: name, sex and age group, marital status, address (permanent address), telephone, email, diagnosis made, health status description, treatment plan, documents proving social status.

When applying for and/or performing a donation relation between the person in need of assistance and the Association, by virtue of the preliminary information included in the Application Statement for the allocation of financial support, PROtegni Raka NPA is entitled to:

- Receive, process and store your personal data and your child’s personal data that you have provided in a request for financial support, as well as those of third parties submitted by you with the purpose of assessing the conditions, amount and manner in which the Association will provide/refuse gratuitous financial support for treatment/rehabilitation in the form of a donation in order to comply with the Association’s internal rules and legal regulations.
- Give you information about the decision taken by a collective body of PROtegni Raka NPA concerning the amount and purpose of the donation, as well as the way funds are used.
- Process information about the persons to whom payments will be made by virtue of

an approved donation in favour of the child in need.

2.3. To manage our activities by means of a legitimate interest:

The legitimate interests for which the Association must process the personal data you have provided are basically:

- To ensure strict management and transparency of consideration, decision-making and expenditure of funds raised by the Association's fund through donations with a view to allowing a wider range of persons in need of financial support for treatment/rehabilitation to obtain funds from the fund;
- To have the right to modify, by synonyms or anonymous presentation, information about children who have received donations, the parental rights over whom are exercised by a person designated by the state/municipality (living in foster families; children placed in a family-type accommodation centre or similar care).
- To store and process data about your financial and/or property status that you have provided voluntarily to the Association as an appendix to an application statement for financial aid you have submitted;
- PROtegni Raka NPA is not responsible if photographs from our site, our social media pages or press releases are used by media and third parties in a way that does not correspond to the truth of the facts.

2.4. When you have given your consent:

The Association uses, processes and stores your personal data and those of the child, whose parent/guardian you are, upon your explicit consent in the following cases:

- To collect, process and store your personal data and the data concerning the child you represent that you have submitted. To use your personal data for direct marketing by subscribing to our newsletters;
- To collect sensitive information - about your child's health condition or other sensitive information you share with us, when applying for a medical product or form of treatment, or when you want to change the purpose of the existing donation goal;
- To publish brief and unbiased information containing the personal and health data on the assisted child describing the condition, age at the time of publication, sex, place of origin of the donated child, and the subject of donation on the Association's website, its accounts in social networks and/or in a newsletter on paper and/or in electronic form. The published information must truthfully reflect the purpose of the donation made by the Association, and at the same time without detriment to the dignity of the child and the parents;
- We do not disclose information about donors who have asked for confidentiality.
- After a successful transfer to the Association's account by a donor who has provided data voluntarily, the Association gives him a donation certificate. We notify donors that the document does not entail tax reliefs based on the Income Taxes on Natural Persons Act and the Corporate Income Tax Act.

You can withdraw your consent at any time via our contact channels allowing your identification. In this case PROtegni Raka NPA shall cease the publication of the data you have provided for the purposes listed above. Withdrawal of consent prior to receiving the support may affect rendering our services and products.

3. What kind of personal data do we collect?

PROtegni Raka NPA collects, records, structures, organizes, processes, stores, and, if necessary, updates personally or through a representative of its, or through our alternative channels of communication, such as our website and social networking pages, different types of personal data provided by those applying for financial assistance in the context of establishing/developing donation relations. The information we process, structure, analyze,

and store may vary depending on the support sought and the illness of the child in need. It falls into different categories, as listed below:

- **Identity and contact information:**

Name, date of birth, place of birth, data contained in a valid identity card or other identity document, a copy of the birth certificate of the child in need, nationality, current photo of the child in need, address (country, region of the country, postal code, city, street), contact information (personal email address, home and/or mobile phone number, business phone number), professional experience, education, marital status, tax information;

- **Financial details and circumstances:**

Financial status and income data/documents for the last 3 months, processing of the requested document and of supporting documents, employment and employment data on related persons, credit history, social status assessment documents, data you have provided from public registers, financial needs, business documents of self-employed persons, property information;

- **Sensitive categories of personal data on you and the child in need**

In case you have given your consent and/or there is a legal/contractual ground, we store and process the information you have provided that includes sensitive personal data, such as health information or criminal conviction information. These data are stored for the duration of the purposes of the service we provide you.

The collection, processing and storage of children's personal data shall be carried out by the Association in compliance with legal requirements and after it has received the consent that a parent or a guardian has given explicitly regarding the type and scope of personal/sensitive data that can be processed and/or used. What falls into this context are photographs, medical discharge summary data, decisions taken by a labour-expert medical committee (LEMC) on acquired disability, outpatient cards, details concerning medicines that have been used, therapies, auxiliary medical equipment and recommendations for them, offers for a recommended treatment, copy of a decision to support/refuse support by state social funds and other charitable organizations;

- **The information on another person you provide us with or the information another person provides on you:**

If you provide us with information about another person (for example, data on a spouse or a cohabiting person in the event of a joint child assistance request), it may be added to the personal information we already have and used in the ways described in this Privacy Policy.

Note: A natural/legal person may disclose information on others only when they have given their consent thereof, and in case this person can provide a proof for their consent to the Association. The latter is responsible for providing data in accordance with the Association's Privacy Policy and the legislation relating to personal data protection.

- **Technical information and online identification:**

Information: about the user's electronic communication and identity such as email address and incoming data (full name); about the location of the device, its unique identifier, the IP address of the device whereby messages are sent to the Association; details concerning the device and technology that you use; about a record that has been made of electronic IT activity (log history); about the donations you make using your bank card; about cookies;

- **Other types of personal data:**

Information relating to the exercise of the data subject rights; records of correspondence

and other communication with the Association; data from investigations (such as money laundering sanctions and controls, external intelligence documents);

4. When and how do we collect information on you?

This section lists the places wherefrom we collect data considered to be part of your personal information. Our Association collects information from a variety of sources in order to obtain the information necessary to make the right decision on the targeted financial assistance you are applying for, as well as to get information on whether you are currently using or have used financial support in the past for the purpose described in your request.

PROtegni Raka NPA processes data that you provide or we collect in the course of our relationship with you:

- When applying for targeted financial support concerning our child's treatment;
- When using the Association's website and/or the services it renders online;
- When providing us with information orally or in writing - in application forms, copies of documents, emails and letters, complaints, through conversations conducted via various communication channels;
- Upon analysis of your social status;
- When making a donation online or by a bank transfer and your personal data are not anonymous.

The Association may also collect, process, rate and store personal data it legally receives from legal entities, natural persons and other sources:

- Information that is publicly available - in the media, websites, social networks, business directories;
- Information you have provided from public registers - the Trade Register, Central Credit Register, Property Register, National Social Security Institute, National Revenue Agency, etc .;
- Information you have provided coming from socially or economically related persons, such as employers, business owners, relatives or others.
- Information provided by state authorities and law enforcement bodies.

5. How long do we keep your personal information?

Personal information is stored for a period that depends both on its nature and the purposes it is handled for. PROtegni Raka NPA sets the relevant retention periods taking into consideration all legal retention obligations.

Information about your personal data and your child's personal data that you have provided, as well as the application together with the documents/papers/photos enclosed thereto that have not led to the allocation of a targeted financial donation, are kept until the day following the day when the decision to refuse targeted funding has been received.

Information about your personal data and your child's personal data that you have provided, as well as the application together with the documents/papers/photos enclosed thereto that have led to the allocation of a targeted financial donation, are kept from the date of signing the contract for granting gratuitous assistance up to 1 month after the child in whose favour the funding has been made reaches 18 years of age.

Information about your personal data that you have provided on the occasion of a donation made is kept for 5 years from the date of the donation.

If the purpose for processing the information ceases to exist, and if the time-limits for its retention provided for in this Policy and by law have expired, it shall be destroyed or anonymized which means that all identification features are removed from the personal data.

6. Am I obliged to provide personal data?

In the context of donation relations with PROtegni Raka NPA, you must provide personal and sensitive data necessary to establish the health condition of the child you represent, as well as data on your social and property status.

You may choose not to provide or share with us personal information.

Please, bear in mind that if you do not provide us with the necessary information, we will not be able to start or continue our relations with you as a natural person or as your child's legal representative. Sometimes the information we require is not based on law or contract but it is essential for us to specify and supplement the initial information you have provided. This information can be collected only upon the consent you have given. Failure on your part to provide these additional data may affect your application for financial support.

In your capacity as a donor, you are entitled to provide your personal data or such of the legal entity you represent, and you are also entitled to remain anonymous.

7. How do we collect your personal data?

The protection of personal data we have been provided with is of major importance to us. We have implemented a number of measures to ensure the safety and security of information. We take all material, technical and organizational measures required by Bulgarian law, including by the Child Protection Act.

We require our team and third parties processing your data to comply with high data protection standards, including the obligation to keep the confidentiality of information, and to implement appropriate data processing and transfer measures.

8. How do we use personal information for direct marketing?

The Association may process your personal data as a natural person and/or as a representative of a business in order to furnish information on our activities, on events that we organize, and on offers that might be of interest to you. We can send marketing messages by mail, email, phone, or text message.

Personal data that we process to that end consist of information you have given us of your own free will. We may use your personal information to promote our donation activities only if we have your explicit consent to do so or if we believe it is legitimate to do so.

You have the right to object at any time to the processing of your personal data for marketing purposes by contacting the Association and requesting that the use of your personal data be discontinued. In case you do not want to receive marketing messages from us, the Association will continue to use your contact details only to give you important information related to your relations with PROtegni Raka NPA.

9. Does PROtegni Raka NPA use automated decision-making to make donations?

PROtegni Raka NPA does not use automated decision-making and profiling of decisions in the process of identifying the need for financial support for the treatment of disadvantaged children.

10. Cookies

PROtegni Raka NPA uses cookies on its site. A cookie is a small text file that our web server sends to the cookie folder on your computer. The main function of the cookie is to allow our web server to recognize partially your operating system and Internet Browser settings with a view to improving and optimizing the performance of our website. Another

important goal of the cookie is to provide feedback on the performance of our site and to gather statistics to help us choose and improve the services we offer. Some cookies are important to the functionality of the site and are automatically activated when visited by users.

Types of cookies used by PROtegni Raka NPA

1. WPGLOBUS – a cookie that is used solely to track the language the visitor uses (Bulgarian or English). It is not deleted when you exit the system, so that the next time you visit our site, it can visualize the contents in the relevant language.
2. PIWIK and Google Analytics cookies. PIWIK and Google Analytics are systems that track and collect statistical information about the operating system, browser, language, and geographic location of users visiting the site. It is used for analyses and statistics related to the use of our site.
3. Some third-party cookies are set by services that appear on our sites and are not under our control. They are set by social media providers such as LinkedIn, YouTube, Facebook, and Instagram and refer to the ability of users to share contents on this site, as it is indicated by the corresponding icon.

You can block or restrict the cookies set by any website, including by the Association's sites, through the settings of each browser and on any device you use to access the Internet. Please, be advised that some of our services will not function if your browser does not support cookies.

11. Whom do we share your personal information with?

Within the Association, your data are collected, processed and stored by the Association and members of the General Assembly. PROtegni Raka NPA may share your personal information with an external organization in order to implement the approved targeted donation or to receive and process incoming donations. The Association shares the information you have provided only with a limited number of individuals and companies in order to process and/or store data with a view to achieving an unbiased assessment of the gratuitous funding, sharing this information by virtue of contractual agreements entered into with the Association whereby compliance with confidentiality and data protection requirements is ensured pursuant to the effective Bulgarian legislation and Regulation (EU) 2016/679. We share the information you have furnished with the providers of healthcare services and products in accordance with your consent and observing the appropriate information protection measures.

Sharing can occur in the following circumstances and / or with the following recipients, for example:

- **Public bodies** with whom we have a public or legal obligation to exchange information: Supervisory and other regulatory and public bodies. The examples include central and local government, the National Revenue Agency, law enforcement and fraud prevention authorities; the Commission on Prevention and Counteraction to Corruption, the Commission for Personal Data Protection and others.
- Representatives you have authorized and everyone else for whom we have your instruction to share information with;
- **Healthcare establishments and companies offering facilities, consumables and medicines not forbidden by law:** for example, hospitals, treatment centres, pharmacies, auxiliary equipment dealers, hearing aids, etc.
- **Companies that render services to fulfill our legitimate interests or contractual obligations:** marketing and advertising agencies, companies for the storage, archiving and destruction of documents, cloud storage providers, providers of IT and telecommunication

services, software developers, computer support companies, printing houses, consultants, banks, etc.

12. Sending information outside the EEC and the EU

Your information and information regarding the children you represent may be transferred and stored in places outside the European Economic Community (EEC), including countries that may not have the same level of personal information protection. In this case, we make sure that the company whereto we transfer the data has an appropriate level of protection, that we have obtained your consent and that the transfer is legal. We may need to transfer information this way in order to make a donation to a health establishment located outside the EEC and the EU. It is important to us to fulfill a legal obligation concerning your and/or our legitimate interests.

We may transfer or permit the transfer of information about you, the child you represent, and the purpose of the approved financial assistance only if we have obtained your prior consent and if they agree to work under our guidelines to protect your information to the same standard, as it is applied in the European Economic Community.

You can find further information on the European Commission's website here: https://ec.europa.eu/info/law/law-topic/data-protection/data-transfers-outside-eu_en

13. Rights of the natural persons

Pursuant to the Data Protection Regulation all individuals have the right:

- To receive information about the processing of their personal data;
- To access the personal data stored about them;
- To request for incorrect, inaccurate or incomplete personal data to be corrected;
- To request to be "forgotten", i.e. to ask for their personal data to be erased when the data are no longer needed or in case the legal/contractual terms for their retention and processing have expired;
- To receive their personal data in a machine-readable format and to send them to another controller ("data portability");
- To object to the processing of their personal data for marketing purposes or when they relate to a particular situation;
- To request restriction of processing;
- To require that people and not only computers should take decisions based on automated processing and on personal data, which decisions affect the said natural persons.

The persons can exercise their rights by contacting us through the contact details of the Association:

Address: Head office, 26, Todor Aleksandrov Blvd., 1303 Sofia

Tel.: + 359 700 1 70 70 or * 7000

protegniraka@procreditbank.bg

For permission for access and correction of your personal data or for other claims related to your rights as data subjects, please, file an application by submitting it to an employee at one of the offices of ProCredit Bank (Bulgaria) whereby the application will be handed over in compliance with the legal requirements for secure personal information.

You also have the right to report to the Commission for Personal Data Protection:

Commission for Personal Data Protection

2 Prof. Tsvetan Lazarov Blvd.

Sofia 1592

tel.: +359 2 915 3523

fax: +359 2 915 3525

email: kzld@cpdp.bg

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