



МУЛТИФОРС А.С. ЕООД

ПРОЕКТИ ЗА СИГУРНОСТ, ФИЗИЧЕСКА ОХРАНА И ОХРАНИТЕЛНА ТЕХНИКА

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PERSONAL DATA PROTECTION POLICY OF "MULTIFORS A.S." LTD.

I. Introduction

1. "MULTIFORCE A.S. Ltd. respects the privacy of employees, customers, suppliers, partners and any other contractors and ensures to the maximum extent possible the protection of their personal data that it processes.

This Privacy Policy has been prepared and is based on the current Bulgarian and European legislation in the field of personal data protection, in accordance with Regulation (EU) 2016/679 (General Data Protection Regulation) and the Personal Data Protection Act.

2. "MULTIFORS A.S." Ltd, is registered in the Commercial Register at the Registry Agency with the UIC 831637711. The company is licensed under the Private Security Activity Act and holds perpetual licenses issued by the General Directorate of National Police - Ministry of Interior for the whole territory of the country. The Company is headquartered in the town of. The company is headquartered in Sofia.

3. "MULTIFORS A.S." Ltd. offers complex licensed services in the field of private security activities, providing personal security, security of property of individuals and legal entities, security of events, SOD and other types of private security activities under the Private Security Activities Act (PSAA). The company professionally organizes and performs armed or unarmed physical security and/or technical security of objects and the property located therein of legal entities and individuals - administrative buildings, large industrial enterprises and business sites, educational institutions, construction sites, mines, roads, etc.

II. Privacy Policy

1. The purpose of this "Personal Data Protection Policy" of MULTIFORS A.S. Ltd. is to protect the "rights and freedoms" of individuals and to ensure that their personal data is not processed without their knowledge and, where applicable, that it is processed with their consent. The management of MULTIFORCE A.S. Ltd, are committed to ensuring compliance with EU and Member State legislation regarding the processing of personal data and the protection of the "rights and freedoms" of individuals whose personal data MULTIFORCE A.S. Ltd collects and processes in accordance with the General Data Protection Regulation (Regulation (EU) 2016/679) and current Bulgarian legislation.

2. This policy applies to all employees, workers and customers of MULTIFORCE A.S. Ltd. as contracting parties to contracts to which the company is a party. Any violation of the General Regulation will be treated as a breach of labour discipline, and in the event that there is an allegation of a criminal offence, the matter will be referred to the relevant government authorities for consideration as soon as possible.

3. Partners and third parties who work with or for MULTIFORCE A.S. Ltd and who have or may have access to personal data will be expected to read, understand and comply with this policy. No third party may have access to personal data held by MULTIFORCE A.S. Ltd without first entering into a data confidentiality agreement which imposes obligations on the third party no less onerous than those which MULTIFORCE A.S. Ltd has undertaken and which entitles MULTIFORCE A.S. Ltd to carry out checks on compliance with the obligations imposed by the agreement.



4. This Privacy Policy sets out the rules that MULTIFORCE A.S. Ltd. will follow when processing personal data that we collect from or about you, or that you provide to us, as required by contracting parties. This Privacy Policy does not affect, restrict or override your rights under the Personal Data Protection Act (PDPA) or other relevant legal provisions.

If you have any questions or comments about this Privacy Policy, please contact us at: multiforce@multiforce.bg.

III. Who processes and is responsible for your personal data

1. "MULTIFORCE A.S. Ltd. is a data controller in relation to its employees and a data processor in relation to the contracting parties under contracts to which it is a party.

2. MULTIFORCE A.S. Ltd. registered office is City of Sofia, "Obikolna" Street, bl. 310 A, entrance B, floor 1.

E-mail: multiforce@multiforce.bg

Tel: 028000000; 080020010

IV. Categories of personal data processed by MULTIFORCE A.S. Ltd.

1. "MULTIFORCE A.S. Ltd. may process publicly available personal data and/or personal data provided by you.

The main types of personal data processed are:

- ✓ Personal identification information (incl. name, ID number, place of residence, nationality, language of communication, etc.);
- ✓ Information on the field of activity (incl. education, educational establishment, workplace, position held, etc.);
- ✓ Contact details (including postal and e-mail addresses, telephone (landline and mobile) numbers, etc.);
- ✓ Financial information (bank account, etc.);
- ✓ Representative information (legal representative or attorney of our client legal entity);
- ✓ Communication data between us and you;
- ✓ Data obtained in the performance of obligations arising from legal acts (i.e. data arising from inquiries, regulations, investigating authorities, notary, tax services, court, bailiff, NRA and NSSI);
- ✓ Data obtained in the performance of contractual obligations (including name, SSN, address, telephone and/or e-mail address, etc.).
- ✓ Other data required by our Customers, as data controller, in the performance of obligations (access regime) under security contracts.

2. MULTIFORCE A.S. Ltd. may process data collected and generated by the company in the process of providing the services:

- ✓ Video recordings in the performance of the main scope of activities under contracts for security activities involving video surveillance provided to the company;
- ✓ Personal data of individuals (names, dates of birth, ID numbers, addresses, etc. data) depending on the purposes and requirements of the Contracting Parties in connection with the performance of security activities awarded under security contracts.

3. In order to ensure the proper performance of the services and the obligations arising from the signed contracts, MULTIFORCE A.S. Ltd. has the right to process any information available in public registers (including public databases and data published on the Internet) as well as information obtained from third parties on the occasion of the implementation of legal provisions concerning clients and contractors.

4. "MULTIFORCE A.S. Ltd. has the right and obligation to verify the accuracy of the personal data recorded in the provided database, for this purpose its requiring you to verify the data and, if necessary, to correct or confirm the accuracy of your data.

"MULTIFORS A.S." Ltd. processes your data for the following purposes:

- ✓ Identification of a customer when concluding a new or amending an existing contract with us, clarification of the services used, performance of a concluded contract.
- ✓ Preparation of contract proposals (offers, tender documentation, etc.), sending pre-contractual information and draft contract;
- ✓ Data obtained from you in the performance of obligations arising from contracts (employment contracts, contracts under the DPA, other contracts, etc.);
- ✓ Service and response to customer complaints/queries/complaints/complaints;
- ✓ Payment of debts, rescheduling of amounts due;
- ✓ Details obtained from you when registering for training/lectures/seminars etc.

2. In compliance with its legal obligations, MULTIFORCE A.S. Ltd. processes your data for the following purposes:

- ✓ For the provision of security services in accordance with the requirements of the PSOA;
- ✓ To issue invoices;
- ✓ To carry out tax and social security control by the relevant competent authorities;
- ✓ Obligations stipulated in the Accounting Act and the Tax and Social Security Procedural Code and other related regulations, in connection with keeping proper and lawful accounting records;
- ✓ In the event of the establishment/termination of an employment relationship;
- ✓ Legitimate interests of the company.

"MULTIFORS A.S." Ltd. processes the relevant data on the basis of:

- ✓ signed contracts;
- ✓ legal requirements;
- ✓ protection of its legitimate interests as a party to contracts;
- ✓ informed consent.

VI . Categories of third parties who access and process your personal data

- ✓ Transport/courier companies, postal operators in order to fulfil our contractual obligations, send correspondence and communications in connection with the performance of contracts;
- ✓ Persons who, on behalf of MULTIFORCE A.S. Ltd, maintain equipment and software used to process your personal data;
- ✓ Debt collection service providers, notary, solicitor, bailiff or other third party if an employee and/or customer has breached an obligation under a contract with us;
- ✓ Banks handling payments made by and to employees and customers;
- ✓ Persons to whom MULTIFORCE A.S. Ltd. has outsourced the performance of any part of the activities or obligations relating to a particular service we owe to you;
- ✓ Persons providing consultancy services in various fields - lawyers, accountants, etc.;
- ✓ Bodies, institutions and persons to whom we are obliged to provide personal data under applicable law;

VI. For how long is your personal data stored?

The duration of storage of your personal data depends on the purposes of the processing for which it was collected:

1. **The personal data processed for the purpose of conclusion/amendment and execution of contracts** signed between "MULTIFORS A.S." Ltd. and you or a company represented by you - for the duration of the contract and until the final settlement of all financial relations between the parties. "MULTIFORCE A.S." Ltd. may also store some of your personal data for a longer period until the

expiry of the relevant statute of limitations in order to protect any claims of employees and/or customers in connection with the performance / termination of contracts with us, as well as for a longer period in the event of a legal dispute that has already arisen until its final resolution by a final court / arbitration decision;

2. Personal data processed for the purpose of issuing accounting/financial documents for tax and social security control, such as, but not limited to: invoices, debit and credit notes, acceptance and transfer protocols, contracts for the provision of services/goods shall be kept for at least 11 years after the expiry of the limitation period for the repayment of the public claim, unless the applicable legislation provides for a longer period.

3. Photography and/or video - data provided by you when participating in training programs and/or issuing a distinctive badge (badge/certificate of participation in a seminar or training program), etc. - until the explicit withdrawal of consent or receipt of an objection to the processing of personal data in connection with the implementation of a training/seminar and/or in the performance of an employment contract.

VII. Your Rights in relation to the processing of your Personal Data

1.General rights

In relation to the processing of personal data, you have the following rights, which you can exercise at any time while we are storing or processing your personal data by sending an application to the address of MULTIFORS A.S. Ltd. indicated above.

You have the right to ask MULTIFORCE A.S. Ltd for:

- ✓ a copy of your personal data and access to it;
- ✓ to correct, without undue delay, your inaccurate personal data as well as data that is no longer up to date;
- ✓ your personal data in a form that is convenient for you to transfer to another data controller, or to request that we do so without hindrance on our part (right of portability);
- ✓ your personal data to be erased without undue delay if one of the legal grounds for doing so exists;
- ✓ to restrict the processing of your personal data, in which case your data will only be stored but not processed. Our refusal to restrict will only be expressly in writing, and we are obliged to justify it with the lawful reason;

You also have the right:

- ✓ to withdraw your consent to the processing of your personal data at any time by a separate request addressed to MULTIFORCE A.S. Ltd, for processing based on consent;
- ✓ to object to the processing of your personal data;
- ✓ to object to automated processing, including profiling;

2. You have the right to complain to the supervisory authority

You have the right to lodge a complaint directly with the supervisory authority, the competent authority is Commission for Personal Data Protection, with address as follow: City of Sofia, 1595, 2“Proff. Tzvetan Lazarov” Blvd. (www.cpdp.bg).

In the event you wish to lodge a complaint regarding the processing of your personal data by MULTIFORCE A.S. Ltd, you can do it at the indicated contact details of the Administrator (at the contact details above).

3. Automated decision-making

The Controller does not use your personal data for automated decision-making. In the event that we intend to use your personal data for automated decision-making, you have the right to be informed of this and to receive information about the logic of any automated processing of personal data relating to you.

4. Objection to use for direct marketing

You have the right to object to the future processing of your personal data for direct marketing and advertising purposes, as well as to their disclosure to third parties and their use on your behalf for direct marketing and advertising purposes, by withdrawing your consent at any time.

5. Can you refuse to provide personal data to MULTIFORCE A.S. Ltd. and what are the consequences of this?

In order to enter into a contract (including an employment contract) with you and/or to provide you with the requested security services, in accordance with our legal and subsequently contractual obligations, MULTIFORCE A.S. Ltd. needs certain data to identify the contracting party, its proxy, contact details, payment details.

Failure to provide such data obstacles us from concluding a contract with you.

VIII. How do we protect your data?

"MULTIFORCE A.S. Ltd. applies organizational, physical, technological and other necessary measures to ensure the security and protection of your personal data and the monitoring of the processing of personal data.

Among other things, such security measures include the following activities:

- ✓ MULTIFORCE A.S. Ltd. has established requirements for the processing, registration and storage of personal data with internal procedures, compliance with which is monitored on an ongoing basis;
- ✓ the access of employees of "MULTIFORCE A.S." Ltd. to personal data and the authorization to process personal data in the database of "MULTIFORCE A.S." Ltd. is limited, depending on their duties;
- ✓ MULTIFORCE A.S. Ltd has established confidentiality obligations for its employees;
- ✓ access to MULTIFORCE A.S. Ltd's office equipment and each employee's computers is restricted;
- ✓ we apply all necessary organizational and technical measures provided for in the Data Protection Act as well as best practices from international standards;
- ✓ In order to maximize the security of the processing, transmission and storage of your data, we may use additional protection mechanisms such as encryption, pseudonymization, etc.
- ✓ The security measures we apply are subject to constant improvement and adaptation to the latest technologies.

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Personal data about children

We do not collect personal information from children under the age of 18, except when our employees provide sick notes for their children.

Privacy Policy Amendments

We may update our Privacy Policy periodically. If this policy changes, a notice will be posted on our website, along with the updated Privacy Policy. Any amendments to the Privacy Policy will only be implemented once the updated Privacy Policy is published and available via our Website: www.multiforce.bg.

This Policy has been adopted and approved on 05.12.2024, by the Managing Director M. Peeva