

## Privacy Policy

British Bulgarian Business Association (the “**Association**” or “**BBBA**”) is committed to protecting and respecting your privacy.

This policy sets out the basis on which BBBA will process any Personal Data that we collect from you, or that you provide to us. This Policy establishes the minimum standards that are required to be adopted in order to establish and maintain an adequate level of privacy in the collection, processing, disclosure and transfer of Personal Data.

By becoming a member, partner or affiliated organisation of BBBA, or by providing us with your personal information, you are consenting to and authorising the collection and processing of your data and relevant third parties’ data as described in this privacy policy.

The **data controller** is the British Bulgarian Business Association, a non-profit association established and existing under the laws of the Republic of Bulgaria and having its seat and registered address at the Republic of Bulgaria, city of Sofia 1000, Oborishte Region 9, Moskovska Str.

### 1. Terms and Definitions

- **Personal Data** – any information relating to an identified or identifiable natural person (‘**data subject**’); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person;

- **Processing** – any operation or set of operations which is performed on Personal Data or on sets of Personal Data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction;

- **Pseudonymisation** – the processing of Personal Data in such a manner that the Personal Data can no longer be attributed to a specific data subject without the use of additional information, provided that such additional information is kept separately and is subject to technical and organisational measures to ensure that the Personal Data are not attributed to an identified or identifiable natural person;

- **Controller** – means the natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of Personal Data; where the purposes and means of such processing are determined by Union or Member State law, the controller or the specific criteria for its nomination may be provided for by Union or Member State law;

- **Third Party** – means a natural or legal person, public authority, agency or body other than the data subject, controller, processor and persons who, under the direct authority of the controller or processor, are authorised to process Personal Data;

- **Consent** – any freely given, specific, informed and unambiguous indication of the data subject's wishes by which he or she, by a statement or by a clear affirmative action, signifies agreement to the processing of Personal Data relating to him or her;
  - **Personal data breach** – a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, Personal Data transmitted, stored or otherwise processed;
  - **Data subject** – a natural person whose Personal Data is being processed;
  - **Child** – a natural person under 16 years of age.

## 2. Data Protection Principles

In handling Personal Data BBBA shall abide by the following key nine (9) principles:

- **Fair, Lawful and Transparent Processing** – BBBA ensures that your Personal Data is processed fairly and lawfully and in a transparent manner, and ensures that the legal grounds for processing of personal information as set out in Section 3 below have been clearly identified before processing commences. We will provide you information regarding Processing upon request.
- **Restricted to the Original Purpose (Purpose Limitation)** – BBBA ensures that your Personal Data is collected, processed, stored, and used only for explicit and legitimate business purposes, and not further processed in a manner that is incompatible with the purpose for which it was collected. If we wish to use your Personal Data for another purpose, then appropriate authorization must be obtained from you.
- **Limited to the Minimum Necessary (Data Minimization)** – Processing is done with minimal data. BBBA ensures that Personal Data is adequate, relevant and limited to what is necessary in relation to the intended purposes for which they are collected and processed.
- **Accurate** – BBBA ensures that your Personal Data is accurate and where necessary, kept up to date, subject to any professional or legal obligations. Every reasonable steps and measures are taken to ensure that Personal Data which may be inaccurate, having regard to the purpose for which they are processed, are erased or rectified without delay.
- **Not Retained Longer than Necessary (Storage Limitation)** – Processing is limited with a time period. BBBA will not store your Personal Data for longer than needed.
- **Kept Secure (Integrity and Confidentiality)** – Reasonable precautions are taken to secure Personal Data against accidental or unlawful destruction or loss, alteration, unauthorized disclosure or access.
- **Processed in Accordance with Your Rights** – BBBA ensures that your rights are taken into consideration and adhered to where appropriate.
- **Transfers** – BBBA ensures that transfers of your Personal Data to a third-party organization or country, which is to be processed after its transfer, can take place only if specific conditions are complied with by the Data Controller and Data Processor.
- **Demonstrate Compliance (Accountability)** – BBBA are responsible and are able to demonstrate compliance with all of the above principles and all related privacy laws.

## 3. Legal Grounds for Processing (Lawful Basis)

The collection and processing of personal information must only be permitted on one of the following six grounds (or Lawful basis) in which the lawfulness of a specific case of processing of Personal Data may be established. It is BBBA's responsibility to identify the appropriate basis for processing and to document it, in accordance with the related regulations.

1. Your unambiguous **Consent** has been given for specific purposes.
2. For the **Performance of a Contract** to which you are a party, or you are preparing to enter into a contract.
3. Necessary for the **Legitimate Interests** (i.e. business process execution, internal administrative purposes, information security) of the Association or a Third Party, except where such interests are overridden by your interests or fundamental rights and freedoms.
4. Necessary for **Compliance with a Legal Obligation** to which the Association collecting and processing the personal information is subject to.
5. Necessary for **Protecting Your Vital Interests**.
6. Necessary to perform a task carried out in the **Public Interest** or exercise of official authority of the Association.

## 4. Your Rights

You have the following rights:

- **Right to information** – meaning you have the right to know whether your Personal Data is being processed; what data is gathered, from where it is obtained and why and by whom it is processed.
- **Right to access** – meaning you have the right to access the data collected from/about you. This includes your right to request and obtain a copy of your Personal Data gathered.
- **Right to rectification** – meaning you have the right to request rectification or erasure of your Personal Data that is inaccurate or incomplete.
- **Right to erasure** – meaning in certain circumstances you can request for your Personal Data to be erased from our records.
- **Right to restrict processing** – meaning where certain conditions apply, you have the right to restrict the Processing of your Personal Data.
- **Right to object to Processing** – meaning in certain cases you have the right to object to Processing of your Personal Data, for example in the case of direct marketing.
- **Right to object to automated Processing** – meaning you have the right to object to automated Processing, including profiling; and not to be subject to a decision based solely on automated Processing. This right you can exercise whenever there is an outcome of the profiling that produces legal effects concerning or significantly affecting you.
- **Right to data portability** – you have the right to obtain your Personal Data in a machine-readable format or if it is feasible, as a direct transfer from one Processor to another.

- **Right to lodge a complaint** – in the event that we refuse your request under the Rights of Access, we will provide you with a reason as to why. If you are not satisfied with the way your request has been handled please contact us.
- **Right for the help of supervisory authority** – meaning you have the right for the help of a supervisory authority and the right for other legal remedies such as claiming damages.
- **Right to withdraw consent** – you have the right withdraw any given consent for Processing of your Personal Data.

## 5. Data we gather

- **Information you have provided us with**

By becoming a member, partner or affiliated organisation of BBBA, or by providing us with your personal information, you are consenting to and authorising the collection and processing of your data and relevant third parties' data as described in this privacy policy. This information includes, for example, full name, address and e-mail.

- **Information we collect**

BBBA also processes data when it is in our legitimate interests to do so and when these interests do not override your rights. Those legitimate interests include providing you with information about our research, services and other activities, and those of our members (see the list of our members on the following link: <http://bbba.bg/members/listing>), partners, affiliates or other organisations.

- **Information automatically collected about you**

This includes information that is automatically stored by cookies and other session tools. For example, your IP address. This information is used to improve your experience on our website. When you use our services or look at the contents of our website, your activities may be logged.

- **Information from our partners**

We gather information from our trusted partners with confirmation that they have legal grounds to share that information with us. This is either information you have provided them directly with or that they have gathered about you on other legal grounds. See the list of BBBA's partners at the bottom of the following page: <http://bbba.bg/about>.

- **Information we receive from other sources**

BBBA may receive information about you from third parties (including, for example, business contacts and search information providers or data providers).

- **Publicly available information**

BBBA might gather information about you that is publicly available.

## 6. How we use your Personal Data

We use your Personal Data in order to:

- provide our service to you;
- enhance your experience on the website;
- fulfil an obligation under law or contract;

We use your Personal Data on legitimate grounds and/or with your Consent.

On the grounds of **entering into a contract** or **fulfilling contractual obligations**, we Process your Personal Data for the following purposes:

- to identify you;
- to provide you a service or to send/offer you promotional materials;
- to communicate for invoicing;

On the ground of **legitimate interest**, we Process your Personal Data for the following purposes:

- to send you personalized offers (from us and/or our carefully selected partners);
- to administer and analyse the services offered/provided;
- to conduct questionnaires concerning member satisfaction;

As long as you have not informed us otherwise, we consider offering you materials/services that are similar or same to your history/browsing behaviour to be our legitimate interest.

With your **consent** we Process your Personal Data for the following purposes:

- to send you newsletters and campaign offers (from us and/or our carefully selected partners);
- for other purposes we have asked your consent for;

We Process your Personal Data in order to **fulfil obligation rising from law** and/or use your Personal Data for options provided by law. We reserve the right to **anonymise** Personal Data gathered and to use any such data. We will use data outside the scope of this Policy only when it is anonymised. We save your information for as long as needed for obligations deriving from law.

We might process your Personal Data for **additional purposes** that are not mentioned here, but are **compatible with the original purpose** for which the data was gathered. To do this, we will ensure that:

- the link between purposes, context and nature of Personal Data is suitable for further Processing;
- the further Processing would not harm your interests and
- there would be appropriate safeguard for Processing.

We will inform you of any further Processing and purposes.

## 7. Storing your Personal Data

We will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this privacy policy.

Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your Personal Data, we cannot guarantee the security of your data transmitted to our Website and any transmission is at your own risk. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorised access.

We hold your information only as long as necessary for the purposes set out above or, if you request not to be contacted by us, we will keep some basic information in order to avoid sending you unwanted communications in future.

The data that we collect from you may be transferred to, and stored at, a destination outside the European Union (EU) and the European Economic Area (“EEA”). It may also be processed by staff operating outside the EU/EEA who work for us. BBBA shall take all reasonably necessary measures to ensure adequate safeguards with respect to the protection of your data. By submitting your Personal Data, you agree to the data transfer, storing or processing.

## 8. Who else can access your Personal Data

BBBA do not share your Personal Data with strangers. Personal Data about you is in some cases provided to our trusted partners in order to make providing the service to you possible.

We disclose your Personal Data to third parties or public officials when we are **legally obliged** to do so. We might disclose your Personal Data to third parties if you have consented to it or if there are other legal grounds for it.

## 9. How we secure your data

We do our best to keep your Personal Data safe. We use anonymising and pseudonymising where suitable. We monitor our systems for possible vulnerabilities and attacks.

Even though we try our best we cannot guarantee the security of information. However, we promise to notify suitable authorities of data breaches. We will also notify you if there is a threat to your rights or interests. We will do everything we reasonably can to prevent security breaches and to assist authorities should any breaches occur. In line with applicable laws, where a breach is known to have occurred, which is likely to result in a risk to the rights and freedoms of individuals, the relevant authority will be informed with 72 hours.

## 10. Children

We do not intend to collect or knowingly collect information from children. We do not target children with our services.

## 11. Cookies and other technologies we use

We use **cookies** and/or similar technologies to administer the website, track users’ movements, and to collect information about users. This is done in order to personalise and enhance your experience with us.



A cookie is a tiny text file stored on your computer. Cookies store information that is used to help make sites work. Only we can access the cookies created by our website. You can control your cookies at the browser level. Choosing to disable cookies may hinder your use of certain functions.

We use cookies for the following purposes:

- **Analytics cookies** – these cookies are used to track the use and performance of our website and services
- **Advertising cookies** – these cookies are used to deliver advertisements that are relevant to you and to your interests. In addition, they are used to limit the number of times you see an advertisement. They are usually placed to the website by advertising networks with the website operator’s permission. These cookies remember that you have visited a website and this information is shared with other organisations such as advertisers. Often targeting or advertising cookies will be linked to site functionality provided by the other organisation.

You can remove cookies stored in your computer via your browser settings. Alternatively, you can control some third party cookies by using a privacy enhancement platform such as [optout.aboutads.info](http://optout.aboutads.info) or [youronlinechoices.com](http://youronlinechoices.com). For more information about cookies, visit [allaboutcookies.org](http://allaboutcookies.org).

We use **Google Analytics** to measure traffic on our website. Google has their own Privacy Policy which you can review on the following link: <https://support.google.com/analytics/answer/6004245>. If you’d like to opt out of tracking by Google Analytics, visit the Google Analytics opt-out page: <https://tools.google.com/dlpage/gaoptout>.

## 12. Other websites and organisations

This privacy policy only addresses the use and dissemination of information processed by BBBA. If you access another website through a link provided by us, different policies may apply to any personal information you provide to that organisation.

BBBA does not control the privacy policies of third parties. We are not responsible for the use or dissemination of personal information you provide to a third party.

## 13. Invalidity

If any provisions of this Privacy Policy are held to be illegal, invalid or unenforceable, then such provisions shall be severed and deleted without affecting the enforceability of the remaining provisions.

## 14. Contact Information

British Bulgarian Business Association

111 Bulgaria blvd., Building A, Floor 6

Sofia 1408

E-Mail: [office@bbba.bg](mailto:office@bbba.bg)



Telephone: +359 24952227

## 15. Changes to this Privacy Policy

We reserve the right to make change to this Privacy Policy.

Last modification was made **July 16, 2018**.