

## PERSONAL DATA PROTECTION POLICY

Revision: 24.07.2025

### 1. Purpose of the Document

The purpose of this Policy is to define the principles, rules, and procedures through which ESPA SYSTEMS ensures lawful, fair, and transparent processing of personal data in compliance with Regulation (EU) 2016/679 (General Data Protection Regulation – GDPR) and the applicable Bulgarian legislation.

### 2. Scope

This Policy applies to all personal data processing activities carried out by ESPA SYSTEMS, regardless of their form (electronic, paper-based, etc.), and to all employees, partners, suppliers, and third parties having access to personal data.

### 3. Principles of Personal Data Processing

ESPA SYSTEMS undertakes to process personal data in accordance with the following fundamental principles:

- **Lawfulness, fairness, and transparency;**
- **Purpose limitation** – data are collected only for specific, explicit, and legitimate purposes;
- **Data minimization** – only personal data necessary for the purposes are processed;
- **Accuracy and up-to-date data;**
- **Storage limitation** – data are retained no longer than necessary;
- **Integrity and confidentiality** – ensured through appropriate technical and organizational measures;
- **Accountability** – the organization is responsible for compliance with these principles.

### 4. Categories of Personal Data

The following categories of personal data may be processed:

- Identification data (names, personal identification number, ID card number, etc.);
- Contact data (address, email, telephone number);
- Data related to employment, contractual, or customer relationships;
- Data necessary for compliance with legal obligations (e.g. accounting, taxation).

### 5. Legal Grounds for Processing

Personal data are processed only when at least one of the following legal grounds applies:

- Consent of the data subject;

- Performance of a contractual obligation;
- Compliance with a legal obligation;
- Protection of vital interests;
- Performance of a task carried out in the public interest;
- Legitimate interest of the controller.

## **6. Rights of Data Subjects**

ESPA SYSTEMS guarantees the following rights to individuals:

- Right of access to personal data;
- Right to rectification;
- Right to erasure (“right to be forgotten”);
- Right to restriction of processing;
- Right to data portability;
- Right to object;
- Right to lodge a complaint with the supervisory authority (Commission for Personal Data Protection – CPDP).

## **7. Data Storage and Protection**

Personal data are stored:

- Only for the period necessary to fulfill the purposes of processing;
- By applying appropriate security measures, including access control, encryption, antivirus protection, personnel training, and others.

## **8. Disclosure of Data to Third Parties**

ESPA SYSTEMS provides personal data to third parties only where a valid legal basis exists and where an adequate level of protection is ensured.

## **9. Appointed Data Protection Officer**

Korneliya Koykova – Accountant

## **10. Amendments and Review of the Policy**

This Policy is subject to regular review (at least once per year) and shall be updated whenever necessary.

Sofia

Aleksandar Zikovski  
General Manager

