

## PRIVACY NOTICE

PRIVACY NOTICE FOR THE PROTECTION OF PERSONAL DATA ADMINISTERED BY VELIS CONSULT, LTD.

**Effective 25<sup>th</sup> May 2018**

This Privacy Notice is intended to let you know about our Privacy and Data Protection Policy regarding Personal Data we collect from or about you, or which you provide to us. The Privacy Statement applies to our website and digital services, and to all Personal data stored by electronic means or on paper.

Please read this Privacy Notice carefully to understand how and why we collect, process and use your Personal Data, to whom we may disclose your Personal Data, as well as your rights under the law regarding Personal Data.

By using our Site, or our services you certify that you have read, understood and accepted our Privacy Policy.

We may make changes to this Privacy Notice at any time to reflect changes in our legal obligations or the ways in which we process your Personal Data. If this Privacy Notice changes in any way, we will place an updated version on this webpage and all changes will be effective at the time we post them. The updated version of the Privacy Notice supersedes all prior versions. Your continued access to our site or use of any of our Services shall be deemed your acceptance of our Privacy Policy.

### Information about the data controller

Name: **VELIS CONSULT, LTD.**

UIC: 040392922

Seat and Head office: Sofia 1142, Graf Ignatiev Str. Nr.53-B, fl.1

E-mail: [office@velisco.bg](mailto:office@velisco.bg)

Contact phone: +359 2 986 68 64

Velis consult Ltd. is registered as Data Controller with ID No.0054376 in compliance with the Bulgarian law concerning Personal Data Protection valid until 25<sup>th</sup> May 2018.

This Privacy notice is based on the requirements of the General Data Protection Regulation EU2016/679 (GDPR) from 27<sup>th</sup> April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and other legal instruments concerning the protection of personal data.

You may read the full text of GDPR in all European languages [here](#).

*With regard to the processing of personal data Velis consult, Ltd. (hereinafter Velis/The Company/We) complies with the following key principles of GDPR:*

- Lawfulness, fairness and transparency
- Purpose limitation
- Data minimisation
- Data accuracy
- Storage limitation
- Integrity and confidentiality (security)

## 1. What personal data do we collect and process

Velis provides qualified services as a Consultant and Estate Agent in real estate transactions. In connection with the realization of our activity and depending on the circumstances, we process either alone or in combination the listed below and provided voluntarily by you data.

- **Contact details**, such as name, email address, telephone number and postal address.
- **Individual data**, such as name; birth date; personal identity number; number, issue date and validity of identity card.
- **Company data**, such as company name, job position, place of work
- **Correspondence data**, such as personal information provided by email, by contact forms, by post or similar means.
- **Technical data**, such as your IP address, your device ID, the browser you are using, your operating system, your global geographic location, and your language.
- **Data about the preferences or behavior** when visiting our site, such as which ads and publications you are interested in and in which language.
- **Other data**. We may also collect and process any other relevant information you share with us, for example through your interactions by email, phone or in person, such as date, time and the subject of conversation.
- **Sensitive data**. We do not collect, do not store and do not process sensitive personal data revealing racial or ethnic origin, political opinions, religion or philosophical beliefs, trade union membership, as well as data concerning health or data concerning a natural person's sex life or sexual orientation. We encourage you not to provide sensitive data in your communications with us and not to include such data in emails since email communication is not always secure.

We process the information you provide only for legitimate reasons. We do not sell or otherwise distribute your personal data.

## 2. For whom do we store and process personal data?

*Velis processes information about the following data subjects:*

- Users who made inquiries by phone call, through the contact form on our website or who have sent a correspondence to Velis by email or to the mailing address.
- Clients wishing to use our services
- Clients who concluded with Velis a contract for the provision of services related to the Company's activity.

We assume that you only provide your current personal information. Everyone declares that the data is his or hers and provides the same voluntarily.

## 3. Protecting the privacy of children

Velis provides services only to persons over the age of 14 and our website is not for use by persons under this age. We understand the importance of protecting personal data of children and we have no policy to collect or store such data intentionally for persons under the age of 14, except in the cases mention below.

When we have to conclude a deal with a property owned by a child, we will demand an explicit consent to process the personal data of the child (if the child is aged over 14 years) from its legal representatives, subject to the special provisions of the law.

## 4. For what purposes do we process your personal data?

*Velis collects stores and processes the information described above for the following purposes:*

- Conclude and perform contracts for brokerage services for the sale, purchase and rental of real estate, as well as contracts for the provision of consulting and marketing services.

- Communicate with you during the course of providing our services, for example process real estate offers, alerts, complaints, requests and enquiries.
- Implement legal obligations relating to requirements for the storage or provision of information in connection with disposal by competent state or judicial authorities.
- Comply with our statutory obligations, including verifying your identity, prevention of fraud and money laundering, and for the proof of your funds.

## 5. What are your personal data protection rights?

*We would like to make sure you are fully aware of all of your personal data protection rights. Every user has the right to the following:*

- **The right to request information** – You have the right to request from us information whether we store your personal data, including what the data is, on what basis and for what purpose we process it.
- **The right to access** - You have the right to request us to deliver you copies of your personal data stored by Velis.
- **The right to rectification** - You have the right to request that we correct any incomplete or inaccurate information we hold about you.
- **The right to erasure** - You have the right to request that that we delete or remove without undue delay all or part of your personal data if there is no reason to continue processing and storing it.
- **The right to restrict processing** – You have the right to request that we restrict the processing of your personal data, under certain conditions – when you contest the accuracy of the personal data, when the processing is unlawful, when Velis no longer needs the personal data for the purposes of the processing and when you object to processing of the data.
- **The right to object to processing** - You have the right to object at any time to the processing of your personal data under certain conditions – in case we refer to a legitimate interest (or the interests of a third party), or that the processing is necessary for the performance of a task carried out in the public interest.
- **The right to data portability** - You have the right to request from us to transfer the data that we have collected directly to you or to another person in a fit for use electronic form.
- **The right to withdraw your consent** – You have the right to withdraw at any time your consent for all or only for a part of your personal data, as well as for a specific or for all processing purposes. Once you notify us that you are withdrawing your consent, we will suspend the processing for the purpose or purposes you initially agreed to, unless there is any other reason to continue such processing.

Exercising of the above-mentioned rights does not require payment of a fee from you. However, we may charge you with an administrative fee to a reasonable amount, if your access order is obviously groundless or in case of repetition or excessiveness of the requests. Upon such circumstances, we may also reject the implementation of the order.

To exercise any of the above rights, please send a request or a free text notification to us by e-mail: [office@velisco.bg](mailto:office@velisco.bg), or contact us on the following address: Sofia 1142, Graf Ignatiev Str. Nr.53-B, fl.1, phone: +359 2 986 68 64

## 6. How Long Do We Save Your Personal Data?

We only keep your personal data as long as it is necessary to fulfil the purposes for which we collected the data. The duration depends on the type of information. We review our need to keep personal data on a regular basis, taking into account the quantity and nature of the personal data, the goals for which we process them and whether we can reach these goals by other means.

We also comply with the relevant legal requirements for the storage of certain categories of data in order to fulfill its obligations deriving from a statutory instrument or contract and to protect its legal rights in the event of a claim.

When the need of storage of your personal data does not exist anymore, we shall erase or anonymise in a safe way and without unnecessary delay your personal data.

### **7. To whom and when will we disclose or share your Personal Data**

Velis does not share or disclose your personal data to third parties without a legal or contractual basis and does not sell or distribute it. We restrict access to your Personal Data to only those employees and third parties acting on our behalf who have a legitimate business need for such access.

*We may share or disclose your Personal Data in following cases:*

- **With third parties** with whom we sign a contract to perform on our behalf services and activities related to the processing purposes of your Personal Data. We will only transfer your Personal Data to third parties acting on our behalf where we have received written assurances that your Personal Data will be protected in a manner consistent with this Privacy Notice and our privacy policies and procedures.
- **With law enforcement bodies and institutions** where this is required by law or other legal act.

### **8. Measures for ensuring the protection and security of your personal data**

We use industry-standard administrative, technical, and physical safeguards to protect your Personal Data against loss, theft, misuse, unauthorized access, modification, disclosure, and destruction.

The personal data are stored on the server of the company, where they are protected by all modern and fit for the purposes standard hardware and software means of protection – firewalls, anti-virus programs, data encrypting etc. For ensuring maximum security upon collection, processing and storage of your personal data, when necessary or appropriate, we use additional protection mechanisms as encrypting, pseudonymization and etc.

Velis is constantly trying to improve the security measures, which we have implemented and currently use in our activity and make them in conformity with the most advanced technologies.

### **9. Information about our website**

To access and use our website, you do not need to provide us with any personal information. We may collect personal information such as your name, postal and e-mail address, telephone number if you provide it voluntarily through our contact form.

In connection with our site's functionality, we may collect standard technical information about your IP address, the type of your browser and your operating system, the date and time of your visit, the content you have reviewed, and the searches you have done, by automated means such as the so-called cookies. We cannot identify you personally from this information and we will not associate any data gathered from this site with any other personally identifying information from any source.

Cookies are used by Internet sites in order to distinguish and remember users; the purpose of the cookies is not to identify you. Cookies are entirely under your control, and you can delete them at any time. The way the cookie is deleted depends on the particular browser, which is used, and its options and settings.

Our site uses cookies aiming at helping you navigate and use the site, such as helping you fill in information/access to certain items, etc.

Other types of cookies are used to collect aggregate information to improve the performance of the site. Cookies can also be used to memorize choices you make, such as the language you choose for opening our page. We use this kind of cookies to improve your user experience on the next visit to our site.

Keep in mind that you can set up your browser so you are notified when you receive cookies in order to decide whether you want to accept them or not. If you do not want to accept them, select the option "do not accept use of cookies" or opt out through your browser settings.

If you disable the use of some types of cookies, some of the functions of the site may be limited or may not function properly.

You can learn more about computer cookies [here](#).

#### **10. Complaints and questions about the use of your personal information**

In case you want to ask questions or complain about the way we process your personal data you may contact us by writing to following address: Sofia 1142, Graf Ignatiev Str. Nr.53-B, fl.1 or by E-mail: [office@velisco.bg](mailto:office@velisco.bg)

If you are not satisfied with our response, you have the right to file a complaint and to address issues related to the protection of your personal data to the supervisory authority – the Personal Data Protection Commission at the following address: Sofia 1592, Tsvetan Lazarov Blvd. No.2, E-mail: [kzld@cpdp.bg](mailto:kzld@cpdp.bg), Phone:+3592 9153580, Website: <http://www.cdpd.bg/>