

## PRIVACY POLICY

### I. GENERAL INFORMATION

This privacy policy provides you with details of how we collect and process your personal data through your use of our site **www.ips-group.net**

This privacy policy is subject to applicable legislation and mainly on General Data Protection Regulation /GDPR/. If you are an IPS customer or subscriber, or just visiting our website, this policy applies to you as provided by GDPR.

**We, International Power Supply AD /IPS/** are the data controller and we are responsible for your personal data.

#### Our contact details

**International Power Supply AD**, UIC 203574810 under the registration of the Commercial registry of the Republic of Bulgaria, with principle office 111, Obikolna Str., 1582 Sofia, Bulgaria.

Email address: **dataprotection@ips-bg.net**

#### Your responsibilities

Read this Privacy Policy.

If you are our customer or are working for our customer, please also check the contracts between us and related information: they may contain further details on how we collect and process your data.

If you provide us with personal information about other people, or if others give us your information, we will only use that information for the specific reason for which it was provided to us. By submitting the information, you confirm that you have the right to authorize us to process it on your behalf in accordance with this Privacy Policy.

By providing us with your data, you warrant to us that you are over 14 years of age.

It is important that the information we hold about you is accurate and up to date. Please let us know if at any time your personal information changes by emailing us at **dataprotection@ips-bg.net**

### II. WHAT DATA DO WE COLLECT ABOUT YOU, FOR WHAT PURPOSE AND ON WHAT LEGAL GROUND WE PROCESS IT

Personal data means any information capable of identifying an individual, and any further information related to such person. It does not include anonymised data.

We may process the following categories of personal data about you:

- **Communication Data** that includes any communication that you send to us whether that be through the Contact form or through the Distributor's form on our website, through email, text, social media messaging, social media posting or any other communication that you send us. We process this data for the **purposes of communicating with you, for record keeping and for the establishment, pursuance or defence of legal claims. Our lawful ground for this processing is our legitimate interests which in this case are to reply to communications sent to us, to keep**

records and to establish, pursue or defend legal claims.

- **Customer Data** that includes data relating to any business transactions between us such as your name, title, billing address, delivery address, email address, phone number, contact details, your position at your company, working address, payment related information. **We process this data to administer and support the business transactions between us and to keep record on them. Our lawful ground for this processing is the performance of a contract between you and us and/or taking steps at your request to enter into such a contract.**
- **User Data** that includes data about how you use our website and any online services together with any data that you post for publication on our website or through other online services. We process this data to operate our website and ensure relevant content is provided to you, to ensure the security of our website, to maintain back- ups of our website and/or databases and to enable publication and administration of our website, other online services and business. Our lawful ground for this processing is our legitimate interests which in this case are to enable us to properly administer our website and our business.
- **Technical Data** that includes data about your use of our website and online services such as your IP address, your login data, details about your browser, length of visit to pages on our website, page views and navigation paths, details about the number of times you use our website, time zone settings and other technology on the devices you use to access our website. The source of this data is from our analytics tracking system. We process this data to analyse your use of our website and other online services, to administer and protect our business and website, to deliver relevant website content and advertisements to you and to understand the effectiveness of our advertising. Our lawful ground for this processing is our legitimate interests which in this case are to enable us to properly administer our website and our business and to grow our business and to decide our marketing strategy.
- **Marketing Data** that includes data about your preferences in receiving marketing from us and our third parties and your communication preferences. We process this data to enable you to deliver you meaningful content to us, inform you on our innovations, to deliver relevant website content and advertisements to you and measure or understand the effectiveness of this advertising. Our lawful ground for this processing is our legitimate interests which in this case are to study how customers use our products/services, to develop them, to grow our business and to decide our marketing strategy.

## Sensitive Data

We do not collect any Sensitive Data about you. Sensitive data refers to data that includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health and genetic and biometric data. We do not collect any information about criminal convictions and offences.

Where we are required to collect personal data by law, or under the terms of the contract between us

and you do not provide us with that data when requested, we may not be able to perform the contract (for example, to deliver goods or services to you). If you don't provide us with the requested data, we may have to cancel a product or service you have ordered but if we do, we will notify you at the time.

We will only use your personal data for a purpose it was collected for or a reasonably compatible purpose if necessary and admissible by law.

In any case if we need to use your details for an unrelated new purpose we will let you know and explain the legal grounds for processing.

We may process your personal data without your knowledge or consent where this is required or permitted by law.

We do not carry out automated decision making or any type of automated profiling.

### **III. HOW WE COLLECT YOUR PERSONAL DATA**

We may collect data about you by you providing the data directly to us (for example by filling in forms on our site or by sending us emails). We may automatically collect certain data from you as you use our website by using cookies and similar technologies. Please check our [Cookie Policy](#) for more details about this.

We may receive data from third parties such as analytics providers such as Google based outside the EU, advertising networks such as Facebook based outside the EU, such as search information providers such as Google based outside the EU, providers of technical, payment and delivery services, such as data brokers or aggregators.

We may also receive data from publicly available sources such as Commercial Register and other public registers.

### **IV. MARKETING COMMUNICATIONS**

Our lawful ground of processing your personal data to send you marketing communications is either your consent or our legitimate interests (namely to grow our business).

Before we share your personal data with any third party for their own marketing purposes we will get your express consent.

You can ask us or third parties to stop sending you marketing messages at any time by following the opt-out links on any marketing message sent to you OR by emailing us at [dataprotection@ips-bg.net](mailto:dataprotection@ips-bg.net) OR by using other available functionalities for opt-out, as might be the case.

If you opt out of receiving marketing communications this opt-out does not apply to personal data provided as a result of other transactions, such as purchases, warranty registrations etc.

### **V. DISCLOSURE OF YOUR PERSONAL DATA**

We may have to share your personal data with the parties set out below:

- Our shareholders – for the purposes of monitoring business development of the company.
- Service providers such as IT and system administration services.
- Professional advisers including lawyers, bankers, auditors and insurers
- State bodies that require us to report processing activities.
- Third parties to whom we sell, transfer, or merge parts of our business or our assets.

We require all third parties to whom we transfer your data to respect the security of your personal data and to treat it in accordance with the law. We only allow such third parties to process your personal data for specified purposes and in accordance with our instructions.

## **VI. INTERNATIONAL TRANSFERS**

We do not transfer your personal data outside the European Economic Area (EEA).

## **VII. DATA SECURITY**

We have put in place security measures to prevent your personal data from being accidentally lost, used, altered, disclosed, or accessed without authorisation. We also allow access to your personal data only to those employees and partners who have a business need to know such data. They will only process your personal data on our instructions and they must keep it confidential.

We have procedures in place to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach if we are legally required to.

## **VIII. RETENTION OF DATA**

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

When deciding what the correct time is to keep the data for we look at its amount, nature and sensitivity, potential risk of harm from unauthorised use or disclosure, the processing purposes, if these can be achieved by other means and legal requirements.

For tax purposes the Bulgarian law requires us to keep basic information about our customers (including Contact, Identity, Financial and Transaction Data) for six years after they stop being customers and sometimes more.

In some circumstances we may anonymise your personal data for research or statistical purposes in which case we may use this information indefinitely without further policy to you.

## **IX. YOUR LEGAL RIGHTS**

As a data subject, you may, as per the respective provisions of GDPR:

- request access to your personal data, Article 15 GDPR;
- request the rectification of incorrect personal data, Article 16 GDPR;
- request the erasure of your personal data, Article 17 GDPR;
- request the restriction of the processing of your personal data, Article 18 GDPR;
- exercise your right to data portability, Article 20 GDPR;
- object the processing of your personal data, Article 21 GDPR.

The aforementioned rights may be asserted against us, e.g. by providing notice to us via the contact details specified on the first page of this policy.

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive or refuse to comply with your request in these circumstances.

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you.

If you are not happy with any aspect of how we collect and use your data, you have the right to lodge a complaint to the Commission for personal data protection, the Bulgarian supervisory authority for data protection issues /[www.cpdp.bg/](http://www.cpdp.bg/). We shall appreciate if you would contact us first if you do have a complaint so that we can try to resolve it for you.

## **X. THIRD-PARTY LINKS**

This website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy policy of every website you visit.

## **XI. COOKIES**

You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of this website may

become inaccessible or not function properly. For more information about the cookies we use, please see [Cookie Policy](#).