

## Privacy policy for website - <https://workhub.bg>

### Section One - Definitions

The following definitions are meant to give a better understanding of the terms we use in the Privacy Policy below.

When used “we”, “us”, “ours” we are referring to the company Bernard Investments Ltd. or the website <https://workhub.bg>. In some cases upon providing our Services we may collect and use Personal Information.

“**Website**” means <https://workhub.bg> Operator of the Website is Bernard Investments Ltd, registered in Bulgarian Commercial Registry under UIC 201509073.

“**Personal Information**” means any information that identifies or can be used to identify a person, directly or indirectly, including, but not limited to, first and last name, e-mail address, phone number, gender, occupation or other demographic information.

We do not collect information for children. We do not collect sensitive personal data about you. This includes details of race or ethnicity, religious or philosophical beliefs, sexual orientation, political opinions, trade union membership, information about your health, and genetic and biometric data. We also do not collect information about criminal convictions or crimes committed.

“**Website Visitor or Website User**” - every person who loads our website in its browser or visits different sections or pages of the website. In this case:

- ✓ Type of data that may be processed: cookies stored in the User’s browser; City or country location based on the IP address of the device, which is part of the data that each website receives; Statistical data on the users’ interactions on the website; Data on the browser or device used to browse the website.
- ✓ Purpose of use: Providing basic and support functions for the proper and efficient functioning of the Website; Statistical reports on how and when the website is used; Providing necessary conditions for using the services of third-party marketing platforms.
- ✓ Storage period: Until the expiration of each cookie carrying the corresponding information (from one browsing session to up to a year) or until the user deletes the cookie directly from its browser and/or device.
- ✓ Legal reason: Giving consent to the cookie consent form.

“**E-mail Subscriber**” - each person who has contacted us by the Contact form or has consented to receive marketing emails from us.

- ✓ Type of data that may be processed: Names, E-mail address, Phone number.
- ✓ Purpose of use: Serving required information for our Services or serving marketing emails for which the person has given consent.
- ✓ Storage period: Up to one month after an unsubscription has occurred.
- ✓ Legal reason: Consent for receiving an e-mail with information required or emails for marketing purposes.

We offer and promote our Services through our website. This Privacy Policy applies to this specific website, as well as any other sites owned or operated by us. While providing the Services, and as described in more detail below, we may collect Personal Information about our Users and Subscribers. We collect such Personal Information for the purposes of conducting our normal business operations.

### Section two – Information we collect. Purpose for use

- ✓ Information you voluntarily provide to us: When you send us an e-mail or a message or contact us in any other way, you are voluntarily giving us information, some of which is collected. That information may include either your name, e-mail address, phone number, etc.
- ✓ The statistical information we collect automatically: When you browse our Website, we may collect information about your visit and the way you browsed our Website. That information may include your operating system, your browser ID, your browsing activity, and other information about how you interacted with our Website. The above information is gathered as statistical data and is anonymous.
- ✓ Information we store as a contact list: When you communicate with us via the contact forms on our website or subscribe to a newsletter/marketing emails, we will store Personal Information as a record of our communication. This information may include name, e-mail, phone number. The above information is gathered when explicit consent is given within the corresponding forms.

- ✓ Cookies and tracking: We may use various technologies to collect and store information when you use our Website, administer the website, track users' movements around the website, serve targeted advertisements, and gather demographic information about our user base. Users can control the use of cookies at the individual browser level.

For what purpose do we process your personal data?

Your personal data is protected by law.

We only have the right to process your personal data if we have a legal basis to do so and the processing is for a legitimate purpose. The purposes set out in this policy are:

- ✓ Purposes necessary for the use of our Services. This includes our use of the data that our clients, users, and subscribers provide us to communicate with them efficiently. This also includes, for example, aggregating information from your previous communication with us and the use of the Service or Website. This might also include sharing your information or the information you provide us with third-party. Our third-party service providers fully comply with the GDPR directives.
- ✓ Purposes for which you have given your explicit consent.
- ✓ Purposes necessary for the performance of our legal obligations.

Who do we share your personal data with?

Occasionally, in order to provide the Services you have requested from us, we may share your personal information with external service providers. We may share your contact information with our affiliated companies, including for each affiliates' marketing purposes if you have consented.

We require all service providers with whom we share your data to respect the security of your personal data and to treat it in accordance with the law. We do not allow any of our service providers to use your personal data for their own purposes and only allow them to process your personal data for certain purposes and in accordance with our instructions. In addition, we restrict access to your personal data to those employees, external service providers and other third parties who have a legitimate right to access it. They will only process your personal data on our instructions and they are subject to a confidentiality obligation.

### **Section three – User's and Subscriber's rights**

If we collected or stored your Personal Information, you have the following rights you can exercise by contacting us at [info@workhub.bg](mailto:info@workhub.bg)

The right of access – you may ask us what Personal Information we have on you and if we do, to access that information.

- ✓ The right to rectification – If you find your Personal Information to be incorrect or incomplete, you may request it to be changed accordingly.
- ✓ The right to erasure – (right to be forgotten): Under special circumstances (such as your Personal Information being misused or you have withdrawn your consent for its use or storage and there is no further reason for using that data) you may contact us to erase that Personal Information.
- ✓ The right to restrict processing – Under special circumstances where you have doubts about the correctness of your Personal Information or you disagree with the legitimate use of your information you may request from us to not use that information until a solution is found.
- ✓ The right to object – If you have doubts about the legitimate purpose for using your Personal Information, you may object against such use, presenting the arguments for your suspicions.
- ✓ The right to data portability – If your Personal Information is collected with your consent via automated methods, you may ask us to send you your data in a machine-readable format in order to transfer them to another data controller.

### **Section four – Third Parties**

We may disclose Personal Information to the following third parties for the purposes described in this policy:

- Service Providers. Sometimes, we share your information with our third-party Service Providers, who help us provide and support our Services. We work with third-parties that fully comply with the GDPR directives.

### **Section five - Notice of Breach of Security**

In case of a security breach affecting your data then we will notify you personally or release a general statement with details. Later we will also release a report on the actions we took.

### **Section six - Safeguarding Your Information**

We take reasonable measures to protect Personal Information from loss, misuse and unauthorized access taking into account the risks involved in the processing of Personal Information.

### **Section seven – Cookies**

A cookie is a small piece of data (text file) that a website, when visited by a user, asks your browser to store on your device in order to remember information about you, such as your language preferences or login information as an example. Those cookies are set by us and called first party cookies. We also use third party cookies, these cookies are from a domain different than the domain of the website you are visiting, used to understand usage, improving site features or personalised advertising as an example.

More specifically, we use cookies and other tracking technologies for the following purposes:

- Assisting you in navigation and ensuring your requirements go to the correct team globally
- Assisting you in finding and selecting products or services of interest
- Analysing your use of our products, services or applications
- Assisting with our promotional and marketing efforts

We use the following types of cookies on our Website:

- **Strictly Necessary Cookies** - These are essential to enable you to use the key features of the Website. Without these cookies we will not be able to connect you to the services you are looking for. These cookies cannot be switched off.

The remainder of the cookies below are optional, and we require your consent before placing them. The following are not strictly necessary for the operation of this website, but are needed to provide you with the best user experience.

- **Performance Cookies** - These cookies allow us to count visits and traffic sources, so we can measure and improve the performance of our Website. They help us know which pages are the most and least popular and see how visitors use our product for future improvements. If you do not allow these cookies, we will not know when you have visited our site, also reducing the information available to improve our website in the future.

- **Functional Cookies** - These allow us to remember choices you have made, such as previous searches to provide you a more enhanced, efficient and personal service. The information these cookies collect relates to our website only. Contact Form is a tool allowing you to send inquiries and questions to our email via the website. We use it to allow potential customers to get in touch with us and describe the type of service they need.

### **Section eight – Access to information. Contact with us**

You have the right to individual access to Personal Information we might have collected from you. We can provide that information upon your e-mail request. You can request to access, correct, amend or delete the information we hold about you by writing to us at below described e-mail. Unless it is prohibited by law, upon request from you, we will remove any Personal Information we might have collected from you.

If you have questions or if you want to delete or change any Personal Information we hold, or you have a concern about how we have handled any privacy matter, please use our e-mail [info@workhub.bg](mailto:info@workhub.bg) to send us a message.

You also have the right to complain to the Bulgarian Commission for Personal Data Protection, e-mail address: [kzld@cpdp.bg](mailto:kzld@cpdp.bg), website: <https://www.cdpd.bg/>.