

## **Privacy Policy Vertigo Services OOD.**

### **Who we are**

Vertigo Services Ltd. is a personal data controller and its main activity is the management and maintenance of Vertigo Business Center, 109, Bulgaria Blvd.

### **Contact with Vertigo Services OOD:**

109, Bulgaria Blvd., Sofia, Bulgaria

**Telephone: +359 2 850 84 80**

**Email:** [v.peshevska@vertigo.bg](mailto:v.peshevska@vertigo.bg)

**Web:** <http://vertigo.bg>

### **Contact with the data protection coordinator**

You can contact directly the data protection coordinator – Ms. Victoria Peshevska here:

**Telephone: +359 2 850 84 80**

**Email:** [v.peshevska@vertigo.bg](mailto:v.peshevska@vertigo.bg)

### **Main target when processing personal data**

Vertigo Services OOD processes your personal data so as to render good and various quality services where main target is customer satisfaction. In this regard we constantly aim at rendering maximum security of the personal data submitted where we apply all necessary appropriate technical and organizational means. The present Statement being part of the elaborated Personal Data Protection Policy of Vertigo Services OOD aims at clarifying why and how we process your personal data.

### **Why and how we use your personal data**

#### **1. For the purpose of performing the contract or at the phase of the pre-contractual relationships**

Vertigo Services OOD processes your identification data and other personal data so as to be able to render the services you applied for as well as to perform our contractual obligations and make use of the rights under the contracts concluded with you.

##### **1.1. Data processing is being performed for the purpose of:**

- Establishing the identity of the client;
- Preparing a proposal for concluding a contract;
- Managing and fulfilling your orders and performing the concluded contracts for services;
- Preparing and addressing receipts/invoices for our services you use;
- ensuring the entire customer service your need as well as for collecting technical and other information in order to maintain the services rendered
- using courier services with pre-contractual information and draft contracts;
- servicing a deal refusal;
- information about the amounts due for the services used;
- notification of anything related to our services you use, addressing diverse notifications, notices about problems, errors or for response to applications, complaints, proposals submitted by you;
- ascertaining and/or preventing unlawful actions or actions contradicting the requirements for the respective services;

Contact to the personal data controller:

Web: <http://vertigo.bg/>

E-mail:  
[v.peshevska@vertigo.bg](mailto:v.peshevska@vertigo.bg)

Telephone: +359 2 850 84 80

- processing the data from your receipts/invoices for purposes in line with the original purpose for their collection and preparing conclusions and analyses of the effectiveness of our services.

## **1.2. Which data we process:**

Usual data categories – full name, address, telephone and email address.

## **1.3.Storage term:**

The total term for storing the personal data collected upon concluding and performing the contract is 6 years as of the date of terminating the legal relationship.

## **1.4. Transmitting data to third parties:**

We do not transfer personal data abroad. The data transferring to third parties is carried out only within the performance of the contracts and on the basis of our legal obligations. That data is transferred to our external bookkeeping, the National Revenue Agency, banks, insurance companies, suppliers of services where all processing principles are being observed.

## **2. For the purpose of performing the video surveillance in the Vertigo Business Center**

### **2.1. Data Processing is performed for the following purposes:**

- Vertigo Services OOD uses their video surveillance system for reason of security, safety and access control. The video surveillance system enhances the control of the access to the building and enhances the safety of the personnel, visitors and other persons in the building. It also helps hinder, prevent and if necessary –investigate incidents related to the safety, including in cases of unauthorized access, theft, etc.

### **2.2. Limitation of Purposes:**

The video surveillance system is not used for any other purposes beyond the above mentioned, e.g. it is not used to observe the work of the employees in the building or their presence. The system does not foresee extraordinary or secret surveillance; all cameras are placed in plain sight, marked with the respective sticker. The video surveillance system is entirely in line with the principle of inviolability of private life of the subjects.

### **2.3. Special data categories:**

The video surveillance system of Vertigo Services does not aim at collecting data of sensitive categories, e.g. information about race or ethnic origin, political views, membership in professional organizations, information about health status or sexual orientation.

### **2.4. Conformity of the video surveillance with the law:**

When performing the contracts for management of the building concluded with our clients we have undertaken to ensure the security and safety of the people in the building, the employees of our clients and visitors. We perform video surveillance in fulfillment of our contractual obligation towards you as well as on the grounds of our legitimate interest in preserving our ownership and safety (art. 6, para 1, item b) and art. 6, para 1, item f of the Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016

### **2.5. Term of storage of the video surveillance data**

On the grounds of the Private Security Business Act the video records are stored for a 30-day term, except for the cases when the respective law enforcement bodies order that the records be stored for a longer term for the purposes of a initiated investigation.

Contact to the personal data controller:		
Web: <a href="http://vertigo.bg/">http://vertigo.bg/</a>	E-mail: v.peshevska@vertigo.bg	Telephone: +359 2 850 84 80

## 2.6 How We Protect Your Personal Data

For the purpose of adequate protection of the data of the company and their clients, we offer all necessary organizational and technical measures as foreseen in GDPR as well as the best practices of the international standards.

The company has appointed a Data Protection Coordinator as well as organization for preventing abuses and security breaches which enhance the processes of ensuring and maintaining the security of your data.

## 2.7. We transfer data from the video surveillance records to the following categories of recipients (personal data controllers):

- Competent authorities which by virtue of a regulation have the legal rights to require the provision of information, including personal data: e.g. courts, the state prosecution office, diverse regulatory bodies - Commission for Consumer Protection, Communications Regulation Commission, Personal Data Protection Commission, Labour Inspectorate, Ministry of Interior and bodies with rights to protect the national security and public order;

## Your rights in connection with processing your personal data

### **Right to information:**

You have the right to require:

- Information as to whether data related to you is being processed, about the purposes of that processing, about the data categories and the recipients, to which the data is being disclosed
- Message in an understandable form containing your personal data which are being processed as well as any available information about their source;
- Information about the logics of each automated personal data processing concerning you, at least in the cases of automated decisions.

### **Right to rectification:**

In case we process incomplete or incorrect data you are entitled any time to request:

- To erase, rectify or block your personal data, the processing of which does not comply with the requirements of the law;
- To inform the third parties to which your personal data had been disclosed, about any erasure, rectification or blocking, except for the cases where that is impossible

### **Right to objection:**

Any time you have the right to:

- Object to the processing of your personal data where legal grounds for that exist. When the objection is reasonable the personal data of the respective natural person can no longer be processed;
- Object to the processing of your personal data for the purposes of direct marketing.

### **Right to restrict the processing:**

You can request restriction of the processing of the personal data if:

- You object to the correctness of the data for the period of time during which data correctness has to be verified;
- The data processing is not legally grounded but instead of erasure you request their restricted processing;
- We no longer need that data (for a specific reason) but you need them for ascertaining, exercising and protecting legal claims.

Contact to the personal data controller:

Web: <http://vertigo.bg/>

E-mail:  
[v.peshevska@vertigo.bg](mailto:v.peshevska@vertigo.bg)

Telephone: +359 2 850 84 80

- You have submitted an objection to the data processing and are waiting for a check as to whether the grounds of the controller are legal.

**Right to data portability:**

You can request us to provide your personal data you have entrusted us with to take care of in an organized, structured commonly acceptable electronic form if:

- We process the data according to a contract and based on the consent declaration or on a contractual obligation;
- The processing is being performed automatically

**Right to complain:**

If you think that we breach the applicable legal regulations you can contact us to clarify the issue. You have the right to lodge a complaint before the Personal Data Protection Commission at 1592 Sofia, 2 Prof. Tsvetan Lazarov Blvd. ([www.cpdp.bg](http://www.cpdp.bg)).

We shall respond to your request within a 14-day term as of its submission. When a longer term is objectively necessary – considering the collection of the entire requested data and this significantly impedes our activity, this term can be prolonged up to 30 days. By our decision we grant or refuse access and/or the information requested by the claimant, but always accompanied by a motivated answer.

**How I can access my data which are being processed**

It is necessary to fill in an application for access in free form and to address it to the given contacts of Vertigo Services OOD or directly to the Data Protection Coordinator.

To prove your identity it is necessary to provide full name and the company/organization you represent or where you work.

**How the personal data subject can gain access to the records of the performed video surveillance:**

The subject has the right to an access to the video record where their personal data are present (where they are recorded) but if doing so personal data of a third party can be disclosed, the controller is obliged to provide to the respective natural person only the part thereof concerning only that natural person. For this purpose the controller must undertake the respective technical measures to erase/mask the images of other persons – object of the video surveillance. When no such technical opportunity is available, access to the video records can be granted only with the consent of all persons – subject to the video surveillance or with an explicit police and/or court order.

**Current validity and amendments to the personal data protection policy.**

We recommend that you get acquainted with our Personal Data Protection Policy as published on <http://vertigo.bg/>. For the purpose of providing the most current protection measures and compliance with the applicable law, we will be regularly updating our Personal Data Protection Policy where you will be constantly informed about how we take care of the protection of your personal data which we are processing.

Contact to the personal data controller:		
Web: <a href="http://vertigo.bg/">http://vertigo.bg/</a>	E-mail: <a href="mailto:v.peshevska@vertigo.bg">v.peshevska@vertigo.bg</a>	Telephone: +359 2 850 84 80