

APPROVED:

ENGINEER VLADIMIR SPASOV

/PROCURATOR/

DECLARATION OF CONFIDENTIALITY

For „M+S Hydraulic” PLC. the personal information protection is of great importance for the company which, in its capacity of personal data administrator and processing personal data of another administrator, puts a lot of effort in providing this protection.

Information about the Administrator/personal data Processor:

„M+S Hydraulic” PLC. is a company with main activity production, repair and trade with hydraulic articles and systems.

Contact details of „M+S Hydraulic“ PLC.:

Location: Country: Republic of Bulgaria

Address: 6100, district of Stara Zagora, municipality of Kazanlak, town of Kazanlak, 68 *Kozloduy* street

Phone: +359 431 65167; +359 431 64271

Fax: +359 431 64114

E-mail: msh@ms-hydraulic.com

Web page: www.ms-hydraulic.com

Contact detail of the Person responsible for the personal data protection:

Hristina Teneva Bozhkova is nominated by the Administrator as a Person responsible for the personal data protection and she is to combine this position with her other position of Technical Organizer at Quality Department and Environment. Duties:

- Develops and implements the requirements of the General Data Protection Regulation (EU) 2016/679 ("GDPR").
- Is directly responsible to guarantee that in general the Administrator, as well as the activity of every member of the governing body and the activity of the officials processing personal data under the guidance of the Administrator, meet the requirements of Regulation (EU) 2016/679;
- Is responsible for managing the security and risk with regard to the compliance with the Personal data protection policy at “M+S Hydraulic” PLC. and the Internal rules for the technical and organizational measures for personal data protection at “M+S Hydraulic” PLC.;
- Is responsible before the Administrator for all other matters, related to personal data processing.

You can directly contact our Person responsible for the personal data protection on:

E-mail: hbojkova@ms-hydraulic.com

Phone: +359 431 60443

Address: 6100 Kazanlak, 68 *Kozloduy* street

Categories of data subjects

In the course of their business activity, the Administrator/ Personal data processor interacts with the following categories of data subjects:

1. shareholders;
2. job applicants;
3. staff /physical persons employed under employment or civil relation/;
4. persons representing the companies with which the Administrator has business relations, or contact persons in the companies with which the Administrator has business relations;
5. visitors;
6. people on holiday at the holiday homes of the company.

Categories of personal data

According to the needs of their activity, the Administrator/Personal data processor collects and processes the following categories of personal data:

Basic identification information and contact information

Name, address, e-mail and/or phone number, gender, family status, date and place of birth, pictures;

Identification numbers, issued by public authorities or agencies

Uniform Civil Number (UCN), personal number of foreigner (PNF), identification document number, military record number or driving license or other license number;

Information about education and employment

Type of education, qualifications, information about certain activities such as information about their experience history in a given profession, information about employment, skills and experience;

Medical condition and health status

Current or previous physical or mental medical condition, health status, information about injuries or disability, carried out medical manipulations, personal habits (such as smoking or consuming alcohol), as well as medical history.

Other sensitive information

In certain cases we might process sensitive information about membership in trade-unions. Also, we might come to obtain sensitive information which has been voluntarily provided to us, or the person has provided it to medical, healing and health institutions (for instance at expressing preferences regarding medical treatments based on religious beliefs).

Video surveillance (CCTV)

On the territory of the company, a twenty-four-hour video surveillance is carried out using technical means – video cameras and video camera recorders without sound. Through these means, the legal interests of the administrator are carried out, exercising control over the access to the company with regard to the safety and the employees' life and health protection, a work process control is carried out.

The physical persons /employees and outside visitors/ are informed about the video surveillance carried out via information boards, put in a visible place and containing information identifying the personal data administrator, including their contact information. The cameras are positioned at the entrance and exit points of the gates, as well as in part of the production premises.

The video records obtained are destroyed within 30 days after being made, except in the cases when they contain data about a breach or an offense carried out. The Administrator shall not allow the use any modes of video recording, recording and others, infringing the ethical rules and offending the human dignity /such as in changing rooms, rest rooms or sanitary rooms/. No video surveillance is carried out beyond the territory of the "M+S Hydraulic" PLC. sites. The CCTV system is not to be used for any other purposes, neither as investigation means (except in the cases of investigating incidents with the physical security such as thefts or unauthorized access). Only in exceptional cases, could the pictures be submitted to investigating bodies with relation to official disciplinary or criminal investigations. In case it is necessary to store pictures or proofs concerning a security incident, the same can be kept until the need for that has ceased to exist.

We hereby declare that the personal data we collect will only be used for the following purposes:

- 1. shareholders:** for all activities related to exercising the rights of ownership of the shareholders over a part of the company's capital;
- 2. job applicants:** carrying out a selection of job applicants; carrying out an estimation for presence / absence of conflict of interests; for realizing and protecting the legal interests of "M+S Hydraulic" PLC.;
- 3. staff:** human resources management; carrying out and administering all activities related to initiation, alteration and termination of employment/civil relations – including for drawing up any documents in that relation (contracts, supplemental agreements, documents to certify length of employment, issuing certificates, references, letters of certification and others); administering and certifying service and employment records; in relation to pension, health and social-security activity; to assess the work capacity of an employee/worker; to carry out a selection of job applicants and staff; for financial and accounting activity; for accounting reporting concerning the remunerations /fees/ and other payments or deductions of employees/workers under employment and civil relations; organizing business trips, other trips and trainings; carrying out statutory obligations and reporting to public and other competent authorities, institutions, organizations, departments and other authorities; administering compensations, sick leaves, leaves and others; to establish contact via phone/email, to send correspondence regarding the performance of their obligations under employment and civil contracts; to assess the presence/absence of conflict of interests; to realize and protect the legal interests of "M+S Hydraulic" PLC.; "M+S Hydraulic" PLC. hereby guarantees that the information they collect and use is indispensable for these purposes and does not aim to invade your personal space.
- 4. contractors:** drawing-up offers, contracts, invoices /pro-forma invoices, as well as any other documents which become necessary as a result of the arising, existence or termination of legal relations with "M+S Hydraulic" PLC., including for performing and realizing the rights and obligations under these, including the cases of appearance of debts; carrying out trade activity; implementing European programs and projects, carrying out financial and accounting activity; fulfilling and protecting the statutory interests of "M+S Hydraulic" PLC.; carrying out statutory obligations and reporting to public and other competent authorities, institutions, organizations, departments and other authorities; establishing contact and correspondence;
- 5. video surveillance:** On the territory of the company, a twenty-four-hour video surveillance is carried out using technical means – video cameras and video camera recorders without sound. Through these means, the legal interests of the administrator are carried out, exercising control over the access to the company with regard to the safety and the employees' life and health protection, a work process control is carried out. The physical persons /employees and outside visitors/ are informed about the video surveillance carried out via information boards, put in a visible place and containing information identifying the personal data administrator, including their contact information.

The Administrator is not allowed to use any modes of video recording, recording and others, infringing the ethical rules and offending the human dignity /such as in changing rooms, rest rooms or sanitary rooms/.

The reason which gives us the right to process your data is:

The processing of your data is necessary for the implementation of a contract with you or our intention to conclude a contract; the processing is necessary for fulfilling the statutory obligations arising for "M+S Hydraulic" PLC. (for instance under the Accounting Act for keeping accounting documentation, under the Labour Code for administering the employment relations, the Social Security Code, the tax legislation, the Tax-Insurance Procedure Code, the Value Added Tax Act and others), as well as to protect the company's legitimate interests.

The following organizations/persons will receive your personal data:

Recipients of your data could be public authorities to which we provide it with regard to specific and clear statutory obligations. Your personal data can be provided to banks, Occupational

Medicine Services, lawyers, security company, insurers, Private law enforcement officers/Public law enforcement officers with the purpose of implementing or drawing up contracts, insurances and other documents related to them, as well as collection of receivables in case of occurrence of indebtedness towards “M+S Hydraulic” PLC..

All recipients of your data are obliged to keep your data safely and to use it only for performing the obligations they have undertaken before us. Once they no longer need your data, in order to perform these obligations, they will be provided with detailed instructions regarding its destruction in compliance with the procedures established by “M+S Hydraulic” PLC..

„Cookies“

“M+S Hydraulic” PLC. use on their website the so called “cookies”.

The "cookies" are small text files which are saved in the computer or the mobile device of a user when a certain site is visited. They give the site the possibility to remember a user's actions and preferences (such as user name, language, font size and other settings to show) for a certain period of time. A number of our pages use "cookies" to remember: user's settings to show and language, a message about whether a certain user has been asked to subscribe for news in order that they are not asked again; a notification about the acceptance or the non-acceptance of the use of cookies on this site.

The acceptance of “cookies” is not absolutely necessary in order for the website to function, but it will contribute to its more correct and adequate use.

The information, related to the “cookies” is not used to find out your personality, and the data samples are under our full control. The “cookies” are not used to any other purpose, different from the ones indicated here.

Period of data storage: “M+S Hydraulic” PLC. is to store your personal data for no longer than the term stipulated by the legal relation, in the contract or the term of validity of the offer/pro-forma invoice; in case of indebtedness – until the final collection of all receivables in favour of “M+S Hydraulic” PLC.; until the procedure for job applicant selection is over; the video cameras recordings are kept for 30 days or until they are no longer needed in cases of incidents with the physical security (theft, disciplinary or criminal investigation).

Nevertheless, the data is to be kept until the respective legally determined terms have expired, in case such terms exist, and the data is to be stored in the ways as described in detail in the approved Instruction for the record-keeping at “M+S Hydraulic” PLC., in the Personal data protection policy, adopted by “M+S Hydraulic” PLC., and the internal rules for technical and organizational measures for personal data protection at “M+S Hydraulic” PLC., as well as the signed procedures which you can make yourself familiar with after visiting “M+S Hydraulic” PLC. or, alternatively, online on the website of “M+S Hydraulic” PLC..

How are you going to store and keep my personal data that you collect?

“M+S Hydraulic” PLC. is to process (collect, store and use) the information provided by you, in a way compatible with the requirements of the General Data Protection Regulation (GDPR). We will try to maintain the information accurate and up-to-date. We are not going to keep the information about you for longer than the reasonably necessary period for the fulfillment of the specific goals for which the information has been collected and about which you have been herein informed.

Some of the terms of storing information depend on statutory obligations for keeping documents and information within certain minimum terms.

We are going to take any appropriate technical and organizational measures in order to provide protection of your personal data against any unauthorized access (the data is stored in specialized premises guarded with active SOT security; the access to the production and administrative departments of “M+S Hydraulic” PLC. is limited – a system for controlled access has been established; any extraneous people are admitted only after they have been identified; there is an active video surveillance system on the territory of “M+S Hydraulic” PLC. ; the electronic data is stored in specialized software programs and access to them is only given to the respective responsible persons, for whom there have been created separate accounts with separate user name and password only familiar to the respective responsible person; a frequent change of

access passwords has been introduced in order to achieve a higher data protection level; different levels of data access have been established; specialized software products are used in relation to GDPR with high protection level – access is allowed only to certain persons with separate accounts protected with separate passwords; the electronic registers are stored on a high protection level server; there are approved various procedures guaranteeing the safety at processing, storing and destroying of data; installed antivirus software is available, as well as protective walls on all computer devices; in case the software programs containing data are not active, the access to them is automatically deactivated; any employee working with a computer device is to enter a user name and a password in order to be able to use it; the data on paper is stored in a locked cupboard and only the respective responsible person has access to it; With regard to the security of the information in the software product, which is used by the financial/accounting department, there have been implemented the following protections: the entry into the system is provided via a user name and a password; each user is associated to certain role(s) which determines to what data they are to have access to and what operations they can perform with the system. The server is locked in a separate room; the database is archived on a weekly basis and the archive is kept on a separate disk on the server. The servers of “M+S Hydraulic” PLC. are two and are to be found in specially adapted and air-conditioned rooms with limited access.

You have the following rights as a personal data subject: in any moment while we keep or process your personal data, you have the following rights:

- you have the right to request a copy of your personal data from “M+S Hydraulic” PLC. and the right to access your personal data in any moment;
- you have the right to request your personal data from “M+S Hydraulic” PLC. in a form suitable for transfer to another personal data administrator, or to request that we do so without any hindrances on our part;
- you have the right to request from “M+S Hydraulic” PLC. to correct, without unnecessary delay, any inaccuracy in your personal data, as well as any data that is no longer up-to-date;
- you have the right to request from “M+S Hydraulic” PLC. to delete your personal data without unnecessary delay in case any of the following reasons is present:
 1. your personal data is no longer needed for the purposes it has been collected for;
 2. in case you have withdrawn your consent;
 3. in case you have objected to the processing;
 4. in case the processing is unlawful;
 5. in case your personal data has to be deleted for the purpose of keeping a statutory obligation under the jurisdiction of the EU or the jurisdiction of another member state, which applies to us as personal data administrator;
 6. in case your personal data has been collected in relation to offering service to the information society.

We can refuse to delete your personal data for the following reasons:

1. in exercising the right to freedom of expression and the right to information;
 2. to keep a statutory obligation on our part or to accomplish a task of public interest;
 3. to establish, exercise or protect legal claims.
- You have the right to request from “M+S Hydraulic” PLC. to restrict your personal data processing and in this case your data will only be stored and not processed. Our refusal to do so will be explicitly only in writing and we are to provide a motivation as of its lawful reason;
 - You have the right to withdraw your consent to processing your personal data at any time through a separate request addressed to the administrator;
 - You have the right to object to certain types of processing, such as direct marketing (not requested advertising messages);

- You have the right to object to automated processing, including profiling;
- You have the right to not be a subject of decision based solely on automated processing, including profiling;
- You have the right to file a complaint straight with the supervisory body - the Commission for Personal Data Protection, address: city of Sofia 1592, 2 Prof. Tsvetan Lazarov blvd. (www.cpdp.bg)

In case you want to file a complaint concerning your personal data processing through “M+S Hydraulic” PLC., you can do so to the above mentioned contact information of “M+S Hydraulic” PLC. or directly to the Person responsible for data protection.

Can I find out what personal data of mine do you dispose of and process?

An Internal procedure has been introduced at M+S Hydraulic” PLC. for exercising the right of data subjects to identify and access personal information.

Upon your request, M+S Hydraulic” PLC. is obliged to provide you an answer concerning what information we have been storing about you and how it has been processed.

You need to address your request to the above provided contact information of M+S Hydraulic” PLC., or directly to the above provided contact information of the Person responsible for data protection. In order to prove your identity you need to present an identity document.

In case that we have your personal data, you are entitled to request the following information:

- What are the purposes of the processing;
- What personal data categories are being processed;
- The recipients to whom the personal data is disclosed;
- The expected period of time for storing the personal data;
- The existence of the right to request from the administrator to correct or delete personal data, as well as to restrict its processing, and also to object to such processing;
- The right to file a complaint with a supervisory body;
- When personal data is not collected from the data subject, any available information about its source;
- The existence of automated decision-making, including profiling, and at least in these cases significant information about the logics used, as well as the meaning and the expected consequences from such processing for the data subject.

How can I practically exercise my rights of a subject of data which is being processed?

You need to address a request to the above provided contact information of M+S Hydraulic” PLC., or directly to the above provided contact information of the Person responsible for data protection. In order to prove your identity you need to present an identity document.

This Declaration of confidentiality has been ratified by the procurator and is to take effect on 25.05.2018 r.