

PRIVACY POLICY OF THE WEBSITE www.arkana.bg, UNDER THE MAINTENANCE
AND ADMINISTRATION OF “SEEWINES SPIRIT” JSC

Approved on 15.12.2022

By Dilyana Vasileva – Executive Director of “Seewines Spirit” Jsc.

I. GENERAL

Since 25th May 2018, Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 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 repealing Directive 95/46/EC (General Data Protection Regulation) is in effect, referred to as “**the Regulation**” for brevity.

The Regulation aims to guarantee the protection of the personal data of all natural persons with a usual residence within European Union member-states and to guarantee that the personal data is not being processed without their knowledge and/or explicit consent (whenever required).

In their capacity of Data Controller, “**Seewines Spirit**” Jsc. – company, registered with the Trade registry to the Registry agency, under **UIC 203328730**, having its seat and management address in Sofia, Vitosha district, postal code 1618, 106 Bulgaria blvd, entr. D, ap. 9 (“**Seewines Spirit**” – “The Company”), fulfills all Regulation requirements regarding the persons, only as far as they are necessary for the provision of their products and services and stores them responsibly, and in accordance to the law. In this regard, and also because the protection and security of your personal data is of utmost importance, we have created this Privacy Policy (“The Policy”)

“**Seewines Spirit**” Jsc reserves their right to amend their Privacy Policy, insofar as it is compliant with the Regulation and all other applicable legislation.

II. DEFINITIONS

Data Controller – Data Controller under art. 4, para. 7 of the Regulation – “**Seewines Spirit**” Jsc, **UIC 203328730**, having its seat and management address in Sofia, Vitosha district, postal code 1618, 106 Bulgaria blvd, entr. D, ap. 9

Personal Data – any information related to an identified or identifiable natural person (“data subject”), including but not limited to: names, date of birth, PIN (other identification number), address – permanent or current, nationality, phone number, online identification (e-mail, social media profile, etc), photographic images, bank account details, physical, physiological, mental, economic, cultural and/or social traits, etc

Personal data breach – a breach in security, which leads to the involuntary and unlawful destruction, loss, change, unauthorized release and access to Personal data, which is transferred, stored or processed in any other way.

Personal data processing – any operation or set of operations which is performed on Personal Data or on sets of Personal Data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction;

Data Subject – any natural person which is identified or is identifiable, either directly or indirectly

Consent of the data subject - any freely given, specific, informed and unambiguous indication of the data subject's wishes by which he or she, by a statement or by a clear affirmative action, signifies agreement to the Personal data processing relating to him or her;

Encryption – the Personal data processing in such a manner that the information and data is converted in code, so as to prevent unauthorized access.

Pseudonymization - the Personal data processing in such a manner that the personal data can no longer be attributed to a specific data subject without the use of additional information;

Anonymization – the Personal data processing in such way, so as they may not be used to identify any natural person (directly or indirectly), in any way, and by any person.

III. PERSONAL DATA PROCESSED BY THE DATA CONTROLLER

The Data Controller shall collect only the information that they require for the proper functioning of the website, as well as to provide a quality service, as established by an Agreement, namely any order as requested by you.

The Personal Data which is collected and stored by the Data Controller, shall be processed in compliance with the law, in good faith and only for the explicit legal purposes related to the activity of the Data Controller and in accordance with the specific Data subject's category.

Personal Data which the Data Controller may process after a registration platform has been created is:

- regular Personal Data – names, address, e-mail, phone number, bank account, etc.
- PIN (or any other unique identification number);
- Personal Data, which is contained within the documents and materials, which have been willingly presented by you for the purposes of the provision of the service of delivery of goods by the Data Controller, under a Sale-Purchase Agreement, concluded between you and the Data Controller;
- other: IP address, browser data (collected using cookies);

The Personal Data is provided by you willingly in relation to the execution of a concluded agreement.

You may refuse to provide any and all personal, and/or financial, and/or other relevant information, which may disrupt the provision of the service, or in any way lead to an inability of the Data Controller to perform any and all agreed upon action.

IV. LEGAL BASIS TO PROCESS PERSONAL DATA

The Data Controller processes Personal Data, under art. 6, para. 1 of the Regulation, based on:

- Consent given by the Data Subject;
- concluded agreement, under which the Data subject is a party or a representative of a party, as well as for the performance of any required actions required for the conclusion of such an agreement, by request of the Data Subject; or
- the obligation to perform a legal obligation of the Data Controller; or

- the obligation to enforce the legal interests of the Data Controller.

V. PURPOSES FOR DATA PROCESSING

The Data Controller processes the Personal Data which you provide in relation to the use of the current website and for the execution of orders, requested by you, including:

- activities, related to the use of the website and to sending of inquiries;
- for execution of obligations under an agreement with a client;
- for establishing a connection via telephone or e-mail, for correspondence;
- for statistical purposes;
- for direct marketing.

All Personal Data is being collected for specific, explicit and lawful purposes and shall not be processed in any manner incompatible with these purposes.

There are several hypotheses in which your Personal Data may be processed additionally for purposes other than the initial purpose for which they were collected. When a decision is adopted regarding the compliance of the new purpose, directions and approval must be received by the Data subject, before such additional processing is initiated.

In all cases in which the Consent has not been gathered for the specific additional processing **“Seewines Spirit” Jsc** shall enforce additional conditions to evaluate the good will and transparency of the processing for any purpose other than the initial purpose for which the Personal Data was collected, and these conditions shall include, but not be limited to the following:

- Any relation between the purpose for which the Personal Data was collected and the purposes of the additional processing;
- The context in which the Personal Data has been collected, more importantly, regarding any relation between the Data subject and Data Controller;
- The nature of the Personal Data collected, more importantly whether any special category Personal Data is being processed or any Personal Data in relation to convictions and violations is being processed;
- The possible consequences of the planned additional Personal data processing;
- Whether appropriate protective measures have been placed, related to the further Processing, which may include Encrypting, Anonymization, Pseudonymization;

VI. TERM FOR THE STORAGE OF PERSONAL DATA

The Personal Data shall be processed actively until the termination of the Agreement;

The Documents, containing Personal Data are being archived for a term of 1 (one) year following termination of the contractual relations between you and the Company. In spite of this general term, documents for which the Bulgarian legislation requires a term longer than the general storage term, shall be archived for the specific, extended term.

When Personal Data is being processed on the basis of consent, said data shall be processed until the explicit withdrawal of said consent.

In the circumstance in which it is required that the term for storage be extended, due to existing legal interests or other reasoning, including but not limited to: the establishing, the exercising, and the protection of legal claims, the Data Controller shall notify you in writing.

VII. PERSONAL DATA DISCLOSURE

The Data Controller may disclose your Personal Data, only when it is required for the execution of an obligation under an agreement or when it is explicitly stated in applicable legislation. The Data Controller may disclose Personal Data to the following categories of third persons:

1. Employees and/or subcontractors

The Data Controller may disclose the Personal Data and/or the Personal Data you have presented to their employees and/or subcontractors (natural or legal persons), whenever necessary for the execution of the order requested by you and whenever it is required for the maintenance of the overall service presented by the Data Controller. These persons may be co-Data Controllers, processors etc., and shall be:

- entities, providing courier and postal services;
- entities maintaining the systems of Seewines Spirit Jsc, located on the territory of Bulgaria;
- Internet service providers;
- entities providing legal and/or accounting services to “Seewines Spirit” Jsc.

2. Public (state and municipal) authority bodies

The Data Controller may disclose Personal Data to third parties – competent authorities, when it is required by law. The Data Controller shall provide only the Personal Data, required to fulfill the legal requirement, or which have been requested in the legally established manner.

3. Transfer to third-party States (States outside the EEA)

The Data Controller may disclose Personal Data to third party states only after:

- 3.1. The Data Controller has received your explicit consent, and/or;
- 3.2. The Data Controller is required to fulfill certain imperative legal requirements of applicable legislation and/or
- 3.3. The Data Controller shall protect their rights and legal interests.

Should the Data Controller deem necessary to undertake transfer of Data to any third-party states or international organizations, they shall do so only so far as deemed acceptable within the GDPR, for such a transfer.

VIII. PRINCIPLES

“Seewines Spirit” Jsc adopts the following principles in regards to the management of the operations in regards to the collection, use, storage, transfer, disclosure and destruction of Personal Data.

1. Lawfulness, fairness and transparency

Personal Data shall be processed lawfully, fairly and in a transparent manner in relation to the Data Subject. This means that, where legally required, **Seewines Spirit” Jsc** must tell the

Data Subject what Processing will occur, i.e. **Seewines Spirit” Jsc** must ensure that the individuals are provided with a privacy information notice concerning their Personal data processing (transparency). Privacy notices should, as a minimum, provide the below listed information (in addition to any other information as required by applicable law, e.g. under consumer legislation):

- The identity of **Seewines Spirit” Jsc** as the Data Controller collecting the information;
- The use(s) to be made of the Personal Data;
- The legal basis of the Processing;
- Whether the information will be shared with or disclosed to third parties or other **Seewines Spirit” Jsc** affiliates;
- Whether the information will be transferred to a Third-Party State; and
- How individuals can exercise their rights of access, correction or deletion of their Personal Data. Under certain circumstances, individuals may have other rights, such as the right to object to further processing and the right to data portability.

When required by law or where there is not another appropriate legal basis for the Processing, **Seewines Spirit” Jsc** will obtain the consent of individuals to collect, use, retain, and disclose their Personal Data.

Where **Seewines Spirit” Jsc** wish to use Personal Data for a purpose for which **Seewines Spirit” Jsc** has not previously notified the individual, **Seewines Spirit” Jsc** may need to notify the individual of the new purpose and, in some cases, gain their consent.

The Processing must match the description given to the Data Subject (fairness), and it must be based on one of the legal basis¹ specified in the applicable Data Protection regulation (lawfulness).

2. Purpose Limitation

Personal Data shall be collected for specified, explicit and legitimate purposes and not further Processed in a manner that is incompatible with those purposes. This means **Seewines Spirit” Jsc** must specify exactly what the Personal Data collected will be used for in the privacy information notice to the Data Subjects and limit the Processing of that Personal Data to only what is necessary to meet the specified purpose.

3. Data Minimization

Personal Data shall be adequate, relevant and limited to what is necessary in relation to the purposes for which it is being Processed. **Seewines Spirit” Jsc** will only collect and use the minimum amount of Personal Data to support **Seewines Spirit” Jsc**'s business activities and will not make Personal Data available to anyone (including internal staff), which is not empowered or which has no professional requirement to know the information. “Seewines Spirit” Jsc. shall not store any Personal Data, other than the one that is strictly required.

4. Accuracy

Personal data must be accurate and up-to-date. The Personal Data must be kept in a precise and accurate form during each type of processing, in order to fulfill its purposes. This

means that **Seewines Spirit” Jsc** shall establish procedures to identify and amend outdated, incorrect or unrequired Personal Data

5. Storage limitation

Personal Data shall be kept in a form which permits identification of Data Subjects for no longer than is necessary for the purposes for which the Personal Data is Processed. This means **Seewines Spirit” Jsc** must, wherever possible, store Personal Data in a way that limits or prevents identification of the Data Subject. **Seewines Spirit” Jsc** will only keep Personal Data necessary to support a specific business activity or legal or regulatory requirement. Personal Data must be:

- Kept only for as long as it is necessary to meet or support a business activity or comply with a legal or regulatory requirement;
- Kept in accordance with the Company’s Data Retention and Disposal Policy of **“Seewines Spirit” Jsc**; and
- Securely disposed of or destroyed at the end of the specified retention period.

6. Integrity and confidentiality

Personal Data shall be Processed in a manner that ensures appropriate security of the Personal Data, including protection against unauthorised or unlawful Processing, and against accidental loss, change, destruction or damage. **Seewines Spirit” Jsc** must use appropriate technical and organisational measures to ensure the integrity and confidentiality of Personal Data is maintained at all times. **Seewines Spirit” Jsc** will protect any Personal Data collected, used, retained, and disclosed in order to support our business activities by following the relevant usage, technical and organisational policies, standards, and processes.

Safeguards must be put in place to protect Personal Data against a variety of threats, including:

- Loss or theft;
- Unauthorized access, use, or disclosure;
- Improper copying, modification, or tampering;
- Improper retention or destruction; and
- Loss of integrity, availability, and access to Personal Data.

Employees must take appropriate steps to prevent the misuse or loss of Personal Data, to prevent unauthorised access to it, and to report any known or suspected instance of misuse, loss or unauthorised access to their line manager.

For the purpose of maximum security while processing, transfer and storage of your Data, we may implement additional mechanism for Protection, such as Encrypting, Pseudonymization, etc.

The Company shall store your Data on special servers, accessible only by Company employees, which are directly responsible for the processing of your Data.

All paper copies shall be stored in special storage areas, for that purpose, which areas are not commonly accessible and are not available for unauthorized persons.

7. Accountability

The Company as a Data Controller shall be responsible for, and be able to demonstrate compliance. This means **Seewines Spirit” Jsc** must demonstrate that the Data Protection

Principles (outlined above) are complied with for all Personal Data for which the Company is responsible.

IX. YOUR RIGHTS

1. Right to information and access

You have the right to receive access to the data, which is related to the means, purposes and basis for the processing of your Personal Data, the recipients and the category of recipients of your Personal Data, etc. in accordance to the Regulation.

2. Right to rectification

You have the right to rectify and complete (or request before the Data Controller that they rectify) inaccurate or incomplete Personal Data, which is related to you.

3. Right to erasure

You have the right to request the erasure of all Personal Data related to you, and the Data Controller is obliged to delete them in the term provided, when one of the Regulation requirements is fulfilled.

The Data Controller shall not erase the Data, which they are legally obliged to store, including for the purpose of defense in legal claims and proving their rights.

4. Right to data portability

You have the right to withdraw all Personal Data, regarding you, which is stored and processed by the Data Controller and request that they transferred to another Data Controller, as appointed by you, whenever technically achievable.

To exercise any of the aforementioned rights, you may file your demand (claim) to the Data Controller to the Correspondence address/e-mail described below.

5. Right to restriction of processing

In the circumstance in which the Personal Data we process is inaccurate or out of date, or if you believe that their processing is unlawful, you have the right to request that we restrict the active processing for a term which allows us to check the accuracy of the information and amend it accordingly, or until the problems with the lawfulness of the processing have been resolved.

If you do not wish for some or all of your Personal Data processed on the base of your consent to continue being processed, you have the right to withdraw the consent provided by you

6. Right to object

You may object against the processing which “**Seewines Spirit**” Jsc performs at any point on ground related to the specific situation (applicable whenever the processing of Personal Data is being carried out on the basis of legal interest of Seewines Spirit or a third party). Under any circumstance, you may object against processing for the purposes of direct marketing.

7. Right to withdraw consent

Whenever we process your Personal Data on the basis of your consent, you may at any point withdraw your consent. This may happen online, by contacting us via e-mail, or on the

address provided below. The withdrawal of your consent shall in no way affect the lawfulness of the processing performed prior to the withdrawal

8. Right to complaint before the authority body

If you believe that your rights in relation to Personal Data protection and their security have been violated, you have the right to contact the Bulgarian commission for Personal Data protection. The contact information of the CPDP is provided at the end of this Policy.

X. SECURITY BREACH

Should a breach in the security of Personal data be established, which may potentially result in risk to your rights and freedoms, you shall be duly and timely informed about the breach, as well as any measures which have been undertaken or are going to be undertaken.

XI. CONTACT INFORMATION

1. Data Controller

“Seewines Spirit” Jsc, UIC 203328730

Address: Sofia, Vitosha district, 106 Bulgaria blvd, entr. D, ap. 9

e-mail: info@arkana.bg

2. Authority body

Commission for personal data protection

Address: Sofia, 2 Prof. Tsvetan Lazarov blvd.

Tel.: +3592/91 53 518

e-mail: kzld@cpdp.bg

website: www.cdpd.bg

Application № 1 – Template for request for the exercising of rights by Data subject

Template for request by Data subject

You may use the hitherto provided template to exercise your rights in regards to your Personal Data, which is being processed by “Seewines Spirit” Jsc.

Data subject information:

| | |
|-----------------------------------|--|
| Natural person information | |
| Name | |
| Unique identifying number | |
| PIN/PFN/other | |
| Contact data | |
| Address | |
| Telephone | |
| e-mail | |
| Relation to the Company | |
| | |

Data for the representative of the Data subject:

| | |
|---|--|
| In the case in which you act as a representative, please disclose in what capacity? | <input type="checkbox"/> Authorised representative <input type="checkbox"/> Parent <input type="checkbox"/> Guardian <input type="checkbox"/> Preserver |
| Natural Person Data | |
| Name | |
| Unique identifying number | |
| PIN/PFN/other | |
| Contact data | |
| Address | |
| Telephone | |
| e-mail | |
| Relation to the Company | |
| | |

Request to exercise rights

| | | |
|----------------------|--|---|
| Request type: | | Description of the request and data which it relates to: |
|----------------------|--|---|

| | | |
|---------------------------------------|------------------------------|--|
| Request to access: | <input type="checkbox"/> Yes | |
| Request to information: | <input type="checkbox"/> Yes | |
| Request for rectification: | <input type="checkbox"/> Yes | |
| Request for erasure | <input type="checkbox"/> Yes | |
| Request for restriction of processing | <input type="checkbox"/> Yes | |
| Obejction against processing | <input type="checkbox"/> Yes | |
| Request for portability | <input type="checkbox"/> Yes | |
| Other | <input type="checkbox"/> Yes | |

Feedback on your request

| | |
|---|--|
| Please select the means by which you wish to receive feedback regarding your request? | <input type="checkbox"/> Phone |
| | <input type="checkbox"/> E-mail |
| | <input type="checkbox"/> Post |
| | <input type="checkbox"/> Courier |
| | <input type="checkbox"/> Other (specify) |

Date: __.__.__..

Signature: _____

Application № 2 – Template for complaint by Data subject

Template for complaint by Data subject

You may use the current template for a complaint in regards to the processing of your Personal data by Seewines Spirit Jsc., so that you can notify us whenever you believe there may be an infringement of your rights or any other legal infringement, as well as whenever you have complaints or worries, regarding the processing of your personal data:

Data subject Information

| | |
|-----------------------------------|--|
| Natural person information | |
| Name | |
| Unique identifying number | |
| PIN/PFN/other | |
| Contact data | |
| Address | |
| Telephone | |
| e-mail | |
| Relation to the Company | |
| | |

Data for the representative of the Data subject:

| | |
|---|--|
| In the case in which you act as a representative, please disclose in what capacity? | <input type="checkbox"/> Authorised representative <input type="checkbox"/> Parent <input type="checkbox"/> Guardian <input type="checkbox"/> Preserver |
| Natural Person Data | |
| Name | |
| Unique identifying number | |
| PIN/PFN/other | |
| Contact data | |
| Address | |
| Telephone | |
| e-mail | |
| Relation to the Company | |
| | |

Data regarding the infringement/complaint:

| | |
|--|--|
| Type of personal data affected | <i>Please specify the types of personal data which have been affected by said infringement</i> |
| What does the infringement consist of | <i>Please specify</i> |
| Other affected persons | <i>If applicable – specify the persons, as well as your relation to them.</i> |
| Additional comments | <i>Please specify any other additional information, which you consider relevant</i> |

Feedback on your request

| | |
|--|--|
| Please select the means by which you wish to receive feedback regarding your request? | <input type="checkbox"/> Phone <input type="checkbox"/> E-mail <input type="checkbox"/> Post <input type="checkbox"/> Courier <input type="checkbox"/> Other (specify) |
|--|--|

Date: __.__.__.r.

Signature: _____