

# YOUR PERSONAL DATA

## WHAT DOES THIS MEAN?

### WE COMMIT OURSELVES

#### WE ARE TRANSPARENT ABOUT HOW WE PROCESS YOUR PERSONAL DATA

On this page you will find all the necessary information about the processing of your personal data, including: when, how and where we process your personal data, why we need it and what your rights are.

#### OUR COMMUNICATION IS RELEVANT AND PURPOSEFUL

If you need to do so, please send us any inquiries addressed to the Data Protection Officer in charge to the following e-mail: [office@sentra.bg](mailto:office@sentra.bg)

Please provide in the submitted application the information about the data you wish to have rectified or deleted. Please note that we will review the submitted applications within the statutory deadline.

## HOW DO WE USE YOUR PERSONAL DATA?

#### PERSONAL DATA PROTECTION POLICY

##### PERSONAL DATA PROTECTION POLICY OF SENTRA OOD

In compliance with the requirements set out in Regulation (EU) 2016/679 (the General Data Protection Regulation - GDPR) of the European Parliament and of the Council of 27 April 2016 and the Personal Data Protection Act, Sentra OOD, UIC: 202351745 (hereinafter referred to as "Sentra" and/or "We" and/or the "Controller") has adopted this Personal Data Protection Policy. By the below information, we aim to explain to you how and why we process your personal data, how long we will retain it, whom we may provide it to, and what protection measures we have taken. Our policy applies to all types of personal data processing.

#### **I. Information about the Data Controller**

Sentra OOD is a company registered in the Commercial Register at the Registry Agency under UIC 202357145, having its registered office and business address at: 1463 Sofia City, 86 Vitosha Blvd., tel: +359 2 851 0344; e-mail: [office@sentra.bg](mailto:office@sentra.bg). In view of our responsible attitude to and our high concern for data protection, we have appointed a Data Protection Officer (hereinafter referred to as the "DPO"). The DPO's contact details are: [office@sentra.bg](mailto:office@sentra.bg). When processing personal data, we strictly follow the following basic principles, namely:

- legality, good faith and transparency;
- restriction of the purposes of processing;
- relevance to the purposes of processing and minimizing the data collected;
- accuracy and timeliness of the data;
- limitation of retention in order to fulfil the purposes;
- integrity and confidentiality of the processing and ensuring an appropriate level of security of personal data.

## **II. Personal Data**

When providing our services and selling goods, we collect personal data of different categories of customers (data subjects) which can be summarized in the following groups:

- individuals using our services or buying our products;
- individuals involved in the conduct of various surveys, campaigns and others, including on social networks;
- legal representatives of other partner business companies.

A full description of the personal data we collect and process can be found below. In cases where a contractual or legal obligation exists, we must comply with it and process your personal data. When such an obligation exists and you fail to provide us with the required information upon request, we may be unable to enter into or perform the contract or other legal obligation we may have. In a separate section we have provided information about the processing of personal data of job applicants at Sentra OOD.

## **III. Purposes, Legal Grounds and Retention Periods:**

### **1. General Provisions:**

#### **1.1. Purposes:**

**We use the data we collect from and about you for the purposes of:**

- **Delivering our services and selling our products;**
- **Organizing campaigns, presentations, surveys and others;**
- **Offering quality customer service and answering inquiries;**
- **Complying with the law and/or legal obligations and/or responding to requests from public and state bodies;**
- **Analyzing and improving our services and products;**
- **Exercising and/or preserving our legal rights and interests;**
- **Managing our social networks;**
- **Promoting our services and products.**

#### **1.2. Legal Grounds**

The legal grounds on the basis of which we process personal data are alternatively:

- Fulfillment of regulatory obligations;
- Conclusion and performance of a contract, incl. in pre-contractual relations;
- Existence of a legitimate interest;
- Protection of your vital interests;
- Your explicit, specific and unambiguous consent.

#### **1.3. Retention Periods**

We will retain your personal data for as long as necessary to fulfill the purposes for which we have collected and described it in this Policy. In determining the data retention period, we take into account its type, volume, potential risk of damage resulting from unauthorized use or disclosure, as well as the regulatory requirements. In many cases, we will comply with the statute of limitations for filing certain claims under the Bulgarian legislation, the longest of which is 10 years. If applicable - the retention period for video surveillance data is described in our video surveillance privacy notice. In any case, we take measures to restrict access to personal data at relevant stages, in view of the current data processing and its relevant purposes.

**2. The specific types of data processing, the legal grounds and the retention periods are described in the below table, as follows:**

Types of processing	Data processed	Legal grounds	Processing period
Opinions and questions about our products, incl. information on the availability of goods	E-mail address and customer data related to determining the exact type of our products	Processing is performed on the basis of our legitimate interest	The data is retained for a period of up to 2 years after answering your question
Services by our workshops	Name, delivery address, e-mail address and telephone number.	Processing is performed on the basis of the contract entered into between us	The data is retained for a period of up to 5 years from the time of performing our services
Online ordering of goods	Name, delivery address, e-mail address and telephone number.	Processing is performed on the basis of the contract entered into between us	The data is retained for a period of up to 10 years from the time of the purchase.
Issuance of invoices	Name, PIN and address, or respectively company name, UIC/BULSTAT, address and name of a representative	Processing is performed on the basis of our regulatory obligations	The data is retained for a period of up to 10 years from the time of the purchase.
Sending of a personalized newsletter electronically	Name, e-mail address, history of purchases and inquiries	Processing is performed on the basis of your consent	The data is retained for a period of up to 2 years from the last activity.
Use of free wireless internet (wi-fi) on the territory of and near our offices	Name, e-mail address, authentication method (Google+, Facebook, Twitter, E-mail, Corporate), gender, language of the relevant device, type of device (smartphone, tablet, etc.), web browser, date and time of the connection and physical visit to the relevant store, as well as all data derived from the web traffic (IP address, user profile, traffic volume)	Processing is performed on the basis of our legitimate interest	The data is retained for a period of up to 12 months from the date of the receipt thereof

We may use anonymised information or information that no longer allows for you to be identified as a specific individual even after the retention periods described above.

#### **IV. Sharing Personal Data**

Sentra will not provide personal data to third parties until we have received a warranty that all technical, organizational and legal measures have been taken to protect such data and that there are valid legal grounds. We may need to share your personal data with the parties referred to below:

- Sentra's affiliated companies within our group – on the grounds of our legitimate interest in administering and reporting our business activities. Should we need further legal grounds, these will be provided before the data transfer;
- Service providers – in their capacity as personal data processors. These may be law and accounting firms, auditors, couriers, carriers, hosting companies, IT service providers, system administration, shippers, mobile operators, insurers, event organizers and others. We enter into contracts with these whereby the security of your data is guaranteed;
- Public authorities - the provision of personal data in some cases is mandatory in order to comply with our legal requirements and, in this regard, we provide information to: public and municipal authorities, ministries, the NRA (National Revenue Agency), the NSSI (National Social Security Institute), the CPC (Competition Protection Commission), the CPC (Consumer Protection Commission), and other regulatory authorities and commissions.

#### **V. Automated Decision Making**

We do not use any automated decision-making and/or profiling tools in the course of our business.

#### **VI. Security**

The security of the data you have entrusted to us is very important to us. To ensure adequate protection of our customers' data, we apply all necessary organizational and technical measures provided for in the legislation, as well as the best practices of the international standards. In this regard, we at Sentra have taken measures to protect your personal data from accidental loss and unauthorized access, use, alteration or disclosure. We have policies and procedures in place that are designed to protect information from loss, misuse and unauthorized disclosure. In addition, we take additional information security measures, including access control, strict physical protection and reliable practices for collecting, storing and processing information. Some of the measures applied are:

- Protection of the collected personal data from unjustified use and monitoring of their processing;
- Adoption of strict policies and procedures applicable to our staff aimed at minimizing the risks associated with personal data processing;
- Control of access to personal data based on a matrix of obligations;
- Periodic staff training in relation to personal data protection.

On the other hand, we apply technical measures such as encryption, pseudonymization and anonymization of the collected personal data, where possible.

#### **VII. Transferring Data outside the EU**

In carrying out our activities, we may transfer your data outside the European Union, but in any case we will provide an adequate level of protection or appropriate warranties and legal grounds for this. If it should be necessary to transfer data to a "third country", we warrant that the necessary level of data protection in the third country concerned or with the recipient in the third country will be ensured before such transfer. This may be based on a consent, an authorization by a supervisory authority, mandatory corporate rules or a decision of the European Commission on the adequate level of data protection in a particular third country in general. Alternatively, data transmission may be based on the so-called "EU standard contractual clauses" agreed with the recipient (where new ones are approved by the EU) or if the recipients are based in the USA, on the grounds of the EU-US Privacy Shield. Upon request, we undertake to provide you with additional information on the proper and appropriate warranties for maintaining an appropriate level of data protection.

#### **VIII. What are your rights with regard to personal data?**

According to the European and local legislations, depending on the legal grounds, you have the following rights in relation to your personal data:

- Right of access: You have the right to receive a confirmation of whether personal data relating to you is being processed and, if so, to have access to such data and its related information, as well as a copy of such data, if possible;
- Right of rectification: You may require that we rectify any inaccurate personal data related to you, or supplement any incomplete personal data related to you;
- Right to delete personal data (the right to be “forgotten”): you have the right to require the deletion of your personal data, but only insofar as there are grounds for doing so;
- Restriction of processing: As long as the legal conditions have been met, you may require that we restrict the processing of personal data relating to you;
- Right to object: You have the right, at any time and on grounds related to the specific type of processing, to object to the processing of personal data on the grounds of a legitimate interest;
- Right to data portability: If we process personal data on a contractual basis or based on your consent, you may require that the personal data provided by you be received by you in a structured, widely used and machine-readable format and/or that we transfer it to another personal data controller;
- Right to object to automated individual decision-making, including profiling;
- Right to withdraw consent: In case we process personal data on the grounds of your consent or explicit consent, you have the right to withdraw your consent at any time, without prejudice to the lawfulness of the processed data based on a consent before such consent has been withdrawn;
- Right to appeal before the supervisory authority - PDPC (1592 Sofia, 2 Prof. Tsvetan Lazarov Blvd. or [www.cdpd.bg](http://www.cdpd.bg)).

You should keep in mind that not all of the above rights are absolute and they are not always applicable, with some exceptions. In response to a request, you will need to confirm your identity and/or provide additional information to help us better and more fully understand your request.

#### **IX. How can you exercise your rights?**

Each one of the rights provided by law may be exercised by submitting a request for the exercise of the respective right. Requests for the exercise of the rights of personal data subjects may alternatively be submitted in any of the following ways:

- Electronically to the following e-mail address: [office@sentra.bg](mailto:office@sentra.bg);
- Personally at the following address: 1463 Sofia City, 86 Vitosha Blvd. The request for exercising personal data rights shall contain the following information:
  - The subject’s identification data – name and PIN;
  - Contact details for the purpose of feedback - address, telephone number, e-mail
  - Request - description of the request.

Sentra provides information on the actions taken in connection with a request for the exercise of your rights within one month from receipt of the request. Where necessary, the said period may be extended by another month, taking into account the complexity and number of requests. Sentra will inform you of any such extension within one month of receipt of the request, stating the reasons for the delay. The information provided in connection with the exercise of the data subject's rights shall be provided free of charge by Sentra, except in case of abuse of the rights granted. In such a case, we may charge a reasonable fee based on our administrative costs incurred in the provision of the information. We may request the provision of additional information necessary to verify your identity where there are concerns about the identity of the individual submitting the request. When exercising your rights through an attorney, we shall be provided with an explicit power of attorney. Sentra shall not be obliged to respond to a request if it is unable to identify the data subject.

#### **Updating the Policy**

This Policy shall be subject to change by Sentra and was last updated on 31.12.2020. Any future amendments or supplementations to this Policy will be updated accordingly.

## COOKIE MANAGEMENT

What do we call “cookies”? These are small files that are installed on your computer or smartphone. They allow us to store information about your browsing on our site or through your mobile device.

### **COOKIES HELP US FOR SEVERAL PURPOSES. LET US EXPLAIN:**

**Functional cookies:** They allow you to use the main functions of the site.

**Personalized cookies:** They allow you to visit the site in a personalized way for you, depending on your previous visits, etc. These cookies allow you to quickly find what you are looking for.

**Advertising cookies:** They allow you to receive offers and suggestions from Sentra, on the sites of our partners.

## VIDEO SURVEILLANCE POLICY

### **Privacy notice when using video surveillance**

By this privacy notice, we provide information on the purposes, grounds and methods of processing personal data collected through video surveillance in and around the offices of Sentra OOD, as well as on the opportunities of individuals to exercise their rights related to the protection of personal data provided for in the Bulgarian and European legislations.

### **Personal Data Controller**

The controller of the collected and processed personal data is Sentra OOD, UIC 202357145, having its registered office and business address at: 1463 Sofia City, 86 Vitosha Blvd., hereinafter referred to as „Sentra“.

### **Information about our Data Protection Officer:**

Sentra provides a high level of personal data protection and, in this regard, has a designated Data Protection Officer (“DPO”). The DPO is the contact person for all matters related to the processing of your personal data, incl. in the exercise, on your part, of the rights provided by law. The e-mail address for contact with the DPO is: [office@sentra.bg](mailto:office@sentra.bg).

### **Purpose and legal grounds for the use of video surveillance**

The video surveillance performed by Sentra is aimed at:

- Ensuring the security of employees and visitors through security;
- Protecting tangible assets;
- Preventing and detecting crimes;
- Establishing circumstances and improving the quality of the services offered.

### **The legal grounds for the performance of video surveillance are:**

The video surveillance is performed on the basis of Sentra’s legitimate interest, pursuant to Art. 6 (1) (f) of Regulation (EU) 2016/679.

### **Personal Data**

The video surveillance system is conventional and mostly static, recording digital images through motion sensors. The system records specific movement captured by the cameras in the monitored areas, along with its time, date and location. All cameras work continuously - 24 hours a day. Sentra's video surveillance system is not intended to capture or otherwise process (e.g. index, profile) images that reveal the so-called "special categories of data".

### **Areas under video surveillance**

The video surveillance system covers the commonly accessible places in the offices of Sentra, incl. entrance and exit.

### **Access to and transmission of personal data**

Access to video recordings is restricted to the “need to know” principle, with specific employees entitled to access. If necessary for the purposes of the investigation or prosecution of a criminal offense, access may be granted to law enforcement authorities.

### **Retention period and security**

Sentra retains personal data only for as long as is necessary to fulfil the purposes for which the recordings were collected and processed. In any case, the retention period is up to 30 days from the date of recording. In the event of a security incident, the relevant recording may be retained for longer than the usual period, until it is necessary for further investigation of the incident. The retention period will also be extended in case of a crime and transmission to the investigating authorities. All possible physical, technical, legal and organizational measures for data protection have been taken, incl. against loss, misuse, alteration, destruction or damage, as required by the European and national legislations.

### **Subjects’ rights**

Sentra provides all rights related to personal data and provided for in the European and national legislations. Those rights are:

- Awareness;
- Access to own personal data;
- Rectification (if the data is inaccurate);
- Deletion of personal data (the right to be “forgotten”);
- Restriction of processing;
- Portability of personal data between individual controllers;
- Objection;
- Complaint (under the currently applicable legislation, you also have the right to complain about the way your data is processed before the supervisory authority, the Personal Data Protection Commission, 1592 Sofia, 2 Prof. Tsvetan Lazarov Blvd. or at [www.cdpd.bg](http://www.cdpd.bg)).

In cases where the exercise of the right of access also reveals personal data about a third party, Sentra will provide the subject with access to the part thereof relating only to such party through appropriate technical measures for deletion/masking of the images of the other persons that are under video surveillance. Where this is not technically feasible, access to video recordings may only be granted subject to the consent of all persons that are under video surveillance.

To exercise the rights described above, as well as upon any issues related to the processing of your personal data, save for the right to complain, you need to contact the Data Protection Officer at the following e-mail address: [office@sentra.bg](mailto:office@sentra.bg). Should you need it, the DPO will provide you with detailed information on the procedures for exercising certain rights. Where necessary, the DPO may request additional information in order to identify you. You will be given a reply, subject to the deadlines applicable under the legislation.

## **ADDITIONAL INFORMATION**

### **JOB APPLICANTS**

#### **NOTICE OF CONFIDENTIALITY OF PERSONAL DATA PROCESSED BY SENTRA OOD IN THE SELECTION OF EMPLOYEES**

This notice aims to inform the subjects about the circumstances related to the protection of personal data in the selection process.

## **WHO ARE WE?**

The Personal Data Controller is Sentra OOD, UIC 202357145, having its registered office and business address at: Sofia City, 86 Vitosha Blvd. (hereinafter "Sentra").

## **The contact details of our Data Protection Officer are:**

[office@sentra.bg](mailto:office@sentra.bg)

## **PERSONAL DATA**

Sentra processes the following categories of personal data of persons involved in the employee selection procedure, namely: name, citizenship, personal identification number, education, qualifications, career development and professional experience, address, telephone number, etc., that are necessary for meeting the requirements for the position held.

## **GROUNDINGS FOR PROCESSING**

The grounds for processing the personal data described in the preceding paragraph is alternative (depending on the positions applied for, the retention period, etc.): - Sentra's legitimate interest pursuant to Art. 6 (1) (f) of the General Data Protection Regulation - Regulation 2016/679. - Consent under Art. 6 (1) (a) of the General Data Protection Regulation - Regulation 2016/679.

## **PURPOSES OF THE PROCESSING**

The purposes of data processing in the selection process are as follows:

- Finding suitable candidates to be employed at Sentra;
- Expansion and increase of Sentra's business and capacity;
- Performing the selection of employees with whom employment contracts are to be entered into.

## **RETENTION PERIOD**

The retention period for the data collected during selection shall be 6 months, unless the subject has given a consent to a longer data retention period or a consent to the processing for other future positions as well, but in any case the retention period may not be longer than 1 year.

In case the data subject applies for work through an online platform, he/she should also take into account the Data Protection Policy on this online platform and, respectively, the data retention periods envisaged therein, for which Sentra shall not be held liable.

## **DATA PROTECTION AND ACCESS TO DATA**

Sentra has taken legal, technical and organizational measures to protect personal data from accidental loss and unauthorized access, use, alteration or disclosure. We have policies and procedures in place designed to protect information from loss, misuse and unauthorized disclosure. Sentra does not transfer the data processed in the selection outside the EU/EEA.

The data shall be accessible to Sentra's employees or managers to enable them to perform the functions assigned to them in connection with the selection performed.

## **YOUR RIGHTS**

Sentra shall grant the job applicant all rights as provided by local and European legislations, namely:

- upon request, it shall have the right to receive all necessary information relating to the processing of the data provided by it, including, if possible, a copy thereof;
- it shall have the right to request from Sentra access to, rectification or deletion of personal data or restriction of the processing of personal data, if there are prerequisites for this;
- it shall have the right to object to the processing, as well as to file a complaint to the PDPC in case of unlawful data processing;
- it shall have the right to withdraw its consent to the processing of its personal data at any time, where the data has been provided on the basis of a consent;



- and it shall have the right to exercise its right of portability.

All requests related to personal data such as: information, access, deletion, withdrawal of consent, etc. described above, shall be executed in writing, signed by the data subject and submitted for processing to Sentra at the e-mail address: [office@sentra.bg](mailto:office@sentra.bg) or at the company's business address. The request shall contain information of the name and, in case the request concerns specific personal data, such data shall be specified, as well as exactly which right is being exercised. The company may provide optional requests for the exercise of the various rights, and we may also request additional information with the purpose of identification and/or clarification of the request. Sentra will respond in a reasoned manner to the subjects' requests within 30 days, and will fulfil them if there are grounds for this, or will issue a reasoned refusal, if there are grounds for that, also indicating the subjects' right to take subsequent action before the supervisory authorities.

Requests will be considered excessive due to their repeatability if they relate to static data that are not subject to change within the period between requests.

Further information regarding your personal data can be found on our website or by sending an inquiry to [office@sentra.bg](mailto:office@sentra.bg).

### DATA PROTECTION OFFICER

For any questions about your personal data and Decathlon, you can contact our Data Protection Officer at: [office@sentra.bg](mailto:office@sentra.bg).