

PRIVACY POLICY

The following information provides you with details about how we process your personal data and your rights under data protection law.

1. Responsibility for data processing and company data protection officer

In line with Article 4, Paragraph 7 of the EU General Data Protection Regulation (GDPR) responsibility lies with:

OPTAplus BG Ltd.

1799 Sofia, Bulgaria,

Mladost, Bl. 233, Entr. 2, Office 3

VAT No: BG 203674020

Tel: +359 2 462 7317

If you have any questions about data protection, you are welcome to contact:

Dilyana Stefanova

stefanova@optaplus.com

2. Your rights

You hold the following rights with regard to your personal data processed by us:

- access to information on the categories of the processed data, purposes of processing, recipients or categories of recipients of your data, and the planned retention period (Article 15 of the GDPR)
- correction of inaccurate or incomplete data and/or their amendment (Article 16 of the GDPR)
- deletion of data in line with Article 17 of the GDPR, in particular if the personal data are no longer necessary for the intended purpose or are processed illegally, or if you withdraw your consent or have lodged an objection to processing
- restriction of data processing in line with Article 18 of the GDPR in certain circumstances insofar as, for instance, deletion is no longer possible or the deletion obligation is at issue
- in line with Article 20 of the GDPR on data portability, to have us provide you or a third party with the personal data you supplied to us in a structured common machine-readable format
- for reasons arising from your particular situation the right to object to data processing on account of a legitimate interest (Article 21, Paragraph 1 of the GDPR)
- withdrawal of your consent at any time to be effective in the future (Article 7, Paragraph 3 of the GDPR); this also of course also applies to the withdrawal of consents you granted us prior to the GDPR coming into effect
- in line with Article 77 of the GDPR to lodge a complaint about data processing with the responsible supervisory authority

3. Collection of personal data when you visit our website

If you only visit our website for informational purposes, i.e. if you do not register or otherwise provide us with information, we shall only collect the personal data that your personal browser sends to our server. These data are necessary from a technical point of view to let you view our website. They are also required in order to ensure the stability and security of our website. (Legal basis is Article 6, Paragraph 1, Sentence 1, Letter f of the GDPR).

- IP address
- Date and time of request
- Country of origin of request
- Content requested (specific web page)
- Access status/http status code
- Website from which the request is launched
- Browser
- Operating system and interface
- Browser software language and version
- Data volume sent in each case
- Time zone difference to Greenwich Mean Time (GMT)

Some of the services offered on our website can only be performed if we are able to contact you. This means that availing yourself of these services is dependent on you providing us with specific personal (contact) data. We only collect, use and process these data insofar as this is necessary for the performance of the respective services. If you contact us via email or a contact form, the data you enter (your email address and other data you impart to us of your own free will, such as your name/telephone number) are stored by us so we can process your request and answer any questions you may have. We delete the data we have stored about you when it is no longer required. We restrict processing in the case of statutory retention obligations. We

process your data in line with Article 6, Paragraph 1, Sentence 1, Letter f of the GDPR.

We use cookies on our website. Cookies are small text files stored on your hard disk that are created when you use your browser to visit a website and are used by it to send specific information. Most of the cookies we use are deleted at the end of the browser session (so-called session cookies). Other cookies remain on your end device and let us recognise your browser again on your next visit (persistent cookies). You can set your cookie preferences in the browser you use, and can refuse the use of cookies or restrict your refusal to the cookies of other parties, so-called third-party cookies. However your cookie preferences may result in you not being able to use all the functions offered on our Internet website.

4. Purpose of processing, legal basis and retention period

If we request consent to process your personal data, we do so in line with Article 6, Paragraph 1, Sentence 1, Letter a of the GDPR. If processing your personal data is required to fulfil a contract or pre-contractual measures prompted by your request, our processing is legally based on Article 6, Paragraph 1, Sentence 1, Letter b of the GDPR. In cases in which processing of personal data is required to fulfil our legal obligations, processing is in line with Article 6, Paragraph 1, Sentence 1, Letter c of the GDPR. If processing of personal data is necessary to protect a legitimate interest of our company or a third party, and if at the same time the interests, basic rights and freedoms of the data subjects, which require the protection of personal data, do not take precedence over our legitimate interest, Article 6, Paragraph 1, Letter f of the GDPR shall serve as legal basis for said processing.

Unless otherwise specified, we delete personal data in accordance with Article 17 and 18 of the GDPR or restrict their processing. We only process and store your personal data for as long as they are required to fulfil our contractual and legal

obligations. Data no longer required for the intended purpose are deleted regularly unless temporary further processing is necessary, which may arise on account of other legally permissible purposes.

5. Recipients of your data

In general, we neither sell nor loan user data.

6. Targeting and Advertising

6.1. Webanalytics:

a) Use of Google Analytics

This website uses Google Analytics, a web analysis service of Google Inc. ("Google"). Google Analytics uses so-called cookies or text files stored on your computer which enable an analysis of your use of the website. The information generated by the cookie about your use of this website is usually transmitted to a Google server in the USA and stored there. However, in the case of IP anonymisation being activated on this website, Google will first truncate your IP address within the member states of the European Union and in other countries party to the Agreement on the European Economic Area. The full IP address will only be transmitted to a Google server in the USA and truncated there in exceptional cases. On behalf of the operator of this website, Google will use this information to evaluate your use of the website to compile reports about website activities and to perform other services related to website and Internet usage services for the website operator. The IP address transmitted by your browser as part of Google Analytics will not be consolidated with other data from Google. You can prevent the storage of cookies by setting your preferences in your browser software; however please note that in this case you may not be able to make full use of all the functions of this website. You can also prevent transmission of the data generated by the cookie

related to your use of the website (including your IP address) to Google and its processing of this data by downloading and installing the browser plugin available under the following link (<https://tools.google.com/dlpage/gaoptout?hl=en>).

This website uses Google Analytics with the “AnonymizeIP()” function. IP addresses are truncated for further processing, thus precluding any linking to a particular individual. If a personal reference is included in the data collected about you, it will therefore be excluded directly and the personal data thus deleted immediately.

We use Google Analytics to analyse the use of our website and improve it on a regular basis. The statistics it yields lets us improve our product and make it more attractive to you as a user. In the exceptional cases in which personal data are transmitted to the USA, Google has submitted itself to the EU-US Privacy Shield (see <https://www.privacyshield.gov/EU-US-Framework>).

Third-party provider information: Google Dublin, Google Ireland Ltd., Gordon House, Barrow Street, Dublin 4, Ireland

For more information on terms and conditions of use and privacy go to www.google.com/analytics/terms/us.html and support.google.com/analytics/answer/6004245

The legal basis for the use of Google Analytics is Article 6, Paragraph 1, Sentence 1, Letter f of the GDPR.

b) Use of Google Adwords and remarketing

We use Google Adwords services to draw attention to our attractive products on external websites with the help of advertising aids (so-called Google Adwords). These advertising media are delivered via so-called ad servers. Ad server cookies are used in the process to enable the evaluation of performance parameters (e.g. ad impressions, clicks or conversions). This lets us establish the extent to which individual advertising measures are successful. If you access our website via a Google ad, Google Adwords stores a cookie on your end device. This cookie stores

the analysis values (unique cookie ID, number of ad impressions per placement (frequency), last impression, opt-out information (label that the user doesn't wish to receive advertising any longer). Cookies set by Google Adwords usually expire after 30 days. They are not intended to identify you personally, but let Google Adwords recognise your Internet browser again. If you visit specific pages on the website of an Adwords customer, Google and the customer will identify that you have been forwarded to it by clicking an ad to the customer's website. As an Adwords customer, Google provides us with a statistical evaluation. Based on this evaluation we can measure the effectiveness of our advertising activities. We do not receive any further data, and in particular, we cannot identify you on the basis of the information. The legal basis for processing your data is Article 6, Paragraph 1, Sentence 1, Letter a and f of the GDPR.

The website also uses remarketing. Remarketing enables specific interest-based advertising across the Google Display Network based on previously accessed websites. Cookies are used to collect remarketing data. We and third-party providers, including Google use first-party cookies (e.g. Google Analytics cookies) in combination with third-party cookies (e.g. double click cookies) in order to orient, optimise and insert ads based on previous visits by a user to our website. Via the stored cookies, Google collects and evaluates your user behaviour when you access different websites. OPTAplus advertising may therefore be displayed by Google or third-party providers, also on other websites. By its own admission, Google does not consolidate the data collected here with any personal data about you that may be stored by Google. In particular, Google draws attention to its use of pseudonymisation. If you do not wish to have advertising tailored to your interests displayed, you can deactivate cookies in your browser or notify Google of this for the future via the following link <https://adssettings.google.com>

For more information about privacy at Google go to: policies.google.com/privacy and services.google.com/sitestats/en.html.

The legal basis for processing your data is Article 6, Paragraph 1, Sentence 1, Letter a and f of the GDPR.