

Privacy Policy of BULBROKERS EAD

Introduction

Hello!

Thank you for your interest in the Privacy Policy of BULBROKERS EAD, an investment intermediary licensed by the Financial Supervision Commission of the Republic of Bulgaria. Hereby we aim to inform you further and explain what personal data we collect, why we collect them and with whom of our trusted partners and administrative and regulatory authorities we share such data. In addition, we also seek to notify you of your rights related to the access, rectification or erasure of your personal data.

If you are looking for more information about BULBROKERS EAD, you can visit our web site at www.bulbrokers.com.

Basic concepts

"Personal data" within the meaning of this policy means any data provided by the Customer to BULBROKERS EAD in relation to: 1) the use of an online platform for registration, 2) the conclusion of a contract for the provision of intermediary services, 3) the conclusion of a contract for trustee management of an individual portfolio or 4) after the conclusion of a contract as part of its execution and administration, which are processed by the investment intermediary.

"Customer Data Processing" means any operation with customer data, including collecting, recording, organizing, storing, modifying, disclosing customer information, providing access, referencing and extracting, using, redirecting, merging, closing, deleting or destroying customer data or several of the above operations, regardless of the way they are performed or the means used.

What kind of personal data do we process?

The personal data normally processed in connection with online platform registration, the conclusion of a contract for the provision of intermediary services, the conclusion of a contract for trust management of an individual portfolio or the conclusion of such contracts are the following:

- Name: Personal, middle and family name;
- Personal Identification Number (PIN), Personal Number of a Foreigner (PNF), Citizenship;
- Copy of an ID card / identification document;
- Identity document number, date and place of issue;
- Contact information: Email, address and telephone number;
- Address: permanent, current and mailing address;
- Bank account number;
- Information about your education, qualifications, place of work, work experience, financial expertise

and knowledge of trading with financial instruments, investment objectives, type, size and source of your monthly income and assets;

- Tax registration information;
- Data for identification and assessment of the risk of money laundering and terrorist financing in connection with entering into a contractual relationship, including but not limited to, customer and customer representative information, property origin, transaction counterparties, business activities, beneficial owner, the capacity of a politically exposed person in connection with the MAMLA and MFTA, etc.;
- Information from our communication with you, habits, preferences, level of satisfaction (service activity, complaints, requests, etc.);
- Data obtained in the performance of the obligations deriving from the legal acts (data resulting from inspections, inquiries, regulation).

What are the grounds for processing your personal data?

The processing of your personal data is necessary for the conclusion and execution of contracts in compliance with the statutory requirements for the provision of these services by the investment intermediary.¹

BULBROKERS EAD protects the collected personal data from unjustified use and monitors its processing.

In certain cases, we share information with service providers (consultants and subcontractors) on the grounds of the legitimate interest of BULBROKERS EAD to fulfill its obligations and to improve the quality of the services provided. Based on our legitimate interest related to the internal administrative objectives of the Group, and in order to comply with the legal obligations regarding accountability, we may share your data with companies belonging to the group of ALFA FINANCE HOLDING AD.

What are the purposes for which will we use your data?

The personal data we collect from you will only be used for the purposes stated upon the collection and / or as required by the applicable law.

The personal data provided by you will be used for the purpose of administering the service, including, but not limited to:

- Identifying you as a customer and risk assessment;
- Your successful registration and the best service for you;
- Assessing your knowledge for the purposes of your classification as a customer and the provision of services;
- Prevention of fraud;
- Implementation of the legal requirements, including avoidance of conflicts of interest, corrupt practices, obligations under the MFIA and the related legal and regulatory acts, as well as obligations under the MAMLA, MFTA and other applicable acts. Your data will also be used for your legitimation as our customer to the Financial Supervision Commission, the Central Depository, the Bulgarian Stock Exchange;

¹ In compliance with, but not limited to, the Personal Data Protection Act, the Markets in Financial Instruments Act (MFIA) and the bylaws on their implementation, together with the direct implementation of the European legislation, the Measures against Money Laundering Act (MAMLA), the Measures Against Financing Terrorism Act (MFTA) and the other statutory instruments imposing binding obligations for the activity of the investment intermediary.

- Execution of the obligations under a contract with you (i.e. receiving and processing orders for transactions, safekeeping of assets and keeping records thereof);
- Offering products and services including marketing communications, advertisements and offers;
- Analysis of the customer preferences and requirements (through surveys, customer inquiries, market researches, etc.);
- Distribution of existing and development of new products and services, incl. control, distribution and management of IT systems, programs and platforms of the investment intermediary;
- Complaint management;
- Protection of the investment intermediary's rights through analysis to assess and prevent the risks of losses;
- Processing in relation to statistical data generated by the cookies which we use for marketing goals

Your personal data is necessary to ensure the security of your investment and its profitability.

We would also like to improve the service we provide to you by receiving information from you. To achieve this goal, when you log on to our website you will be asked to provide or refuse to provide your consent to save cookies on your device. Detailed information can be found in [The cookie policy](#).

Who has access to your data?

BULBROKERS EAD is the controller of your personal data and in its capacity as such, it will not sell your data to third parties, including for marketing purposes. "BULBROKERS" EAD respects and keeps the confidentiality of your personal data. Subject to the legal requirements or your consent, BULBROKERS EAD may disclose your personal data to third parties which are data processors or joint data controllers with Bulbrokers.

Personal data processors are third parties who may use your personal data only in the manner specified in the agreement between BULBROKERS EAD and them, for the purposes stated in this policy. They will not share your personal data with any organization except us. They will keep your data secure for a period we have set in advance.

In case you choose to register and trade online via TWS platform and you have signed a contract for the provision of these services, Interactive Brokers LLC is a partner of ours and it can collect, store and process your personal data. For more information about the manners and purposes for which Interactive Brokers processes your personal data please read their [Privacy Policy](#).

The persons with whom we share data are:

- Service providers (Interactive Brokers LLC, consultants, experts, valuers, attorneys, notaries, bailiffs, Central Depository, Bulgarian Stock Exchange, court, arbitration). In the case of technical maintenance of information systems and operational support of our activity, BULBROKERS EAD may disclose personal data. Such disclosure of data will take place only in the presence of a justified reason and upon written agreement with the recipients, requiring them to ensure an adequate level of protection.
- Providers of translation services, consultations related to IT servicing, maintenance, registration and/or settlement of customer assets, reporting of commercial information or other services (eg. auditors, valuers, etc.)

Third-party personal data processors also include regulatory administrative bodies, receiving information on the basis of their legal authority to request and receive such information, as well as

other state authorities in the cases provided for by law, in connection with the performance of legal obligations or in connection with legal proceedings. Your data is shared with administrative regulatory bodies in accordance with the requirements for carrying out the activity and for accountability of the investment intermediary, with the Financial Supervision Commission, the Bulgarian Stock Exchange, the Central Depository AD, custodian banks and other bodies in the cases provided by the MFIA.

We retain your customer information in our Customer Relationship Management (CRM) system, our accounting systems, and the Interactive Brokers systems.

As mentioned above, if you provide us with your consent, we will share information with our partner Google, who processes it for analytical purposes, as well as pixel tags and other Internet tags that allow us to better understand consumer behavior, calculate and segment user traffic, measure conversions of our Web pages and retarget (remarket) our ads. Detailed information can be found in [The cookie policy](#).

In the cases where we send you information via email, we work with our partners [MailChimp](#).

For what period do we store your personal data?

BULBROKERS EAD registers and stores your personal data, which it administers for the purpose of providing the relevant service, for an indefinite period of time, in case of prior consent. Detailed information you can find in the [Data retention and disposal policy](#).

Data storage includes:

- Data and documents related to the provision of services that define the rights and obligations of BULBROKERS EAD and the client, as well as the conditions for the provision of these services;
- Data about the provided services, transactions and communication between you and BULBROKERS EAD in order to document and report the activity of the investment intermediary in connection with the provision of services;

We will store your data while your account is active, you have a contractual relationship with us, or you need our services. Your data will be stored until the expiry of the statutory deadlines for storing customer data for the purpose of regulatory oversight by the competent state authorities but not less than 5 years from the date of termination of our contractual relations, unless a longer term is established by another statutory act.

We will store and use your information as necessary, for the purposes of performing our legal obligations, resolving any disputes arising out of or in connection with the performance of our contractual relationship.

Your rights with respect to your personal data

You have control over your personal data that you share with us.

We may contact you for marketing purposes if you accept this option through your consent upon registration or after changing your preferences in your account settings. Please note, that in case of contacts for marketing purposes, we will need to save your choice, so that we do not contact you for

marketing activities if you do not wish us to do so. You also have the right to withdraw your consent for the use of your data for marketing purposes at any time.

In the event that the consent is withdrawn, the personal data will be deleted from the BULBROKERS EAD direct marketing systems within 30 days. You will be duly notified of the outcome of your request within 30 days of submission of the request for withdrawal of consent, as well as of your specific rights and time limits, after which you may request that your data be deleted, respectfully of our counter-obligation to erase them after the expiry of these deadlines. The 30-day term starts from the date of identification of the person, who has requested withdrawal of his consent via the approved communication channels with BULBROKERS EAD.

After registration, you can change your preferences by contacting us at +359 2/4893 712 or sending us an email at office@bulbrokers.com.

For the purpose of protecting your personal data, we may ask you to verify the data contained in our systems and, if necessary, rectify or validate your data. Rectification of collected data is also made on the basis of data from independent public official registers and other reliable sources.

By entering into a contract for the use of services provided by BULBROKERS EAD, you may request a change in your data via the contractual communication channels at any time.

You have the following rights with respect to your personal data processed by BULBROKERS EAD:

1. To access your personal data processed by BULBROKERS EAD and obtain a copy thereof;
2. In case of incompleteness or inaccuracy in the data that BULBROKERS EAD processes, your personal data will be rectified;
3. To request your data to be deleted when the required conditions are met. Such cases include: the purpose, for which the data has been collected, is already achieved; you have withdrawn your consent where processing is based on consent and there is no other legal basis for processing; your data is being illegally processed, and others;
4. In the cases specified by law, you may require that the processing of your personal data be restricted;
5. In cases where your data is processed based on a legitimate interest (listed above in this notice), you may object to the processing of your personal data on these grounds;
6. To exercise your right to data portability and ask for your data to be provided in a structured, commonly- used and machine-readable form;
7. To withdraw your consent if the processing your personal data is based on consent.

Detailed information you can find in the [Policy for Data Subject Rights](#).

We do our best to keep your data up to date. However, if you notice any incorrect data or other irregularities, you can rectify, update, change, delete or disable them by contacting us at office@bulbrokers.com. We will respond to your request as soon as possible and no later than 30 days after receipt.

You also have the right to file a complaint with the Personal Data Protection Commission of the Republic of Bulgaria if the relevant prerequisites are in place.

How do we protect your personal data?

The security of your data is important to us. When you provide us with data, we will take steps and make maximum effort to ensure that it is treated securely in our systems.

When you enter information in our order forms, we transfer this information for the purpose of administering the service, including to brokers, exchanges, payment partners such as banking institutions, Central Depository, Bulgarian Stock Exchange, Central Depository AD, custodian banks and other bodies in the cases provided by the MFIA , through encrypted technologies including, but not limited to, secure sockets layer (SSL).

We have introduced reasonable procedures to help protect the data and restrict the access to your personal data only to those employees who need access to perform their duties.

Links

The site of BULBROKERS EAD contains links to other websites. We are not responsible for the content or privacy messages of any of these sites. If you provide personal information to any of these sites, your data will be managed based on their privacy policies. We encourage you to carefully read the privacy statements of each website you visit.

Changes to this policy

This policy is published on May 23, 2018 and we will revise it continuously. It was last updated on June 22nd, 2018. We expect to make substantial changes to this policy additionally following the entry into force of the General Data Protection Regulation (GDPR) and the amendments to the Personal Data Protection Act.

How to contact us?

If this policy does not respond to your questions or you have another inquiry, please, contact us directly. You can do that at the following address: Sofia 1504, 18, Krakra St., E-mail: office@bulbrokers.com