**PRIVACY NOTICE for Direct Marketing of Sopharma AD**

**1. Introduction**

This Notification about Confidentiality presents the practices which Sopharma AD, UIC 831902088 ("Sopharma", "We", "the Company") follows up in the management of its database with contacts for direct marketing, referring to the right of private life of all the persons whose personal data are processed and stored at the Company for the purposes of the direct marketing.

**2. Who manages the database with contacts of Sopharma?**

The database with contacts for direct marketing of Sopharma refers to Sopharma AD and is controlled by the Company.

**3. Why do we need your information?**

The database with contacts for direct marketing of Sopharma represents means which renders assistance to the interrelations with the contacts regarding the marketing activities of the Company. The contacts included in the database with contacts for direct marketing of Sopharma, may be received from Sopharma through marketing materials, information bulletins, investigations and invitations for events and with respect to existing business relations or intention to build business relationship with Sopharma.

The personal data processed in the database with contacts are used for the purposes of the marketing, including for the organization, performance and registration for your participation in general and target meetings for acquaintance with the activities of Sopharma and Sopharma Group companies.

The processing of the information about connection lets us communicate with you through electronic, text messages, print-outs and invitations.

For the legitimacy in the processing of the personal data in the database with contacts for direct marketing, Sopharma refers to the following:

- Received consent (including such demonstrated by conduct, i. e: acceptance of invitation, participation in a promotional event etc.) from the person for the processing of the personal data within the framework of the database with contacts; or

- Sopharma has a legitimate interest for processing of the personal data in the database with contacts for direct marketing, which legitimate interest is expressed in the processing of the personal data for the purposes of the direct marketing.

**4. What personal data are processed in the database of Sopharma?**

The database with contacts for direct marketing processes personal data of persons interested in the activities of the Company as: former, present and potential future partners, customers, contractors, shareholders of the companies from Sopharma Group. The database with contacts of Sopharma may also contain data about other business contacts (e.g. consultants, journalists etc.), as well as former employees.

The lists and examples below are illustrative, incomplete and not fully representative of each included person.

The following categories of data are processed in the database with contacts for direct marketing:

Name, father’s name, family name;

Position, organization;

Telephone, fax, address of electronic mail;

Mail address, including: city, country

**5. Special categories of personal data**

The special categories of personal data disclose your race or ethnic origin, political views, religious or philosophical beliefs, membership in a trade union, genetic data, biometric data, data related to the health or data related to the sexual life or the sexual orientation.

Sopharma does not collect intentionally any special categories of personal data from you aimed at their storage in the database for direct marketing. The objective of this database is not to process such data, unless you explicitly present to us special categories of personal data.

**6. Who has access to your information?**

The access to your personal data is restricted to the need for that. Only this part of the personnel of Sopharma which is engaged with the activities for direct marketing has access to your contact information.

We disclose your personal data before third persons:

- Only, if such a third person is engaged by Sopharma for facilitation, maintenance or provision of information technologies or other services for administrative assistance for the functionality of the database;

- Only when this is explicitly requested from you;

- Sopharma Group companies;

- As well as if this is required by virtue of a court order or any other legal or regulatory requirement.

**7. International transfer of data**

Sopharma may announce your personal data only before third parties which provide adequate degree of protection of the rights for privacy.

**8. Storage of data in the database with contact for direct marketing**

The data about persons who declared to be notified through an electronic message are stored in our lists for sending messages on secured servers.

Data of persons who have accepted invitation for participation in a corporate event organized by the Company shall be kept for the minimum required technological period after the relevant event.

If you wish that your data should be erased from our database or if you wish to object to the processing of your personal data for the purposes of the direct marketing, please, contact us by electronic mail at address: [personaldata@sopharma.bg](mailto:personaldata@sopharma.bg)

**9. Security**

Sopharma applies technical and organizational measures for protection and safety of your personal data aimed at preventing unauthorized access or announcement. The personnel of Sopharma and the third parties, which Sopharma engages for processing your personal data, shall be obligated to keep confidentiality with regard to your data.

**10. Control over your personal data**

Sopharma does not transfer your personal data to third parties (with the exception of the external parties mentioned in Section 6 hereinabove), unless it has permission on your part or unless it is obligated to do this by law.

You have the legal right to request detailed information about the personal data which Sopharma has about you.

To confirm whether your personal data are processed in our database for direct marketing or for access to your personal data in the database, please, send your request by an electronic message to address: [personaldata@sopharma.bg](mailto:personaldata@sopharma.bg)

**11. Rectification, erasure, restriction in the processing or the portability of the data**

To confirm that your personal data are accurate and valid or to request rectification, erasure, restriction in the processing or easily accessible for transmission copy of your personal data, you may send an electronic message to address: [personaldata@sopharma.bg](mailto:personaldata@sopharma.bg)

**12. Complaints**

If you have any concerns in connection with an allegation for violation of the law for the right to private life, or any other legislative documents, contact the Data Protection Officer of Sopharma: Law Firm Ernst and Young sending an electronic massage to address: [personaldata@sopharma.bg](mailto:personaldata@sopharma.bg)

The personal data protection official shall make verification with regard to your complaint and shall provide information about the manner which it shall be processed in.

If you are not satisfied with the manner in which Sopharma settled the issue related to your complaint, you shall be entitled to submit a complaint to the Commission for Personal Data Protection in the Republic of Bulgaria. You may also refer the issue to the competent Court in the relevant jurisdiction.

**13. Contact us**

If you have additional questions or considerations, contact the Data Protection Officer of Sopharma: Ernst and Young Lawyers Office sending an electronic message to: [personaldata@sopharma.bg](mailto:personaldata@sopharma.bg)