POLICY FOR CONFIDENTIALITY OF PERSONAL DATA PROCESSED THROUGH THE WEBSITE

of SYNCHRON-S Ltd. – www.synchron-s.com

The protection of individuals with regard to the processing of personal data is a fundamental right. Article 8 (1) of the Charter of Fundamental Rights of the European Union (the Charter) and article 16 (1) of the Treaty on the Functioning of the European Union (TFEU) provide that everyone has the right to the protection of his personal data. The principles and rules on the protection of individuals with regard to the processing of their personal data should, regardless of their nationality or place of residence, be complied with their fundamental rights and freedoms, and in particular the right to protection of their personal data. The right to the protection of personal data is not an absolute right but must be considered in relation to its function in society and be in balance with other fundamental rights in accordance with the principle of proportionality. The protection provided by Regulation (EC) 2016/679 should be applied to individuals, regardless of their nationality or residence, in relation to the processing of their personal data. The protection of individuals should apply to the processing of personal data by automated means, as well as to their manual processing.

To that end, we have developed our COMPANY POLICY in accordance with the Personal Data Protection Act and Regulation (EC) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of individuals with regard to the processing of personal data and on the free movement of such data. With this POLICY FOR CONFIDENTIALITY, we take into account the personal privacy of the person and declare the necessary efforts to protect the personal data we process.

This POLICY OF CONFIDENTIALITY regarding personal data processed through the website provides information on how SYNCHRON-S Ltd. ("we", "the Organization") manages the personal data of visitors to our website.

I. INFORMATION ABOUT THE PROCESSED PERSONAL DATA

1. What data we process when you visit our website?

A. When filling in the contact form to send a message to us, you need to fill in:

- name of the company on whose behalf you write;
- contact person;
- position;
- contact phone number and
- e-mail address.

As an option, a mobile phone, webpage and business activity can also be completed.

For the most part, these data concern legal entities and do not have the nature of personal data. However, for the received names and other data, we require your consent to process them as described below.

Б. Automatically collected data

When you visit our web page, the web server automatically recognizes and collects your IP address that is determined by your Internet Service Provider and does not identify you personally. These data are stored in our servers Log Files. They contain a set of system user information: IP address; ISP (Internet Service Provider); the browser you use when you visit a group site (such as Google Chrome, Internet Explorer, and Mozilla Firefox); The data collected in this way are only statistical and anonymous data and can not easily be linked to a particular individual because the pseudonymisation of data is applied - a unique user number is automatically generated.

Cookies

Cookies: This is the amount of information the web server sends to the web browser, allowing the server to collect feedback from the browser. You can choose to delete the cookies generated by the sites through the options of each browser. In some cases, the lack of the ability to store cookies may affect the interaction with some sites.

The site uses first-party cookies. Some of these are the so-called "necessary" cookies. They do not need user consent because they belong to the group of "necessary" cookies. „Necessary' cookies help navigation between pages on the site and access to all of its functionalities protected. The website can not function properly without these cookies. In addition, we also use cookies for analytical and statistical purposes that are generated by the Google Analytics application. More about the work of Google Analytics you can learn here.

	Name	Type	Explanation	Duration
1	__utmb	Source: Google Analytics, analytical goals	Records a time tag with the exact time of site visit by the user. Used by Google Analytics to calculate the duration of visits to the site.	30 minutes
2	__utmc	Source: Google Analytics, analytical goals	Records a time tag with the exact time of leaving the site by the user. Used by Google Analytics to calculate the duration of visits to the site.	By the end of the visit session
3	__utmz	Source: Google Analytics, analytical goals	A cookie that collects information about where the user reaches the site from, the search engine used, what link has been clicked, and what term it used to search. Used by Google Analytics.	6 months
4	__utma	Source: Google Analytics, analytical goals	A cookie that collects information about the number of visits to the site by the user, as well as the date of the first and last visit. Used by Google Analytics.	2 years

5	__utmt	Source: Google Analytics, analytical goals	Used to limit the volume of requests to Google Analytics.	10 minutes
6	__atuvc	Source: addthis.com	Stores the number of page shares.	By the end of the session
7	__atuvs	Source: addthis.com	Used by addthis to limit the volume of queries.	10 minutes

The site further uses Addthis to give us information about the number of shares. The cookies applied by this application can be considered as "third party" requests that are required by our website. The information provided by Addthis is in the form of aggregated analysis without taking into account the individual characteristics of the staff, but by identifier, designed to provide a device that is used.

2. On what basis do we process the data?

A. For your data completed in the contact form we need your explicit consent, without which you can not send the information entered;

B. For automatically collected data - IP address and data from a server log file (*date and time of access, name and address (URL) of the extracted file, a website which the access come from (URL address of the referring site), browser used and if is applicable, the operating system of the computer as well as the name of an Internet connection provider*) – **and article 6 (1) (e) of the GDPR, which allows the processing of personal data for a legitimate interest** – protection against unlawful use. These data are not combined and used for consumer analysis.

C. For data from cookies, we also need your consent, but keep in mind that while continuing to use the page, you agree to the use of cookies. You can delete generated cookies from your browser settings.

3. For what purpose do we process the data?

A. Your data completed in the contact form - in order to be able to respond to your request and to identify whom it is originated from.

B. The automatically collected data - to detect and prevent fraud and unauthorized access to the system and to ensure the security of the Administrator's systems.

C. The data from cookies – improving site performance, statistics and analysis, advertising.

4. Automated decision making.

Based on your data, automated decision making, including profiling, is not carried out.

"Profiling" means any form of automated processing of personal data involving the use of personal data for the assessment of certain personal aspects of an individual and, in particular, for the analysis or forecasting of aspects relating to the performance of professional duties of the person, his or her economic status, health, personal preferences, interests, reliability, behavior, location or movement.

II. YOUR RIGHTS IN RELATION TO THE PROCESSING OF YOUR PERSONAL DATA BY THE ADMINISTRATOR.

1. Right of access to your personal data - you may want information about how we use your data and to provide you with a copy of the information we store for you.

2. Right to correct data - e.g. inaccurate, incomplete or changed after submitting the original information.

3. Right to delete personal information related to you (the "right to be forgotten").

4. Right to restrict the processing of personal data relating to you.

5. The right to receive the personal data you have provided to us that concern you and reuse them by transferring them to another administrator (the "portability rights").

6. Right, at any time and on grounds relating to your particular situation, to object to the processing of personal data relating to you.

7. Right of appeal to the supervision of the authority in case of violation of your rights or you have suffered from the unlawful processing of personal data (The Supervisory Authority for Personal Data Protection in the Republic of Bulgaria is the Commission for Personal Data Protection, address: 2 Tsvetan Lazarov Blvd., Sofia, post code 1592).

The implementation of your rights described above is carried out free of charge. Only in the event that claims are manifestly unfounded or excessive, particularly because of its repeatability, the Administrator reserves the right:

- *to impose a reasonable fee, taking into account the administrative costs of providing information or communication or taking the requested action, or*
- *refusing to take action on the request.*

III. INFORMATION FOR CONTACT WITH ADMINISTRATOR

Administrator: **SYNCHRON-S LTD**, UIC: 040579893,

Headquarters and management address: 19A Krakra Str., 1504 Sofia, Bulgaria

email: office@synchron-s.com; Phone: +359 2 9441404

Contact person: Nikolay Stoytchev – General Manager