

Policy for Protection of Personal Data (Privacy Policy)

of www.sopharmatrading.com/?lang=bg

Last updated on April 27, 2021. Cancels all previous versions.

Introduction

Sopharma Trading AD is a company registered in the Commercial Register of the Republic of Bulgaria under UIC 103267194 with address of management in Sofia, Bulgaria, P.O.Box 1756, Izgrev district, 5 Lachezar Stanchev Str., Sopharma Business Towers, Building "A", floor 12 (hereinafter referred to as "**Sopharma Trading**", "**we**", "**us**", "**our**", "**Data Controller**").

We understand the importance of your personal information and its privacy.

This Policy for Personal Data Protection (the "**Policy**") sets the basis on which we process your personal data when signing contracts with us or using the services of www.sopharmatrading.com/?lang=bg (the "**Website**"), as defined in Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC ("**General Data Protection Regulation**" or the "**GDPR**").

Please read this Policy carefully. It provides important information about how we process personal data and explains your legal rights. This Policy is not intended to change the terms of any contract entered into with us, or the rights you have, or our obligations under applicable data protection laws.

By providing your personal data or using the Website, you voluntarily accept the terms of this Policy.

Definitions

a) "Data Controller" means the natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of personal data. For the avoidance of doubt, Data Controller of the personal data processed for the purposes of this Policy is Sopharma Trading AD.

b) "Cookie" – means a small amount of text or data that is submitted to the device (computer, laptop, tablet, phone) for storage and can be requested back by the sender.

c) "Data subject" means an individual who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person; legal entities registered as users will not be considered as data subjects.

d) "Personal Data" means any information relating to an identified or identifiable natural person (Data subject).

e) "EU" - the European Union.

f) "EEA" - European Economic Area.

g) "Processing" means any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

h) "Profiling" - means any form of automated processing of personal data consisting of the use of personal data to evaluate certain personal aspects relating to a natural person, in particular to analyse or predict aspects concerning that natural person's performance at work, economic situation, health, personal preferences, interests, reliability, behaviour, location or movements.

All capitalized words that are used but not defined in this Policy have the meaning as defined in the GDPR.

What kind of Personal Data we process?

1. When providing the information requested by you

When you ask us for information about products and / or services provided by us, in order to identify you and to be able to respond to your inquiry, request etc., you should fill out the contact form on our Website.

Through this contact form, we collect and process the following Personal Data for you:

- ✓ Name, surname
- ✓ Organisation (in which you work, you represent or on behalf of which you contact us)
- ✓ E-mail address
- ✓ Mobile phone
- ✓ Interests - information that you provide to us with respect to your interests when describing your inquiry

2. When applying for a position published on the Website

When you apply for a job via our Website, you provide us with the following Personal Data, which we subsequently collect and process:

- ✓ Name, surname
- ✓ E-mail address
- ✓ Education, qualification, professional experience

- ✓ Interests, as well as any other information provided voluntarily by you and included in your CV, cover letter and/or other documents sent to us by you at your own discretion in support of your application

3. Contractual relations

When entering into a contractual relationship with us, in order to be able to manage this relationship, we collect and process the following Personal Data:

- ✓ Name, surname of the representative of the legal entity or individual (if the contract is concluded with an individual)
- ✓ Organization
- ✓ E-mail address
- ✓ Phone number
- ✓ Contact address

4. When using Cookies

By using Cookies, we identify:

- ✓ Your browser
- ✓ Your device

You can learn more about the Personal Data processed by us via Cookies in the "Cookies" section of this Policy.

How we collect personal data

If you contact us directly to request information about our products and services, for example by using our contact details or via the inquiry forms on the Website.

Directly from you when you apply for a job via the Website.

As a result of the use of Cookies - by using online identifiers to collect information about IP addresses, cookie data, operating system and browser type.

If you provide your data when concluding a contract with the Data Controller.

If third parties (our business partners) make a permitted transfer of your Personal Data to us.

If you provide us with information on behalf of another Data subject, you must ensure that this Policy has been provided to that person and that the requirements of the applicable law have been complied with before providing the information.

If you are under the age of 14, please do not provide us with your Personal Data unless you have the permission of a parent or guardian to do so.

We ask for your assistance to keep your information up to date by informing us of any changes in your Personal Data.

How is your Personal Data processed?

The main operations for processing your Personal Data are collection and storage.

We collect and store your Personal Data and process them to the extent necessary to provide you with the services of our Website, as well as to enter into and maintain our contractual relationship with you.

We use some of the Personal Data to compile statistics that help us assess the interest in our Website. In this case, however, we process such data anonymously and do not associate it with your identification data.

Furthermore, we do not do Profiling of your behavior on the Website but use only the aggregated data from the statistics.

Cookies

Cookies are widely used by website owners and aim to improve the efficiency of the website, as well as to facilitate its use.

There are different types of cookies that differ in their purpose, the data processed and the domain where the data is stored. The function of the Cookie can vary: from keeping you logged in while filling out a form of inquiry and / or applying for a position via our Website, from storing your language preferences to view the Website, to tracking Your behavior when surfing the Internet, sometimes for an extended period of time and regardless of the device used: in latter case, as in all other similar cases, such a Cookie may not be used without your prior consent on the basis of received detailed information.

We have reduced the number of cookies we use on our Website. The only cookies we use belong to the following categories:

- A. Strictly Necessary Cookies - Cookies without which the functionality of the Website cannot be used. These cookies cannot be turned off in our systems.

- B. Functional Cookies – Functional cookies enable the Website to provide enhanced functionality and personalization based on your interaction with the Website. These cookies allow users to store language choices, access passwords, usernames or provide other features that facilitate the use of the Website.
- C. Statistic Cookies – Statistic Cookies, also known as analytics Cookies, help website owners to understand how visitors interact with websites by collecting and reporting information anonymously. These cookies allow us to track analytics by counting visits and traffic sources so we can measure and improve the performance of our Website. They may be set by us or by third party providers (e.g. Google Analytics) to help us to know which pages or videos are the most and least popular and see how visitors move around the Website. These Cookies do not collect information referring to a specific user. The information provided to us is summarized in the form of statistics without personal data, therefore, anonymous.

With the exception of the Strictly Necessary Cookies, all other Cookies require your prior consent.

Thus, we will process Personal Data gained via Cookies only after you have consented to them.

Name	Type	Description	Category	Term	Domain
JSESSIONID	HTTP	This cookie is used to ensure the security of your session throughout your visit to the site.	A	Session	Sopharmatrading.com
LFR_SESSION_STATE_20120	HTTP	This cookie is used to ensure the security of your session throughout your visit to the site.	A	Session	Sopharmatrading.com
SERVERID	HTTP	This cookie is used to ensure the security of your session throughout your visit to the site.	A	Session	Sopharmatrading.com

[cms+name_of_the_website]route	HTTP	These cookies are used to ensure good load balancing on our servers.	A	Session	Sopharmatrading.com
PHPSESID	HTTP	This cookie is used to maintain the session while the browser is active, thus, there is no automatic decommissioning in the system and disruption of the user experience on the website.	A	Session	Sopharmatrading.com
_wpfuid	HTTP	This cookie is used to automatically fill out forms and shapes.	B	12 months	Sopharmatrading.com
wp-wpml_current_language	HTTP	This cookie is used to save the language in which the site is displayed.	B	12 months	Sopharmatrading.com
GUEST_LANGUAGE_ID	HTTP	This cookie is used to save the language in which the site is displayed.	B	12 months	Sopharmatrading.com
p-wpml_current_language	HTTP	Google Analytics mandatory cookie for user's language settings.	B	12 months	Sopharmatrading.com

wp-settings-time-2	HTTP	Google Analytics mandatory cookie for server's time (date and year).	B	12 months	Sopharmatrading.com
viewed_cookie_policy	HTTP	Google Analytics mandatory cookie for accepted Privacy Policy.	B	12 months	Sopharmatrading.com
jobsearch_employer_views_count43008	HTTP	Google Analytics optional cookie which counts the views on single open position in Careers.	C	12 months	Sopharmatrading.com
hide_passwords	HTTP	Google Analytics cookie which hides the passwords and automatic pre-filling of forms and fields.	B	12 months	Sopharmatrading.com
cookieLawinfo-checkbox-others	HTTP	Google Analytics cookie which allows the user to select which cookies to be tracked for other cookies (e.g. passwords).	B	12 months	Sopharmatrading.com
cookieLawinfo-checkbox-necessary	HTTP	Google Analytics cookie which allows the user to select which cookies to be tracked for saving the filter for cookies' choice.	B	12 months	Sopharmatrading.com
cookieLawinfo-checkbox-functional	HTTP	This cookie stores if a visitor has accepted "functional" cookies.	B	12 months	Sopharmatrading.com

cookieLawInfo-checkbox-analytics	HTTP	This cookie stores if a visitor has accepted "statistic" cookies.	B / C	12 months	Sopharmatrading.com
CookieLawInfoConsent	HTTP	Cookie for Cookie pop-up window which disappears when user clicks Accept.	B	12 months	Sopharmatrading.com
_gid	Pixel	This cookie is installed by Google Analytics. The cookie is used to store information of how visitors use a website and helps in creating an analytics report of how the website is doing. The data collected includes the number visitors, the source where they have come from, and the pages visited in an anonymous form.	C	1 day	Google.com
_ga	Pixel	This cookie is installed by Google Analytics. The cookie is used to calculate visitor, session, campaign data and keep track of site usage for the site's analytics report. The cookie stores	C	24 months	Google.com

		information anonymously and assigns a randomly generated number to identify unique visitors.			
_gat	Pixel	Google uses this cookie to distinguish users.	C	2 hours	<u>Google.com</u>

All Cookies used on this Website are automatically deleted/erased after a certain period of time, as indicated in the table above.

Cookies are stored on the user's computer and from there are transmitted to our Website. Therefore, as a user, you have full control over the use of cookies. By changing the settings in your internet browser, you can disable or restrict the transfer of cookies. Already saved Cookies can be deleted at any time. This can also be done automatically. If you disable (some) cookies for our Website, the full use of (some of) its features may no longer be possible.

You can avoid storing cookies by setting up your browser. More information about Cookies, including the ability to manage them, can be found on the following website: <http://www.allaboutcookies.org/manage-cookies/> Please note that the content of <http://www.allaboutcookies.org/manage-cookies/> is only available in the following languages: English, German, Spanish and French.

It is possible that our Website contains links to other sites or embedded content from other sites (e.g. LinkedIn, YouTube, Facebook, Instagram, or others). When you visit these sites or open the content from them, there is a possibility cookie(s) from these other sites to be placed on your end device. In practice, such cookies are called "third-party cookies". Sopharma Trading has no control over the generation and management of "third party cookies". For more information about the purpose of using "third party cookies" and their content, please consult the respective privacy and cookies policy adopted by the respective third parties.

Purposes of Personal Data processing

The main purposes for which we collect and process your Personal Data are:

- ✓ Providing the services/information requested by you via the Website. This includes processing and storing inquiry forms for the purpose of contacting you (e.g. providing a response to your email and/or feedback based on your call to the telephone number provided to contact us on the Website).

All Personal Data that you provide to us via the inquiry forms on the Website are necessary to respond to your need or provide you with a service requested by you.

- ✓ Selecting employees who have applied for jobs with us via the Website.

We offer a convenient opportunity via the Website to get acquainted with open positions for work in companies from the group of Sopharma Trading and to apply directly for a job of your choice. Thus, you can submit your documents via the Website, and for the purposes of applicants' selection we will identify you and process the information you send (including your Personal Data).

- ✓ Exercising the rights and obligations of Sopharma Trading AD, resulting from contracts entered into with you.
- ✓ Performing of financial and accounting activities by Sopharma Trading AD upon and due to the contracts entered into, including receiving and ordering amounts due to bank accounts, issuing invoices.
- ✓ For our business purposes, such as data analysis, development of new products and services, improvement of our Website, improvement of our products and services.
- ✓ Website analysis through Cookies - we need statistical information about the use of our Website in order to make it more accessible, more efficient etc.

The use of your Personal Data for statistic purposes is carried out after its anonymization.

- ✓ Ensuring the functioning of our Website.

Lawfulness (legal grounds) of the Processing

When you contact us via the inquiry forms on our Website, the legal ground on which we process your data is the consent you provide to us - Art. 6, paragraph 1, letter "a" of GDPR.

In case you apply for a position published on the Website, we collect personal data for the purposes of selection on the basis of your consent in accordance with Art. 6, paragraph 1, letter "a" of GDPR.

When we exercise our rights and obligations based on contracts we have entered into with you, the legal ground for the Processing is either performance of a contract or compliance with our legal obligations as Data Controller - Art. 6, paragraph 1, letter "b" or "c" of GDPR.

Performing of financial and accounting activities by Sopharma Trading AD upon and due to the contracts entered into is based on our rights and obligations arising from the performance of the contract or compliance with our legal obligations as Data Controller - Art. 6, paragraph 1, letter "b" or "c" of GDPR.

When we process Personal Data for our business purposes, such as data analysis, development of new products and services, improvement of our Website, improvement of our products and services, the legal basis for Processing are the legitimate interests of Sopharma Trading AD - Art. 6, paragraph 1, letter "f" of the GDPR. The legitimate interest of the companies from the Sopharma Trading group to provide first-class products and services complies with the interests of the clients and is, therefore, in accordance with the requirements of the Bulgarian and European personal data protection legislation. Hence, it is sufficient legal ground for Processing.

The Processing of Personal Data via Cookies (except the so-called Strictly necessary Cookies) for the purpose of analysis/improving the functionality of the Website is carried out on the basis of consent obtained from you - Art. 6, paragraph 1, letter "a" of GDPR.

The legal ground for Processing of Personal Data with respect to the use of the so-called Strictly necessary Cookies for ensuring the functioning of our Website are the legitimate interests of the Data Controller - Art. 6, paragraph 1, letter "f" of GDPR. Personal Data collected for this purpose are anonymized and processed in this form. For the legitimate interest of the Data Controller we have a justification and a three-stage test. Therefore, with respect to these processing operations, the Processing of Personal Data is based on of Art. 6, paragraph 1, letter "f" of GDPR.

How long we store Personal Data

Personal data gained via the Website are stored in our information system, for the operation of which technical and organizational security measures have been taken, including the use of a separate high-end server with limited access, on which only this Website is located; using an encrypted connection to access the server; use of SSL and DDoS protection, HTTP / 2, "smart" Firewall and fail2ban.

We store your data as long as necessary in view of the purpose for which we have obtained it. If your Personal Data are processed for two purposes, we will keep them until the purpose with the longer period of processing is completed but we will stop processing them for the purpose with the shorter period after this

shorter period has expired. Depending on the legal grounds on which we process your Personal Data, the period for their storage varies as follows:

The Personal Data that we collect and process through the inquiry forms on our Website are stored until we respond to your request, unless we have no other legal basis to continue to store them - e.g. in the event that as a result of your inquiry we take steps to enter into a contractual relationship with you/the company you represent.

All CVs, cover letters, recommendations, documents referring to education, experience gained etc. sent to us via the Website are collected with your consent and are subject to strict confidentiality, considering that: 1) the data of the job applicants who have not been selected to conclude a contract with the Data Controller, are stored for up to 12 months after the selection procedure is completed; while 2) the data of successful job applicants become part of their employment records and continue to be further stored by us on the basis of this contractual relationship.

If we process your Personal Data for the performance of a contract, your Personal Data are stored by us for a period of 5 years from the termination of this contract.

Personal data gained via Cookies are kept within the time limits specified in the cookie table above.

Under certain circumstances we may keep your Personal Data for longer periods of time, if we are obliged under law, by an act of competent authority or in order to have a correct record of your relations with us in the event of complaints or if we have reason to believe that there is a possibility of court disputes in view of which your Personal Data will be needed, until the expiration of the relevant limitation period for filing claims in court.

After the expiration of the above deadlines, the Personal Data, which are no longer needed, are anonymised (the anonymised data may be kept but it is no longer linked to you) or they are destroyed.

Sharing Personal Data with Third Parties / Protection of Personal Data

Generally, third parties do not process your Personal Data gained via this Website.

We store all data on our own server located in our office in Sofia, 16 Rozhen Blvd. where Personal Data could be accessed solely by authorized employees of the Data Controller on a “need to know” basis.

Transfer of Personal Data outside the EU/EEA

Sopharma Trading AD does not transfer your Personal Data outside the EU/EEA. Our servers are located in Bulgaria and we store there all information and Personal Data that we process via the Website.

Notwithstanding the above, if our partners and/or companies from the corporate group of the Data Controller outside the EU/EEA (for example in Serbia) gain access to your Personal Data, each transfer will be covered by appropriate safeguards, as provided for in the GDPR - e.g. by applying standard contractual clauses adopted by the European Commission.

More information regarding the standard contractual clauses of the European Commission as an appropriate safeguard for data transfers out of the EU/EEA can be found at the following website: www.ec.europa.eu/info/law/law-topic/data-protection/data-transfers-outside-eu/model-contracts-transfer-personal-data-third-countries_en.

Security

We will take all reasonably necessary steps to ensure that your Personal Data is treated securely and in accordance with the GDPR.

In addition, Sopharma Trading has a data security policy according to which we monitor security vulnerabilities and incidents with respect to our systems, maintain the Website software and ensure that we have the necessary updates. We also use appropriate security tools, so that your Personal Data is processed in a secure manner. Although we cannot guarantee that the transmission of data via the Internet or the Website is free from any cyber attack' risks, we work hard to maintain measures for the physical, personal and documentary protection, including protection of automated information systems regarding your Personal Data in accordance with the applicable legislation. For example, we apply the following measures:

- ✓ Strictly limited access of our employees to your Personal Data – access is granted on the basis of “the need to know” principle;
- ✓ Personal data is stored electronically in databases or in shared folders, protected by passwords or by different degrees of authorization;
- ✓ Performing monitoring and virus protection; copies and backups are created for recovery; our systems also store logs with history of document operations;
- ✓ All paper documents that may contain your Personal Data are stored in an archive in the building of the Data Controller in Sofia, Bulgaria, 5 Lachezar Stanchev Str., Sopharma Business Towers, Building "A";
- ✓ At offices of the Data Controller, where processing of Personal Data is carried out, round-the-clock physical and/or technical security is carried out (through signal-security equipment and video surveillance); Furthermore, fire protection, physical access control procedures have been implemented;

- ✓ The staff of the Data Controller who processes Personal Data is acquainted with the requirements of the current national and European legislation in the field of personal data protection, with the policies of Sopharma Trading AD in this regard, with the existing risks and scenarios for action upon their occurrence.

How do we apply the GDPR

Sopharma Trading AD is a legal entity with a place of establishment in the EU. We process Personal Data while you browse our Website and take advantage of the services provided on it - by filling out inquiry forms, applying for a job with us etc. Therefore, Sopharma Trading AD is Data Controller according to the GDPR.

We are committed to ensuring the highest standards of protection of your Personal Data. With this in mind, we strictly adhere to the requirements of the GDPR, by applying the technical and organizational measures above, as well as the principles of privacy - by default and by design, the principles of lawfulness, fairness and transparency of the Processing, purpose limitations and limited storage periods, data minimization, integrity, confidentiality and accuracy of data. In addition, we strive to demonstrate accountability and transparency by providing you with detailed information about the Processing of your Personal Data. You may find this information in this Policy and in other privacy notices we address to you while using the Website.

The GDPR grants Data subjects a wide range of rights. As Data Controller, we will assist you with any requests for exercising any of your GDPR rights regarding Processing related to the services on this Website, provided the relevant legal grounds exist - in accordance with "Your Rights" section of this Policy.

Your rights

You have the right to exercise the rights you have as Data subject under the GDPR. Depending on the specific circumstances regarding your Personal Data, which we process when you use the Website or when we provide you with the services on the Website, you have the following rights:

1. Right of access

You have the right to receive from us confirmation as to whether or not Personal Data concerning you are being processed by us or not, including information about the purposes, legal grounds and terms of Processing, the categories of relevant Personal Data etc. You also have the right to access your Personal Data.

When you submit an application to us and upon verification of your identity - by sending an email to the following email address: dpo@sopharmatrading.bg (as per the provision of Art. 12, paragraph 6 of the GDPR) - we will disclose and/or will provide you with the Personal Data we process for you.

We reserve the right to charge you for submitting applications more than twice over a 12-month period.

2. Right to rectification

You have the right to request from us (by sending an email to the following email address: dpo@sopharmatrading.bg) the rectification of inaccurate Personal Data concerning you. Taking into account the purposes of the Processing, you have the right to have incomplete personal data completed, including by means of providing a supplementary statement.

3. Right to erasure

You have the right to request from us erasure of all Personal Data that we have collected and processed for you. Please, note that this right does not apply in any of the following cases:

- ✓ we are legally obliged to store personal data for a certain period of time or we must comply with another law or legal obligation;
- ✓ we defend the right to freedom of expression and information – e.g. when we guarantee the right of another Data Subject to exercise his/her right to freedom of expression or we assist in the exercise of another right that overrides your right or we assist in the exercise of another right provided by law;
- ✓ we process Personal Data for archiving purposes in the public interest, for scientific or historical research or for statistical purposes, in so far as the right of erasure is likely to render impossible or seriously impair the achievement of the objectives of that Processing;
- ✓ we process your Personal Data for the establishment, exercise or defence of legal claims.

You can request erasure of your Personal Data if any of the following circumstances exist:

- ✓ Your Personal Data are no longer necessary in relation to the purposes for which they were collected or otherwise processed;
- ✓ You have withdrawn your consent on which the processing is based and we have no other legal ground for the Processing (please see item 7 below);
- ✓ You object to the processing of your Personal Data under the conditions of automated individual decision-making and Profiling or you object to the processing for the purposes of direct marketing (please see item 6 below);
- ✓ The Personal Data have been unlawfully processed;

- ✓ The Personal Data have to be erased for compliance with a legal obligation in the EU or Member State law to which the Data Controller is subject;

In case you want to exercise your right to erasure, please send us e-mail to the following e-mail address: dpo@sopharmatrading.bg. If there are legal grounds for exercising your right, we will irrevocably erase all your Personal Data that we process, thus, you will no longer be a person that we identify or can identify. As a result, we will suspend the Processing of your Personal Data.

4. Right to restriction of Processing

You have the right to obtain from us (by sending an email to the following email address: dpo@sopharmatrading.bg) restriction of the Processing of your Personal Data in any of the following cases:

- ✓ You have contested the accuracy of your Personal Data and request us to restrict the Processing for a period enabling the Data Controller to verify the accuracy of the Personal Data;
- ✓ The Processing is unlawful, but you do not want us to erase your Personal Data, but request us to restrict their use instead;
- ✓ We no longer need your Personal Data for the purposes of the Processing, but they are required by the Data subject for the establishment, exercise or defence of legal claims;
- ✓ You have objected to the Processing of your Personal Data on the basis of our legitimate interest(s) and request us to restrict the Processing pending the verification whether the legitimate grounds of the Data Controller override those of the Data subject.

5. Right to data portability

You have the right to receive your Personal Data in a structured, commonly used and machine-readable format and have the right to transmit those data to another data controller without hindrance from us, as long as the Processing is performed by automated means and is based on your consent or contract you have with us. Again, this right could be exercised by sending an email to the following email address: dpo@sopharmatrading.bg.

6. Right to object

You have the right, at any time and on grounds relating to your particular situation, to object to the Processing of Personal Data concerning you when the Processing is carried out on the basis of a legitimate interest (Art. 6, para.1, letter "f" of GDPR) - by sending an email to the following email address: dpo@sopharmatrading.bg.

When you exercise your right to object, we will no longer process your Personal Data unless we demonstrate compelling legitimate grounds for further Processing which override your interests, rights and freedoms or for the establishment, exercise or defence of legal claims.

If you are not sure on what grounds and for what purposes we process your Personal Data, you can contact us for information (see the Right of Access in item 1 above).

7. Withdrawal of consent

You have the right to withdraw your consent at any time for any operation for the Processing of your Personal Data for which you have provided your consent, by sending an email to the following email address: dpo@sopharmatrading.bg.

Withdrawal of your consent will not affect the lawfulness of Processing based on your consent before its withdrawal.

8. Filing a complaint to a competent authority

You have the right to lodge a complaint with a supervisory authority if you believe that we have violated the GDPR or any other applicable data protection law while we process your Personal Data. Please, note that the Bulgarian supervisory authority is the Commission for Personal Data Protection which could be contacted at www.cdpd.bg

Any of the above rights can be exercised if you submit a request to dpo@sopharmatrading.bg . We will return a response to your request no later than 30 days after receipt.

The exercise of any of the above rights does not allow Sopharma Trading AD to discriminate against the respective Data subject.

Contact us

If you have any concerns or complaints about the protection of your Personal Data, please let us know and we will try to resolve the issue. You can also contact us if you want to make us a proposal to improve the functioning of the Website in terms of privacy. Our contacts are as follows: dpo@sopharmatrading.bg

The Personal Data Protection Officer of Sopharma Trading AD is Law Company "Dinev, Mandazhieva, Bliznakova and Kaldamukov", BULSTAT 177434261, with which you can get in touch by sending an email to dpo@sopharmatrading.bg in case of ambiguities related to the application of this Policy or the exercise of your rights.

Policy Updates

The Policy will not remain the same throughout the operation of the Website. We may modify or amend this Policy from time to time at our discretion, reflecting the new developments in digitalization and the regulations of personal data processing. When we make changes to this Policy, we will amend the revision date at the top of this page, and such modified or amended Privacy Policy shall be effective as to you and your Personal Data as of that revision date. Each time we make a change in the Policy, we will publish a short notice on the Website with the most important highlights.