



# Euro Finance

Member of Eurohold



**Privacy policy**

## **PRIVACY POLICY**

*for clients - natural persons, for natural persons representing and/or members of management and supervisory bodies of legal person clients, for natural persons - agents of natural person clients or legal person clients, for natural persons - beneficial owners of legal person clients*

### **WHO ARE WE AND HOW CAN YOU CONTACT US?**

EURO-FINANCE AD ("the Company", "We", "Us") is a company incorporated under the laws of the Republic of Bulgaria, UIC: 831136740, seat and address of management: Sofia, 1592, Iskar res. area, 43 Hristofor Kolumb Blvd., fl. 5, tel: (+359 2) 980 56 57, fax: (+359 2) 981 14 96, email address: office@eurofinance.bg, for the purposes of protection of personal data: dpo@eurofinance.bg, website: www.eurofinance.bg. EURO-FINANCE AD holds a license to perform as an investment intermediary services and carry on a professional activity in the territory of the European Union and the European Economic Area and in third countries, in accordance with Decision No. 81-ИП/01.02.2006 of the Financial Supervision Commission (FSC). The Personal Data Protection Officer of EURO-FINANCE AD is Natalia Ivanova Popova - Tsepenisheva with contact details as follows: Sofia, 1592, Iskar res. area, 43 Hristofor Kolumb Blvd., fl. 5, email address: dpo@eurofinance.bg, tel: (+359 2) 980 56 57

### **FOR WHAT PURPOSES DO WE PROCESS YOUR DATA?**

EURO-FINANCE AD is the controller of your personal data. We will collect and use your personal data which you provide to us and/or which we have obtained from other sources (e.g. Trade Register and Register of Non Profit Legal Entities with the Registry Agency, etc.) for the purposes set out below:

- To identify you when you sign a contract with us, respectively to identify a legal entity of which you are a representative, a member of the management or control body and/or the beneficial owner when we enter into a contract with the legal entity or to identify a legal entity or natural person for which you are an agent likewise for the purpose of establishing a contractual relationship between us and the legal entity or natural person concerned.
- To obtain information about your knowledge and experience of the products and services offered by us, your financial situation, your investment objectives and your ability to sustain losses, including your risk tolerance, where applicable.
- For the performance of the contract entered into between us, respectively for the performance of the contract entered into between us and the legal entity of which you are a representative, a member of the management or supervisory body and/or the beneficial owner or for the performance of the contract entered into between us and the legal entity or natural person for which you are an agent and for maintenance of the partnership under the contracts entered into, as well as for the purpose of conducting subsequent communication between us in connection with the performance of the relevant contract and the services and/or activities provided on the basis of it;
- To perform and keep the necessary records in connection with the performance of the contract concluded between us, respectively in connection with the performance of the contract concluded between us and the legal entity of which you are a representative, a member of the management or control body and/or the beneficial owner, or for the performance of the contract concluded between us and the legal entity or natural person of which you are an agent and the services and/or activities provided on the basis of the relevant contract.

- To add you to our customer database as an individual customer, respectively as a representative, member of the management or supervisory body and/or beneficial owner of a legal entity customer or as an agent of a legal entity customer or a natural person customer.
- To provide you with up-to-date information about the products of EURO-FINANCE AD and related news, as well as with advertising and promotional information about our products and services via SMS, e-mail or post (direct marketing), subject to your explicit consent to do so.

## **WHAT PERSONAL DATA DO WE PROCESS ABOUT YOU?**

For the purposes set out above, where applicable, depending on the capacity in which you act - natural person client, representative and/or member of the management and supervisory bodies of a legal person client, agent of a natural or legal person client, beneficial owner of a legal person client, we will process the following data about you: names; personal identification number (official personal identification number or other unique element of identification contained in an official identity document); date and place of birth; nationality, country of residence and address; correspondence address; country of residence for tax purposes; identity document number, date of issue and expiry date; copy of identity document; e-mail address; contact telephone numbers; details of a notarised power of attorney or a copy of a notarised power of attorney, whereas the power of attorney or copy of the power of attorney, as the case may be, remain on file with the Company; information regarding your knowledge and experience of the products and services we offer, including your education and profession, your financial situation, your investment objectives and your ability to bear losses, including your risk tolerance, except in the cases provided for by law where it is permissible not to require such information; a document in original issued by a credit institution that you are the holder of a bank account with the credit institution in the case of a contract concluded remotely, a document, including credit and/or debit card details, issued by a credit institution and/or a document certifying the charging or payment of a utility service, in the case of a contract concluded remotely; data contained in a qualified electronic signature, in the case of a contract concluded remotely; IP address; bank account; marital status; information concerning political or public office held, as well as other documents and information established by law, including under the Law on Measures against Money Laundering. If you choose to provide us with additional information, we will use it to the extent that it is relevant for the purposes of the processing.

If you use services through our website, such as opening a demo trading account or making a complaint, the information we require from you is as follows: for opening demo trading accounts - name, country, e-mail address and telephone number, for filing complaints - name, customer number, mailing address, e-mail address and telephone number. We need the details required for opening demo trading accounts in order to provide the service and to contact you. The details you provide when making a complaint are necessary for us to contact you, to resolve the issue you have raised and to respond to your complaint. Personal data is also collected through the use of cookies, as discussed in the Cookie Policy, which is available on the website of EURO-FINANCE AD and can be consulted at any time.

## **ON WHAT GROUNDS DO WE PROCESS YOUR PERSONAL DATA?**

The legal basis for processing the above personal data is taking steps to enter into a contract with you, with the legal entity of which you are the representative, with the natural or legal person for which you are an agent, and the subsequent performance of the contract entered into. The applicable legal basis to the legal relationship is also the legal obligation for us, in the capacity of an investment firm, to collect and store data pursuant to Directive 2014/65/EU of the European Parliament and of the Council of 15

May 2014 on markets in financial instruments and amending Directive 2002/92/EC and Directive 2011/61/EU and its delegated regulations and directives, the Markets in Financial Instruments Act and its subordinate legislation, the Law on Measures against Money Laundering and its subordinate legislation such as the obligation to identify the client and its beneficial owner, to establish the affiliation of the management and control bodies and to clarify the origin of the funds. In the event that you refuse to provide your personal data, it will not be possible for us to establish a contract with you, with the legal entity of which you are a representative, a member of the management or supervisory body and/or the beneficial owner, with the natural or legal person for which you are an agent.

If you wish to open a demo trading account through our website, we process your personal data on the basis of our legitimate interest to increase your knowledge and skills in trading in financial instruments, with a view to your becoming our actual client. When you open a demo account, we process your data only to the extent necessary to fulfil the purposes described above and subject to the principle that this does not prejudice your rights in a way that would take precedence over our legitimate interest. According to our rules, you may object at any time to the processing of data for the stated purposes at the administrative headquarters of EURO-FINANCE AD in Sofia, 1592, Iskar res. area, 43 Hristofor Kolumb Blvd., fl. 5, or via e-mail: [dpo@eurofinance.bg](mailto:dpo@eurofinance.bg). In case you refuse to provide your personal data, we will not be able to open a demo trading account for you.

If you lodge a complaint via our website, the data you provide will be necessary for us to contact you, to resolve the issue specified and to send you a response to your complaint. In these cases, we process your data on the basis of our legal obligation to provide you with the opportunity to lodge a complaint. If you refuse to provide your personal data, we will not be able to process your complaint.

If you have provided your explicit consent to receive advertising messages or updates on commercial campaigns, data processing will also occur on the basis of the consent provided by you for the purpose specifically stated therein.

## **PROFILING**

Your data will be processed by manual and automated means and EURO-FINANCE AD will not apply automated decision-making and profiling to your personal data.

## **WHO CAN WE SHARE YOUR PERSONAL DATA WITH**

Information about your personal data in connection with the performance of the contract concluded with you, with the legal entity of which you are a representative, a member of the management or supervisory body and/or the beneficial owner, with the natural or legal person for which you are an agent, and in connection with the provision of investment services and activities on the basis of the contract, may be transmitted to Bulgarian and foreign / from a member state of the European Union or the European Economic Area or from third countries / depository institutions, stock exchanges and other trading venues, execution venues and counterparties of EURO-FINANCE AD relevant to the performance of the relevant investment services and activities. In connection with the exercise of our supervisory functions, we may also share your personal data with the competent state authorities, including judicial institutions, the Financial Supervision Commission, the Personal Data Protection Commission, the National Revenue Agency, etc. We may also share your personal data with certain third parties, such as: companies or persons acting as our subcontractors for the purposes of the performance of a contract; a tied agent; certification service providers for the purposes of the remote conclusion of a contract; service

provider for verification and compliance with the requirements of the AML Act for the purpose of identification of the person and reference to the listed circumstances under the AML Act, validity of identity document or presence of negative public information; IT providers for the purposes of the development and technical support of our electronic systems; auditors and consultants to verify our compliance with external and internal standards and requirements; enforcement agencies and parties to disputes pursuant to a legal reporting obligation or in the pursuit of claims; a successor or business partner of EURO-FINANCE AD if we sell or form a joint venture for all or part of our business.

### **FOR WHAT PERIOD DO WE RETAIN YOUR PERSONAL DATA?**

We will retain your personal data for a specified period in accordance with the applicable Bulgarian and European legislation and the internal policies and procedures of EURO-FINANCE AD for as long as is necessary to comply with our statutory obligations, satisfy our legitimate business interests, or to establish, exercise or defend our rights. When it is no longer necessary to process your personal data for these purposes, your personal data will be securely erased.

### **HOW DO WE PROTECT YOUR PERSONAL DATA?**

The security of the data you entrust to Us is very important to Us. That is why We protect Your data by implementing all appropriate technical, physical and organizational means at Our disposal to prevent unauthorized access, unauthorized or malicious use, loss or premature deletion of information. We have adopted the necessary internal rules and policies. Our employees are familiar with the requirements regarding the protection of Your personal data. Processing is limited to the minimum data necessary to achieve the relevant purposes. The main data protection measures applied by EURO-FINANCE AD are as follows:

- Physical protection measures: controlled access to EURO-FINANCE AD's office; locked cabinets, equipment on the premises and fire extinguishing equipment; prohibition of unauthorised removal of documents containing personal data; a separate server room in which the elements of the communication and information systems for processing personal data are located, and the room is locked and access controlled.
- Personal protection measures: familiarisation with data protection legislation of all employees; training of employees on the dangers of personal data breaches; undertaking by all employees not to disclose personal data.
- Documentary protection measures: drawing up a register of personal data processing activities and making it known to the staff responsible; introducing rules on the lawful processing of personal data; drawing up personal data processing impact assessments for high-risk processes, if any; setting retention periods for personal data and establishing rules for action once retention periods have expired.
- Technical protection measures: encryption, pseudonymisation and anonymisation of personal data collected; identification and authentication of information systems by means of a unique username and password for each employee; introduction of different levels of access to information systems; use of specialised software to protect the information systems used against viruses; preparation of copies and backups for the recovery of data sets; specific testing and feasibility checking when implementing a new personal data processing software product to ascertain compliance with the requirements of the Regulation and that the software product provides maximum protection of personal data from unauthorised access, loss, corruption or destruction.
- Other measures defined in the internal policies and procedures of EURO-FINANCE AD.



## **WHAT ARE YOUR RIGHTS IN RELATION TO YOUR PERSONAL DATA?**

You can contact EURO-FINANCE AD and our Data Protection Officer Natalia Ivanova Popova-Tsepenisheva at the address of the company's administrative headquarters in the city of Sofia, 1592, Iskar res. area, 43 Hristofor Kolumb Blvd., fl. 5, or via e-mail: [dpo@eurofinance.bg](mailto:dpo@eurofinance.bg), to request to exercise the following rights: the right to access the personal data that EURO-FINANCE AD holds about you, the right to rectification of your personal data in case of inaccuracies and/or incompleteness, the right to erasure of your personal data, the right to restriction of processing, the right to object to the processing of your personal data, the right to withdraw consent when the processing is based on your consent, the right to portability of your data to another personal data controller under certain conditions. If such a request places EURO-FINANCE AD in breach of our obligations under the applicable Bulgarian and European legislation and EURO-FINANCE AD's internal policies and procedures, then we may not comply with your request. If your request is submitted by e-mail to the above e-mail address, it should be signed with a qualified electronic signature. A template of the request for the exercise of rights is available on the website of EURO-FINANCE AD for your convenience.

You are entitled to lodge a complaint about the processing of your personal data by EURO-FINANCE AD with the Personal Data Protection Commission at the following e-mail address: [kzld@cpdp.bg](mailto:kzld@cpdp.bg).

## **WILL WE USE YOUR PERSONAL DATA FOR DIRECT MARKETING?**

We will use your personal data for direct marketing purposes after obtaining your explicit consent to do so. You have the right to withdraw your consent at any time and to object to the processing of your personal data for direct marketing purposes at the address of the administrative headquarters of EURO-FINANCE AD in the city of Sofia, 1592, Iskar res. area, 43 Hristofor Kolumb Blvd., fl. 5, or via e-mail: [dpo@eurofinance.bg](mailto:dpo@eurofinance.bg), signed with a qualified electronic signature, or in the manner indicated in our advertising material (in every advertisement we will give you the opportunity to object to receiving further messages). Upon receipt of your objection, we will immediately stop sending to you information with advertising content about our products and services.

## **WHAT CHANGES HAVE WE RECENTLY MADE TO THE PRIVACY POLICY?**

We reserve the right to change this Privacy Policy at any time, and we will indicate the date on which the Privacy Policy was last updated. If significant changes have occurred, We will highlight them and try to alert You directly where possible. We will also keep previous versions of this Privacy Policy on record for you to review.

## **THE PRINCIPLE THAT PERSONAL DATA BE KEPT ACCURATE AND UP TO DATE AS NEEDED BY THE DATA CONTROLLER**

In connection with this fundamental principle of European data protection legislation and in view of the established and existing relationship between EURO-FINANCE AD and you, we request that, in the event that there is a change in the personal data that you have provided to EURO-FINANCE AD, you should contact us for the purpose of updating it, at the address of the company's registered office in: Sofia, 1592, Iskar res. area, 43 Hristofor Kolumb Blvd., fl. 5, tel: (+359 2) 980 56 57, fax: (+359 2) 981 14 96, or email address: [office@eurofinance.bg](mailto:office@eurofinance.bg).

**IS THERE ANYTHING ELSE YOU SHOULD KNOW?**

The website of EURO-FINANCE AD may contain links to third party websites. These third party websites have their own privacy policies. If you visit these websites, you are subject to their policies.

This Privacy Policy was updated on 08.11.2021.



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