

PRIVACY POLICY

The present document contains the Privacy Policy provided by SANA Bulgaria with respect to the maintenance and administration of SANA Bulgaria's website – www.sanabg.com, accessible via <https://www.sanabg.com> (in short, **Privacy Policy**) and it regulates the data protection mechanisms for collecting, processing and protecting users' personal data while using the services offered by SANA Bulgaria via www.sanabg.com to any user of information services and content accessible through SANA Bulgaria's website, in SANA Bulgaria's capacity as a data controller.

„SANA Bulgaria“ – „SANA-R 1“ EOOD, is a private company, established and operating in accordance with the laws of the Republic of Bulgaria, UIC 201630993, with seat and address of management: Rousse, 100 Bulgaria Blvd, and email: info@sanabg.com.

Should any questions or concerns regarding the present Privacy Policy occur, you can contact SANA Bulgaria using the following email address: info@sanabg.com.

For the purposes of the application and interpretation of the present Privacy Policy, the terms and phrases used have the meaning, established in Article 1, paragraph 1 of the [general terms and conditions of the contract for the use of the information services and resources](#) provided via SANA Bulgaria's website.

I. YOUR PRIVACY

The [General Data Protection Regulation \(GDPR\)](#) which became applicable in the territory of the European Union since 25th May 2018 aims to protect your basic rights and freedoms as users of the services offered via SANA Bulgaria's website by setting requirements and measures in order to ensure your personal data protection at any given time. More information on the application of the GDPR can be found in the [Guidelines Section](#) on the website of the Bulgarian [Commission for Personal Data Protection](#), being the Bulgarian Data Protection Authority.

We, at SANA Bulgaria, deeply believes that protecting your privacy and other fundamental rights and the integrity and confidentiality of your personal data is an integral part of the values and aims of the organization and the level of services we seek to provide.

Some of the services offered through SANA Bulgaria's website require the processing of your personal data. The present document gives you information about the compliance measures we have taken to protect your rights and freedoms while respecting the principles of lawful, transparent and honest processing of personal data.

Here you can find out what kind of personal data we process, for what purposes and under what terms, with whom and under what conditions we share them. You can also read about how you can access your personal data and exercise the full amount of rights guaranteed by the GDPR.

Here we give you a general overview of the ways this website processes your personal data including the use of cookies.

At any time, you may exercise your right of objection to the processing of personal data relating to you by contacting us directly, using the technical mechanisms provided via our website or changing your browser settings (also described below).

II. YOUR PERSONAL DATA AND SANA BULGARIA'S WEBSITE

We process your personal data in order to provide you with quality, adequate and professional service. 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. Any processing of personal data can only be exercised for specified, explicit and legitimate purposes and on the grounds of one of the legal bases listed in the General Data Protection Regulation.

We do not reuse the information for another purpose that is different to the one stated.

We put in place measures to guarantee that your data are kept up-to-date and processed securely.

We will never divulge your personal data for direct marketing purposes.

You have the right to access your personal information, to have it corrected and the right to recourse; at any time if you believe your data protection rights have been breached.

We do not keep your personal information for longer than necessary for the purposes for which we collected it. However, we may keep your information for a longer period for historical, statistical or scientific purposes with the appropriate safeguards in place such as data aggregation, anonymization and/or pseudonymization.

SANA Bulgaria's website processes personal data only with regards to the functioning of and maintaining accurate statistics for SANA Bulgaria's website.

In order to provide services and improve their quality, we automatically store certain information that your computer or other terminal device sends to the server of the Shared Hosting Services Provider (e.g., the hosting company whose services

we use) in connection with your activity. The information is stored in log files on the servers of the Shared Hosting Services Provider, and may include data about:

1. SANA Bulgaria's webpages you visit; websites that have redirected you to SANA Bulgaria's website; and websites visited by you via electronic references located on SANA Bulgaria's website;
2. date and time of the visits under item 1;
3. public IP address of your terminal device;
4. type, name and version of the Internet browser you are using;
5. keywords you've used to search for information on SANA Bulgaria's website;
6. number of users who visited a particular webpage on SANA Bulgaria's website;
7. number of clicks on electronic references located on SANA Bulgaria's website, etc.

We collect, process and use log files containing, for example, date, time, source of the connection (IP addresses) when required by applicable law; as well as log files and any other information required for the reproduction of electronic statements made by users of the website in the course of using the services or for identifying the user (where applicable) in an event of a legal dispute.

Where applicable and while providing our services, we store information and obtain access to information stored on the user's terminal device that we process for the following purposes:

1. providing the user with normal and qualitative access to services with all their functional capabilities;
2. verifying the availability of scripts, software applications and user's terminal device settings necessary for the normal access and use of the services and, accordingly, informing the user of their lack thereof;
3. visualizing or hiding elements of SANA Bulgaria's website that have specific requirements that are compatible or incompatible with certain user's preferences, properties or settings, such as, for example, screen width, resolution, etc.;
4. customizing the services and ensuring the automatic displaying or hiding of various elements of SANA Bulgaria's website according to user's preferences, properties or settings.

We collect and process this data on the basis of Article 6(1)(f) of the GDPR with respect to our legitimate interest in knowing your preferences when using the services, products and content provided through our website, so that we can provide you with better services that take into account your needs and expectations. In determining our legitimate interest, we take into account your interests and fundamental rights and freedoms and we collect and process your data only when those interests, rights and freedoms are not disproportionately affected by this legitimate interest.

We process these data for the following periods of time:

1. the data related to the proper functioning of the website - within 1 year of the relevant website visit;
2. data related to analytical services and statistics - within 2 years from the respective visit to the website.

For more information about the cookies we use, please refer to the Cookies Section below.

III. YOUR RIGHTS

1) RIGHT TO ACCESS

You have the right to receive confirmation whether your personal data is being processed and, if so, to access the data and the following information:

- a copy of the personal data that is being processed;
- processing purposes;
- categories of personal data;
- recipients or categories of recipients to whom personal data is or will be disclosed;
- the retention period for which personal data will be stored, or at least the criteria used towards determining that period;
- any available information about the source of personal data, when the personal data is not collected directly from you, if applicable.

You can exercise your right to access to find out what personal data is held and how it is used by sending us a request at info@sanabg.com. Please identify the following:

- what kind personal data you want to access, or would you like to access all the personal data you have for you;
- your name and contact details; and
- if you need the data in a specific format.

We may refuse your access request if your data includes information about another individual, except where the other individual has agreed to the disclosure, or it is reasonable to provide you with this information without the other individual's consent.

We are going to provide the requested information in the one-month term specified in Article 12(3) of the GDPR.

If you are unhappy with the result, please get back to us first so that we can investigate the matter further.

2) RIGHT TO RECTIFICATION

You have the right to ask us to rectify information you think is inaccurate. You also have the right to ask us to complete information you think is incomplete. This right always applies.

If you want to exercise this right of yours, send us a request at info@sanabg.com and let us know what data you consider incorrect and how you want it to be amended.

When we receive your request, we are going to investigate the issue and either correct it or inform you why we consider the data accurate. We can also refuse on the ground of your request being “manifestly unfounded or excessive” which means it will cost us a significant amount of money or it will take a vast amount of resources.

If your request is justified, we are going to erase your data in the one-month term specified in Article 12(3) of the General Data Protection Regulation. In some cases we may need some extra time for investigation up to two more months but we will let you know about the delay in the initial one-month period.

If you are unhappy with the result, please get back to us first so that we can investigate the matter further.

3) RIGHT TO ERASURE

You have the right to ask us to erase your personal information in certain circumstances. We will reply to each request and we will erase your data without any delay. However, this right is not absolute so make sure your case falls within one of the following circumstances:

- we do not need your data anymore;
- you initially consented to the use of your data, but have now withdrawn your consent (have in mind that this applies only to the personal data we process on the ground of your consent);
- you have objected to the use of your data, and your interests outweigh ours;
- we have a legal obligation to erase your data;
- you suspect we have used your data unlawfully.

If you want to exercise this right of yours, send us a request at info@sanabg.com and let us know what data you want us to erase, the reason behind your request, as well as your name and contact details.

If your request meets one of the above scenarios we will erase your data. We can refuse to erase your data on one of the grounds in Article 17(3) of the General Data Protection Regulation, namely if your data is necessary for reasons of:

- freedom of expression and information;
- legal obligation to keep your data;
- public health;
- establishing, exercising or defending legal claims;

- when erasing your data would prejudice scientific or historical research, or archiving that is in the public interest.

If your request is justified, we are going to erase your data in the one-month term specified in Article 12(3) of the General Data Protection Regulation.

If you are unhappy with the result, please first get back to us so that we can investigate the matter further.

4) RIGHT TO RESTRICTION OF PROCESSING

You have the right to ask us to restrict the processing of your personal data in certain circumstances. You can exercise this right on one or more of the following grounds:

- you believe the personal data we process is inaccurate, in which case we restrict the processing of this personal data for a period that will allow us to verify their accuracy;
- you believe or it has been found that the processing of personal data is unlawful, but you oppose their erasure and request the restriction of their use instead;
- you require personal data for the establishment, exercise or defence of legal claims, even though we no longer need the personal data for the purposes of the processing;
- you have exercised your right of objection and expect the result of the verification whether the legitimate grounds of the controller override yours.

Where processing has been restricted, we may continue to process such data, with the exception of storage, only with your consent or for the establishment, exercise or defence of legal claims or for the protection of the rights of another natural or legal person or for reasons of important public interest of the EU or of a Member State.

In any case, we will inform you before canceling the limitation of processing.

What we will do to restrict the use of your data may include:

- temporarily moving your data to another system;
- making the data unavailable to users;
- temporarily removing it from SANA Bulgaria's website.

We will securely store your data and not use it unless:

- you give us your consent to do so;
- the data is needed for legal claims;
- the data is used is to protect another person's rights;
- the data is used is for reasons of important public interest.

We can refuse your request on the ground of being "manifestly unfounded or excessive" which means it will cost us a significant amount of money or it will take a vast amount of resources.

If you want to exercise this right of yours, send us a request at info@sanabg.com and let us know the processing of what data you want us to restrict, the reason behind your request, as well as your name and contact details.

If your request is justified, we are going to erase your data in the one-month term specified in Article 12(3) of the General Data Protection Regulation. In some cases we may need some extra time for investigation up to two more months but we will let you know about the delay in the initial one-month period.

If you are unhappy with the result, please get back to us first so that we can investigate the matter further.

5) RIGHT TO OBJECT TO PROCESSING

You have the right to object to processing if we process your information on the ground of our legitimate interests.

If you feel we should stop processing your data on this ground, you can contact us and justify your reasons using our info@sanabg.com.

Note, however, that we may continue legitimately use your data despite your objection if we can prove we have a strong reason to process your data that overrides your objection.

If your request is justified, we are going to stop processing your data in the one-month term specified in Article 12(3) of the General Data Protection Regulation.

If you are unhappy with the result, please first get back to us so that we can investigate the matter further.

6) RIGHT TO DATA PORTABILITY

You have the right to obtain the personal data concerning you, which you have provided us with, in a structured, commonly used and machine-readable format. You also have the right to transfer this data to another data controller without hindrance from our side.

You can exercise this right in cases where the processing is carried out by automated means and is based on:

- consent pursuant to point (a) of Article 6(1) GDPR or point (a) of Article 9(2) GDPR or
- a contract pursuant to point (b) of Article 6(1) GDPR.

In cases where this is technically feasible, you may receive a direct transfer of personal data from us to another administrator.

The right of portability cannot be exercised in cases where the processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in us.

If you want to exercise this right of yours, contact us via info@sanabg.com, indicating what kind of data you would like to receive from us in a machine-readable format.

Before sending you this data we may need to confirm your identity in order to prevent fraud and other people getting access to your data. Then we will provide it in the required format.

If you are unhappy with the result, please first get back to us so that we can investigate the matter further.

IV. LODGING A COMPLAINT TO THE COMPETENT SUPERVISORY AUTHORITY

In any case, and regardless of what other means of protecting your rights have been envisaged or undertaken, if you believe that the processing of your personal data infringes the principles and provisions of the General Data Protection Regulation or other applicable legislation, you are entitled to lodge a complaint with the competent supervisory authority - the Bulgarian Personal Data Protection Commission.

More information about the Bulgarian Personal Data Protection Commission can be found here: <https://www.cpdp.bg>

More information on how to lodge a complaint with the Bulgarian the Personal Data Protection Commission can be found here: <https://www.cpdp.bg/?p=pages&aid=6>

Contact details of the Bulgarian Commission for Personal Data Protection:

- Address: 2 Prof. Tsvetan Lazarov Blvd., Sofia 1592
- Phone number: +359 (2) 91 53 518
- Email: kzld@cpdp.bg

Nevertheless, we advise you to try and contact us on the matter first.

V. COOKIES

1) WHAT ARE COOKIES

The cookie is a small text file that can be stored on your computer (or other terminal device) when you visit websites. Certain information is saved in this text file, such as the choice of website language. When you visit the website again, this cookie is sent to the particular website. This way, the website recognizes your browser and may, for example, save your language preferences.

Cookies usually have an "expiration date" which indicates for how long they are kept on your device. For example, some cookies are automatically deleted when you close your browser (so-called session cookies) while others stay on your device for a longer time, sometimes until you delete them manually - we call them permanent cookies.

2) WHY DO WE USE COOKIES

As administrators of SANA Bulgaria’s website we use two types of cookies:

1. cookies that ensure specific functions of the website work properly;
2. cookies that are used for analytical purposes.

We use a [WordPress](#) platform to keep the content and services provided through the SANA Bulgaria’s website up-to-date. This software uses the so-called cookies to provide specific functionality which means that they are necessary for the proper functioning of the website and therefore you cannot refuse the placement of these cookies on your device if you want to visit and use the services of our website.

We use [Google Analytics](#) for analytical purposes. As a user navigates between web pages, Google Analytics provides website owners with specific JavaScript tags (libraries) to record information about the page a user has seen, for example the URL of the page (for more information, please visit [Google Analytics Cookie Usage on Websites](#) and/or read the [Google Analytics privacy document](#) for more details about the data collected by Google Analytics). This analytics tool installs the cookies we use to monitor the number of visits (traffic) on the website. This allows us to understand, for example, how many times a page has been visited. We only use this information to improve the content of our website or as a justification for launching a new campaign or service on a particular topic of great interest. User data is all anonymous.

3) WHAT COOKIES DO WE USE

You can check the cookies we use and their functions here.

Functional cookies

If you want to use SANA Bulgaria’s website, you cannot refuse the placement of the following cookies, necessary for its proper functioning.

Name	Expiration date	First-party or third-party cookie	Purpose
cookie_notice_accepted	1 month	First-party cookie	This cookie is used to indicate whether the user has accepted the use of the analytical cookies or not.
pll_language	1 year	First-party cookie	This cookie is used to indicate the language preferences of the user.

You can block cookies by activating the setting on your browser that allows you to refuse the setting of all or some cookies. However, if you use your browser settings to block all cookies (including essential cookies) you may not be able to access all or parts of our site.

Analytical cookies

The following cookies may be refused, and you may continue to use SANA Bulgaria’s website and the services offered through it.

Name	Expiration date	First-party or third-party cookie	Purpose
_ga	2 years	First-party cookie	This cookie is used to help us count how many people visit our site by tracking if you’ve visited before.
_gid	24 hours	First-party cookie	This cookie is used to distinguish visitors via a visitor ID data.
_gat_gtag_UA_138682806_1	10 minute	First-party cookie	This cookie is used to manage the rate at which page view requests are made.

These cookies are used to collect information about how visitors use our website. We use the information to compile reports and to help us improve the website. The cookies collect information in an anonymous form, including the number of visitors to the website and blog, where visitors have come to the website from and the pages they visited. [Read Google's overview of privacy and safeguarding data.](#)

4) HOW TO FIND OUT WHAT COOKIES WERE PLACED ON MY DEVICE AND HOW TO DELATE THEM

If you want to know what cookies are installed on your device or want to delete them, you can use your browser settings.

You can prevent your browser from accepting certain cookies, have the browser require your consent before a new cookie is placed in your browser, or block cookies altogether by selecting the appropriate settings on your browser privacy preferences menu. To avoid receiving cookies on the browser of your mobile device, you will need to refer to its user manual. For information on how to opt-out of cookies set by our suppliers, please visit the applicable links listed in the table above.

Most web browsers allow some control of most cookies through the browser settings. To find out more about cookies, including how to see what cookies have been set, visit www.aboutcookies.org or www.allaboutcookies.org.

The links below will help you find the settings for some common browsers:

- Manage cookie settings in [Chrome](#) and [Chrome Android](#) and [Chrome iOS](#)
- Manage cookie settings in [Safari](#) and [Safari iOS](#)
- Manage cookie settings in [Microsoft Edge](#)
- Manage cookie settings in [Mozilla Firefox](#)
- Manage cookie settings in [Microsoft Internet Explorer](#)
- Manage cookie settings in [Opera](#)

To find information relating to other browsers, visit the browser developer's website.

To opt out of being tracked by Google Analytics across all websites, visit <http://tools.google.com/dlpage/gaoptout>.

VI. SOCIAL MEDIA

We use Facebook to present our work through widely used and contemporary channels. Our use of social media is highlighted on this website. Cookies are not set by our display of the electronic references leading to those services when our webpages are loaded on your computer (or other devices).

Each social media channel has their own policy on the way they process your personal data when you access their sites. If you have any concerns or questions about their use of your personal data, you should read their privacy policies carefully before using them.

The present Privacy Policy is adopted with a decision of the SANA Bulgaria's General Manager on 01.04.2019 prior to the launch of SANA Bulgaria's website.

Any subsequent changes to the Privacy Policy shall be effective from the date indicated with the corresponding amendments.

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