

GENERAL TERMS

AQ CERT LTD. is committed to strict adherence to the legal and regulatory provisions regarding the collection and processing of personal data. Customer satisfaction in all its aspects is our priority, especially when it comes to your data. Therefore, we consider our duty to process your personal data with due care and to take all possible measures to protect it from misuse. AQ CERT LTD. declares that acting as a management systems certification body it treats as its own secret all personal data obtained in connection with its business and will manage it in strict compliance with the requirements of Regulation (EC) 2016/679.

This is to inform you of the processing of your personal data, of your rights related to data protection, and to provide you with the information under Articles 13 and 14 of Regulation 2016/679 of the European Parliament. The content and scope of processed data is in line with the type of services that you request or already use.

OBJECTIVE AND GROUNDS FOR PROCESSING OF PERSONAL DATA

Pursuant to Art. 13 and Art. 14 of Regulation (EC) 2016/679 of EP AQ CERT LTD. processes personal data of individuals when:

- verifying the identity of the customer at all stages of communication;
- managing and completing customers' orders for products or services, performing service contracts;
- online subscription for training;
- issuing certificates for participation in training;
- preparing an offer for conclusion of a contract;
- preparing and sending bills/invoices for services provided by AQ CERT LTD.;
- sending newsletters and advertising messages related to the services that we offer;
- in order to ensure the necessary complete customer service as well as to collect the amounts due for the services received;
- ensuring technical support for provision of top quality services in line with the agreed terms;
- all kinds of technical assistance to maintain the quality of the services provided by AQ CERT LTD.;
- drafting offers for contracting and actual contracting, sending renegotiated information and draft contracts by courier service until entering into of a contract;
- informing about all matters related to the services that customers receive from AQ CERT LTD.;
- sending various notices, notification of problems, non-conformities, errors or in order to respond to requests, complaints, suggestions, etc. submitted by customers;
- analyzing customer history and preparing user profile for the purpose of determining the most appropriate offer from AQ CERT LTD.;
- evaluating and measuring the advertising efficiency of the ads of AQ CERT LTD., as well as offering advertising content in line with customers' needs;
- researching and analyzing customer demand for products or services based on anonymous or personalized information to identify major trends, improve customer behavior understanding, and collaborate with third parties to provide new products or services for our customers;
- processing by data processor upon conclusion of a contract, assignment, reporting, acceptance, payment;

FOR PERFORMANCE OF LEGAL OBLIGATIONS:

AQ CERT LTD. processes personal identification data, bidding data, contracts, invoices, stock receipts, bills and other personal data in order to comply with the obligations stipulated in the legal acts, such as:

- obligations to provide information to state control authorities;
- provision of information to the Commission for Personal Data Protection in relation to obligations stipulated in the personal data protection laws, such as the Personal Data Protection Act, Regulation (EC) 2016/679 of 27 April 2016, etc. ;
- obligations stipulated in the Accountancy Act and the Tax and Social Security Procedure Code and other related legal acts in connection with the keeping of proper and lawful accounting;
- provision of information to the court and third parties in the context of proceedings before a court, in accordance with the requirements of procedural and substantive legal acts applicable to the proceedings;

TYPES OF DATA PROCESSED BY AQ CERT LTD.

Personal data means any information relating to an identified or identifiable natural person (“data subject”); an identifiable natural person is one 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;

Processing of personal data - 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.

The information that we store and process may be:

- full name
- position
- address
- e-mail address
- phone number
- bidding data, contracts, invoices, stock receipts, and other documents as well as proof of their reliability; data processed in electronic communications networks, e-mails, letters, information on troubleshooting requests, appeals, requests, complaints;
- information about the type and content of a bid, marketing study or proposal, a contractual relationship, and any other contract-related information, including call records;
- other feedback received from customers;
- personal contact details: contact address, phone number, and contact information (email, phone number);
- video recordings made to improve the security of AQ CERT LTD.;
- marketing preference studies for the products or services that we produce or provide;
- credit card or debit card information, bank account number or other bank and payment information related to payments made to AQ CERT LTD.;
- customer ID, code or other identifier created by AQ CERT LTD. for customer identification;
- data provided through the company’s website or mobile apps;
- information about the terminal electronic communications devices used, type of devices, operating system used, IP address when visiting our website;

When processing personal data and other described data for the purpose of providing services, paying for such, completing customer’s orders for products or services, and in order to meet our regulatory obligations, such processing is compulsory for achieving these goals. Without such data we could not provide the relevant services. If no identification data is provided, we could not conclude any product or service contract.

CONSENT TO PROVIDE PERSONAL DATA

Consents for processing of personal data provided by data subjects may be withdrawn at any time. Withdrawal of the consent may affect performance of the contractual obligations of AQ CERT LTD. In such case, personal data described in the database of AQ CERT LTD. is subject to pseudonymisation/anonymisation. If the data subject withdraws his or her consent to the processing of personal data for any or all of the ways described above, AQ CERT LTD. will not use personal data and information for the purposes set forth above. Withdrawal of consent does not affect the lawfulness of processing based on any consent provided before its withdrawal. AQ CERT LTD. has a large portfolio of services. When giving consent to data processing, this consent applies to all services that the customer uses.

Withdrawal of personal data that concerns the preparation of offers, concluding of contracts, preparation of documents may lead to impossibility of conducting such actions. In all cases of withdrawal of personal data, the data subject will be informed about the consequences it may cause, according to the customer’s relationships with AQ CERT LTD.

In order to withdraw the consent, AQ CERT LTD. must be informed about the publicly known contact details /telephone, email, etc./ related to the management of personal data.

FOUNDATIONS FOR COLLECTING, PROCESSING AND STORING YOUR PERSONAL DATA

The grounds for the processing of personal data is Art. 6, para. 1 of Regulation (EC) 2016/679. By accepting the general terms and conditions of this policy, when submitting information to the data controller containing personal data or upon entering into a written contract between the data controller and the data subject, a contractual relationship is created, on the grounds of which the data controller processes personal data, i.e. Art. 6, para. 1, letter (b) of the Regulation. Data for sending news release, newsletters, marketing information, etc. is processed on the grounds of the explicit consent given by the data subject – Art. 6, para. 1, letter (a) of the Regulation.

Grounds for processing data - consent to process your personal data for one or more specific purposes - 6, para. 1, letter (a) of GDPR

THE CONTROLLER DOES NOT COLLECT OR PROCESS ANY PERSONAL DATA RELATING TO THE FOLLOWING:

- racial or ethnic origin;
- political opinions, religious or philosophical beliefs, or trade union membership;
- genetic and biometric data, data about sex life or sexual orientation;
- data for individuals under 16, except with the explicit consent of their parents or custodians.

MAIN TERMS IN THE PRIVACY POLICY

Electronically collected and processed data: data processed in an electronic communications network for the purposes of storing, transmitting, distributing or exchanging electronic message content, including data used to track and identify the source and destination of the communication, location data and type of the device, generated in the context of the provision of electronic communications services, as well as date, time and type of communication.

Data analysis: detailed analysis is a method of analysis that allows the processing of large volumes of data through statistical models and algorithms and others, which involve the use of network and personal data as well as processes of pseudonymisation and anonymisation of such in order to retrieve trend information and various statistical metrics.

Partner/s: these are companies with which AQ CERT LTD. has concluded partnership agreements and which provide a variety of services.

LEGITIMATE INTEREST

AQ CERT LTD. uses the personal identification data, bidding data, invoices, bills and any other documents related to our legitimate interest in order to conduct a basic analysis to adjust the products or services that we offer to the individual customer's needs and to offer new products/services to satisfy them.

PROTECTION OF PERSONAL DATA

In order to ensure adequate protection of the data of the company's employees and the personal data of its customers and partners, AQ CERT LTD. implements all necessary organizational and technical measures stipulated in the Personal Data Protection Act as well as best practices, etc.

- The company has established rules to prevent misuse and security breaches
- Additional security mechanisms such as encryption, pseudonymisation, etc. can be used to provide maximum security for the processing, transfer, and storage of personal data.

STORAGE OF PERSONAL INFORMATION

The information is stored electronically and is web-based. For this purpose we use special software that encrypts the information and so it is not accessible to third parties.

POSSIBILITY FOR TRANSMISSION OF PERSONAL DATA TO THIRD PARTIES

AQ CERT LTD. provides personal data to third parties in exceptional cases, the main purpose being to offer quality, fast, and comprehensive service. We provide personal data to third parties only after we have made sure that technical and organizational measures have been taken to protect such data.

AQ CERT LTD. provides personal data to the following categories of recipients (data controllers):

- on-line e-mail distribution platforms;
- postal operators for the purposes of sending parcels containing contracts, additional agreements, and other documents and the need to verify identity at delivery;
- entities assigned with the provision of support of equipment, software, and hardware used for processing of personal data and required for the development of the company's network and provision of various services in accounting, payment of services and products, technical support, etc. ;
- providers of support services of terminal devices that assist AQ CERT LTD. for the sale of services and for customer service before and during the duration of the contractual relationship;
- authorities, institutions, and entities to which AQ CERT LTD. has an obligation to provide personal data by virtue of the effective legislation;
- competent authorities which by virtue of a legal act have the power to request the provision of information including personal data such as courts, prosecutor's offices, various regulatory bodies such as the Commission for

Consumer Protection, Communications Regulation Commission, Commission for Personal Data Protection, bodies with powers to protect national security and public order;

- providers of electronic authentication services where a document related to the provision of a product or service is signed with an electronic signature;
- banks for issuing cards and servicing payments, including salaries, advance payments, and other receivables and remunerations;
- providers of services in organizing, storing, indexing, and destructing archives on paper and/or electronic media;
- providers of consultancy services in different spheres.

JOINT CONTROLLERS

Distributors and agents of AQ CERT LTD., who act as representatives of the company in the sale of services and products;

COOKIES

Along with the above-mentioned personal data, AQ CERT LTD. on its website and related websites uses cookies to form commercial and other similar proposals to website visitors in a convenient way (*HTTP cookie, usually simply referred to as cookie, is a piece of data sent from a web server to an Internet browser and then returned by the browser every time it is granted access to that server. "Cookies" may contain random information selected by the server and they are used to maintain the status of HTTP transactions that are otherwise with "no status". They are typically used to authenticate a registered website user as part of the login or initial sign-up process on the website/s, and the user is not required to reenter username and password for each subsequent access to the website/s. Other purposes of cookies may be to maintain a "shopping cart" for selected items to buy from a website/s during one session for customization of the website/s (presenting different pages to different users), and tracking the access of certain users to a particular website.*) Some cookies remain stored on the user terminal device until deleted. They allow AQ CERT LTD. to recognize the user's browser again on the next visit. If you do not wish to do so, you can set up your browser to inform you about the use of cookies and to allow them to be used only in individual cases. Disabling cookies may limit the functionality of our webpage.

WEB ANALYSIS

The website/s of AQ CERT LTD. use/s the Google Analytics* service, the web analysis service of Google LLC, Mountain View, CA 94043 USA ("Google"). Google Analytics uses cookies. The information collected through the Google Analytics' cookie about how users use the website/s is generally redirected to Google's IT infrastructure in the US and stored there. Data processing is carried out on the basis of the legal provisions of § 96, para. 3 of the Austrian Telecommunications Act, as well as of Art. 6, para. 1, letter "a" (prior consent) and/or "f" (legitimate interest) of the Regulation. The task of AQ CERT LTD. within the meaning of the Regulation (legitimate interest) is to improve the commercial offers and the web presentation of the website/s of AQ CERT LTD. The user data (IP address) used by these Google Analytics' cookies is pseudonymised. This procedure deletes the last digit of your IP address. As a result, only coarse location is possible, which allows protection of the personal data of the users of the website/s of AQ CERT LTD. in accordance with the requirements of the Regulation.

** If the users of the website/s of AQ CERT LTD. wish to prevent analysis of data by Google, the following settings should be made:*

- *Disable the use of cookies in the browser that you are using*
- *Install plug-in: [<http://tools.google.com/dlpage/gaoptout?hl=en>]*

GOOGLE CONVERSION TRACKING

Google Conversion Tracking allows us and Google to recognize when someone has clicked on our Google ad and has then been redirected to our webpage. However, we cannot see which other webpages you have loaded. The information gathered through Google Conversion Tracking is solely for the purpose of producing statistics on the success and use of our AdWords advertising campaigns. Nevertheless, we do not collect or receive information that allows users to be personally identified.

STATISTICAL STUDIES AND ANALYSES

Google's website/s contain a one-pixel file or web beacon that is called from the server of the e-service provider. This collects, first of all, technical information about the browsers used, as well as user the IP address and the time of the request to the website. This information is used to technically improve the service based on technical data, or to specify the target groups and their reading habits based on the call points (which can be determined using the IP address) or the access times. Statistical surveys also include statements as on whether the website/s has/have been opened, when they have been opened, and which links has been clicked. This information does not serve to track users but to recognize their reading habits in order to adapt content to them or to send different content according to their interests.

BROWSER VIEW AND DATA MANAGEMENT

The website/s of AQ CERT LTD. may contain links that redirect to the webpage of other websites. These links serve as an online presentation of the newsletter, and also provide an option to stop receiving it, and they do not participate in the process of personal data management.

SOCIAL NETWORKS

Your access to social networks such as Facebook, Google+, YouTube, Twitter, and other similar, requires individual registration and acceptance of the general terms and conditions of these websites. AQ CERT LTD. is not responsible for the protection of your personal data when accepting these terms and conditions, and in this regard you need to get to know in details the general terms and conditions of these websites.

FACEBOOK

This social network uses Social Plugins ("Plugins") on the social network facebook.com, which is maintained by Facebook Inc., 1601 S. California Ave, Palo Alto, CA 94304, USA. ("Facebook").

Plugins are recognized by the Facebook logos (white "f" on blue background or "thumb up") or they are distinguished by the "Facebook Social Plugin".

When you log on to a webpage, your browser will instantly make a direct connection to Facebook servers. The content of this Plugin will be transmitted directly from Facebook to your browser, which will link it to the webpage. AQ CERT LTD. cannot control the amount of data Facebook collects using these Plugins. Therefore, through the following link, we only provide you information about what we know <http://www.facebook.com/help/?faq=17512>

By linking to these Plugins, Facebook receives information that our relevant webpage or platform has been visited. If you are logged into Facebook, Facebook can assign this visit to your profile. If you interact with these Plugins, e.g. click the "Like" button or write a comment, the relevant information will be immediately transferred from your browser to Facebook and will be saved there. If you are not registered with Facebook, Facebook still has the ability to retrieve your IP address and save it.

These Facebook plugins can be attached by website operators to their own websites or platforms. With one click on these Plugins, users registered with Facebook can automatically leave a message on their Facebook profile that they like the information from the website operator's links. The Plugin connected to Facebook "communicates" on an ongoing basis with Facebook and upon visiting the website it sends the data to Facebook, even if the user has not clicked Plugins.

Through the so-called iFrame connection, the browser loads, apart from the started page, one more additional smaller "page in the page" that contains the corresponding Plugin. If a Plugin belongs to Facebook, this iFrame-link or the source text is fully powered by Facebook and can not be controlled or processed by AQ CERT LTD.

If the browser later reconnects to the social network server, the cookie is transferred and can help create a profile. For users who register later, connection to the information contained in the cookie is also possible.

If the user is logged in the current Facebook session, both page and cookie information is transmitted, and this session identification information may be assigned to the relevant account.

We are not aware of the scope of the data and the purposes for which it is collected and how it is used by Facebook. For information about your rights and setup options to protect your personal data, please contact Facebook Inc. or follow the Facebook privacy instructions.

With Add-ons, you can block Facebook-Social-Plugins for your browser using, for example, "Facebook Blocker".

FACEBOOK SOCIAL PLUGINS

This online application uses the Social Plugins ("Plugins") on the social network facebook.com, which is maintained by Facebook Inc., 1601 S. California Ave, Palo Alto, CA 94304, USA. ("Facebook"). Plugins are recognized by the Facebook logos (white "f" on blue background or "thumb up") or they are distinguished by the "Facebook Social Plugin".

When you log on to a webpage, your browser will instantly make a direct connection to Facebook servers. The content of this Plugin will be transmitted directly from Facebook to your browser, which will link it to the webpage. AQ CERT LTD. cannot control the amount of data Facebook collects using these Plugins. Therefore, through the following link, we only provide you information about what we know <http://www.facebook.com/help/?faq=17512>.

With Add-ons, you can block Facebook-Social-Plugins for your browser using, for example, "Facebook Blocker".

FACEBOOK CONVERSION PIXEL AND FACEBOOK REMARKETING

Using Facebook Conversion Pixel, we and Facebook can recognize when someone has clicked on our Facebook ad and been redirected to our webpage. However, we cannot see which other webpages you have loaded. The information gathered using Facebook Conversion Pixel is designed to produce statistics on the success and use of our Facebook ads. Nevertheless, we do not collect or receive information that allows users to be personally identified.

With Facebook Remarketing technology, targeted advertising on Facebook webpages can be directed to users who have visited our webpages. However, we do not collect data and we do not monitor which Facebook users are actually shown targeted ads. And here we do not have the ability to identify individual users. For more information on the purposes and scope of collecting

and processing your personal data by Facebook and setup options to protect your privacy on Facebook, please refer to <https://www.facebook.com/policy.php>

GOOGLE ADWORDS

This website uses Google AdWords, a remarketing and behavioral targeting service provided by Google. With this service, ad activity on the website is linked to the Adwords advertising network using cookies (refer to cookie information here). AQ CERT LTD. does not identify or collect user data using Google AdWords. You can opt out of a Google AdWords ad on the Google Ad Words page.

ENCRYPTING

We take technical and organizational security precautions to protect your data from unwanted misuse and access to the greatest possible extent. Along with securing our information infrastructure, cryptographic methods are used in all sections. To prevent your data from being misused by third parties, the information you provide is transported and verified in encrypted form using the SSL (Secure Socket Layer) protocol. You can recognize this in your browser's progress bar by the padlock symbol, which is locked, and the Internet address starts with https.

Modern sites use different systems to analyze and improve the provision of goods and services to users, and it is not possible to describe them all in details. If you have any concerns about the information that is collected from our website, we recommend that you use the Incognito option of the Google Chrome Browser or Private Browsing for Firefox.

INFORMATION REGARDING THE DATA CONTROLLER:

AQ CERT LTD. is a business company, duly registered as per the requirements of the Bulgarian legislation, with headquarters and registered office: Sofia, 19 Banat Str.

INFORMATION REGARDING THE COMPETENT SUPERVISORY AUTHORITY:

Name: Commission for Personal Data Protection.

Headquarters and mailing address: Sofia 1592, 2 Prof. Tsvetan Lazarov Blvd.

Phone: (+ 359-2) 915 3 518

Website: www.cdpd.bg

RIGHTS OF DATA SUBJECTS WITH REGARD TO PROCESSING OF PERSONAL DATA

Right to information

Data subjects have the right to request:

- information on whether personal data is being processed, information about the purposes of such processing, about data categories, and about recipients or categories of recipients to which data is being disclosed;
- a message in a comprehensible form containing the personal data of the data subjects being processed as well as any available information about their source;
- information about the logic of any automated processing of personal data relating to the customers in the case of automated solutions (for example, when creating a customer profile or preparing marketing information).

Right to correct

If AQ CERT LTD. processes incomplete or erroneous/wrong data, data subjects are entitled at any time to request:

- deletion, correction or blocking of personal data, the processing of which does not meet the requirements of the law;
- that third parties to whom personal information has been disclosed be notified of any deletion, correction or blocking, except where this is impracticable or involves undue effort.

Right to object

At any time, data subjects are entitled to:

- object to the processing of personal data where there is a legitimate reason for doing so, and whenever the objection is reasonable, the personal data of the data subject concerned can no longer be processed;
- object to the processing of personal data for marketing purposes.

Right to restrict processing

Data subjects may request restriction of the processing of personal data, where:

- the data subject contests the correctness of the data for the period during which the personal data verification is being performed;
- the processing of the data is without legal basis, and until that time data subjects may request restricted processing;
- when data subjects have objected to the processing of the data, pending verification of whether the grounds of AQ CERT LTD. for the processing of the data are lawful.

Right to data portability

Data subjects may request to be provided with the personal data they have entrusted to AQ CERT LTD. in an organized, orderly, structured, generally accepted electronic format, where:

- the processing of personal data is based on the declaration of consent that may be withdrawn or on any other contractual obligation;

Right to file a complaint

Where a data subject considers that AQ CERT LTD. is in breach of the applicable legal acts, he or she may contact the responsible person in AQ CERT LTD. for clarification of the matter. Nevertheless, data subjects have the right to file a complaint before the Commission for Personal Data Protection.

All applications for access to information or for correction shall be submitted either personally or by a person specifically authorized by the data subject with a notarized power of attorney. An application may also be filed electronically, in accordance with the Electronic Document and Electronic Signature Act. AQ CERT LTD. will announce its decision to any duly filed request within 30 /thirty/ days as from its submission. If objective reasons require a longer period of time in order to collect all requested data and if the request implies serious difficulties for AQ CERT LTD., this period may be extended to no more than 90 /ninety/ days as from submission of the application. The decision of AQ CERT LTD. grants or denies access and/or the information requested by the applicant, but the decision will always be motivated.

For the abovementioned activities, please contact us at office@aqcert.org. If a data subject considers that processing of his or her data by AQ CERT LTD. is in breach of the effective data protection or privacy laws, he or she also has the option to file a complaint with the competent supervisory authority /Commission for Personal Data Protection/.

Updates and changes to the privacy policy

In order to apply up-to-date protection measures and to comply with the legislation in force, AQ CERT LTD. takes responsibility for updating this Privacy Policy in case of change in the legislation or the circumstances that it concerns.

VALIDITY AND UPDATE OF THE POLICY

This Privacy Policy was last updated on 01.06.2018.

We may update our Privacy Policy on a regular basis. In case of change in the current policy, a notice will be published on our website along with the updated Privacy Policy.