

Data Protection Policy

Purpose of the Policy

Protecting our customers, partners and employees' privacy is an important priority at Veolia and we are committed to maintaining strong and meaningful privacy protections. The privacy of your information is a significant responsibility and we value the trust you place in us.

By means of this **Data Protection Policy**, we would like to inform the general public of the nature, scope and purpose of the personal data we collect, use and process.

Furthermore, by means of this **Data Protection Policy**, data subjects are informed of the rights to which they are entitled.

Veolia and your personal data

“**Veolia**” refers collectively to Veolia group companies which are:

- “**Veolia Energy Varna**” EAD, with UIC: 103195446 and registered address at str. “Ianos Hunyadi” No. 5, district “Mladost”, Varna; tel.: 080014448
- “**Veolia Energy Bulgaria**” EAD, with UIC: 121371700 and registered address at Blvd. “Maria Louiza” No. 47, district “Vazrajane”, Sofia; tel.: 02/8132021
- “**Veolia Energy Solutions Bulgaria**” EAD, with UIC: 130547859, with registered address at Blvd. “Maria Louiza” No. 47, district “Vazrajane”, Sofia, tel.: 02/8132021

Veolia has various business activities such as provision of district heating services, facility management, energy efficiency solutions, etc. which services often involve processing of personal data such as collection and use of clients' data.

Because of their corporate structure and shared corporate functions Veolia group companies act as joint controllers when processing personal data.

What is the General Data Protection Regulation (“GDPR”) and how does it affect Veolia?

The General Data Protection Regulation (EU) 2016/679 has been adopted in 2016 and enters into force as of 25 May 2018. The GDPR replaces the previous regulatory framework and establishes higher standards for the protection of personal data. The GDPR affects Veolia as Veolia processes personal data of its employees, clients and business partners.

What does the term “personal data” mean?

“Personal data” means any information relating to an identified or identifiable living natural person.

Separate pieces of data, which are not personal data in themselves, could be considered to be personal data, if they, taken in their entirety, can lead to the identification of a particular person.

Examples of personal data:

- first name and surname;
- address;
- email address such as name.surname@company.com;
- ID card number;
- location data (e.g. the location data function on a mobile phone);

What is processing of personal data?

Under the GDPR 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, organization, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

Practical examples activities involving processing of personal data:

- sending personal CV when applying for a job;
- reviewing job applicants’ CVs;
- sending of advertisement message via email;
- shredding documents having personal data
- publishing/posting on a website a picture of a given person
- keeping IP and MAC addresses
- filming (video surveillance)

How does Veolia comply with the GDPR requirements?

When processing personal data as part of our daily business activities Veolia uses its best endeavors to ensure that:

- Veolia processes personal data in lawful, fair and transparent manner. In practice, that means that:
 - ✓ We have lawful basis for collecting and processing of personal data.
 - ✓ We do not do anything with the data in breach of any other laws.
 - ✓ We use personal data in a way that is fair. This means we do not process the data in a way that is unduly detrimental, unexpected or misleading to the individuals concerned.
 - ✓ We are open and honest with people from the start about how we will use their personal data.
 - ✓ At present, Veolia does not transfer personal data to third countries or international organizations.
- Veolia complies with the purpose limitation principle under the GDPR. In practice, that means that:
 - ✓ We are clear about what our purposes for processing of personal data are from the start.
 - ✓ We record our purposes and specify them in our privacy notices.
 - ✓ We can only use the personal data for a new purpose if either this is compatible with our original purpose, we get consent, or we have a clear basis in law.
- Veolia complies with the data minimization requirements under the GDPR. In practice, that means that the Veolia do its best to ensure that the personal data it processes is:
 - ✓ adequate – sufficient to properly fulfil a specific purpose;
 - ✓ relevant – has a rational link to that purpose; and
 - ✓ limited to what is necessary – we do not process more personal data than we need for that purpose.
- Veolia do its best to ensure that the personal data it processes is accurate. That means that:
 - ✓ We take all reasonable efforts to ensure the personal data we process is not incorrect or misleading.
 - ✓ We may need to update the personal data.
 - ✓ If we discover that personal data is incorrect or misleading, we take reasonable steps to correct or erase it as soon as possible.

- Veolia does its best efforts to ensure compliance with the “storage limitation principle”. That means that:
 - ✓ We do not keep personal data for longer than we need it.
 - ✓ We also periodically review the data we hold, and erase or anonymize it when we no longer need it.
 - ✓ We address individuals’ right to erasure if we no longer need the data.
- Veolia aims to ensure that it has appropriate security measures in place to protect the personal data we process.
 - ✓ This is the ‘integrity and confidentiality’ principle of the GDPR – also known as the security principle.
- Veolia uses its best endeavors to ensure compliance with the accountability principle.
 - ✓ The accountability principle requires us to take responsibility for what we do with personal data and how we comply with the other data protection principles.
 - ✓ In particular, we strive to ensure that we have appropriate measures and records in place to be able to demonstrate our compliance with the GDPR.

Veolia’s contact details for data protection inquiries

For any questions or inquiries concerning processing and usage made of your personal data by Veolia, you can reach out to Veolia’s Data Protection Officer:

Data Protection Officer (DPO):

Name: Maria Kalaydjieva

Address:

VEOLIA, 3 rd floor, 47 th “Maria Louiza” Blvd., district “Vazrazhdane”, Sofia

or

VEOLIA ,5 th “Ianosht Hunyadi” str., district “Mladost”, Varna

Telephone: 02 / 813 20 45

E-mail: gdpr.bg@veolia.com

Last updated on 14/12/2018.