



NOTIFICATION

on data protection in accordance with the Regulation (EU)
2016/679 for the clients of
„VEOLIA ENERGY SOLUTIONS BULGARIA” EAD

In accordance with the new General Data Protection Regulation¹ (Regulation), the Notification we provide you with information on the processing of your personal data.

The Notification is provided on the basis of Article 13 of the Regulation, which regulates the information, which the controller is obliged to present at the time of data collection.

In order to present the information in an understandable, transparent, and concise manner, this information sheet is made in a Q&A form.

We ask you to familiarize yourselves thoroughly with the content of the current information sheet.

If you have any questions, please do not hesitate to contact the responsible persons using the contact details listed below.

¹ 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



1. Who is responsible for the processing of my personal data and who should I contact?

These legal persons act as joint controllers of your personal data:

- **„VEOLIA ENERGY SOLUTIONS BULGARIA” EAD**
 - **UIC:** 130547859
 - **Seat and address of management:** 47th “Maria Louiza” Blvd., district “Vazrazhdane”, Sofia
 - Tel.: 02 / 813 20 21

- **„VEOLIA ENERGY BULGARIA” EAD**
 - **UIC:** 121371700
 - **Seat and address of management:** 47th “Maria Louiza” Blvd., district “Vazrazhdane”, Sofia
 - Tel.: 02 / 813 20 21

- **„VEOLIA ENERGY VARNA” EAD**
 - **UIC:** 103195446
 - **Seat and address of management:** 5th “Ianosht Hunyadi” str., district “Mladost”, Varna
 - Tel.: 0800 144 48

The above persons act as joint controllers of your personal data (hereinafter referred to as Veolia or the Company).

Veolia has designated a Data Protection Officer, who you can contact in case of questions as to the processing of your personal data and the exercise of your rights under the Regulation.

- **DATA PROTECTION OFFICER:**
 - Name: Maria Kalaydjieva
 - Address:
„VEOLIA ENERGY SOLUTIONS BULGARIA” EAD
47th “Maria Louiza” Blvd., district “Vazrazhdane”
 - Email: gdpr.bg@veolia.com
 - Tel.: 02/ 813 20 45



2. What personal data is collected? What is the purpose and on what basis is it done?

Personal data collected by Veolia includes contact and identification data, as well as other personal data regarding facility management and operation necessary for the effective communication with you.

2.1. What is the purpose of data collection?

Your personal data is processed in view of the following objectives:

- Delivering multi-technical and energy efficiency services, as well as other services such as management and maintenance servicing of residential buildings, shopping centers, complexes, office buildings and industrial enterprises, as well as other follow-up activities such as: providing reports on the payments due, reviewing and replying to written requests, meter reading, duties division, debt collection, collection of default receivables and execution of emergency interventions;
- Contacting you in relation with the service we provide; which includes sending various emails and letters;
- Performance reporting of the obligations to our clients and our services' users;
- Direct marketing – advertising materials and information on supplementary products and services offered by Veolia, processing that could continue after the termination of the contract to which you are a party.

2.2. What are the legal grounds for processing my personal data?

Veolia processes your personal data on the following grounds envisaged in the Regulation:

- **consent to the processing of your personal data for one or more specific purposes** (art. 6, para 1, subpara „a“ of the Regulation);
- **processing is necessary for the performance of a contract to which you are a party** (art. 6, para 1, subpara „b“ of the Regulation);
- **processing is necessary for compliance with a legal obligation** (art. 6, para 1, subpara „c“ of the Regulation);
- **processing is necessary for the purposes of the legitimate interests pursued by Veolia** (art. 6, para 1, subpara „f“ of the Regulation).

2.3. Am I obliged to provide my personal data to Veolia? What will happen in case I refuse?

- The collection and the subsequent processing of your personal data by Veolia is mandatory so that Veolia is able to perform its contractual obligations. Not



providing your personal data will significantly impede the performance of the obligations, undertaken by Veolia.

- You can object to the processing of your personal data for the purposes of direct marketing by Veolia at any moment. In such a case, Veolia shall stop processing your personal data.

3. Who are the recipients or the categories of recipients of my personal data?

Your personal data is provided only to the below recipients after obtaining guarantees for the application of suitable technical and organizational measures that meet the requirements of the Bulgarian and EU legislation.

- **Veolia Group Companies:**
 - „VEOLIA ENERGY SOLUTIONS BULGARIA” EAD
 - „VEOLIA ENERGY BULGARIA” EAD
 - „VEOLIA ENERGY VARNA” EAD

: Each of the joint controllers could provide personal data to:

- State and local authorities for the purposes of the application and execution of the provisions referred to the Contracts and Obligations Act or other laws and regulations applicable to the services provided by Veolia;
- Companies operating call centers;
- Service providers or subcontractors when necessary in relation to the services provided by Veolia;
- Providers of information storage services (e-mail and cloud services), as well as for the maintenance of the company's software;
- Default collection companies;
- Lawyers, law firms and legal consultants for the purpose of solving legal issues or protecting Veolia's interests that have arisen in the process of providing services.
- Your personal data is not transferred to third countries or international organizations.

4. For what period of time is my personal data being processed?

Your personal data is processed for the period of the contract for delivering services by Veolia.

After the expiry date and if the contract has not been renewed, your personal data is initially archived and after the expiry of the limitation periods defined in the civil and tax legislation, the data is deleted or anonymized.

What is more, in cases in which the data is saved and stored due to legal requirements, the data concerned is limited to what is necessary under the legal requirement.

5. Does Veolia perform automatic personal data processing such as profiling?

It is possible your personal data to be processed automatically in a manner that includes profiling for the purposes of direct marketing.

You are able to object to personal data processing for purposes of direct marketing / profiling at any moment.

6. Does Veolia intend to transfer my personal data to countries outside of the EEA or to an international organization?

Currently Veolia does not transfer personal data to countries outside the EEA or to an international organization. If a change occurs, you will be informed.

7. What rights do I have as a Veolia client?

According to the regulation you have the right of:

1. **Access to your own personal data** – you can ask and receive your personal data that is being processed on a convenient medium and in an easily understandable form;
2. **Adjustment** – in case your data is inaccurate, you can ask for it to be edited;
3. **Erasure of personal data (the right “to be forgotten”)** – you have the right to request the erasure of your personal data; this right could be limited in view of your contractual relations with Veolia or for the purpose of the execution of your contractual/legal obligations to the company. As a whole, the right to be forgotten could be exercised only if the data is processed on the basis of an agreement or a legitimate interest;
4. **Processing restriction** – as far as it is possible in view of the specific situation and the legal requirements;



5. **Portability of personal data between controllers** – when processing is based on a contractual obligation or agreement and when it is done automatically, you have the right to receive your personal data from Veolia in a structured, widely used and machine-readable format, as well as the right your personal data to be granted to another personal data controllers when it is technically feasible;
6. **Objections to the processing of your personal data**– you can object to the processing of your personal data, if it is processed on the basis of Veolia’s legitimate interest;
7. **You have the right to prevent Veolia from making a decision for you on the basis of automatized processing or profiling** – you can object to the processing of your personal data on the basis of the automatized processing;
8. **Remedy before judicial or administrative proceedings** – in case you consider your rights under the Regulation violated, you have the right to file a complaint before the **Data Protection Officer of Veolia** or **Commission for Personal Data Protection** (CPDP²) at the following address:

Commission for personal data protection

Address: 2nd “Prof. Tsvetan Lazarov” Blvd., Sofia 1592

Information and contact center - tel. 02/91-53-518, 02/91-53-555, 02/91-53-519

E-mail: kzld@cpdp.bg

Web page: www.cdpd.bg

In force as of 14 December 2018.