

Revision: <b>0/05.2018</b>	<b>Neft Oil EOOD, company number (EIK) 125544808</b> Varna city 2, Dunav Str., floor 3 Tel.: 052 685 555, Fax: 052/ 643 266 e-mail: office@neftoil.eu, www.neftoil.eu	 Integrated Management System
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Approved by: .....  
/General Manager/

Date: 25.05.2018



The management of Neft Oil EOOD aims to ensure compliance with the EU legislation regarding the processing of personal data and the protection of the rights and freedoms of people whose personal data it collects and processes in accordance with the General Data Protection Regulation (Regulation (EU) 2016/679).

This policy applies to all activities of processing personal data of employees, managers, customers, suppliers, contractors and business partners. It is mandatory for all company employees and contractors, involved in processing personal data on behalf of Neft Oil EOOD.

Neft Oil EOOD follows the data protection principles outlined in Regulation (EU) 2016/679. The policies and procedures of the company aim to regulate the adherence to these principles. Neft Oil EOOD is committed to:

- processing personal data in a lawful, fair and transparent manner;
- collecting personal data for specified, explicit and legitimate purposes;
- limiting the personal data to what is necessary in relation to the purposes for which they are processed;
- keeping personal data accurate and up to date;
- ensuring that the period for which the personal data are stored is limited to a strict minimum with respect to the purposes the personal data are gathered for;

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- implementing proper technical and organizational measures to ensure protection against unauthorized or illegal processing, accidental loss, destruction or damaging;
- ensuring sufficient record keeping in order to demonstrate adherence to the above principles.

All contractors, which process personal data on behalf of Neft Oil EOOD and for purposes determined by the company as a controller are required to provide sufficient guarantees for implementing appropriate technical and organizational measures so that they can ensure that the processing meets the requirements of Regulation (EU) 2016/679. These arrangements are made in writing and are part of the agreements with the personal data processors.

The employees of the company who are engaged in processing personal data on behalf of Neft Oil EOOD must ensure the security of processing and storage of data on their part, including to guarantee that they shall not disclose the personal data to third parties unless the disclosure is required by a legal provision, based on a contractual obligation or specific instruction of the personal data subject.

Neft Oil EOOD shall take appropriate measures to ensure that data subjects can exercise their rights. The personal data procedure foresees mechanisms for filing requests and/or complaints on the part of the subjects and regulates the rules of their processing. Where applicable, the company provides the subjects with personal data protection notices to inform them of the following:

- what type of personal data are collected and processed by Neft Oil EOOD;



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- the purposes they are used for;
- the grounds, which give the company the right to collect and process these personal data;
- the personal data recipients;
- the protection measures;
- the storage period;
- their rights as data subjects and the procedure for exercising them in accordance with the internal company rules.

The personal data processed by Neft Oil EOOD are stored for a period no longer than necessary for the purposes they have been collected for. The internal company rules regulate the term of storage for all types of personal data, the order and method of their erasure and the responsible persons for these actions.

The data protection procedure of Neft Oil EOOD regulates actions in case of security breaches - order for reporting, documenting and notifying the supervisory authority and the people who are affected, as well as undertaking subsequent measures to ensure that there is no possibility for materialization of a high risk to the rights and freedoms of the data subjects.

Neft Oil EOOD applies appropriate measures for keeping the employees informed on issues related to personal data protection. Particular attention is paid to employees who have current obligations related to operations of processing and/or regular access to personal data.

The company has designated a data protection officer who controls the processes of personal data protection and monitors compliance to the

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requirements of Regulation (EU) 2016/679 and the national legislation as follows:

- Develops and maintains up to date company documentation, which regulates protection of personal data, processed by Neft Oil EOOD;
- Provides education and access to the relevant information for all employees of the company who process personal data;
- Informs and advises all members of the staff regarding their rights and obligations under the General Data Protection Regulation (Regulation (EU) 2016/679) and the national legislation regulating the protection of personal data;
- Clarifies company procedures and personal data protection rules and the order of their application;
- Communicates and cooperates with the supervisory authority (Commission on personal data protection);
- Acts as the contact point for the data subjects regarding the processing of their personal data;

**Contact details of the Data Protection Officer:**

- Name: Ekaterina Milanova, Administrative Manager
- Email: [e.milanova@neftoil.eu](mailto:e.milanova@neftoil.eu)
- Tel.: 052/685 550, 0887/603512