

# PRIVACY POLICY

at

## "KATANA STONE LTD, UIC 201018319

with registered office in the town of Sofia, "Yordan Yossifov" Str. 8B,  
office 16

### 1. Introduction:

This Personal Data Policy of KATANA STONE Ltd, UIC 201018319 with registered office in. Sofia, Yordan Yossifov Str. 8B, office 16, refers to your personal data that "KATANA STONE" Ltd. (hereinafter referred to as "KATANA STONE" Ltd." and/or "the Company") collects in order to provide you with services ("Services") in accordance with its business scope. We apply this policy to the protection of personal data collected by us through our website:

<https://www.katanastone.com/>, as well as through paper forms completed by you or our representative in person, email correspondence, contract or other methods of collecting personal data permitted by law. This policy is also intended to inform you what personal data is processed, why and how it is processed and when it is necessary to disclose it to third parties. It also provides information about the rights that users have in relation to the processing of personal data by the Company, in accordance with Regulation (EU) 2016/679 and the Data Protection Act.

Through this Privacy Policy, we inform you about our data protection practices, the rights you have regarding the personal data collected about you through our website and/or collected by us through other of the methods mentioned above.

If you have any questions, you can contact us at our address in Sofia, Yordan Yossifov 8B Str., office 16 or at the following e-mail address:

[office@katanastone.com](mailto:office@katanastone.com).

### 2. Definitions:

1. 'Data controller' means a natural or legal person, public authority, agency or other body which alone or jointly with others determines the purposes and means of the processing of personal data; where the purposes and means of such

processing are determined by Union or Member State law, the controller or the specific criteria for its determination may be laid down in Union or Member State law.

2. "Processor" means a natural or legal person, public authority, agency or other body which processes personal data on behalf of the controller.

3. "Personal Data Controller" is a natural person elected and appointed by the Manager(s) of the Company, with limited personal data processing functions under the terms and conditions set out above, and other authorised persons of the controller when temporarily and expressly authorised by the personal data controller to do so.

4. "Processing of personal data" means any operation or set of operations which may be performed upon personal data, whether or not by automatic means, such as collection, recording, organisation, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination, disclosure, updating or combination, blocking, erasure or destruction.

5. 'Personal data' means any information relating to an identified individual or to a person 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, psychological, economic, cultural or social identity of that individual;

6. "Applicable Legislation" means legislation of the European Union and the Republic of Bulgaria that is relevant to the protection of personal data;

7. 'Profiling' means any form of automated processing of personal data consisting in the use of personal data to evaluate certain personal aspects relating to a natural person, and in particular to analyse or predict aspects relating to the performance of that individual's professional duties, economic situation, health, personal preferences, interests, reliability, behaviour, location or movements;

8. 'Data subject' means a natural person who can be identified, directly or indirectly, in particular by reference to an identifier such as the name, identification number and location data of that natural person;

9. "Regulation (EU) 2016/679" means Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of individuals with regard to the processing of personal data and on the free movement of such

data, and repealing Directive 95/46/EC (General Data Protection Regulation), as promulgated in the Official Journal of the European Union on 4 May 2016.

10. "Supervisory Authority" means the Commission for the Protection of Personal Data (CPDP), an independent public authority responsible for monitoring the application of Regulation (EU) 2016/679.

### **3. General Information:**

In collecting and processing your personal data, the Company is subject to a number of laws and regulations which prescribe how these activities are to be carried out, for what purposes and what safeguards for the protection of personal data are to be applied. Relevant regulations include, but are not limited to, the General Data Protection Regulation (Regulation (EU) 679/2016), the Data Protection Act, and related acts.

### **4. Principles for the collection, processing and storage of your personal data:**

We comply with the following principles when processing your personal data:

- legality;
- integrity and transparency;
- limitation of the purposes of processing;
- minimisation of the data collected;
- accuracy and timeliness of data;
- limitation of storage to achieve the purposes;
- integrity and confidentiality of processing and ensuring an appropriate level of security of personal data;
- accountability.

### **5. Why we collect personal data and what we use it for:**

The Company processes your personal data for the purposes described below:

- To register and manage your account, including to use services, place online orders requiring registration and/or payment on our site;

- Acceptance, confirmation, fulfillment, delivery, cancellation, return, exchange and billing when ordering products, including through our online platform;
- Resolving issues related to order cancellations and any other issues related to orders and/or purchased goods, including product returns and product refunds in accordance with applicable laws and regulations;
- for registration and admission to events organised by the Society;
- to measure and track user behavior on our site in order to improve our products and your user experience;
- to show you advertisements and content relevant to you;
- to send you email newsletters to which you have explicitly subscribed;
- to send you messages about our products and services, if you have explicitly given your consent to this;
- to send you messages about products and services of our Partners, when you have explicitly given your consent for this.

## **6. What personal data we collect from you and why:**

For the purposes of processing the orders you have placed on our website, as well as for their fulfillment, we store and process the following personal data about you:

- First name, last name;
- E-mail;
- ID number;
- Contact phone;
- Invoice and shipping address;
- Zip Code.

In connection with the acceptance, confirmation, fulfillment, delivery, cancellation, return, exchange in order of products by Customers, for the resolution of problems related to order cancellations and any other problems related to orders, for the return of products and the refund of products, and in other relevant cases, the Company collects and processes other personal data of Customers such as ID, Signature and Bank details.

We do not store bank card numbers but forward them directly to the payment service provider.

In the majority of cases, we collect data from you that is explicitly stated in the law or that is necessary for the execution of a specific order placed with us.

We will inform you in a clear and transparent manner in the event that we need to collect personal data from you that is not explicitly stated in the law as being mandatory, but the Company may find it necessary and/or has a legitimate interest in collecting or is necessary to protect your vital interests.

### **7. Data for the purpose of using services and orders on the Company's website:**

The data that we collect in the case of an online order from our website is clearly indicated in the designated fields and the mandatory to provide are clearly marked. These are such data without which it is impossible to realize the respective Order/Service or part thereof. The data we collect in these cases are:

- First name, last name;
- E-mail;
- Contact phone;
- Invoice and shipping address;
- Zip Code.

In addition, information about the completion of the order and agreement to the General Terms of Use (date, time and IP address) is stored.

### **8. Processing of personal data of persons under the age of 14:**

It is important for us to take extra precautions for the protection and safety of children. For this reason, children under the age of 14 may not place orders on the Company's website without the express consent of their parent/guardian. If you are under 14, please do not submit or post any information about yourself, including but not limited to name, address, phone number, email address, etc.

## **9. Your consent and our legitimate interest:**

Except where we collect personal data based on law, contract, legitimate interest or to protect your vital interests, we will ask for your consent. We will only use your personal data after your explicit consent for the specific purpose. You have the right, if you later change your mind, to withdraw your consent. Where it is necessary for us to collect your personal data because of our legitimate interest or to safeguard your vital interests, we will inform you promptly and explain your rights. You have the right to object to us collecting your personal data if you believe we do not have a legitimate interest in collecting it. We will take further measures as well as provide you with additional information and our reasons within a period of no longer than 1 month from your request.

## **10. Disclosure of your data to third parties:**

The Company discloses your personal data only in the following cases:

- only to government authorities, institutions and persons to whom we are required to provide personal data by law;
- to persons who, on our behalf, maintain equipment, software and hardware used to process personal data;

## **11. Protection measures:**

The Company collects, processes and stores personal data in compliance with all legal requirements and applying adequate technical and organizational security measures. In order to maximize the security of the processing, transmission and storage of personal data, we use where necessary additional protection mechanisms such as encryption, pseudonymization, etc.

## **12. Time period for which we store your personal data:**

Your personal data will be kept for the period specified in applicable laws, depending on the purpose for which it was collected. In the absence of such a legal period, the Company agrees that it will keep your personal data for a reasonable period determined on the basis of additional criteria. The criteria for determining the period are in line with our desire to provide you with high quality services as well as the normal development of our partnership relationship. Our

aim is that the storage of your personal data will require minimal action on your part to re-register or re-provide data. When the personal data we collect is no longer necessary for the purposes mentioned, we delete it, anonymise it or otherwise destroy it in an appropriate manner.

**13. You are entitled to the following rights regarding your personal data:**

- Right of access;
- Right to rectification;
- Right to data portability;
- Right to erasure;
- Right to erasure (right to be forgotten);
- Right to request restriction of processing;
- Right to object to the processing of personal data;
- Right not to be subject to a decision based solely on automated processing, including profiling.

**14. Right of access:**

Upon request, the Company shall provide a data subject with the following information:

- information as to whether or not the Company processes the personal data of the individual;
- a copy of the individual's personal data that is processed by the Company; and
- an explanation of the data processed.

The information includes the following information regarding the personal data processed by the Company:

- the purposes of the processing;
- relevant categories of personal data;

- the recipients or categories of recipients to whom the personal data have been or will be disclosed, in particular recipients in third countries or international organizations;
- where possible, the intended period for which the personal data will be kept and, if this is not possible, the criteria used to determine that period;
- the existence of a right to have personal data relating to the data subject rectified or erased or to object to processing;
- the right to lodge a complaint with a supervisory authority;
- where the personal data are not collected from the data subject, any available information about their source;
- the existence of automated decision-making, whether or not that processing also includes profiling, and information on the logic used and the significance and intended consequences of that processing for the data subject;
- where personal data are transferred to a third country or to an international organization, the data subject has the right to be informed of the appropriate safeguards in relation to the transfer.

The explanation concerning the processing shall contain the information that the Company provides to data subjects by means of privacy notices.

At the request of the data subject, the Company may provide a copy of the personal data being processed.

When providing a copy of personal data, the Company should not disclose the following categories of data:

- personal data to third parties unless they have expressly consented to it;
- data which constitute trade secrets, intellectual property or confidential information;
- other information that is protected under applicable law.

Providing access to data subjects may not adversely affect the rights and freedoms of third parties or result in a breach of a legal obligation of the Company.

## **15. Your right to rectification:**



Data Subjects may request that their personal data processed by the Company be rectified if the latter is inaccurate or incomplete. If a request for rectification of personal data is granted, the Company will notify the other recipients to whom the data has been disclosed (e.g. government authorities, service providers, etc.) so that they can reflect the changes.

#### **16. Right to have your personal data erased (right to be forgotten):**

Upon request, the Company is obliged to erase personal data if any of the following grounds apply:

- The personal data is no longer necessary for the purposes for which it was collected or otherwise processed;
- The data subject withdraws the consent on which the processing is based and there is no other legal basis for the processing;
- The data subject objects to the processing and there are no legitimate grounds for the processing which override;
- The data subject objects to the processing for direct marketing purposes;
- The personal data have been unlawfully processed;
- Personal data must be erased in order to comply with a legal obligation of the Company;

The Company is under no obligation to erase personal data to the extent that processing is necessary:

- to comply with a legal obligation of the Company;
- for the establishment, exercise or defense of legal claims.
- in accordance with the purposes of Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of individuals with regard to the processing of personal data.

#### **17. Right to restriction of processing:**

The data subject shall have the right to request restriction of processing where one of the following applies:

- The accuracy of the personal data is contested by the data subject; the restriction of processing shall apply for a period that allows the controller to verify the accuracy of the personal data;

- The processing is unlawful but the data subject does not wish the personal data to be erased but requests instead that their use be restricted;
- The controller no longer needs the personal data for the purposes of the processing, but the data subject requires them for the establishment, exercise or defense of legal claims;
- The data subject has objected to the processing on the grounds of the legitimate interest of the Company and an investigation is ongoing to determine whether the legitimate grounds of the controller override the interests of the data subject.

The Company may only process personal data the processing of which is restricted for the following purposes:

- For data storage;
- With the consent of the data subject;
- To establish, exercise or defend legal claims;
- To protect the rights of another natural person; or
- For important reasons of public interest.

Where a data subject has requested a restriction of processing and one of the grounds above applies, the Company shall inform the data subject before revoking the restriction of processing.

### **18. Right to data portability:**

The data subject shall have the right to receive the personal data concerning him or her which he or she has provided to the Company in a structured, commonly used and machine-readable format.

Upon request, such data may be transferred to another controller designated by the data subject, where technically feasible.

The data subject may exercise the right to data portability in the following cases:

- The processing is based on the consent of the data subject;
- The processing is based on a contractual obligation;
- The processing is carried out in an automated manner.

The right to portability may not adversely affect the rights and freedoms of others.

### **19. Right to object:**

The data subject shall have the right to object to processing of his or her personal data by the Company if the data is processed on one of the following grounds:

- 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 the controller;
- the processing is necessary for purposes relating to the legitimate interests of the Company or of a third party;
- the processing involves profiling.

The Company shall no longer process the personal data unless the Company demonstrates compelling legitimate grounds for its continued processing which override the interests, rights and freedoms of the data subject, or for the establishment, exercise or defense of legal claims.

(2) Right to object to personal data for direct marketing purposes:

Where personal data are processed for direct marketing purposes, the data subject shall have the right to object at any time to processing of personal data for that purpose, including with regard to profiling related to direct marketing.

Where the data subject objects to processing for direct marketing purposes, the processing of personal data for those purposes shall cease.

## **20. Right to human intervention in automated decision-making:**

The Company does not currently perform automated decision making.

If the Company makes automated individual decisions in the future, whether or not those decisions are made using profiling, that have legal consequences for individuals or affect them in a significant way in a similar way, those individuals may request a review of the decision with human intervention as well as express their views.

The Company will provide the natural persons subject to automated decision-making with essential information about the logic used, as well as about the meaning and intended consequences of this processing for the individual.

## **21. Procedure for exercising the rights of data subjects:**

1. Personal data subjects may exercise the rights under these Rules by submitting a request to exercise the relevant right.
2. A request to exercise the rights of data subjects may be submitted in the following manner:

- At the address of the Company. At the address of the Data Subject, at the Company's registered office in Sofia. The address of the Company's registered office is at the Sofia City, "Yordan Yosifov" Street 8B, office 16.
- By post to the address of the Company. The address of the registered office of the Company is at the address of the Company's registered office at the address of the Company's registered office at the address of the Company's registered office at Sofia City, Yordan Yosifov Street 8B, office 16 or at the Company's e-mail address: office@katanastone.com

3. The request for exercising personal data rights should contain the following information:

- Identification of the person - name and ID number (where applicable);
- Contacts for feedback - address, phone, e-mail;
- Request - description of the request.

4. The Company shall provide information on the actions taken in relation to a request to exercise the rights of the subjects within one month of receipt of the request.

5. If necessary, this period may be extended by a further two months, taking into account the complexity and number of requests from a particular person. The Company shall inform the person of any such extension within one month of receipt of the request, including the reasons for the delay.

6. The Company shall not be obliged to respond to a request in the event that it is unable to identify the data subject.

7. The Company may request additional information necessary to confirm the identity of the data subject where there are reasonable concerns about the identity of the individual making the request.

8. Where the request is made by electronic means, the information shall, where possible, be provided by electronic means, unless the data subject has requested otherwise.

9. In case of refusal to provide access to personal data, the Company shall substantiate its refusal and inform the data subject of his/her right to lodge a complaint with the Commission for the Protection of Personal Data (CPDP).

Our employees

- will assist you in exercising your rights;

- inform you further about each of your rights.

We aim always to satisfy your requests where these requests are admissible and justified and to provide you with an answer within the statutory time limit. In rare cases, we may need to extend this time limit, but by no more than the maximum time limit permitted by law.

Right to complain If you believe we are violating your rights, you may contact us to investigate the matter. You also have the right to lodge a complaint with the Data Protection Commission:

Data Protection Commission

The headquarters and registered office of the Personal Data Protection Authority are located at 1592 Sofia, Blvd. "Prof. Tsvetan Lazarov" No. 2

Address for correspondence Sofia 1592, bul. "Prof. Tsvetan Lazarov" No. 2

Telephone: +359 02 915 3 519

Website: [www.cdpd.bg](http://www.cdpd.bg)

Update/Update This declaration is revised and updated by us on a regular basis in order to be as clear, accurate and transparent as possible and to incorporate any new changes that may occur (if necessary).