

In correspondence with the transparency principle and Regulation 2016/679, Stankov, Todorov, Hinkov & Spasov, Attorneys-at-Law presents to you information regarding the way in which we use, share and keep your personal data.

Who are we?

Stankov, Todorov, Hinkov & Spasov, Attorneys-at-Law is a legal entity, registered in Sofia City Court, with seat and management address: 5 Tsar Shishman str., entrance A, floor 1, Sofia.

How can you contact us?

You can contact us in a preferred and convenient way for you, namely: by e-mail - e.bekirova@sths-law.com, as well as on telephone number +359 2 950 6242. If you prefer to meet the data protection officer, you can arrange a meeting by sending an e-mail or calling on the stated phone and you can also visit us on: 5 Tsar Shishman str., entrance A, floor 1, Sofia.

Who do the current Transparency rules concern?

The Transparency rules for processing personal data concern:

- Our clients;
- Third persons whose data we process;
- Our counterparties;
- Visitors of our website;
- Employment/internship candidates;
- Persons who have subscribed to receive information messages.

CLIENTS

A client is every person with which Stankov, Todorov, Hinkov & Spasov, Attorneys-at-Law concludes a contract by virtue of which the law firm undertake to provide legal assistance and cooperation.

The rules for processing personal data of clients are also applied to persons who have addressed an inquiry to the law firm by visiting on the spot, telephone, e-mail or another way and in this regard the Controller processes the provided data.

What data about our clients do we collect?

The client data which we collect is determined by the parameters of the specific entrustment. In this sense, it is permissible in regard to the entrustment that we collect sensitive data, as well as data for sentences and violations, biometric data and personal data concerning health.

How do we collect our clients' personal data?

The way we collect your personal data is directly from you and the documents you provide us with. It is possible that in the process of the contract execution that we receive your personal data from other persons/entities, including municipal, state and other private structures.

What is the purpose of processing personal data of clients?

If you are our client, you should know that the purpose for which we process your personal data is the contract execution and the provision of the legal assistance and cooperation service which we have undertaken.

Pre-contractual relations exist in the period before the conclusion of the contract – from the moment of inquiry. In this case the provided personal data is processed with the purpose of concluding a specific contract and determining the parameters for legal actions which the Controller can initiate.

On what grounds do we process personal data of our clients?

The grounds for processing your personal data are the existence of pre-contractual or contractual relations, as well as the performance of legal obligations. It is permissible by exception that the processing of your personal data is of the legitimate interest of the Controller.

To whom do we provide personal data of our clients?

Stankov, Todorov, Hinkov & Spasov, Attorneys-at-Law provides personal data of clients to an accounting firm for the purpose of performing the requirements of the tax-accounting and financial legislation. It is possible that we transfer your personal data to third persons when this is necessary in order to execute the contract or to comply with statutory obligations of the Controller.

Stankov, Todorov, Hinkov & Spasov, Attorneys-at-Law has no intention of transferring your personal data to international organizations and/or third states.

How long do we store the personal data of our clients?

The conservation of our clients' data after the completion of the contract is for the period of 10 years, considered from 1st January of the period under review following the period under review, during which the obligation has become recoverable. The conservation is for the purposes of financial-accounting or reporting activity.

All personal data that does not require to be kept for executing financial-accounting and reporting activity, is stored for a period of 5 years from the completion of the entrustment due to legal reasons – Art. 47 of the Bar Act.

THIRD PERSONS WHOSE PERSONAL DATA WE PROCESS

When carrying out their activity, the Controller receives personal data regarding third persons in connection with inquiries, respectively – entrustments of clients.

What personal data of third persons do we collect?

The personal data of third persons which we collect is determined by the specifications of the particular assignment given by our client. To that extent, it is acceptable that we collect sensitive data, as well as data regarding verdicts and violations, biometric data and health status data in connection with the entrustments.

How do we collect personal data of third persons?

Personal data of third persons is provided to us by our client or government and/or private entities regarding a specific inquiry/entrustment by the client.

What is the purpose of processing personal data of third persons?

The purposes for which we process personal data of third persons are subject to the obligation which we have undertaken towards our client and the defence of their legitimate interests.

On what grounds do we process personal data of third persons?

Generally the ground on which we process personal data of third persons is the legitimate interest of our client. As an exception it is possible that the ground for processing personal data of third persons can be the legitimate interest of the Controller.

To whom do we provide personal data of third persons?

Stankov, Todorov, Hinkov & Spasov, Attorneys-at-Law provides personal data of third persons to other third persons which are usually judiciary and/or executive authorities (judiciary authorities, executive agencies, ministries, state commissions and etc.). In certain cases personal data of third persons can be provided to private entities when it is necessary for the defence of the Controller's client.

Stankov, Todorov, Hinkov & Spasov, Attorneys-at-Law has no intention of providing personal data of third persons to international organizations and/or third states.

How long do we store personal data of third persons?

Personal data of third persons is stored for a period of 5 years from the completion of the entrustment under legal grounds – Art. 47 of the Bar Act.

COUNTERPARTIES

Counterparties are data subjects with which Stankov, Todorov, Hinkov & Spasov, Attorneys-at-Law comes to an agreement for the execution of certain actions which are not connected with providing legal assistance and cooperation on behalf of the law firm.

What personal data do we collect?

The data we collect regarding you as our counterparties is in the category general personal data. It is necessary only for the contract execution and the compliance with the applicable legislation.

How do we collect personal data of our counterparties?

Personal data of the counterparties of Stankov, Todorov, Hinkov & Spasov, Attorneys-at-Law is collected directly from them. It is possible that the processing of personal data could be based on contracts that are concluded via online platforms or e-mail correspondence.

With what purpose do we process personal data of our counterparties?

If you are our counterparty, the purpose for which we process your personal data is the conclusion of a contract or the execution of an already existing legal obligation for Stankov, Todorov, Hinkov & Spasov, Attorneys-at-Law.

On what grounds do we process your personal data?

The grounds for processing your personal data are the existence of pre-contractual or contractual relations, as well as the performance of legal obligations. It is permissible by exception that the processing of your personal data is of the legitimate interest of the Controller.

To whom do we provide personal data of our clients?

Stankov, Todorov, Hinkov & Spasov, Attorneys-at-Law provides the personal data of their counterparties to third persons only if it is necessary for the conclusion of a contract or the execution of an already concluded contract (for example – bank, courier firms and etc.), as well as if the latter is necessary for the performance of a legal obligation (National Revenue Agency and etc.).

For the purposes of the accounting services, your personal data will be provided to an accounting firm.

Stankov, Todorov, Hinkov & Spasov, Attorneys-at-Law has no intention of transferring your personal data to international organizations and/or third states.

How long do we store the personal data of our counterparties?

The conservation of our counterparties' data after the completion of the contract/specific entrustment is only for financial and accounting purposes and is for the period of 10 years, considered from 1st January of the period under review following the period under review, during which the obligation has become recoverable. The conservation is for the purposes of financial-accounting or reporting activity.

VISITORS OF THE WEBSITE

What personal data do we collect about visitors of the website?

Stankov, Todorov, Hinkov & Spasov, Attorneys-at-Law does not collect personal data of the website visitors. For more information about the data which is processed when visiting the website you can read our [Cookie Policy](#).

WORK/ INTERNSHIP CANDIDATES

Documents which contain personal data are submitted when applying for a position in Stankov, Todorov, Hinkov & Spasov, Attorneys-at-Law. The processing of the data is carried out under the Personal Data Protection Act and the General Data Protection Regulation.

What kind of personal data do we process?

The personal data about the work/internship candidates which we collect is necessary in order to determine the competence of the candidate and their future inclusion in the team.

How do we collect your personal data?

The collecting of personal data of work/internship candidates is based on the documents which they send – autobiographies/CV, motivational letters, certificates, diplomas and etc., as well as copies of them.

What is the purpose of processing your personal data?

The purpose of processing your personal data is management of human resources, financial and accounting activities and is grounded in our shared strive for concluding a contract.

On what grounds do we process your personal data?

The grounds for processing your personal data are the pre-contractual relations which aim at concluding a work or internship contract.

How long do we store your personal data?

The provided personal data in the process of selecting a suitable candidate is kept for a period of 6 months from the completion of the selection procedure.

After the term in the previous paragraph expires the data is destroyed or deleted.

If during the selection procedure original documents or copies of documents with a notarial attestation were provided, which authenticate the physical and mental qualification of the candidate, the necessary qualification level and internship for the position, the data subject has the right to receive the provided documents in a 6-month period after the ultimate completion of the selection procedure

The return of the documents is done by signing an acceptance and delivery protocol.

To whom do we provide personal data of work/internship candidates?

Stankov, Todorov, Hinkov & Spasov, Attorneys-at-Law does not provide data of work/internship candidates to third persons.

PERSONS WHO ARE SUBSCRIBED TO RECEIVE INFORMATION MESSAGES

What kind of personal data do we process?

When you are subscribed to receive marketing messages, you provide us with personal correspondence data – e-mail, names, telephone number and/or address.

How do we collect your personal data?

Only on the basis of your active behaviour do we collect your personal data for the purpose of receiving information messages. You express your interest to receive information messages by sending a request for receiving information messages, filling out a form or another way for subscribing.

For what purpose do we process your personal data?

The purpose for which we process your personal data is providing you with the information which you stated in your consent to processing personal data.

On what grounds do we process your personal data for the purposes of direct marketing?

The grounds for this processing is the consent of the data subject.

Do we provide third persons with your personal data?

The personal data of persons, who have given their consent to receive information messages, is not provided to third persons, as well as third states and/or international organizations.

How long do we keep your personal data?

The personal data of persons who have subscribed to receive information messages are kept on the basis of the given consents as long as the consents are valid. If the consent is withdrawn, personal data will not be processed.

Can you withdraw your consent?

You can withdraw your consent at any given time by submitting a request to the Controller by courier or by mail on address: 5 Tsar Shishman str., entrance A, floor 1, Sofia or at e.bekirova@sths-law.com.

The consent withdrawal can be done by a request in free text or by filling out the form, available on the website and at the Controller's office.

RIGHTS OF DATA SUBJECTS

In connection with your personal data processing, it is important for us to inform you that you have a number of rights which you are free to exercise when you find it necessary. This can be done by addressing Stankov, Todorov, Hinkov & Spasov, Attorneys-at-Law in our capacity as a controller with the relevant request.

Right of access

What is the right of access to personal data?

On the basis of the right of access, we inform you whether we process your personal data, what categories and in what way do we process personal data, on what grounds do we do it, as well as whether we provide the data to third persons.

Are we always obliged to satisfy your request?

Access can be denied if your request is ungrounded.

Access can be denied if your personal data contains personal data of third persons unless the third person explicitly gives consent to provide you with their data.

What will you receive in response to your request?

If we estimate that your request is grounded and its satisfaction would not affect a third person's rights (or the third persons have given their consent), you will receive an answer which contains information regarding the above-mentioned criteria.

If there is a reason to deny access, we will provide you with information about the explanation for it.

Rectification of personal data

What is rectification of personal data?

The right of rectification gives the opportunity to rectify inaccurate or outdated data.

You can exercise this right when extension of your personal data is necessary in view of the purposes for which it has been provided to us.

How can you exercise your right of rectification of personal data?

You can exercise your right of rectification of personal data which Stankov, Todorov, Hinkov & Spasov, Attorneys-at-Law processes by submitting a request. You can use the form, available on the Controller's website or you can submit a request in free text.

It is necessary that you point out which specific data you regard as incorrect and how it should be rectified and extended in the request for rectification or extension. You should also apply the relevant evidence if such is available.

What will you receive in response to your request?

If we conclude that your request should be satisfied, we will take the necessary steps for rectifying your personal data in the manner you requested.

If there is a reason to deny rectification, we will provide you with information about it.

Erasure of personal data

What is the right of erasure of personal data?

The right of erasure of personal data, or as it is more widely spread as the right to be forgotten, gives you the opportunity to request the deletion of personal data after it is no longer necessary for the purposes for which Stankov, Todorov, Hinkov & Spasov, Attorneys-at-Law collects and processes them.

When can you request the erasure of your personal data?

You can exercise your right of erasure of your personal data if:

- your personal data is processed on the grounds of your consent and you decide to withdraw it;
- you no longer wish that your data is processed for marketing purposes;
- you consider that its processing is unlawful.

Will your request always be satisfied?

The right to be forgotten is not an absolute right. That is why Stankov, Todorov, Hinkov & Spasov, Attorneys-at-Law retains the right to deny the request if the processing is:

- on legal grounds;

- for the establishment, exercise or defence of legal claims;
- for the purposes for which the data was collected or processed in another manner;
- for scientific, research and statistical purposes, as well as when it is done for purposes in the public interest.

Additionally, if your request is obviously ungrounded, we retain our right to deny the erasure of your data.

What will you receive in response to your request?

If we deny your request, you will receive our motives for it.

If the conditions for your request are met, we will fulfil it.

Restriction of personal data processing

What is the right to restriction of processing personal data?

The right to restriction of processing personal data gives the data subjects the opportunity to restrict the way in which their personal data is being processed if they have doubts about the data accuracy or the way the data is used.

Does the right to restriction prohibit the Controller from processing personal data?

Exercising this right does not impact the Controller's right to process your personal data in one of the following ways:

- to continue to keep your personal data;
- to use the data for the establishment, exercise or defence of legal claims;
- do defend the rights of third persons;
- if an important public interest requires so.

What is restriction of processing?

The restriction of processing is usually temporary, for the following periods:

- If you contradict the accuracy of your personal data – the personal data processing is restricted until it is clarified whether the request for rectification is reasonable;
- If you object the data processing on the grounds of public or legitimate interest – the personal data processing is restricted as long as the inspection is in progress. This inspection will assess whose interest is of utmost importance.

It is possible that the restriction is not temporary and that it is in regard to a specific type of processing.

If the restriction is temporary, the Controller undertakes to inform you before the restriction drops.

Is the Controller always obliged to satisfy your request?

The Controller is obliged to satisfy your request, if:

- they no longer need your data for the purposes of the processing, but you need the data in view of establishment, exercise or defence of legal claims;
- you consider that we process your data unlawfully but you still do not want the data to be erased;
- the Controller provided third persons with your data, the Controller undertakes to inform them about your request as far as it is possible and if it would not cost disproportionate effort.

If we consider that your restriction request is obviously ungrounded, we retain our right to deny to restrict the data processing. We will inform you about our denial with motives.

Data portability

What is the right to data portability?

As a Controller, Stankov, Todorov, Hinkov & Spasov, Attorneys-at-Law provides the opportunity for you to exercise your right to data portability when your data is processed by automatic means, on the basis of your consent or the processing is necessary for the performance of contract obligations. You can receive your personal data and it can be directly transmitted to another Controller, chosen by you.

You have the right to receive your personal data in a structured, commonly used, machine-readable format and transmit it to another controller. When this is technically impossible, you can request that we directly transmit the data to a controller, specified by you.

Is the Controller always obliged to satisfy your request?

The right to data portability is not an absolute right. The right to personal data portability is applicable when:

- the processing is based on consent or it is necessary for the performance of a contractual obligation, and
- data is processed by automatic means.

What happens to my personal data when my request for data portability was satisfied?

The Controller does not erase your personal data but stops processing it for the purposes for which it was provided to him.

Objection against personal data processing

What is the right to object processing of personal data?

The right to objection gives you the opportunity to oppose the processing of personal data for specific purposes.

Can you always object to processing of your personal data?

You can object the processing only when the Controller processes the data:

- on grounds - legitimate interest, irrespective whether this is the Controller's legitimate interest or the legitimate interest of a third person;
- for scientific or historic research or statistical purposes;
- for direct marketing purposes (including profiling).

Exercising the rights

How can you exercise the enumerated rights?

You can exercise each of the enumerated rights by submitting a request to the Controller.

How do you submit a request?

You can use the application format for the relevant right or you can submit a request in free text.

Where can you find the application format?

The format is available at the Controller's address: 5 Tsar Shishman str., entrance A, floor 1, Sofia or at the Controller's website – www.sths-law.com

What does the request in free text have to contain if you prefer to refer the matter to the Controller in such a way?

You have to point out your name, address, as well as other identifying information if you consider necessary, a description of your request, the preferred way of correspondence, date and signature in your request.

If you are an authorized person you have to attach the relevant power of attorney to the request.

How do you submit the request?

The request can be submitted on spot at the office of Stankov, Todorov, Hinkov & Spasov, Attorneys-at-Law at address: 5 Tsar Shishman str., entrance A, floor 1, Sofia as well as by courier or by mail at this address.

You can submit your request or application in free text at e-mail: e.bekirova@sths-law.com

How will you find out the result from your request?

We will contact you in the way you specified – e-mail or address. If you do not explicitly specify a way of communication – e-mail or address - the Controller will contact you in the manner that they consider the most convenient in view of the efficiency. If you specified only an e-mail address or only an address, we will contact you in the manner you specified.

Is it possible that additional documents/data is requested from me?

It is possible that we request additional information or data for the purpose of data subject protection, so that we are sure that there is no misuse of rights. The requested additional data

or documents will not be processed in a manner, with means and for purposes, different from identifying the data subject and the person who submitted the request for exercising rights.

How long will you have to wait for a response?

Stankov, Todorov, Hinkov & Spasov, Attorneys-at-Law is a Controller with high engagement in the sphere of personal data protection. That is why we make efforts to respond as quickly as possible to requests. However, we inform you that the normatively established term is up to 1 month from the submission of the request.

LEGAL REMEDIES

What can you do if you are not pleased with the Controller's response and you reckon there is a violation of your rights?

If you reckon that your rights under Regulation 2016/679 and under the Personal Data Protection Act are violated, you have the right to refer the matter to the Commission for Personal Data Protection.

The Commission will consider your case and will inform you with the results.

After the Commission delivers a resolution, a copy of it will be sent to you. You have the right to appeal against it in court under the rules of the Administrative Procedure Code.

Along with this you have the opportunity to refer the matter to the relevant administrative court or the Supreme Administrative Court under the rules of the Administrative Procedure Code.

You cannot refer the matter to a court, if there is a pending proceeding for the same violation before the Commission or a resolution about the same violation is appealed and there is no court ruling in force.