

PRIVACY POLICY OF KUMINIANO FRUIT OOD

This Privacy Policy regulates the processing of personal data of individuals by **KUMINIANO FRUIT OOD**, UIC: 832099347, with corporate seat and registered address at 8, Iskra Str., village of Katunitsa 4120, Sadovo Municipality, Plovdiv District, represented by the Managing Director Roberto Santorelli, when visiting the website of the Company: www.kuminianofruit.com. The Policy also covers the processing of personal data of customers, suppliers, and visitors of the Company.

Kuminiano Fruit OOD (hereinafter referred to as the “**Administrator**”) processes the personal data of individuals in accordance with the requirements of *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* (General Data Protection Regulation) /”GDPR” or the “Regulation(s)”, the Personal Data Protection Act, as well as all other regulations, guidelines, and instructions related to the processing and protection of personal data of individuals.

Contact person:	Iliyana Avramova
Contact telephone:	00359 889 30 30 85
E-mail:	gdpr@kuminianofruit.com

With this Privacy Policy we strive to provide you with comprehensive information regarding the processing of your personal data in accordance with Art.13 and Art.14 of the Regulation in a transparent, accessible, and easily understandable way. This information shall include non-exhaustive types of personal data that we process, the purposes and legal basis for the processing, the categories of recipients of the data, the security measures we apply, your rights, and how you may exercise them in accordance with the Regulation and the relevant applicable legislation.

❖ DEFINITIONS

You should keep in mind that the meaning of the terms used in this Policy is as follows:

- “**Personal Data Administrator**” means a natural or legal person, public authority, agency, or any other body, which separately or jointly with others determines the purposes and means of the processing of personal data. In the context of this Policy, the Data Administrator is Kuminiano Fruit OOD.
- “**Domain**” is part of the hierarchical space of the global Internet network, which has its own unique name (domain name), which must meet certain requirements. In order to load a specific web page, the domain name is displayed in the browser field, and in the context of these General Terms, the domain name is www.kuminianofruit.com.
- “**Deletion**” is the irreversible deletion of the information from the respective medium;

- **“Personal data”** means any information related to a natural person that allows his/her identification or identifies him/her, including identifiers, such as name, identification number (Personal No, PNF), etc., location data (geolocation), online identifier (for example, IP address) or one or more characteristics specific to the physical, physiological, genetic, mental, intellectual, economic, cultural, or social identity of that individual;
The processing of special categories of personal data is prohibited, except in a few explicit hypotheses described in Art.9, § 2 of the Regulation. Such data is personal data revealing racial or ethnic origin, political views, religious or philosophical beliefs or trade union membership, as well as the processing of genetic data, biometric data for the sole purpose of identifying an individual, health data or data of the sexual life or sexual orientation of the individual.
- **“Supervisory body”** is an independent public body responsible for monitoring the application of the Regulation in order to protect the fundamental rights and freedoms of individuals with regard to the processing, as well as to facilitate the free movement of personal data within the Union. On the territory of the Republic of Bulgaria the competent supervisory body is the Commission for Personal Data Protection.
- **“Breach of personal data security”** means a breach of security, which results in the accidental or unlawful destruction, loss, alteration, unauthorized disclosure, or access to personal data that is transmitted, stored, or otherwise processed.
- **“Processing”** means any operation or set of operations carried out with personal data or a set of personal data by automatic (electronic) or other means (paper-based), such as collection, recording, organization, structuring, storage, adaptation or modification, retrieval, consultation, use, disclosure by transmission, dissemination or other means of making the data available, arrangement or combination, restriction, deletion, or destroying.
- **“Processor of personal data”** means a natural or legal person, public authority, agency, or any other body which processes personal data on behalf of the Administrator.
- **“Recipient”** means a natural or legal person, public authority, agency, or any other body, to which personal data is disclosed, whether this is a third party or not. At the same time, public authorities which may receive personal data in the context of a specific investigation in accordance with Union law or the law of a Member State shall not be considered as “recipients”; the processing of such data by those public authorities complies with the applicable data protection rules in accordance with the purposes of the processing.
- **“Risk”** is the possibility of property or non-property damage to the data subject under certain conditions, assessed in terms of its severity and probability.
- **“Consent of the data subject”** means any freely expressed, specific, informed, and unambiguous indication of the will of the data subject, by means of a statement or clear confirmatory action expressing his or her consent to the processing of personal data relating to him or her.

- **“Data subject”** within the meaning of this Privacy Policy is a natural person, whose personal data is processed by the Personal Data Administrator in the course of his/her activity, as well as when visiting the website www.kuminianofruit.com.
- **“Destruction”** is the irreversible physical destruction of a material medium of information.

The terms not defined above have the meaning given to them in Regulation (EU) 2016/679, the content of which is available at <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=celex%3A32016R0679>, as well as in the Personal Data Protection Act or the respective normative act regulating the matter.

I. DATA OF THE PERSONAL DATA ADMINISTRATOR

Kuminiano Fruit OOD is a Personal Data Administrator within the meaning of Art.4, § 7 of the Regulation, as it determines the **purposes and means** for processing the personal data of the natural persons within the framework of their activity, incl. through the website www.kuminianofruit.com.

Name of the Data Administrator:	Kuminiano Fruit OOD
UIC:	832099347
Registered address:	8, Iskra Str., village of Katunitsa 4120, Sadovo Municipality, Plovdiv District
Contact person:	Iliyana Avramova
Contact telephone:	00359 889 30 30 85
E-mail:	gdpr@kuminianofruit.com

In case you have questions and/or need additional information or suggestions related to the processing of personal data or their protection, you can contact us at the above coordinates.

II. CATEGORIES OF DATA SUBJECTS

Through the website www.kuminianofruit.com we process the personal data of the following categories of individuals:

- people loading the domain www.kuminianofruit.com in their browser;
- people making inquiries through our contact form or by sending a message by e-mail/to our correspondence address;

This Policy also addresses the data processed by the Company regarding the following categories of entities:

- visitors;
- customers;
- suppliers;

The administrator does not process personal data of persons under 14 years of age. If you establish such processing, please inform us immediately so that we can take the necessary actions.

III. TYPES OF PERSONAL DATA. PURPOSES AND LEGAL BASIS OF THE PROCESSING. TERM FOR STORAGE.

A) Personal data obtained by the data subject when visiting the website www.kuminianofruit.com:

No	Category and type of data	Purpose(s)	Legal basis	Term for storage
1	Physical identity and contact details: Name, e-mail, other information provided voluntarily by the data subject;	Identification of the data subject, processing of his/her application, and provision of feedback on the application;	Art.6, §1, letter “b” of the Regulation: contractual grounds or Art.6, § 1, letter “e” – legitimate interest;	Up to 3 months after the end of the correspondence <i>(except when concluding a contract as a result of the correspondence)</i>
2	Physical identity: full name, address, e-mail;	Exercise of any of the rights provided for in the Regulation in favor of the data subjects; Processing the application, satisfying the application; maintaining a register of applications;	Art.6, §1, letter “c” of the Regulation: regulatory obligation;	Up to 5 years from the last action taken on the application;
3	Physical identity: full name, address, e-mail;	Maintaining a register of violations; Taking action in case of violation; Notification of the Commission for Personal Data Protection and the victims of the violation <i>(when applicable)</i> ;	Art.6, §1, letter “c” of the Regulation: regulatory obligation;	Up to 5 years from the establishment of the violation;
4	Log files;	Storage of information in accordance with the requirements of the Personal Data Protection Act;	Art.6, §1, letter “c” of the Regulation: regulatory obligation;	Up to 3 years from the performance of the respective action;

We do not process special categories of personal data through www.kuminianofruit.com. We do not process personal data through profiling or other methods of automated decision-making.

After the expiration of the terms for personal data processing, they shall be deleted/destroyed, unless they are necessary for pending court, arbitration, administrative, or enforcement proceedings.

B) Personal data obtained automatically through cookies

The website www.kuminianofruit.com uses cookies. Cookies are small files consisting of letters and numbers that are stored on your computer or mobile device when you visit a website.

You can control and manage cookies in different ways using your web browser. For more information on how to change your browser settings to block or filter cookies, please visit: <https://www.pcmag.com/how-to/how-to-control-and-delete-cookies-on-your-browser> or <https://www.aboutcookies.org>.

C) Personal data of visitors, customers and suppliers

No	Category and type of data	Purpose(s)	Legal basis	Term for storage
1.	<p>Physical identity and contact details: Full name, Personal No, address, phone number, e-mail; Bank data: IBAN, servicing bank, etc. information in connection with the payment of the due remuneration.</p> <p>Regarding agricultural producers, in addition to the ones described above, data of social identity is also processed: location of agricultural plantations, type and area; information on how to process the arrays, and other related information;</p>	<ul style="list-style-type: none"> • Identification of the data subject; • Conclusion and execution of a contract; • Information support of activities related to the existence, amendment, and termination of legal relations and preparation of all types of documents in this regard (contracts, handover protocols, invoices, etc.); • Establishing contact with the person by phone or by sending correspondence related to the performance of contractual obligations; • Fulfillment of the normative requirements of the Commercial Act and the Accounting Act; 	<p>Art.6, §1, letter “b” of the Regulation:</p> <p>Art. 6, §1, letter “c” of the Regulation: legal basis;</p>	<p>Up to 5 years from the termination of the contract;</p>
2.	<p>Physical identity: full name, Personal No, address, telephone, e-mail;</p>	<p>Exercise of any of the rights provided for in the Regulation in favor of the data subjects; Processing the application, satisfying the application; maintaining a register of applications;</p>	<p>Art.6, §1, letter “c” of the Regulation: regulatory obligation;</p>	<p>Up to 5 years from the last action taken on</p>

				the application;
3.	Physical identity: full name, Personal No, address, telephone, e-mail;	Maintaining a register of violations; Taking action in case of violation; Notification of the Commission for Personal Data Protection and the victims of the violation (when applicable);	Art. 6, §1, letter “c” of the Regulation: regulatory obligation;	Up to 5 years from the establishment of the violation;
4.	Video surveillance recordings, incl. sound recording;	Ensuring the security of property, staff, and visitors and control of the production process in the implementation of a procedure for bioterrorism, as well as ensuring the quality and safety of products; Fulfillment of obligations under the Excise Duties and Tax Warehouses Act and the bylaws;	Art. 6, §1, letter “e” of the Regulation: legitimate interest; Art. 6, §1, letter “c” of the Regulation: legal obligation;	Up to 2 months
5.	Registration Plates numbers of motor vehicles for visitors who access the site by motor vehicles;	Ensuring the security of property, staff, and visitors and control of the production process in the implementation of a procedure for bioterrorism, as well as fulfillment of obligations under the Excise Duties and Tax Warehouses Act.	Art.6, §1, letter “e” of the Regulation: legitimate interest and Art.6, §1, letter “c” of the Regulation: legal obligation	Up to 3 years
6.	Declaration of the health status of the data subject;	Ensuring the safety of food products and control of the production process in the implementation of a bioterrorism procedure and within the certification of the Company according to ISO 22000.	Art. 9, §2, letter “a” of the Regulation: consent	Up to 3 years from the visit

IV. RECIPIENTS OF THE DATA

Your personal data may be provided to:

- competent public authorities in compliance with legal provisions or other statutory obligations;
- our partners, with whom we have concluded contracts for the provision of various services, such as: couriers, persons providing technical support for the website and computer network and the software used by the Company, companies conducting the access mode and the video surveillance, mobile operators, financial institutions, customs, auditors and audit firms, consultants, etc.

All our partners comply with the requirements of Regulation (EU) 2016/679 by making such commitments through the personal data protection agreements concluded with us (in accordance with Article 28, § 3 of the Regulation).

Kuminiano Fruit OOD does not provide personal data to other persons within the EU, nor to third countries or international organizations.

V. YOUR RIGHTS

In your capacity as a data subject, you have the following rights, which you can exercise for free at any time:

1. Right of access

You have the right to receive confirmation whether we process personal data related to you. In case we process such data, we will provide you with a copy of the data (on the appropriate medium), as well as with the following information:

- the purposes of the processing;
- the relevant categories of personal data;
- the recipients or categories of recipients, to whom the personal data is or will be disclosed;
- where possible, the envisaged period, for which the personal data will be stored, and when this is not possible – the criteria for its determination;
- the existence of the right to require the Administrator to correct or delete personal data or to restrict the processing of personal data related to the data subject, or to object to such processing;
- the right to appeal to a supervisory body;
- where personal data is not collected by the data subject, any available information about its source;
- the existence of automated decision-making, incl. profiling (with relevant information on the logic used and the meaning and intended consequences of this processing)

In the event that the documents containing personal data about the data subject contain personal data of other persons, they will be deleted in an appropriate manner.

2. Right of correction

You have the right to request that we correct the personal data we process about you when it is inaccurate. In case you wish to supplement your personal data, you will need to submit a declaration containing the relevant information or to fill in the correct data in the application for exercising the right to correction.

After we receive your application, we will correct/supplement the data as soon as possible.

3. Right of deletion (the so-called “Right to be forgotten”)

You have the right to request the deletion of personal data related to you. In order to delete your personal data, any of the following grounds should apply:

- personal data is no longer needed for the purposes for which it was collected or otherwise processed;
- you withdraw your consent on which the data processing is based and we have no other legal basis for its processing;
- you object to the processing and there are no legal grounds for the processing to take precedence. When you object to processing for marketing purposes, the grounds are not analyzed.
- your personal data has been processed illegally;
- personal data must be deleted in order to comply with a legal obligation under EU law or Bulgarian law;
- personal data has been collected in connection with the provision of information society services; An information society service is any service normally provided for remuneration, remotely, by electronic means, and at the individual request of the recipient of the services.

Even if any of the hypotheses described above are present, we will not delete your personal data when the processing is necessary for:

- exercising the right to freedom of expression and the right to information;
- for compliance with a legal obligation that requires processing provided for in EU law or Bulgarian law, or for the performance of a task of public interest, or in the exercise of official powers of the Administrator;
- for the establishment, exercise, or defense of legal claims;
- two more specific hypotheses set out in Art.17, § 3, letters “c” and “d” of the Regulation.

4. Right to limit processing

You have the right to ask us to limit processing when one of the following applies:

- you dispute the accuracy of personal data. In this case, the restriction is carried out for the period necessary for the Administrator to check the accuracy of the data.
- the processing is illegal, but you want the use of personal data to be restricted instead of being deleted;
- the Administrator no longer needs the personal data for the purposes of processing, but you require them for the establishment, exercise, or protection of legal claims;
- you have objected to the processing and are awaiting verification that the legitimate interests of the Administrator take precedence over your interests.

The Administrator shall inform any person to whom data have been disclosed that it has been corrected, deleted, or restricted, except in cases where this is not possible or requires a disproportionate effort. If you wish, we will let you know who these people are.

5. Right of portability

You have the right to receive the personal data you have provided to us in a structured, widely used, and machine-readable format, as well as to application that we transfer the data to another administrator of your choice. In order to take such action, the following two prerequisites must be present:

- the processing is based on consent or a contractual obligation; and
- data has to be processed in an automated manner.

6. Right to object

You have the right to object to the processing of your personal data when it is based on:

- performing of a task of public interest or in the exercise of official powers conferred on the Administrator, or
- legitimate interest.

We will stop processing your data immediately if we are unable to prove that there are compelling legal grounds for processing that take precedence over your interests, rights, and freedoms, or for establishing, exercising, or defending legal claims.

When the processing is for marketing purposes, we will stop processing your data as soon as we process your application.

7. Right to withdraw the consent given

When the processing of your data is based on consent, you have the right to withdraw the consent given at any time by notifying us at the indicated contact data.

How to exercise any of the rights described above?

Stage 1. In case you want to exercise any of your rights, please download the application from **HERE (HYPERLINK)** and fill in the necessary information. The application is created for your convenience, but is not mandatory for you.

If you wish, you can send us an application in free form, which must contain the following information:

- full name;
- Personal No (if you have provided us with a similar identifier so far);
- address;
- correspondence address;
- description of the application;
- preferred form for receipt of a response and information;
- signature;

→ submission date;

Stage 2. Please send your application in one of the following ways:

- **by e-mail to gdpr@kuminianofruit.com** under the terms of the Electronic Documents and Electronic Certification Services Act, the Electronic Government Act, or the Electronic Identification Act (i.e. electronic signature, with electronic identifier or otherwise);
- **by post, courier or in person at the address:** 8, Iskra Str., village of Katunitsa 4120, Sadovo Municipality, Plovdiv District. When the application is submitted by an authorized person, a Power of Attorney should be attached to it.

Stage 3. After reviewing your application, we will analyze its content and, if necessary, ask for additional information. You will receive information about its processing within one month of sending it in the manner specified by you as preferred for communication.

Stage 4. In case you need assistance in filling out the form we offer, you can contact us at the contact details provided in this Policy.

You should be aware that the Administrator may refuse to grant, in whole or in part, any of the rights described above where such exercise would pose a risk to public order or security, the prevention, investigation, detection, or prosecution of criminal offenses or the enforcement of penalties, including the protection and the prevention of threats to public policy or security, other important objectives of general public interest and in particular an important economic or financial interest, including monetary, budgetary, and fiscal matters, public health and social security, data protection or the rights and freedoms of others, or enforcement of civil claims.

In addition to the rights described above, you have the opportunity to take the following actions:

8. To file a complaint with the Data Protection Commission

If you have any doubts or concerns that we are processing your personal data illegally, you can contact us at the above contacts. Any data subject has the right to file a complaint to the Commission for Personal Data Protection, if he/she considers that the processing of personal data concerning him/her violates the provisions of the Regulation or the Personal Data Protection Act. The data subject should refer to the Commission for Personal Data Protection within 6 months of learning of the violation, but not later than 2 years from it, by filing a complaint by letter, fax, or electronically under the procedure of the Electronic Document and the Electronic Signature Act.

9. To file an appeal with the competent administrative court

Without prejudice to your right to appeal to the Commission for Personal Data Protection, described in item 8, you have the opportunity to appeal to the competent administrative court when you believe that your rights under the Regulation/Personal Data Protection Act have been violated as a result of the processing of your personal data.

10. Right to compensation and liability for damages

In case you have suffered material or non-material damages as a result of violation of the Regulation, you have the right to receive compensation from the Administrator for the damages.

VI. INFORMATION ABOUT THE SUPERVISORY BODY

The supervisory body competent on the territory of the Republic of Bulgaria is the Commission for Personal Data Protection.

Contact details of the Commission for Personal Data Protection:

Address: 2, Prof. Tsvetan Lazarov Blvd., Sofia 1592

E-mail: kzld@cpdp.bg

Website: www.cdpd.bg

Information and Contact Center – Tel. 000359 2/91-53-518

VII. DATA PROTECTION MEASURES

In order to ensure the security of your personal data, a number of protection measures have been taken, including:

- integrated TLS certificate;
- all Administrator accounts are password protected with a high level of security;
- keeping operating systems up to date;
- keeping antivirus programs up to date;
- limited access to the data of persons whose official duties require such access;
- documented procedures for the processing of personal data of individuals, etc.

VIII. FINAL PROVISIONS

1. Taking into account current trends, the current privacy policy may be changed.
2. All changes and additions to the Privacy Policy will be applied after the publication of its current content, available through our website. In case the amendments are substantial, in accordance with the Guidelines on Transparency under Regulation 2016/679 of the Working Group under Article 29 (now the European Data Protection Board), adopted on 29.11.2017, last revised on 11.04.2018, we will notify you of them via a pop-up message on our website, or via e-mail to the e-mail address you have provided.
3. This Privacy Policy is valid as of 01.04.2021.