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STOCK EXCHANGE

## PRIVACY POLICY

The Privacy Policy is intended to inform you transparently and in compliance with the General Data Protection Regulation about the data Financial Market Services Ltd. (hereafter the Company) collects, the purpose of their processing, the way of use and the rights you have concerning the processing, modification and deletion of your data.

### Information On Your Personal Data Controller

This Policy is to inform you that the Company is a personal data controller within the meaning of Regulation (EU) 2016/679 and in this capacity it collects, records, stores, deletes or otherwise processes personal data.

Information on your data controller:

Company name: Financial Market Services Ltd.

UIC: 131455253

Address: Bulgaria, Sofia Region (capital), Sofia Municipality, city of Sofia, zip code 1000, Triaditsa District, 6 Tri Ushi St.

Websites: <http://www.extri.bg/>; <http://www.x3news.com/>; <https://www.fms.capital/>

E-mail: [GDPRFMS@bse-sofia.bg](mailto:GDPRFMS@bse-sofia.bg)

Tel: +359 2 937 09 67

### When Does This Policy Not Apply?

This Policy applies to the personal data that we collect from you or for you via this website as well as to the provision of services related to the main scope of business of Financial Market Services Ltd. By accessing any part of this website or using our services otherwise, you acknowledge your understanding that we collect, use and transfer your personal information as described in this Policy. If you do not agree with the terms of this Policy, please do not continue to use this website or our services.

This Policy shall **not** apply in case when:

- Other terms of personal data processing or confidentiality conditions are arranged in a product or services agreement with Financial Market Services Ltd.
- It concerns personal data of job applicants and employees, of which the Company maintains an own recruitment privacy policy.
- Financial Market Services Ltd. provides products or services as a processing party in an agreement between the Company and a controller, who determines the privacy policy as permitted by law.

### The Information We Collect

- **Personal data processed for the provision of products and services related to the main scope of business of Financial Market Services Ltd.**

Financial Market Services Ltd. collects from you/your representative or for you only the information necessary and required by law, in order to provide the respective product or service and facilitate business relations and/or communications resulting from the nature of the respective product or service.

Based on the specific products, services and the applicable legislation, we collect the following types of personal data, which you or a representative of yours (e.g. employer, financial service provider, legal representative, the company in which you are an employee, a member of a management or supervisory body or a shareholder) provide:

- Full name
- E-mail address
- Identification data through QES
- User name when creating an account in the Company's systems and platforms
- Phone number;
- Postal address
- Firm name
- Contact person
- Position in the company of an employee, member of a management body or a shareholder
- National identification number (PIN)
- Regulated information under § 1, item 41 of the POSA, as far it contains personal data



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- Any other information you or a representative of yours voluntarily provided or granted access to via our website and offered services or when taking part in an event and such organised by us.

➤ **Personal data processed when visiting our website**

We may also automatically collect the following types of information from devices as mobile phones, PCs, laptops, tablets and suchlike used for visiting our website:

- IP address
- Device identifier
- Log files
- Cookies and

Other information described in our [Cookies Policy](#).

In most cases, these data are anonymous and do not allow us to identify you.

➤ **Other personal data we process**

If you share with us sensitive personal information (e.g. racial or ethnic origin, political, religious or philosophical views or membership in trade unions), and as far it is not relevant and necessary for the provided services, Financial Market Services Ltd. will not process this information and will take measures for its timely deletion.

We will process the personal data you provide to us **in connection with a request, complaint or praise** of our services for the time we need to respond to them.

Furthermore, we inform you that the building in which the office of the Company is located is under constant **video surveillance** for access control, protection of the property and employees of all tenants and owners. We do not use biometric technologies to identify you, nor do we collect biometric data. There are security camera signs placed at the entrances of the premises, which are under video surveillance. We store the video records for one month in a safe place, allowing only a limited number of people to access them only when necessary.

**Why Is It Necessary To Collect Your Personal Data And On What Grounds We Do It?**

Purpose of Personal Data Processing	Legal Grounds
Providing you (or your employer/company) with our services and products and contacting you concerning	1. Concluding or executing an agreement 2. Legitimate interest

<p>your (or your employer's/company's) account or use of our products, services and/or websites.</p>	<p>3. Compliance with a legal obligation</p>
<p>Execution of transactions/deals and compliance with obligations for reporting to the competent authorities under the applicable legislation</p>	<p>1. Concluding or executing an agreement 2. Compliance with a legal obligation</p>
<p>Monitoring for security and prevention of risks and fraud in connection with the products and services offered, use of the website or the Company's premises</p>	<p>1. Compliance with a legal obligation 2. Legitimate interest</p>
<p>Administering the relationships incl. legal relationships with you (your employer or company with which you are affiliated) in the capacity of a client, potential client or person to whom we provide information</p>	<p>1. Concluding or executing an agreement 2. Legitimate interest 3. Compliance with a legal obligation</p>
<p>To protect our legal rights and interests in connection with the services, products, use of our websites or to protect against legal claims by third parties</p>	<p>1. Concluding or executing an agreement 2. Legitimate interest</p>
<p>Development, providing content, operation, delivery and offering of our services and websites</p>	<p>1. Concluding or executing an agreement 2. Legitimate interest 3. Consent</p>
<p>To improve the quality of our services and to adapt them to the needs of our clients</p>	<p>1. Legitimate interest 2. Consent</p>

When we process your data based on our legitimate interests, you have the right to disagree with this processing by contacting us at the email or postal address provided at the end of this Policy.



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### **Automatic Personal Data Processing**

Financial Market Services Ltd. does not automatically process personal data, based on which the company should make decisions that cause legal consequences for data subjects or similarly affect them to a significant extent.

### **How Long Do We Store Your Data?**

The Company stores your data only for the minimum necessary time to achieve the objectives set out in this Policy unless we are required by law or have the right to store them for a longer period.

The data storage period is determined by several factors, including the duration of the services provided, if it is necessary to establish, exercise or protect our and/or your legal claims and inquiries, or if we have a legal obligation to store the data. Personal data that are collected and processed in fulfilment of a legal obligation that applies to the controller or in the exercise of official powers are stored for the period specified in the relevant law or for the statutory period of limitation. In this regard, Financial Market Services Ltd. should provide information services connected with regulated information disclosure for the time limits specified in the POSA.

Video surveillance data are stored for a short period - one month usually, unless a longer processing time is required to protect our legal claims - for example for further incident investigation.

### **Do We Share Your Data?**

We provide some of the above-mentioned data to regulatory authorities, courts, state bodies to fulfil legal obligations. For example, the systems of Financial Market Services Ltd., given the information services they provide, are connected with the systems of the Financial Supervision Commission /the FSC/ and Bulgarian Stock Exchange /BSE/.

We share your personal information with third-party service providers who perform activities and functions on our behalf, such as hosting services or the services providing technical support or data analysis to our systems and websites. We do not authorise these third parties to use your information for purposes other than those for which they were provided, and these third parties have no right to disclose this information to others. We require these third parties to maintain adequate security to protect your information from unauthorised access or processing.

We may share your information with third parties only if we have received instructions from you in this regard or with your explicit prior consent.



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We do not share, sell, borrow or trade your information with third parties, service providers or business partners for their purposes or direct marketing purposes.

### **How Do We Protect Your Rights?**

We process your data only for the above purposes, grounds and deadlines. The Company makes every effort to protect your data from damage, loss, disclosure, misuse, intrusion, modification or destruction. To protect the confidentiality of the data, we apply physical, program-technical, organisational and administrative measures.

When we collect personal data, we do so in the minimum amount and only for clearly pre-defined purposes and storage periods. We restrict access to your personal information only to those who need this information to provide you with benefits or services. We grant access to the data only to a limited number of persons who are trained and instructed to deal with them.

### **Relationships Between Joint Data Controllers**

For the provision of information services and for regulated information dissemination within the meaning of the POSA as well as other information in the Republic of Bulgaria and the EU Member States in a way that ensures the fulfilment of the legal obligations by public companies and other issuers of securities, Financial Market Services Ltd. on the one hand and public companies and other issuers of securities on the other hand act as joint personal data controllers including joint determination of the purposes and means of the data processing.

The joint data controllers define jointly the purposes of personal data processing as follows:

- Publication of information by public companies through the system of extri.bg
- Regulated information dissemination within the meaning of the POSA to the respective body, when there is a legal obligation to provide data to the public under the conditions of Art. 100s of the POSA
- Services and products providing and making contact regarding the created account or the use of the products, services and/or websites of Financial Market Services Ltd.
- Development, providing content, operation, delivery and offering of our services and websites
- Compliance with reporting and notification obligations to the competent under the applicable law
- Monitoring for security purposes and prevention of risks and fraud in connection with the offered products and services, the use of extri.bg website



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- Improvement of the quality of services offered by Financial Market Services Ltd.
- Administering the relationships incl. legal relationships with you as a potential client or person to whom we provide information
- To protect our legal rights and interests in connection with the provided services, products, use of our websites or to protect against legal claims by third parties

Each of the controllers is obliged to indemnify the other party for any costs, liability and claims of any nature incurred by the other controller and arising from or in connection with any breach, act of negligence, error or omission of the guilty party, its employees or subcontractors in connection with or arising from the requirements of personal data protection and security.

When Financial Market Services Ltd. provides you with services in connection with its main scope of activity, namely to disseminate the regulated and other information provided by you in a way that ensures its prompt dissemination to the widest possible range of persons in the Republic of Bulgaria and all EU Member States in a way that does not discriminate against them, you agree that you should delete the personal data contained in the information you disseminate that are not necessary and go beyond the purposes for which they are processed following Regulation (EU) 2016/679 and the Bulgarian legislation.

Financial Market Services Ltd. does not make any changes nor edits the information provided by you, distributing it unedited in full. Financial Market Services Ltd. is not responsible for the dissemination of information that does not meet the requirements of personal data protection but has been provided by you in a way that goes beyond the purposes for which it is processed. Financial Market Services Ltd. is entitled to seek responsibility from you for all damages suffered by the Company as a result of illegal processing of personal data, which led to imposing of measures and sanctions for violation of Regulation (EU) 2016/679 and Bulgarian law.

### What Are Your Rights As A Data Subject?

As a data subject, you have the right to request from the Company:

**Access** to your data, i.e. you have the right to know which of your data are processed by us. The company shall provide you, upon request, with a free copy of the processed personal data related to you. When submitting a request electronically, the controller shall provide the information in a widely used electronic form.

**Correction**, i.e. the right to request correction of your data stored by us if they are inaccurate or incomplete.



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**Right to erasure** ('right to be forgotten'). You are entitled to request the erasure of personal data in the following cases:

- The personal data are no longer necessary for the purposes for which they were collected or otherwise processed.
- The data subject withdraws consent on which the processing is based and where there is no other legal ground for the processing.
- The personal data have to be erased for compliance with a legal obligation to which the controller is subject.

**The right to erasure shall not apply to the extent that processing is necessary:**

- for exercising the right of freedom of expression and information.
- for compliance with a legal obligation which requires processing by Union or Member State law to which the controller is subject or for the performance of a task carried out in the public interest or the exercise of official authority vested in the controller.
- for reasons of public interest in the area of public health.
- for archiving purposes in the public interest, for scientific or historical researches or statistical purposes following Art. 89 (1) of Regulation (EU) 2016/679 in so far as the right to erasure is likely to render impossible or seriously impair the achievement of the objectives of that processing
- for the establishment, exercise or defence of legal claims

**Restriction of processing** of your personal information. If you need to check the accuracy of the data, the grounds or the legality of their processing, you can ask the controller to limit (stop) the processing of your data.

**Objection to processing.** Concerning data processed on the basis of a "legitimate interest", you have the right at any time and on grounds related to your specific situation to object to the processing. In the event of such an objection, the controller is obliged to terminate the processing of your personal information, unless the controller demonstrates compelling legitimate grounds for the processing which override the interests, rights and freedoms of the data subject or for the establishment, exercise or defence of legal claims.

**Right to data portability** i.e. to receive your personal information in a structured, commonly used and machine-readable form.

When processing is based on your consent, you have the **right to withdraw your consent** at any time.





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You also have the right to **file a complaint** with the competent supervisory authority if you believe that your data is being unlawfully processed by the controller.

### **Commission for Personal Data Protection**

Seat and registered address: Sofia 1592, 2 Prof. Tsvetan Lazarov Blvd.

Correspondence address: Sofia 1592, 2 Prof. Tsvetan Lazarov Blvd.

Tel: +359 2 915 3 518

E-mail: [kzld@cpdp.bg](mailto:kzld@cpdp.bg)

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

To exercise your rights, you may contact us at the contact details provided under the 'Contact For Personal Data Issues'. We will respond to any of your requests without undue delay within one month of receiving the request. If we are unable to do so for reasons beyond our control, we will duly notify you, stating the reasons for the delay.

### **Changes To The Privacy Policy**

The Company retains the right to make changes to the Privacy Policy at any time.

In case the Company plans to adjust this policy (e.g. if we intend to use your personal information for purposes other than those specified in the policy in force at the time of data collection and in compliance with the principle of legality), we will publish a notice of amendments to the current privacy policy, which will enter into force on the date of its publication.

The Company will notify you of any changes by posting them on the privacy policy page or by e-mail or another type of notification.

### **Contact For Personal Data Issues**

For any questions or comments related to this Privacy Policy, the way of collection and use of your personal information by Financial Market Services Ltd., the exercise of your rights regarding the personal data collected, please, contact us at:

- ✓ E-mail: [GDPRFMS@bse-sofia.bg](mailto:GDPRFMS@bse-sofia.bg)
- ✓ Correspondence address: Bulgaria, Sofia Region (capital), Sofia Municipality, city of Sofia, zip code 1000, Triaditsa District, 6 Tri Ushi St.



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You may also contact the Data Protection Officer at Financial Market Services Ltd., in charge of the compliance with data protection legislation:

- ✓ Name: Pavel Dochev
- ✓ Tel: +359 2 937 09 67
- ✓ E-mail: [pavel.dochev@bse-sofia.bg](mailto:pavel.dochev@bse-sofia.bg)