Personal Data Protection Policy

General Information

The present data protection policy (hereinafter referred to as “Policy/the Policy”) describes how and why we are processing your personal data, how we are protecting and storing it as well as what your rights referring to your personal data are.

The Policy relates to your personal data processing regardless of the way, the form and/or the medium used for submitting it to us (by you personally using paper form, through the website of Sofia Motors EOOD, by phone or by e-mail) as well as regardless whether the data is processed as a hard copy or electronically.

The term “personal data” in this Policy means any information relating to you, or information which allows you to be identified either directly or indirectly.

Sofia Motors EOOD (hereinafter referred to as “We”, “the Company” or “Sofia Motors”) undertakes to protect your personal data. We shall not use it for purpose other than submitting, supporting and improving the services offered by us. The Company shall process your personal data only in accordance with the applicable laws and provisions.

To improve user experience and optimize our website, we use analytical tools that allow us to monitor and analyze how visitors interact with the site. These technologies (such as heatmaps and session recordings) help us understand which parts of the website are most frequently used and where users encounter difficulties, without collecting personal or sensitive data.

The collected information may include:

• cursor movements, clicks, and scrolling behavior;

• technical data such as device type, browser, and operating system;

• aggregated navigation data (visited pages, time spent on site, etc.).

All data is stored in an aggregated and anonymized form and is used solely for analytical purposes — to improve the structure, content, and functionality of the website.

These tools do not record text input, identify individual users, or collect sensitive information.

The use of such technologies is carried out only with your explicit consent, provided via the cookie banner. You can refuse or withdraw this consent at any time through the “Cookies Settings” or by blocking analytical tools in your browser.

We use analytical tools (e.g., heatmaps and recordings) to understand how users interact with our website and to improve it. The data is completely anonymous. You can manage your preferences in the “Cookies” section.

Principles applied by the Company in the data processing are as follows:

- legality, good faith, and transparency throughout the whole procedure of personal data processing;
- limitation on the processing purposes. The personal data processed by the Company shall be collected for exact, clearly stated and legitimate purposes and it shall not be processed in a way

that is incompatible with these purposes;
- - relevance with the processing purposes and minimizing the personal data processed by the Company and limitation of such data to as far is it necessary for the purposes for its processing;
- accuracy and timeliness of the processed personal data and taking reasonable measures in order to ensure the timely deletion or correction of imprecise personal data, taking into account the purposes for its processing;
- limitation of the storage in accordance with achieving the objectives;
- integrity and confidentiality of the processing, and providing an appropriate level of security, including protection against unauthorized or unlawful processing and against accidental loss, destruction or damage by applying appropriate technical and organizational measures.

Information about the Personal Data Administrator

Sofia Motors EOOD is registered in the Trade Register of the Registry Agency at the Ministry of Justice with UIC 175104206. The Company has its headquarters and business & correspondence address at the city of Sofia, 115K Tssarigradsko shousse Blvd., Building B, fl. 8, e-mail: info@drivesimpl.bg.

Contact Information of the Data Protection Responsible Person

Contact details: City of Sofia, 43 Hristofor Kolumb Blvd.
Email: dpo@elg.bg
Information regarding the competent supervisory authority
Title: Personal Data Protection Commission
Contact details: City of Sofia, 1592, 2, Prof. Tsvetan Lazarov Blvd.
Telephone: 02 915 3 518
Email: kzld@government.bg, kzld@cpdp.bg
Website: www.cpdp.bg

What kind of personal data we collect from or about you

Sofia Motors collects and processes the personal data provided by you with regards to using our services and for concluding a contract with the Company.

HThe valid and precise identification is in your own interest and for your own safety as well. That is why we collect from you personal data that allows us to identify you::

- Data by which we identify you taken from an identification document of yours, such as your full name, EGN (Personal Identification Number)/FIN (Foreigner Identity Number), number and date of the identification document;
- Data related to you such as your address (permanent and current), mobile/landline phone and your e-mail address;

The Company may collect and process information regarding the services you apply for with us.

We also process information about the vehicle rented by you:

- Data of the vehicle, subject to your contract with Sofia Motors, such as make, model, SCN (State Control Number), frame, GPS coordinates, etc.;

When you visit us in our offices or contact us for any reason via e-mail, website or telephone, we may process any information you provide us with and keep a record of the correspondence. Personal data that can be processed by us also include any kind of messages such as letters, emails, electronic chat messages, requests, complaints, and others.
In addition, Sofia Motors may collect and process information about your computer, laptop, tablet or smart phone used by you to access our websites including, if available, your IP address and other data collected from the cookies.

Grounds for processing your personal data and why we need it

Sofia Motors processes your personal data on the following legal grounds:

- To conclude a contract with you and to ensure its execution or to take steps upon your request prior to the conclusion of a contract, as well as to enforce our rights arising from contracts concluded with you;
- When the processing is necessary in order to comply with a legal obligation that applies to the Company;

The Company may provide information to the Consumer Protection Commission or to third parties provided for in the Consumer Protection Act, the Personal Data Protection Commission and all other public authorities under the applicable legislation; the Traffic Police or the State Vehicle Inspectorate in their inspections in connection with the Road Traffic Act or the relevant secondary legislation;

- To prevent or eliminate fraud;
- For the purpose of collecting receivables arising from contracts concluded with you;
- If processing is necessary to ensure our legitimate interest under the applicable laws and regulations or the legal relationship between Sofia Motors and you (including the right to do business, to provide services and to advertise a product);
- In order to check your identity, so that we can perform a general analysis of your data for the purposes of adjusting the services we offer in accordance with your individual needs and offering you new Services, which meet them, as well informing you about changes in the Services and maintaining communication with you;
- Within the scope of your consent - for example, for marketing and promotional purposes. If you have consented to us processing your personal data for the purposes of marketing, the processing shall be performed only in accordance with the purposes set out in your consent. Each provided consent for the processing of personal data for the purposes of marketing may be withdrawn by you at any time, and this will not affect in any way whatsoever the Services we provide. To withdraw your consent, you only need to use the contact data on our site.

Purposes for data processing

According to your consent and the applicable laws and regulations, Sofia Motors processes your personal data for the following purposes:

- Provision of the Services requested by you and provided pursuant to the Contract concluded between you and Sofia Motors, namely, management and performance of your request and performance of Services in accordance with the Contract; determination of the identity of the client;

in order to provide the full service required by you, as well to collect the due amounts for the products and Services used; any cooperation with regards to the provided Services; notifications on anything related to the products and Services you use with us, sending various messages, including text messages and e-mails, courier services, or responding to requests, complaints, suggestions filed by you;
- Compliance with a legal requirement - provision of information to the competent authorities, institutions and third parties within the scope of their powers, as well as within the scope of a court procedure, in accordance with the requirements of procedural and substantive legal acts applicable to the proceedings; obligations set out in the Accountancy Act and the Tax and Social Insurance Procedure Code and other related regulations for keeping correct and lawful accounting;
- Preventing frauds, proving transactions and communication; establishing and/or preventing illegal actions or actions inconsistent with our terms and conditions for the relevant Services;
- Improving and personalizing our Services by sending you important information related to your contract and/or Services through various communication channels, including surveys, notifications, messages sent via email that we believe will be of interest to;
- Communicating with you about updates of our products and services, and notifying you of all products and services we offer, as long as it is in our legitimate interest or you have agreed to receive such messages, and unless you choose to opt out of them.
- Processing the information you provide (applications, notifications, complaints, etc.) and providing services;
- For any other purposes compatible with the legislation, the Personal Data and Business Protection Policy of Sofia Motors.

We do not apply automated decision-making, including profiling within the meaning of Art. 22 of Regulation (EU) 2016/679 of 27 April 2016 (the “Regulation”) when deciding whether to conclude a contract with you.

Sharing personal data with third parties

Your personal data may be transferred to third parties provided there are legal grounds for the transfer.

Your personal data is received and processed by employees of Sofia Motors and other parties that the Company has entered into agreements with for the lawful processing of personal data, in the event those parties need this information to fulfill contractual, legal and regulatory obligations. In addition, we may disclose your personal data to the extent that we consider the disclosure or transmission necessary to meet the above purposes to the following recipients:

- Insurance companies and insurance intermediaries when concluding insurances for the vehicles, subject to your contract with us;
- Postal operators in view of sending shipments containing contracts, supplementary agreements and other documents and the need of identity verification when they are delivered;
- Banks and/or payment institutions that are funding us as well as for servicing the payments made by/to you;
- Competent authorities, institutions and entities that have the power to request the submission of personal data and to which we are required to provide personal data according to the current legislation, such as judicial authorities (courts, etc.), the prosecutor’s office, various regulatory

bodies such as the Consumer Protection Commission, the Personal Data Protection Commission, national security and public order protection authorities, the Traffic Police, the State Vehicle Inspectorate;
- Companies and entities that, by assignment, maintain equipment, software and hardware used for the personal data processing and necessary for the establishment of the Company's network, as well as for the provision of various services related to communication with customers, sending SMS notifications, emails , technical support, etc.;
- Lawyers, external auditors, notaries, private and state enforcement agents, in order to implement or apply our General Terms and Conditions or the Contract;
- To third parties, for which you have provided an explicit consent.

We require confidentiality liability from all third parties which we disclose personal data to as well as taking all technical and organizational measures to protect such data as per the Regulation. We do not share or sell your personal data to third parties for them to carry out their own business or marketing activities without your consent.

Although we cannot guarantee that the data transmission via the internet or the website is free from cyberattacks, we and our subcontractors and business partners are working hard to maintain physical, electronic and procedural guarantees for the protection of your information in accordance with the applicable data protection requirements.

Periods of time for processing your personal data

We process and store your personal data with due diligence for the entire term of the Contract you have concluded with us and store them for a period of ten years after the termination of the Contract in order to comply with the applicable tax legislation, as well as with the expiration of certain statutory deadlines for submitting claims or obligations, to provide information to the court, any competent state authorities, as well as for any other purposes provided for in the applicable legislation (10 years).

Upon the expiration of the periods stated above, the Company shall delete or anonymize your personal data, unless they are necessary for pending court or administrative proceedings or proceedings for examination of a complaint you have filed with us.

What your personal data processing rights are

At any time while we store or process your personal data, you have the following rights:

- Right of access: You may receive information regarding the processing of your personal data and a copy of the personal data in question;
- Right to rectification: When you believe that your personal data are incorrect or incomplete, you may require your personal data to be amended accordingly;
- Right to erasure: You may require the deletion of your personal data to the extent permitted by law;
- Right to restriction: You may require to limit the processing of your personal data;
- Right to object: You may object to the processing of your personal data on grounds, related to the particular situation. You have the absolute right to object to the processing of your personal data for the purposes of direct marketing, which includes profiling associated with such direct marketing;
- Right to withdraw consent: When you have given your consent for processing your personal data,

you have the right to withdraw it at any time;
- Right to data portability: When legally enforceable, you are entitled to have your personal data, submitted to us, returned to you or, when technically possible, to be submitted to third party.

If you require further information or you want to exercise your rights stated above, please send a letter or email to the contacts listed in this Policy, as in order to protect your personal data you will need to identify yourself.

How we protect your personal data

The security of your personal data is important to us and therefore we implement various organizational and technical measures to ensure that your data is protected and kept confidential. We have systems and procedures to prevent unauthorized access, incorrect modification or disclosure, abuse or loss of information. We protect your personal data by maintaining physical, electronic and procedural measures and rules in accordance to the applicable laws and regulations. Among others, some of the measures we apply to ensure a high level of security regarding the management of the personal data include as follows:

- Minimization - the personal data we require from you are adequate and limited only to what is necessary in relation to the purposes for which they are processed;
- Strict internal control on the access to personal data - the access to your personal data is permitted only to these employees of ours who need such information in order to dully perform their professional obligations;
- Provision of current training with regards to the protection of personal data to all of our employees and constant internal control on the implementation of the confidentiality measures.

Taking into account the nature of the communication technology and the information processing technology, we cannot guarantee that the information, during transmission via the internet or while stored in our systems or otherwise, will be absolutely safe from unauthorized access by other people.

Our site may contain links to third-party websites. If you follow a link to any of these websites, please note that they have their own privacy policies and Sofia Motors is not responsible for them.

Use of Sofia Motors services by minors

The services provided by Sofia Motors are prohibited for individuals under the age of 18 and we neither provide any services to such persons, nor process their personal data. If you believe that a physical person under the age of 18 has unlawfully submitted personal data to us, please contact us immediately and we will take measures to delete such information.

Changes to this Data Protection Policy

We reserve the right to modify this Policy in accordance with the applicable laws and the good practices. We will inform you timely about this by publishing the changes on our website.

This policy is in force since May 29, 2019.