

**COMMON PRIVACY AND PERSONAL DATA PROTECTION
POLICY**
of
AGRIA GROUP HOLDING JSC

Adopted on 23.05.2018
Version 1.0

I. General provisions

1. **AGRIA GROUP HOLDING JSC**, UIC 148135254, having its registered and management office in Varna: 9th fl., Dimyat Business Centre, 111, Knyaz Boris I Blvd., 9002 Varna operating as a holding entity within the meaning of art. 277 of the Bulgarian Commercial Law by holding and controlling a group of undertakings and developing its own trade activity.
2. In view of its business, **AGRIA GROUP HOLDING JSC** and the companies of the Group act in the capacity of controllers of personal data according to art. 4, par. 7 of Regulation (EU) 2016/679 of the European parliament and of the Council of 27.04.2016 on the protection of natural persons with regard to processing of personal data and on the free movement of such data, repealing Directive 95/45/EC (General Data Protection Regulation) and take actions in collecting, processing and storage of personal data and determine solely and/or jointly the purposes and means of personal data processing in compliance with Regulation (EU) 2016/679 and the Law on Personal Data Protection.
3. The specific legal and organizational structure of **AGRIA GROUP HOLDING JSC** as a holding entity and the interconnected work processes within the companies of the Group determines the need for creating a dynamic internal organization relating to access and the processing of personal data in the maintained data registers within **AGRIA GROUP HOLDING JSC** and the companies of the Group.
4. The current policy determines the terms under which **AGRIA GROUP HOLDING JSC** and the companies of the Group collect, record, organize, structure, store, adopt or change, extract, consult, use, disclose by transmission, distribution or by other means and through which the data become accessible, arrange or combine, limit, delete, destroy or process, in other way for the purposes of their activities, personal data of job applicants, employees and members of their families, contractors under civil contracts, shareholders and bondholders, counterparties – natural persons (suppliers and customers) or representatives (legal and contractual) of legal entities (suppliers and customers) or potential ones.
5. The current policy is consistent and prepared in compliance with the provisions of the Law on personal data protection and Regulation (EU) 2016/679 of the European parliament and of the Council of 27.04.2016 on the protection of natural persons with regard to processing of personal data and on the free movement of such data, and repealing Directive 95/45/EC (General Data Protection Regulation) which is directly applicable in all member states of the European Union from May 25th 2018.
6. This policy has a direct effect and binds **AGRIA GROUP HOLDING JSC** and all companies controlled by the latter.

7. An integral part of the current policy is Appendix №1, which individualizes the group of undertakings of **AGRIA GROUP HOLDING JSC** according to their credentials and type of operation.
8. An integral part of the current policy is Appendix №2, which regulates and differentiates within the organization access to personal data registers that are kept by **AGRIA GROUP HOLDING JSC** and the companies of the Group.

II. Main terms

For the purposes of this Policy, the terms used herein have the following meaning:

1. **Personal data** - any information relating to an identified or identifiable natural person ("data subject"); an identifiable natural person is one 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, economic, cultural or social identity of that natural person.
2. **Data subject** – any natural person alive who is a subject of personal data stored by an administrator.
3. **Personal data processing** - any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organizing, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.
4. **Controller** - 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
5. **Personal data processor** - a natural or legal person, public authority, agency or other body, which processes personal data on behalf of the controller.
6. **Filing system** – any structured set of personal data which are accessible according to specific criteria, whether centralized, decentralized or dispersed on a functional or geographic basis;
7. **Recipient** – a natural or legal person, public authority, agency or another body, to which the personal data are disclosed, whether a third party or not.
8. **Third party** - a natural or legal person, public authority, agency or body other than the data subject, controller, processor and persons who, under the direct authority of the controller or processor, are authorized to process personal data
9. **“Consent”** – any freely given, specific, informed and unambiguous indication of the data subject's wishes made by a statement or by a clear affirmative action.
10. **Cookies** - small text files which are stored, emanating from a webpage on the Internet browser to a hard drive of an end user and gives the opportunity to restore information for the latter and identify the used end-device and/or browser.

III. Related documents

The preparation and adoption of the current Policy is consistent with the business operation of **AGRIA GROUP HOLDING JSC** and the companies of the Group. The current principles and rules are in direct connection and compliance with the policy adopted by **AGRIA GROUP HOLDING JSC** and are common and applicable for all the companies of the Group:

1. Internal policy for protecting the personal data of the job candidates and the persons employed under labor and civil contract;
2. Clean desk and clean screen policy;
3. Mobile devices and distant work policy;
4. Procedure on processing of applications for exercising data subjects' rights in accordance with art. 15 – art. 21 of Regulation (EU) 2016/679;
5. Procedure for actions in case of security data breach and actions for informing the interested parties.

IV. Principles of personal data protection

AGRIA GROUP HOLDING JSC and the companies of the Group comply with all activities in the collection and processing of personal data according to the principles as set out in art. 5 of Regulation (EU) 2016/679:

a) **Lawfulness, fairness and transparency** – the processing is carried out on a legal ground in accordance with art. 6 of Regulation (EU) 2016/679 where ensuring fairness with regard to the persons whose data is processed. Each information and correspondence with regard to the processing shall be provided to the data subjects in an easy and comprehensive way.

b) **Purpose restriction** – the personal data is collected and processed for particular, explicitly indicated and legitimate purposes whereas data are not processed in any other way that is incompatible with these purposes.

c) **Minimization** – personal data are not collected and stored in larger than the data amount necessary for the purposes for which they are stored.

d) **Accuracy** – necessary measures are taken for ensuring accuracy and update of the collected personal data by establishing the necessary organisation to ensure the timely deletion or rectification of inaccurate personal data with the resulting consequences

e) **Storage restriction** – personal data are stored pursuant to the applicable legislation in the envisaged terms. The personal data which period of storage is not regulated by law or regulation are stored until they are no longer factually required.

f) **Integrity and confidentiality** – personal data are processed with an adequate level of security and protection against illegal processing, storage, loss, destruction, alteration or damage.

g) **Accountability** – **AGRIA GROUP HOLDING JSC** and the companies of the Group are responsible for following the principles of personal data protection and are able to demonstrate at any moment compliance of their activity with the regulation requirements.

V. Personal data categories

1. **AGRIA GROUP HOLDING JSC** and the companies of the Group collect and process the following categories of personal data from job applicants, employees

and members of their families, contractors under civil contracts, shareholders and bond holders, counterparties, natural persons (suppliers and customers) or representatives (lawful or contractual) of legal entities (suppliers and customers) or potential ones.

a) Physical identity data- name and national identification number, data on an identity document, permanent and current address, phone, place of birth, e-mail;

b) Medical condition data – data which identify the common health status of the person, including specific diseases;

c) Employment and education data – information about type and level of the education obtained, previous work experience,...

d) Family identity data – information about marital status and children;

e) Economic identity data – information about financial statement, in particular data for financial obligations;

f) Data for number, issue date and category of driving license;

g) Data for professional qualities, skills and habits;

h) Data for membership in professional organizations;

i) Data for presence or absence of criminal record;

j) Data from video surveillance and location data;

k) Data for usage of information and communication systems;

l) Data for bank accounts;

m) Data for identification of shareholders and bondholders – number of shares, number of bonds, dividend amount, income amount.

2. Personal data are collected by the data subjects themselves and also by websites and social networks sites, public registers, data bases and other data subjects.
3. The data amount, collected and processed for every particular data subject, is different depending on the corresponding legitimate grounds and purposes of processing, described in p. VI of the current Policy.
4. Personal data is not collected more than that necessary for carrying out the regulatory obligation and/or accomplishing the corresponding goals. Processing of special categories of personal data in the meaning of art. 9, par. 1 of Regulation (EU) 2016/679 is carried out only in the presence of applicable grounds in accordance with those described in art. 9, par. 2.

VI. Legal grounds and objectives of personal data processing

1. In order to follow the principle of lawfulness of the processing, **AGRIA GROUP HOLDING JSC** and the companies of the Group process personal data only and insofar as applicable any of the following conditions:
 - a) Data subject have consented processing of personal data for one or more certain purposes;
 - b) Data processing is necessary for execution of a contract under which the data subject is a party, respectively for taking steps in requesting from the data subject before concluding a contract;
 - c) Data processing is necessary for following a legal obligation of **AGRIA GROUP HOLDING JSC** and the companies of the Group;
 - d) Data processing is necessary for the protection of vital interests of the data subject or other natural person;
 - e) Data processing is necessary for the purposes of the legitimate interests of **AGRIA GROUP HOLDING JSC** and the companies of the Group or third party,

unless the interests or fundamental rights and freedoms of the data subject override and require protection of personal data.

2. The main activities, objectives and grounds with regard to the personal data processing of job candidates, employees and members of their families, contractors under civil contracts, shareholders and bond holders, counterparties – natural persons (suppliers and customers) or representatives (legal and contractual) of legal entities (suppliers and customers) or potential ones, are:

2.1. For performance of duties of AGRIA GROUP HOLDING JSC as a public company:

- a) Hold General meetings of shareholders and bondholders, payment of dividends;
- b) Keep records of the persons who have access to internal information in compliance with Regulation (EU) 596/2014 of the European parliament and of the Council on market abuse;
- c) For the performance of regulatory obligations to public authorities (National Revenue Agency, the Financial Supervision Commission, the Bulgarian Stock Exchange, the Central Depository and others);

2.2. Recruitment and human resources management whereas these include:

- a) Collect documents of job applicants, selection and presentation of the those suitable for the available job positions;
- b) Prepare employment and dismissal orders, job descriptions, keeping and storing of employment record, conducting periodic assessments, organizing internal and external training and qualifications;
- c) Conclude, alter and cancel labour and civil contracts; job placement;
- d) Pay working and non-working remuneration, premiums, bonuses, compensation,
- e) Organize business and other travel in order to perform job and work functions;
- f) Organize taking paid and unpaid leave;
- g) Take evidence in the course of labour disputes and disciplinary proceedings;
- h) Provide and organize healthy and safe working conditions;
- i) Organize and improve social and household services and any other activities designed for human resources management, communication with employees, protection of their interests, fulfill and perform the provisions of labour and social security law

2.3. Trade activity:

- a) Pre-contractual relations; conclude, execute and cancel contracts and legal relationships;
- b) Execution of obligations under agreed and concluded contracts;
- c) Maintaining active trade relations and communication;
- d) Administration and responding to inquiries, complaints, claims, refund requests;
- e) Process and send orders to suppliers;
- f) Order processing and produce dispatching to customers;
- g) Invoicing and execution of other obligations in accordance with Accounting Law, Tax Insurance Procedure Code and related regulations for the purposes of corporate accounting.

2.4. Assistance to public authorities – in the case of a requirement for the provision of personal data and submission of relevant documents to public authorities in accordance with their legal duty to perform their public functions and tasks, as public authorities include but not limited to: bodies referred to in

point 2.1.c ., National Social Security Institute, Commission for personal data protection, Commission for Protection against Discrimination, EA "Labour Inspectorate", Ministry of Interior, Local Authorities, Judiciary Authorities and others.

2.5. Exercise and defense of legal claims – actions in establishing, exercising or protection of legal claims, including the collection of receivables of **AGRIA GROUP HOLDING JSC** and the companies of the Group before a competent or arbitration court, lodge complaints, files and claims with other competent state or juridical authorities.

2.6. Ensure network, information and physical security, whereas this activities include:

a) Stop attacks and preventing unauthorized access to and/or spreading of malware requiring the processing of personal data by public authorities, teams for immediate computer incident response, teams for computer security incidents, network e-mail services and security providers.

b) Video surveillance and GPS tracking of company vehicles – in view of physical security, protection of property, prevention of crime, ensuring normal running of the work process.

2.7. Website administration – by installing Cookies which can be used for site traffic analysis, marketing purposes, system reports of the website activity as well as for restoring usage information, improving the functionality of the website and its analytics.

VII. Obligations of AGRIA GROUP HOLDING JSC and the companies in the group as administrators of personal data

1. Determine the policies, procedures and rules of personal data protection in compliance with the regulatory requirements;
2. Adopt and implement common policies, rules and procedures valid for **AGRIA GROUP HOLDING JSC** and the companies of the Group;
3. Adopt and implement in the companies of the Group internal policies, rules and procedures individualized according to the type and nature of the business operation;
4. Analyze the need for designating an officer for the protection of personal data in accordance with art. 37 of Regulation (EU) 2016/679 and determining if this is necessary;
5. Ensure that the organization of keeping records of the activities in processing data is in accordance with art. 30 of Regulation (EU) 2016/679;
6. Implement, adopt and update appropriate technical and organizational measures for personal data protection;
7. Follow the principles of personal data protection from the stage of design and at default development of new technologies, systems, applications or business processes;
8. Ensure the exercise of natural persons' rights with regard to personal data protection;
9. Constantly observe, supervise and carry out constant control for compliance with the requirements for protection of the filing systems whereas in case of detecting infringements, take immediate actions for their rectification and/or elimination;

10. Maintain personal data in a manner which allows identification of the respective personal data subject for a period not longer than that is necessary for the objectives of which the personal data are processed;
11. Conducting training and assistance for personnel with regard to the protection of personal data;
12. Assist the Commission for personal data protection in carrying out its controlling functions;
13. Determine the method and order for access to personal data in the used information systems according to the objectives of processing;
14. Establish contractual relationships only with entities who process personal data and who are able to provide sufficient warranties for applying appropriate technical and organizational precautions for lawful processing and protection of data subjects' personal data;
15. Inform the Commission for personal data protection about any security breach of the personal data – if a high risk is detected;
16. Inform in an appropriate way the affected entities and persons about the security breach of the personal data – if a high risk is detected;
17. Register any breach of the security of personal data, the circumstances related to the breach, the consequences of it and the actions taken for dealing with it.
18. Assess the effect according to the requirements of art. 35 of Regulation (EU) 2016/679.

VIII. Obligations of the persons, who collect and process personal data

1. The employees and the contractors under civil contracts in **AGRIA GROUP HOLDING JSC** and the group of undertakings whose working functions or contractual obligations are related to collecting and processing of personal data, as well as managers and members of the managerial bodies are aware of the valid regulatory framework in personal data protection whereas they are given initial and periodical instructions for personal data processing and their safeguard.
2. When concluding a contract for management, employment or civil contract, the persons who deal with personal data collection and processing as well as with confidential and other privacy information, have signed privacy statements.
3. The employees will have disciplinary action taken against them for infringement of their duties with regard to the applicable policies, rules and procedures for personal data protection. The contractors under civil contracts are liable according to Law on Obligations and Contracts.
4. The employees and the contractors under civil contracts in **AGRIA GROUP HOLDING JSC** and the group of undertakings perform their tasks in accordance to their given rights of access – to the filing systems of their direct employer or assignor as well as to the filing systems of the group of undertakings, as follows:
 - a) The Executive Director of **AGRIA GROUP HOLDING JSC** appoints a particular employee at a company of the Group (Coordinator).
 - b) The coordinator determines the need for employees at the group undertakings to be given access to certain filing systems containing personal data that are kept in a record at any of the companies in the Group.

- c) The Coordinator determines the access type which shall be provided to a particular employee, e.g.: 1) types of filing systems containing personal data; 2) one or more companies of the Group which keep those records; 3) the means of actual access.
- d) The access is individualized by giving an individualized password (authentication data) and for a certain level of access.
- e) The level of access can refer to certain filing systems for particular purposes, to a single company or to all companies of the Group.
- f) The level of access to the information systems used by the Group include the electronic (e-mail) correspondence, e-documents as well as to paper documents.
- g) Managers (managerial bodies and/or empowered persons) of the companies of the Group ensure at a group and individual level compliance with the adopted rules for personal data protection of:
 - 1) Its employees regardless of the access level provided to them
 - 2) Employees of other companies of the Group which have been given access to the records, kept accordingly at that company.

IX. Means and period of personal data storage.

1. **AGRIA GROUP HOLDING JSC** and the companies of the Group follow the regulatory periods for storage of documents containing personal data even if the same data is stored in a paper and/or a technical format, respectively, the same contractual obligations are set for contractors under civil contracts.
2. The organization of storing and level of access to personal data are defined depending on the occupied position and the particular job functions of every employee, and respectively the particular contractual obligations of the contractors under civil contract.
3. Individual criteria for determining the necessary storage period is applied with regard to the documents and data for which the legislation has not determined obligatory periods of data storage. The periods of storage are defined in compliance with the legal requirements, quantity, type and sensitivity of the personal data, the potential risks of damage, the purposes of processing the ability to achieve these objectives by other means.
4. The data collected and processed with the explicit consent of the data subject is stored until the withdrawal of the given consent or under the statutory order.
5. Employees, who are explicitly authorized, make an annual review of the stored documents and data for determining the regulatory and factual necessity of continuing the storage.
6. In case of a withdrawal of consent or a lack of regulatory or factual necessity to continue the storage of, the data and is not subject to submission in the National Archive Fund or in the National Insurance Institute shall be destroyed or erased with the respective withdrawal of consent order:
 - a) The destruction of personal data on paper shall be carried out by burning or tearing via shredder. The services of companies specialized in guaranteed destruction of documents are used when large quantities of documents are needed to be destroyed.
 - b) Personal data on optical media or other technical media and records in the system of the administrators shall be destroyed by physical damage or destruction of the respective optical media or by deleting information from the

systems of the administrators without the possibility of its recovery. If it is not possible, the services of companies specialized in guaranteed destroying of documents are used.

c) Clear instructions (Protocols) for the destruction and/or erasure shall be prepared where the personal data media to be destroyed or erased is clearly described.

7. The storage of data for a longer period shall be admissible only if it will be processed for the purposes of public interest archiving, scientific or historical research or for statistical purposes, applying the appropriate technical and organizational measures to ensure the rights and freedoms of the data subjects.

X. Sharing personal data to third parties

1. **AGRIA GROUP HOLDING JSC** and the companies of the Group can delegate activities in data processing to third parties who act in capacity of processor. For carrying out different activities, the access to personal data which are collected and processed by **AGRIA GROUP HOLDING JSC** and the companies of the Group can be provided to:
 - a) Financial institutions;
 - b) Counterparties who are engaged in courier services, transport and logistics;
 - c) Counterparties who provide and maintain information systems and resources;
 - d) Counterparties who provide consultancy and agency services;
 - e) Occupational health services;
 - f) Insurance companies;
 - g) Lawyers, auditors, etc.
2. The assignment is made on the basis of a contract - individualized or containing general terms and standard contractual clauses. **AGRIA GROUP HOLDING JSC** and the companies of the Group establish legal relationships only with personal data processors who are able to provide sufficient guarantees for the implementation of appropriate technical and organizational measures for lawful processing and protection of the rights of the data subjects.
3. When the processing of data is assigned to a processor, **AGRIA GROUP HOLDING JSC** and the group companies inform the data subjects in time by providing them with information on the categories of personal data that will be collected and provided for processing as well as the purposes of such processing.
4. As of the date of adopting the current Policy generally processing on behalf of **AGRIA GROUP HOLDING JSC** and the companies of the Group are:
 - a) under a contract for provision and maintenance of information systems and resources – **INLAB OOD**, UIC 103951228, having registered and administration office at: office 5, 24, Pater Raichev Str., Primorski region, 9000 Varna, represented by Georgi Kjurkchiev and Kiril Terziev. The processor receives access to filing systems of personal data in connection with the maintenance of the provided software products.
 - b) under a contract for provision and maintenance of information systems and resources – **INTELLIGENT SYSTEMS BULGARIA EOOD**, UIC 131201760, having registered and administration office at: fl. 9th , entr. 2, 51, Alexander

Malinov Blvd., 1712 Sofia, represented by Elena Laleva and Kalin Tsvetanov. The processor receives access to filing systems of personal data in connection with the maintenance of the provided software products.

5. For carrying out the obligations in compliance with the Labour Code and Law on Health and Safety at Work, the companies of the Group conclude agreements with insurance companies and occupational health services according to individual solution of the managerial and governing bodies.

XI. Personal data protection and information security

Information security consists of the protection of information in all forms – electronic, on paper or other. Depending on the applied measures, the protection is: physical, individual, protection of information systems and networks, cryptographic protection. **AGRIA GROUP HOLDING JSC** and the companies of the Group guarantee the information security by applying three main principles in all types of protection – confidentiality, integrity and accessibility, whereas in the meantime following the principles of lawfulness, good faith, transparency and accountability.

1. Confidentiality means establishing and integrating appropriate measures against the disclosure of information to unauthorized persons or systems by:
 - a) Establish and implement internal policies and procedures which the current is part of.
 - b) Use of passwords for access, antiviruses software, cryptography, protection walls and protected e-mail connection;
 - c) Designate the employees who have the right of access to personal data and confidential information.
2. Integrity means establishing warranties against unauthorized change, erasure or damage of information by:
 - a) Allocating the responsibility for ensuring information security to particular employees; assigning particular tasks with regard to the information security;
 - b) Establish scheduling and planning for periodic checks and analysis in implementing the measures for information security protection and detecting potential risks;
3. Accessibility means the opportunity of access to information when necessary where the access is not impeded by technical problems or such of other kind, by:
 - a) Establish regular maintenance and update of information systems and networks as well as technical measures and means of protection of their security;
 - b) Establish algorithms for reporting and taking actions in arising problems concerning the information security and the physical protection of the data working environment.
4. By implementing these principles **AGRIA GROUP HOLDING JSC** and the companies of the Group establish and use appropriate and adequate measures for physical, individual, documental protection of information systems and networks and with cryptographic protection. They are adapted to be adopted by every company of the Group's internal policies in view of the type of operation and the filing systems maintained by the company as well as the particular specifics of the work processes.

XII. Security breach

1. All employees who have detected signs of a security breach are obliged to inform immediately the person responsible for personal data security providing to the latter all available information.
2. The person responsible for personal data protection reports immediately to the coordinator information about the parameters of the security breach, the personal data amount affected, the type of the damage, the measures taken and the actions, which are to be taken.
3. After consultation with the company's management, the person who is responsible for personal data protection takes measures to prevent or reduce the consequences of the breach and restore data where needed.
4. In cases where the security data breach entails a risk to the rights and freedoms of natural persons the data affected and after the approval by the company's management, a notification is sent to the Commission for personal data protection, ensuring that the notification contains the information indicated in art. 33, par. 3 of Regulation (EU) 2016/679.
5. All security breaches and the taken actions related to them are entered into the register of security breaches maintained by the company.

XIII. Impact assessment

1. With certain types of data processing, specifically when using new technologies, and with regard to the nature, scope, context and purposes of the processing, if it entails a high risk to the rights and freedoms of natural persons, as well as in the cases where it is required by the applicable legislation, **AGRIA GROUP HOLDING JSC** and the companies of the Group assess the impact of the foreseen operations concerning personal data protection before they carry out the processing.
2. The assessment of the impact consists of:
 - a) Systemic identification of the envisaged processing operations the purposes of processing and a description of the legitimate interest if present;
 - b) an assessment of the necessity and proportionality of the processing operations in terms of the objectives;
 - c) assessment of the risks to the rights and freedoms of data subjects;
 - d) identification of measures designed to address risks, including safeguards, security measures and mechanisms to ensure the protection of personal data;
3. When needed including a change of the risk level, **AGRIA GROUP HOLDING JSC** and the companies of the Group carry out an analysis of compliance of the actual processing including an assessment of the impact and takes appropriate actions depending on the outcome of the analysis.

XIV. Rights of personal data subjects

1. **Right of access**
 - a) Data subjects have the right of access to the processed personal data and following information:
 - The purposes of the processing;
 - The categories of the processed personal data;
 - The recipients/categories of recipient to whom the personal data has been or will be disclosed;

- The envisaged period for which the personal data will be stored, additionally the criteria used to determine that period;
 - The right to lodge a complaint with a supervisory authority;
 - Information about the personal data source when the personal data is not collected from the data subject;
 - The existence of automated decision-making, including profiling.
- b) The employees have the right at any time to personally access their professional record in order to be familiarized with its content, to ascertain its completion and accuracy and if they detect incompleteness or inaccuracy, to request its rectification. The employees also have the right to access information about the current assessment level of their job performance, duties and work tasks.
- c) In the cases in exercising the right of access where a third party's personal data can be disclosed, only that part of the data referring to the data subject is provided to him or her.
- d) **AGRIA GROUP HOLDING JSC** and the companies of the Group provide free copies of the personal data that is being processed while retaining the right to charge a proportionate amount in case of recurring or excessive demand.
2. **Right of rectification and erasure**
- Data subjects have the right to obtain from the controller without undue delay the rectification of inaccurate data concerning him or her. In case of incomplete data, the data subjects have the right to have their data completed, including by means of providing a supplementary statement. Information that contains attestation or other assessment element is not subject to rectification due to the objection of the person to whom it refers. Relevant legal procedures are followed in such cases.
- The data subjects have the right to request erasure of personal data concerning him or her where one of the following applies:
- a) The personal data are no longer needed for the purposes for which they have been collected or processed;
 - b) The data subjects withdraw their consent on which the processing is based where there is no other legal ground for the processing;
 - c) The data subjects object to the processing where there are no overriding legitimate grounds for the processing;
 - d) It is found that the personal data are processed unlawfully;
 - e) The personal data has to be erased for compliance with a legal obligation according to the law of the European Union or of EU member-country.
3. **Right of restriction of processing**
- Data subjects have the right to obtain from the controller restriction of processing where one of the following applies:
- a) The accuracy of the personal data is contested – for a period enabling the controller to verify the accuracy of the personal data;
 - b) The processing is unlawful;
 - c) The employer no longer needs the personal data for the purposes of the processing, but they are required by the data subject for the establishment, exercise or defence of legal claims;
 - d) The data subjects have objected to processing and are awaiting the verification of the legitimate grounds of the employer and whether those grounds override the interests of the data subjects.
4. **Right to data portability**

Data subjects have the right to receive without hindrance the personal data concerning him or her which they provided to AGRIA GROUP HOLDING JSC and/or the companies of the Group in order to transmit that data to another controller when the processing is based on consent or following a contractual obligation and the processing is carried out by automated means.

5. Right to object

Data subjects have the right, on grounds relating to his or her particular situation, to object processing, including profiling, of their personal data which is not related to legitimate objectives.

XV. Procedure of right exercising

1. An application or request for information and rights exercising shall be submitted in person and in writing by the data subject. The application can be prepared in accordance with a template provided by **AGRIA GROUP HOLDING JSC** and the companies of the Group as well as free text.
2. The application has to contain name, address and/or other identification data of the corresponding natural person or his or her empowered representative (if there one); description of the request; indicate a preferred form of access to the personal data; correspondence address, date and signature. When submitting an application through a third party – empowered person/proxy, the latter shall explicitly present a notarized power of attorney.
3. The application can be sent by postal and courier services, to an e-mail address or at a physical location in accordance with physical and electronic addresses indicated by every company of the Group.
4. Requests shall be considered within one month of submission. In cases where a longer period is required for processing, the deadline is extended by up to 2 (two) months, and the data subject is accordingly notified.
5. When exercising the right of access, if any third party personal data could be disclosed to the data subject, the data subject shall be presented only that part which concerns them.
6. Upon accepting a request for rectification, erasure or restriction of personal data processing, **AGRIA GROUP HOLDING JSC** or the respective company of the Group shall notify their actions to all recipients to whom personal data has been disclosed unless it is established that this is impossible, incurs disproportionate costs or work load. If the data subject has requested, **AGRIA GROUP HOLDING JSC** or the respective company of the Group shall inform him or her of notifying the recipients.

XVI. Appeal the actions of AGRIA GROUP HOLDING JSC and the companies of the Group carried out in their capacity of personal data controllers

1. Individuals in their capacity as data subjects have the right to refer, within a period of 1 year from establishing a violation, to the Commission for personal data protection¹ a violation of their rights, but not later than 5 years from the violation. No state fee is due for the procedure.

¹ 2, Prof. Tsvetan Lazarov Blvd., 1592 Sofia; e-mail: kzld@cpdp.bg; Phone: 02/91-53-518.

2. The Commission for personal data protection shall deliver a decision within a 30-day period from its referral. They can give obligatory instructions, to determine a deadline for the removal of the observed violation or to pose upon **AGRIA GROUP HOLDING JSC** or the respective company of the Group an administrative sanction.
3. The decision of the Commission for personal data protection can be appealed by either of the parties before the Supreme Administrative Court within 14 days of its receipt.
4. In case of violation of their rights, the persons may appeal the acts and actions of **AGRIA GROUP HOLDING JSC** and the companies of the group through a competent court. In these court proceedings, individuals can claim compensation for damages suffered as a result of the unlawful processing of their personal data by **AGRIA GROUP HOLDING JSC** or a group company.
5. In the event of a pending procedure before the Commission for personal data protection, or an unresolved court decision on appeal against a decision of the Commission, the person cannot bring an action under the procedure of item 4.

For the issues not covered by this Policy, other common policies, rules and procedures apply the provisions of Regulation (EU) 2016/679, the Personal Data Protection Act and the regulations on its implementation.

The current policy is adopted and established by Order of 23.05.2018.

This policy is consistent with the valid European and national legal framework in personal data protection. In case of changes in the regulatory provisions and/or the factual circumstances, this Policy shall be accordingly amended whereas information about the amendments shall be notified to the relative addressee.

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History of the versions:

Date	Version	Author	Confidentiality:	Circumstances:
	1.0.	“AGRIA GROUP HOLDING’ JSC	To inform all persons who process personal data in “AGRIA GROUP HOLDING” JSC and the companies of the Group.	Adopted in connection with the entry into force and implementation of Regulation (EU) 2016/679 of the European parliament and of the Council.

