

PERSONAL DATA PROTECTION POLICY OF GOPET

General provisions

1. (1) "GOPET" means any of the companies in the GOPET group: GOPET TRANS EOOD, GOPET LOGISTICS EOOD, GOPET OOD, GOPET ROMANIA SRL, GOPET POLAND SP. ZO.O, GOPET TRANS HELLAS ΕΠΕ, GOPET TRANS IBERICA SL, GOPET GLOBAL LOJISTIK TICARET A.S. or the entire Group. Each of the said companies constitutes a Personal Data Controller/Personal data Processor.

(2) "Data Subject" means an identified or identifiable natural person 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.

(3) "Personal data" means any information relating to an identified or identifiable natural person ('data subject') as per EU Regulation 2016/679 (**General Data Protection Regulation**);

(4) "Controller" means the 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 as per EU Regulation 2016/679 (**General Data Protection Regulation**);

(5) "Processor" means a natural or legal person, public authority, agency or other body which processes personal data on behalf of the controller as per EU Regulation 2016/679 (**General Data Protection Regulation**);

In connection with the provision of freight forwarding and transportation services GOPET processes personal data of its clients and subcontractors – natural persons as well as personal data of other natural persons listed below ("Data Subjects"), in accordance with the measures provided for in this Personal Data Protection Policy of GOPET ("The Policy") rules and principles.

2. The Data Subject can address any of his/her requests and questions, related to the exercise of his/her rights on his/her personal data protection at:

E-mail address: privacy@gopettrans.com

Correspondence addresses:

GOPET TRANS EOOD and GOPET LOGISTICS EOOD: Sofia Region, Sofia Municipality, village of Kazichene 1532, 7 Vega str., phone contact: + 359 2 958 15 15. Ext. 277;

GOPET OOD: Sofia Region, Sofia Municipality, village of Kazichene 1532, Bivsh stopanski dvor, Skladova baza Gopet logistics;

GOPET ROMANIA SRL: Bruxelles Building, Entrance C, Sema Parc, 319L Splaiul Independentei, PC060044, Bucharest, Romania;

GOPET POLAND SP.ZO.O: 77 Targowa St., 90-324 Łódź, Poland;

GOPET TRANS HELLAS MIKE: Thesi Araies Velanidies, 10th km Attiki Odos (exit 4), 19300 Aspropyrgos, Greece;

GOPET TRANS IBERICA SL: Paseo Germanias, 54-1º, 46702 Gandia (Valencia);

Data Subjects

3. GOPET has the right to collect and process information on the following categories of Data Subjects:

1. Current and potential clients – natural persons;
2. Representatives of clients;
3. Representatives of the Government and regulatory authorities;
4. Auditors and consultants;
5. Proxies;
6. Service providers and their representatives;
7. Subcontractors, drivers and their representatives;
8. Customs agents;
9. Insurance brokers;
10. Surveyors;
11. Lawyers;
12. Visitors in the buildings of Gopet;
13. Other persons than those referred to above, who come into contact with GOPET or claim, directly or indirectly, to GOPET.

Categories of personal data

4. The categories of personal data which GOPET process regarding the Data Subjects in accordance with this policy may include:

- Identification data: Names as per identity document; personal identification number, business number or any other identification number (for natural persons), address (permanent, current, for correspondence); place of birth; age; Identity document data, nationality; driving license; passport data; IP addresses etc.;
- Contact information: phone numbers; fax numbers; e-mail addresses; physical address for correspondence; other contact/correspondence data provided by the data subject etc.;
- Social identity: place of employment data, certificates, education (educational level); position; years of starting and resigning, recommendations, work experience;
- Additional information about representatives of clients, subcontractors and natural persons: information who the representative represents with information on represented data subject; names, ID cards data, address, invoice numbers, liability amount, applications, statements, position/job title; place of employment; capacity (type of legal representative, proxy, employee, partner of an unincorporated entity); changes and history of changes in legal representation; powers of attorney; information about representative power; information on the revocation or expiry of the validity of the authorization, information of the owners (when a legal person or an unincorporated entities) – e.g. information for partners/ shareholders, number and type of shares/ stocks held, and other related;
- Contractual and financial information: contract, number and date of conclusion of the contract; information on dates of amendment and termination of the contract; number and content of invoices; information on the amount of liabilities; information on deferred payments; payments made; repayment of liabilities; bank account number (IBAN), information on the bank account of the client; information on insurance; information on monetary amounts for the benefit of GOPET;
- Information for filed claims, damages cause, applications, requests, petitions and signals (including in free format) and other correspondence with GOPET, including

information on their status and processing, as well as on the final result of their processing;

- Other information and documents: any other information and documents (declarations; statements; lists; inventories; schedules; certificates and letters-certificatory; applications; protocols; official notes for stolen property issued by the competent authorities; orders, statements, declarations and other acts of the competent authorities; contracts (including preliminary contracts, lease agreements etc.) that the Data Subjects, the competent public authorities or third parties provide to GOPET or which are generated in the preliminary process and/or in the context of conclusion, implementation, amendment and termination of contracts with the data subject.

Purposes of personal data processing

5. GOPET processes lawfully the personal data in connection with the following purposes:

- 1.** Purposes related to GOPET's compliance with its legal obligations;
- 2.** Purposes related to and/or necessary for the performance of the contracts concluded with GOPET or for the taking of steps at the data subject request prior to entering into a contract;
- 3.** Purposes related to the legitimate interests of GOPET or third parties;
- 4.** Purposes for which the data subject has given consent to the processing of his/her data.

6. The purpose of personal data processing by the side of GOPET, related to compliance with the legal obligations, include:

- 1.** Collection of receivables owed to GOPET including by assignment to third parties;
- 2.** Activities related to the performance of transport and logistics services;
- 3.** Legal activities related to the preparation of the replies and complaints to a public authority, responds to inquiries of a judicial authority, preparation of legal statements and papers;
- 4.** Other activities in fulfilment of legal obligations (taxation, accounting, regulatory etc.) of the GOPET related to submission/reporting of information to competent state and judicial authorities and assistance in inspections by competent authorities.

7. The purposes of personal data processing, related to the implementation of the contracts or for the taking of steps at the request of the data subject prior to entering into a contract with GOPET, include:

- 1.** Bidding and negotiation, conclusion, amendment and performance of a contract for service;
- 2.** Communication on the conclusion, amendment and performance of contracts.
- 3.** Checks on complaints and claims on transport and logistics services provided;
- 4.** Processing, collection and rescheduling of due-payments for transport and logistics services provided.

8. The purpose of personal data processing, necessary for the legitimate interests of GOPET or third parties, includes:

- 1.** The establishment, exercise or defence on legal claims of the companies of GOPET group , including by court proceedings, including the lodging of appeals, signals and other related to the competent State and judicial authorities;

2. Collection of receivables owed to Gopet, including by enforcement proceedings;
3. Assigning to third parties (e.g. to debt collection companies) debt collection activities;
4. Security and protection of property.

9. The purposes of personal data processing to which the Data Subject has given consent, include:

1. Marketing activities for offering the services of GOPET.

Provision of personal data and consequences in case of refusal of data provision to GOPET

10. (1) GOPET shall inform the Data Subjects about the Personal Data protection policy and the resulting thereof, in accordance with the Regulation on the personal data protection and the national legislation, rights, obligations and restrictions. The following must be explicitly defined: the provision of which data and/or documents is mandatory or contractual requirement; what requirement is necessary for the conclusion of the contract; which is entirely voluntary and the consequences of the refusal to provide the data.

(3) The refusal for provision of information and documents referred to as mandatory, may constitute an insurmountable obstacle to the conclusion of the contract with GOPET, to satisfaction and implementation of requests, applications, petitions, claims and other similar, that exempts GOPET from responsibility for default.

(4) Data Subjects shall not provide GOPET with any special categories of data within the meaning of article 9 and article 10 of the Regulation (i.e. personal data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs or trade-union membership, genetic data, biometric data, data about health or sex life details or sexual orientation of the natural person; and personal data relating to criminal convictions and violations or with associated with them security measures).

Other sources of personal information

11. In some cases, the personal data processed by GOPET, are not collected or obtained directly from the data subject, for whom they relate, but from third parties such as:

1. Clients or representatives of clients, other than the data subject;
2. Official public records (such as the Trade Register, the Property Register, public records and other related);
3. Specialized online platforms;
4. Witnesses;
5. Service providers;
6. Freight Exchange;
7. State and municipal authorities;
8. Subcontractors and contractors of GOPET.

Processing of information for the Data Subject by third parties –personal data controllers

12. (1) For the purposes set out in this Policy and the General terms and conditions, applicable to the transport/freight forwarding contracts, GOPET shall be entitled to re-assign the activities of personal data processing of Data Subjects to third parties – processing personal data in accordance with and within the requirements of the Regulation and other rules applicable to the personal data protection.

(2) Where personal data concerning the Data Subjects shall be disclosed to and processed by personal data processors, this shall be done only to the extent and in volume, needed for achieve the tasks entrusted to them by GOPET.

(3) The personal data processors shall act on behalf of GOPET and shall be required to process the personal data only in strict compliance with the instructions of GOPET and shall not have the right to use or process in any other way the information about Data Subjects for purposes other than the ones set out in this Policy.

Categories of personal data recipients

13. Gopet undertakes not to disclose personal data about the data subject, for the services requested or used by the data subject, as well as not to provide the collected information to third parties, except in the following case:

- 1.** This is necessary for the implementation of a legal obligation of the GOPET:
 - a. competent State and municipal authorities;
- 2.** This is expressly provided for in the Policy and in the General terms and conditions applicable to the transport/freight forwarding contracts;
- 3.** This is necessary for the conclusion, amendment, execution or termination of contracts:
 - a. banks and payment service providers (e.g. for the purpose of the payments between GOPET and the Clients);
 - b. postal operators and couriers;
 - c. ferry operators and agents;
 - d. notaries;
 - e. Freight Exchange;
 - f. insurers;
 - g. consultants and auditors;
 - h. external subcontractors in the implementation of a/contract;
 - i. debts collection companies for the recovery of claims;
 - j. partners and contractors of GOPET.
- 4.** The data subject has given his/her explicit consent:
 - a. business partners of GOPET;
 - b. other persons, expressly provided for in the relevant consent.
- 5.** To protect the rights or legitimate interests of GOPET, third parties, or the data subject.
- 6.** In other cases provided for by the law.

Period of storage of personal data

14. (1) GOPET may process and store information about the data subject till the achievement of the relevant purposes in accordance with the principle of "storage limitation".

Rights in respect of personal data

15. (1) With regard to the processing of personal data related thereto, any Data Subject has the following rights granted him/ her by the Regulation:

- 1.** The right of information;
- 2.** Right of access;
- 3.** The right of rectification
- 4.** The right of erasure
- 5.** The right of restricting of the processing of his/ her personal data
- 6.** Notification of third parties
- 7.** The right of data portability
- 8.** Rights in case of automated individual decisions making, including profiling;

9. The right of withdrawal of the consent for processing;
10. The right to object to the processing of personal data.
16. (1) The data subject may exercise his/ her rights related to the personal data protection, upon written request, respectively, to the responsible data protection officer – submitted personally by the data subject or by a notarized request sent by mail.
- (2) The data subject may exercise the rights relating to personal data, either in person or by a person expressly authorized by him/her (with a notarized power of attorney).

Right to complaint to the supervisory authority

17. Every data subject has the right to lodge a complaint to the supervisory authority for the personal data protection, in particular in the Member State (EU/EEA) of his/her normal place of residence, place of work or place of the alleged violation, if the data subject considers that the processing of his/her personal data is in breach of the Regulation or of any other applicable requirements on the personal data protection.

This Personal Data Protection Policy was drawn up by GOPET in order to fulfil the obligations for the provision of information to the Data Subjects under article 13 and article 14 of Regulation (EC) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the natural persons` protection with regard to the processing of personal data and on the free movement of such data and repealing Directive 95/46/EC (General Regulation on data protection).

This Personal Data Protection Policy was approved by the relevant Management body of each of the companies within GOPET group and enters into force on 25.05.2018.

This Policy was updated on 20.07.2020 to reflect the integration of a new entity in Gopet group.