

PERSONAL DATA PROTECTION POLICY and COOKIE POLICY

This Personal Data Protection Policy and the Cookie Policy included in it are designed to help you understand what personal data we collect, why we collect it and what we do with it. Please take the time to read our Personal Data Protection Policy carefully. We want you to be aware of how we use your information and the ways in which you can exercise your rights.

This Personal Data Protection Policy, and the Cookie Policy included in it, apply to your personal data when you visit www.elevencapital.bg and do not apply to other websites and/or services.

WHO ARE WE?

The company providing services to you as a Personal Data Controller is "ELEVEN Capital" AD, UIC 205485399, with registered address and head office in Sofia, post code 1729, Mladost district, 31 Aleksandar Malinov Blvd., Campus X, building 1, e-mail: info@elevencapital.com. Data Protection Officer: Martin Bozhidarov Uzunov, e-mail: martin@11.vc, tel. 0888 13 60 95.

DATA WE COLLECT AND HOW WE USE IT

Personal data are data that describe and are related to someone in a personal capacity. These are data with which individuals can be identified.

We collect and process personal data for lawful reasons only. We do not sell or disclose your personal data in any other way. We may share it with our selected subcontractors only when this is necessary to provide our services, specifically as described below.

We process the following personal data of individuals for the following purposes: If we receive an enquiry from an individual via one of our contact forms, we will use the contact details they have provided to contact them and provide them with the information and/or assistance they need.

DATA COLLECTION METHOD

We process personal data in compliance with the requirement for lawfulness under Art. 6, para. 1 of the General Data Protection Regulation (Regulation (EU) 2016/679). Beyond the hypotheses in letters "b" to "f" of the first paragraph of the General Data Protection Regulation (Regulation (EU) 2016/679), we process and use only data that have been provided to us voluntarily by the subject of these personal data. This means that each person is responsible for ensuring that they do not provide third-party data in breach of the third parties' personal data protection rights, as we do not have access to these individuals and we have no practical ability to control whether you provide us with the data of third parties with their knowledge and consent given in accordance with the legal requirements.

Therefore, every individual is fully liable if he or she provides us with the data of a third party without their knowledge and/or without obtaining their consent in compliance with the requirements of the applicable legislation on personal data protection, including with regard to names, telephone numbers and addresses.

SECURITY MEASURES

We have undertaken a wide range of technical and organizational measures to protect your personal data against loss and/or other forms of unlawful processing. The personal data is accessible only by those persons who need access in order to perform their work in connection with the provision of our services. These persons are trained and authorized accordingly. Our staff are required to process personal data in accordance with our guidelines on lawfulness, confidentiality, ethics and appropriate use of the data.

MINORS AND UNDERAGE PERSONS

We provide services only to persons above the age of 18. If you are under the age of 18, please seek the assistance of a person aged at least 18 to use our services.

If we become aware that we have collected personal data from a person under the age of 18, we will delete it immediately, unless we are legally obliged to retain such data.

Please contact us, if you believe that we have mistakenly or unknowingly collected information from a person under the age of 18.

STORAGE PERIOD AND DELETION OF THE DATA

We store the data received via our contact forms for up to 6 (six) months in order to establish and settle a contractual relationship.

YOUR RIGHTS

You have the right to request a copy of your personal data at any time, to verify the accuracy of the information kept, to correct or update that information, to request that your personal information be deleted, if there are reasons to do so as described below. You also have the right to complain, if your data protection rights have been breached. We have detailed below your rights as a personal data subject:

- you have the right to request confirmation about whether personal data related to you are being processed and to request a copy of your personal data, as well as to request access to the information related to the collection, processing and storage of your personal data;
- you have the right to request that your personal data be erased, if any of the following conditions are present: the personal data are no longer necessary for the purposes for which they were collected; if you have objected to the processing, when the processing is unlawful; if the data are processed based on your consent and you withdraw that consent; if the personal data have to be erased in order to comply with a legal obligation under Union or Member State law to which the controller is subject. We may refuse to erase your personal data for the following reasons: to exercise the right to freedom of expression and the right to information; to comply with a legal obligation of ours and/or to perform a task of public interest and/or to exercise official powers of ours; for reasons of public interest in the field of public health; to establish, exercise or defend legal claims;
- you are entitled to request that your personal data be corrected, if they are incorrect, or completed, if they are incomplete;
- you are entitled to request that we restrict the processing of your personal data, if this is applicable and there is a ground for doing so, for example: you contest the accuracy of the personal data for a period of time that allows us to verify the accuracy of the personal data; the processing is unlawful, but you do not wish the personal data to be erased, but only their use to be restricted; we no longer need your personal data for

processing purposes, but you need them to establish, exercise or defend legal claims of yours; you have objected to the processing and are waiting for us to assess whether our legitimate justifications override your interests;

- you have the right to request to receive the personal data that concern you and that you have provided to us in a structured, commonly used and machine-readable format and you have the right to transfer that data to another controller where the processing is based on consent or a contractual obligation and the processing is carried out in an automated manner;
- you have the right to object to the processing of your personal data before the Personal Data Protection Officer, if there are grounds for doing so.

You can address all requests to the Personal Data Protection Officer. To enable us to provide you with full assistance, please provide us with accurate information about you and be specific in your request. It is possible that, when you exercise your rights, we may request additional information so as establish your identity.

Please note that in cases where your requests are manifestly unfounded and/or excessive, in particular due to their repetitiveness, we may:

1. charge a fee, taking into account the administrative costs for providing the information and/or communication and/or taking the requested action,
or
2. refuse to act on your request.

We will make reasonable effort to honor your request within 30 (thirty) days of receipt of your request. If necessary, this period may be extended by a further two (2) months, taking into account the complexity and number of the requests.

SUPERVISORY AUTHORITY

If you believe that we have violated your rights in connection with your personal data, you can file a complaint with a court or with the supervisory authority in the Republic of Bulgaria, which is the Commission for Personal Data Protection. More information can be found at: www.cpdp.bg.

You can file your complaint also in the country where you live, at your place of work and/or in the place where you believe we are violating your rights.

COOKIE POLICY

Why do we use cookies?

This website uses cookies which allow us to improve the service we provide to you and to enable certain features that may be of use to you. We use cookies to improve your user experience across our site by remembering your preferences and to facilitate browsing.

What are cookies?

Cookies are small pieces of data stored in text files that are stored on your computer or other devices when websites load in a browser.

Cookies are small text files that are sent to your browser by a web server, stored on your

computer and/or another device and used to identify the user and/or device and to collect information. Usually, Cookies are related to several categories, depending on their functionality and their purpose. With the help of cookies, the necessary information and data are collected in order to provide more personalized content, so as to make the use of the website more comfortable.

Cookies may be placed by the site you are visiting ("first party cookies") or by third parties, such as those servicing content or providing advertising or analytics services to the site ("third party cookies").

What types of cookies do we use on our website?

1) Required cookies - these cookies are necessary for the operation of the site and cannot be disabled in our systems. Without these cookies, we would not be able to provide certain services or functionalities that you have requested and our site would not function as smoothly and efficiently for you as we would like, so these cookies cannot be turned off. The legal basis for using the required cookies is our legitimate interest.

2) Functionality (preference), statistics and marketing cookies - these cookies are not strictly necessary, but they allow us to personalize your online experience and to calculate and improve the performance of our site. Their use enables us to provide enhanced functionality and personalization by remembering the choices you make, so that we avoid re-entering information you have already provided. The information collected by these cookies can be anonymized and they will not track your activity as you browse other websites. In addition, some of these cookies help us to obtain information about how you use the site and/or how you respond to different sections of the website, in order to tailor them to your preferences. These specific cookies enable us to determine which are the most popular parts of our site and to monitor the frequency of interaction with our site, so that your interaction with us can be improved. These cookies remember that you have visited a website and this information is shared with other organizations. The legal basis for using functionality (preference), statistics and marketing cookies is your consent. **If you do not allow these cookies, some or all services may not work properly. You can still opt out of them and continue to use our site.**

The cookies cannot harm your files and/or increase the risk of viruses on your computer!

Third party cookies:

Some cookies are provided by third parties. Such cookies are identified as third-party cookies in the pop-up window containing the cookie information.

How can you control cookies on our website?

To make it easier for you to manage cookies in our site, we use a special application. You can easily accept or reject cookies in our site. You can read about it in the pop-up window and when you access our Personal Data Protection Policy and Cookie Policy, after you have made your choice.

When you visit our site, you will be notified of our use of cookies by a banner message that gives you the option to choose to allow all optional cookies by clicking the "Accept All" button, to refuse all optional cookies by clicking the "Refuse All" button, or to customize your preferences by clicking "Customize". By selecting the "Customize" option, you can customize and consent to our use of certain categories of cookies described in the pop-up window and in this Cookie Policy.

You can disable the use of optional cookies from this website at any time by clicking the "Consent Preferences" button in the bottom left corner of your screen: <https://prnt.sc/s15sQNKnEEL7>. In the same place, once you have made your choice to use cookies, you will be able to see in real time what optional cookies you have accepted or refused. At any time, you can change your settings and preferences by clicking on the "Consent Preferences" button in the bottom left corner of the screen: <https://prnt.sc/s15sQNKnEEL7>.

Using the above method, you can control and/or delete cookies whenever you wish.

To learn more about cookies, we recommend that you visit: www.aboutcookies.org , www.whatarecookies.com or www.cookiechoices.org.

Warning: rejecting cookies will delete all cookies from www.elevencapital.bg and may remove some of the buttons and functionalities available on the website.

What cookies do we collect on our website and how long do we keep them?

The different categories of cookies provided by <https://elevencapital.bg/>, with specific examples, are described in detail in the dedicated cookie application used and can be viewed in the cookie banner and by clicking on the "Consent preferences" button in the bottom left corner of the screen: <https://prnt.sc/s15sQNKnEEL7>. This includes their name, expiry date and purpose.

If you have any questions and/or need any additional information, please do not hesitate to contact us at the following email address: martin@11.me.

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