

## PRIVACY NOTICE

### INTRODUCTION

We at Sands Digital Services Bulgaria EOOD (“our”, “we” or “us”) respect concerns about privacy and strive to provide individuals whose personal data we process (“you”) with exceptional experiences and service.

This Privacy Notice sets out the basis on which we process your personal data in our capacity as data controller, as defined in the General Data Protection Regulation (EU) 2016/679 (the “GDPR”).

This Privacy Notice describes the types of personal data we obtain, how we may use and retain that personal data, with whom we may share it, and how you may exercise your rights and choices with respect to our processing of your personal data. This Privacy Notice also describes the measures we take to safeguard personal data and how you may contact us if you have questions about our privacy practices.

### HOW WE OBTAIN PERSONAL DATA

We collect personal data about you in different ways and from various sources. This Privacy Notice applies to all personal data we obtain including:

- through our websites, and other digital platforms we operate or control, whether directly or indirectly via third parties, that reference this Privacy Notice (collectively, the “**Online Channels**”);
- when you visit us, attend a meeting or event and through other offline interactions, e.g. contact acting us by email or phone (collectively, “**Offline Channels**”);
- through third-party sources, including business partners, social media companies and vendors; and
- through other data collection points that reference this Privacy Notice;

(collectively the “**Channels**”).

If you are, or become, one of our employees, a separate privacy notice will apply to our processing of your personal data in the capacity as your employer.

### Personal Data You Provide

Depending on the Channels you use and the nature of your interactions with us, you may provide us with certain types of personal data, including:

- **Contact information** such as name, email address, postal address, and telephone number;
- **Demographic information** such as age, date of birth, education, profession, marital status and gender;
- **Billing and financial information** such as your bank account information, payment card number, expiration date, security code, delivery address and billing address;
- **Government-issued ID information** such as your passport, driver’s license or other government-issued ID, which you may provide;
- **Content** such as photos, comments, feedback and other content you provide;
- **Employment application information** such as employment history, Social Security number, education, training and skills (including licenses and certificates), background check information, and any other information provided in connection with an application if you apply for a job with us; and
- **Any other personal data** you provide through the Channels.

Providing your personal data to us is voluntary on your part. If you choose not to provide us certain data, we may not be able to offer you certain products and services, and you may not be able to access certain features of the Online Channels.

## Personal Data Obtained from Other Sources

In addition to the personal data you provide to us directly, we may obtain additional information about you from other sources, including:

- **Other individuals** such as authorized personnel or agents who provide your information to us on your behalf;
- **Publicly available information** such as name, contact information, content and online activity that we obtain from publicly available sources (such as public databases) and social media platforms you interact with;
- **Video and audio information** such as images, video and audio data that may be collected or processed through our security cameras, closed-circuit television, recorded phone lines and other technologies, where permitted by law;
- **Data from third-party sources** such as personal data we obtain from our third-party service providers (including data aggregators and data cleansing companies), and business partners.

## HOW WE USE PERSONAL DATA

We may use your personal data for various purposes, including:

- Managing our communications with you including to send you information about your dealings with us and events or meetings you may attend;
- Managing career opportunities including to process and assess your job application, and to conduct recruiting and other talent management purposes;
- Data analytics including to maintain and improve our products and services;
- Prevention and protection including to protect our visitors and employees, identify and prevent fraud and other unlawful activity and protect and defend against legal claims and other liabilities we may face;
- Operating, evaluating and improving our business including to perform accounting, auditing, record keeping, credit risk management and other internal functions (such as ensuring the functioning, safety and security of our Online Channels, premises, infrastructure and networks), developing new products and services and analysing and improving our existing products and services; and
- Legal and compliance including to comply with and enforce applicable laws and regulations, industry standards and contractual obligations, as well as our policies and terms and conditions.

We may combine data collected from you with other sources to help us improve our products, services, marketing and communications, as well as to help expand and tailor our interactions with you. This includes combining personal data we obtain through our Online Channels with information we obtain through Offline Channels, as well as other sources for the purposes described above. We may anonymise, de-identify or aggregate personal data and use it for the purposes described above and for other purposes to the extent permitted by applicable law. We also may use personal data for additional purposes that we specify at the time of collection.

Depending on the purposes for which personal data is used, and the context in which the information is obtained, we rely on one or more of the following legal bases, subject to applicable law:

- Performance of a contract or to take steps at your request prior to entering into a contract;
- Our legitimate business interests (which we can explain to you in further detail upon request by contacting us as indicated in the HOW TO CONTACT US section below);
- Compliance with a legal obligation; or
- Your consent, which you can revoke at any time.

## HOW WE SHARE PERSONAL DATA

We may share your personal data with certain third parties, including as indicated below.

- **Our Affiliates and Subsidiaries.** We may share your personal data with our affiliates and subsidiaries for the purposes set out in this Privacy Notice.
- **Service Providers, Suppliers, Agents and Other Business Partners.** We use service providers, suppliers and agents to help us provide our products and services and to perform services on our behalf (such as maintenance, IT services and support, analysis and analytics, audit, payments, marketing, development, reservations, security, ID verification and background and credit checks). We do not authorize these entities to use or disclose such information except as necessary to perform services on our behalf or comply with legal requirements. We also may share personal data with business partners for the purposes described in this Privacy Notice.

We also may disclose personal data about you (1) if we are required or permitted to do so by applicable law, regulation or legal process (such as a court order or subpoena); (2) to law enforcement authorities and other government officials to comply with a legitimate legal request; (3) when we believe disclosure is necessary to prevent physical harm or financial loss to us, our employees or the public as required or permitted by law; (4) to establish, exercise or defend our legal rights; and (5) in connection with an investigation of suspected or actual fraud, illegal activity, security or technical issues.

In addition, we reserve the right to transfer to relevant third parties the personal data we have about you in the event of a potential or actual sale or transfer of all or a portion of our business or assets (including in the event of a merger, acquisition, joint venture, reorganization, divestiture, dissolution or liquidation), or other business transaction.

We also may share the information in other ways for which we provide specific notice at the time of collection and obtain your consent to the extent required by applicable law.

## **DATA TRANSFERS**

We may transfer your personal data globally, including to the United States of America. We will comply with legal requirements with respect to providing adequate protection for the transfer of personal data to recipients in countries outside of the EU, UK or Switzerland that have not been recognized as providing an adequate level of data protection, to the extent such legal requirements are applicable to our processing of your personal data. In this event, we will implement appropriate safeguards, including as appropriate by executing data transfer agreements based on the European Commission's Standard Contractual Clauses. For more information contact us as specified in the HOW TO CONTACT US section of this Privacy Notice.

## **HOW WE PROTECT YOUR PERSONAL DATA**

We maintain administrative, technical and physical safeguards designed to protect the personal data you provide against accidental, unlawful or unauthorised destruction, loss, alteration, access, disclosure or use.

## **RETENTION OF YOUR PERSONAL DATA**

To the extent permitted by applicable law, we typically retain your personal data for as long as it is needed (1) for the purposes for which we obtained it and in accordance with the terms of this Privacy Notice; (2) to take into account applicable statute of limitation periods and comply with applicable laws; or (3) for legitimate business purposes to the extent permitted by applicable law. As described in the YOUR RIGHTS AND CHOICES section of this Privacy Notice, to the extent provided by applicable law, you may request that we delete your personal data or exercise any of your rights as a data subject by contacting us as indicated below.

## **YOUR RIGHTS AND CHOICES**

Subject to applicable law, you may have certain rights and choices in connection with the personal data we process.

To update your preferences, limit or unsubscribe from the communications you receive from us, or submit a data subject request, contact us as specified in the HOW TO CONTACT US section of this Privacy Notice.

To the extent provided by the law applicable to our processing of your personal data, you may:

- Request access to the personal data we maintain about you;
- Request that we correct, update, complete, amend or delete your personal data;
- Request that we restrict the processing of your personal data;
- Request to receive your personal data in a structured, commonly used and machine-readable format, as well as having this data transmitted to another organization, where it is technically feasible; and / or
- Where processing is based on your consent, withdraw your consent to our processing of your personal data (provided that this withdrawal will not affect the lawfulness of our use of your information based on your consent before its withdrawal).

To exercise any of these rights, contact us as indicated in the HOW TO CONTACT US section below.

To help protect your privacy and maintain security, we may take steps to verify your identity before granting you access to the information or responding to requests related to your personal data. To the extent permitted by applicable law, a charge may apply before we provide you with a copy of any of your personal data that we maintain. Depending on your location, you may have the right to file a complaint with a government regulator if you are not satisfied with our response.

## LINKS TO OTHER SITES

Our websites may contain links to other sites on the internet that are owned and operated by third parties. The information practices of those websites linked to our websites are not covered by this Privacy Notice. We are not responsible for the privacy notices of websites to which our website links. If you provide any information to such third parties, different rules regarding the collection and use of your personal data may apply. We strongly suggest you review such third parties' privacy notices before providing any data to them.

## UPDATES TO THIS PRIVACY NOTICE

This Privacy Notice may be updated periodically and without prior notice to you to reflect changes in our information practices. We may post a notice on our Online Channels to notify you of significant changes to this Privacy Notice and indicate at the top of the notice when it was most recently updated. We encourage you to periodically review this Privacy Notice for the latest information on our privacy practices.

## HOW TO CONTACT US

For questions or comments regarding this Privacy Notice, or to exercise any of your data subject rights, contact us at: [privacy@sands.com](mailto:privacy@sands.com).

## COMPLAINTS

We encourage you to always contact us first to raise your questions or concerns. In any case, you have the right to lodge a complaint with a supervisory authority if you consider that we have infringed applicable data protection law when processing your personal data. For Bulgaria the supervisory authority is the Commission on Personal Data Protection at [www.cpdp.bg](http://www.cpdp.bg).

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