

**PRIVACY POLICY
OF "LUCAFFE BULGARIA" OOD
IN THE PROCESSING OF PERSONAL DATA**

1. Introduction

One of the main concerns of "LUCAFFE BULGARIA" OOD is the security of the personal data of the natural persons - our clients and partners, by taking the necessary measures to bring our activities in line with the best practices and legal requirements for protection of personal data and its confidentiality.

This Policy aims at explaining why we collect and how we treat the information and personal data you provide.

Please be aware of this privacy policy before you become our client and / or use our site as it provides information on how we process your personal data and how we will use "cookies". Processing your personal data will be executed as described in this Policy.

By presenting this Policy, we aim to clarify what information we collect about you, why and how we do it, what your rights are under the Personal Data Protection Act (PDPA) and the General Data Protection Regulation (EU Regulation) 2016/679 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL of 27 April 2016, also known as the Regulation or GDPR.

2. Information about "LUCAFFE BULGARIA" OOD as a Personal Data Administrator

The policy concerns the collected from the clients of "LUCAFFE BULGARIA" OOD, with UIC: 2034139671, seat and address of management: Sofia, r.e. "Mladost 1A", bl. 528 (hereinafter referred to as "the Company") / in its capacity of a Personal Data Administrator.

3. Why is your consent necessary

Our exclusive priority is to protect your personal data and obtain your free, informed and unambiguous consent to the processing of your personal data by "LUCAFFE BULGARIA" OOD.

If you ticked "I've read the Terms and Conditions and I agree with them" You agree that you provide your personal data voluntarily that you have become aware of your rights under the PDPA and REGULATION (EU) 2016/679 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL of 27 April 2016 year, also called the Regulation or the GDPR, and you agree that your personal data be collected, processed, stored and transmitted to third parties for purposes that we have listed below.

4. Policy Purpose

This Privacy Policy aims to ensure that the Administrator:

- Complies with data protection legislation, namely the Personal Data Protection Act (PDPA), the General Regulation on Personal Data Protection, other applicable legislation and best practices;
- Protects the clients and partners of "LUCAFFE BULGARIA" OOD;
- Ensure transparency of the ways in which the personal data of the entities are stored and processed;
- Provides protection against the risks of data breaches.

5. Information required

Information and data about you that we may require, use and process include the following:

- Information you provide to us by filling out forms on www.lucaffebg.com or any other information you send us via the site or e-mail;
- Records from correspondence via www.lucaffebg.com, e-mail, telephone or other methods;
- Your answers to questionnaires or surveys for our clients;
- Details of your visits to www.lucaffebg.com, including, but not limited to, traffic data and other communications data.

6. Protecting your personal data

Your personal data is protected not only by our actions and the high standards of "LUCAFFE BULGARIA" OOD, they are also protected by the Personal Data Protection Act and the Regulation. According to the law, we can process your personal data only if there is a reason to do so, and these reasons may be one of the following:

- Perform a contract between us and you;

- We have a legal obligation to do so;
- If you have given your consent to processing;
- If it is in our legitimate interest;
- If it is in the public interest;
- If it is in your vital interest.

7. Consent

Unless it is necessary for a reason admissible in GDPR, "LUCAFFE BULGARIA" OOD will always request the explicit consent of the data subject to collect and process the data. In the case of children under the age of 18 or persons under guardianship, the consent of the parent / guardian / guardian will be sought. Entities may exercise their rights under GDPR (request for access to their personal data, correction, limitation of processing, denial of automatic profiling, deletion) in a manner established and communicated to them, within the framework of the law, free of charge and within 30 / thirty / days after filing the request.

8. The vital interests of the data subject

Where personal data are necessary to protect the vital interests of the data subject or another individual, this may be used as the legal basis for the processing.

9. Confidentiality right protection

"LUCAFFE BULGARIA" OOD has adopted the principle of confidentiality in designing (innovations) and will ensure that the identification and planning of all new or significant changes in the processes in which personal data are collected or processed will be subject to due consideration of the issues related to confidentiality, including the completion of one or more impact assessments on data protection.

10. Personal data international transfer

" LUCAFFE BULGARIA " OOD transfers personal data to other countries, including those outside the European Union. The transmission of personal data processed or intended to be processed after the transfer to a third country or to an international organization outside the EU is carried out by "LUCAFFE BULGARIA" OOD only under the terms of the General Regulation on Data Protection - Regulation (EC) 2016 / 679, subject to the conditions laid down in Chapter V of the Regulation.

11. Your data processing principles

We adhere to the following principles when processing your personal information:

- Principle of legality, good faith and transparency;
- Target restriction principle;
- The principle of minimizing data;
- Principle of accuracy;
- Restriction of storage principle;
- Principle of loyalty and confidentiality.

For any questions about your rights or if you want to exercise one of them, please contact us at lucaffebulgaria@gmail.com.

For more information about your rights over your Personal Data, you can contact us by e-mail at lucaffebulgaria@gmail.com.

This Privacy Policy is operative as of 25.05.2018.