Courtesy translation of the Bulgarian original (privacy.pdf). In case of any discrepancy, the Bulgarian version shall prevail.

PERSONAL DATA PROTECTION POLICY

Dental Center "MEDSTOM-M" EOOD – a single-member limited liability company registered in the Commercial Register with UIC 201770924 (hereinafter referred to for short as the "Company") – operates and manages the website https://medstom.com/ (the "Site") and is engaged in oral surgery and dental implantation (the "Services").

When we provide you with our Services, we collect, process and store your personal data. This Privacy Policy aims to inform you how we process your personal data, to what extent, for what purposes, on what grounds and for what period, as well as about the practices we apply to ensure the lawful handling of your personal data and its security. Here you will also find information on how to contact us if you have questions about the processing of your personal data, and in cases where you wish to exercise any of your rights.

We at Dental Center "MEDSTOM-M" EOOD take the handling of personal data very seriously and for this reason we adhere both to the applicable national and European legislation and to good practices in the field. The applicable regulatory framework includes (but is not limited to) the General Data Protection Regulation – Regulation (EU) 679/2016 (the "Regulation" and/or "GDPR"), the Personal Data Protection Act, as well as the related secondary legislation, opinions, decisions and recommendations of national and European institutions, etc.

PRINCIPLES OF PROCESSING

When processing your personal data, the Company observes the principles for data processing established by law. We process data only on the grounds specified in the regulatory framework and we aim to be as transparent as possible in carrying out our activity. In addition, we collect only the data that is the minimum necessary to achieve the purposes of collection, and we try to keep the data as up to date as possible. Last but not least, we store the collected data only for the period necessary to achieve the purpose of processing, and we maintain an adequate and appropriate level of security for the processing and storage of your personal data.

CATEGORIES OF PERSONAL DATA PROCESSED

The decision whether, when and how to use our Site and/or Services is entirely yours. The appointment booking and message forms collect data and information from you, the provision of which is both mandatory and voluntary. The mandatory data is data without which it is impossible for us to provide you with the Services. When using the Site and the Services, the following personal data is provided:

- **Data collected when filling in the electronic forms on the Site** – when booking an appointment for consultation and/or treatment, as well as when sending a message through the electronic forms indicated on the Site, you provide us with your data such as names, mobile telephone and e-mail address. At your wish, you may provide us with the following optional information – profiles on the social networks Facebook, Instagram, Google, files in the form of photographs, medical condition and other information that you consider necessary.
- **Data collected when visiting and using the Site** – during visits to our Site we collect data such as the time you spend on the site, your behaviour in the application (for example: number of visits, pages viewed, internet protocol address, the type of device from which the Site is used and the type of operating system, as well as any other information that you voluntarily provide to us. In addition, the Site uses cookies and social plug-ins for better, faster and more personalised functioning. More information about what data we collect when you visit the Site can be found in our Cookie Policy, available at this link: https://medstom.com/uploads/legal/cookies-en.pdf.
- **Data processed for the purpose of improving the Service and increasing the quality of customer service** – in these cases we process the data from the contact form, data indicated in surveys, enquiries and forms, statistical and aggregated data, etc. For marketing purposes (on the basis of your consent or our legitimate interest) we process your contact data in order to send you

news, applications and offers. If you do not wish us to contact you for direct marketing purposes, you may object to this and withdraw your consent in the manner specified in this policy.

- **Other personal data** that we may collect when using the Site and/or providing the Services are, for example, the data you disclose to us during and in connection with communication with us – by filling in our contact form, by submitting an opinion, recommendation or complaint.

PURPOSE OF DATA PROCESSING

The processing of your data is always related to some or part of the Services, whether provided by the Company or requested by the user. The processing of your personal data is subject to one of the following purposes:

- Establishing the identity of the data subject, in cases where this is necessary;
- Management and provision of the Services on the Site, including technical support of the Site, adding new functionalities, for the use of the Site;
- Communication with the client in connection with the provision of the Services, such as sending notices, notifications of problems or errors in the operation of the Site, submitting complaints, requests, grievances, subscribing to and unsubscribing from newsletters and messages, requesting more information about a user's order and his or her specific needs;
- Establishing and/or preventing unlawful actions or actions that contradict the General Terms and Conditions for using the Site or this Privacy Policy;
- Carrying out statistical analyses and assessments for the purpose of developing and improving the Services;
- To protect the rights of the Company and its legitimate interests;
- For other purposes defined in the General Terms and Conditions and arising from the nature of the services and the way they are used (where such purposes exist).

SHARING OF DATA

Dental Center "MEDSTOM-M" EOOD strives to share your personal data only in exceptional cases and only when this is necessary for providing the relevant service, concluding, performing and reporting on the performance of a contract and/or protecting the legitimate interests of the Company and its users.

When we protect the rights and legitimate interests of the Company, and if this involves the use of the services of consultants, lawyers, auditors, translators and other professionals, we may disclose your personal data to them only and solely to the extent necessary to ensure the assistance of the persons mentioned. In limited cases, and only to the extent necessary for carrying out the service, access to your data may also be given to our trusted partners – providers of technical services, such as web design, maintenance of the information technology and infrastructure of the company, servicing of the software used, etc. The Company has made sure that the partners we have chosen comply with the applicable legislation as well as with the highest standards of professional ethics, information security and confidentiality.

DATA RETENTION

We store your data only for the minimum period necessary for providing the Services. The retention periods are determined taking into account the requirements of the legislation and good practices in the field of providing job search and job placement services, as well as the specifics of our activity, of the services provided and of the technical characteristics and capabilities of our infrastructure. The retention periods may be affected by whether the stored data is necessary to us for the protection of our legal interests or by changes in national and supranational legislation.

PROTECTION MEASURES

Dental Center "MEDSTOM-M" EOOD processes your personal data only for the purposes and in compliance with the principles set out in this policy. We strive to process only the minimum information necessary for providing our services and to store your data only for the minimum necessary periods. Our employees are trained and instructed on how to handle your data in compliance with the legal requirements and the recommendations and good practices in the field. We use modern hardware and software infrastructure to ensure the protection and confidentiality of your data. Where possible, we use techniques for anonymising your data.

RIGHTS OF USERS

In connection with the processing of your personal data, you have the following rights:

- **Right to be informed** – you have the right to ask us to confirm whether and to what extent we process your data, as well as the right to receive, where possible, a copy of your personal data processed by us.
- **Right to rectification** – at any time you have the right to ask us to correct (update, complete) your personal data that we process, if it is incomplete or incorrect.
- **Right to erasure** – if we process your data unlawfully (without a legal basis), or if the processing of the data violates your legitimate interests in the protection of data, you can ask us to erase this data. You should take into account that, for reasons of various kinds (for example, we have a legal obligation to store it), we may not erase your data immediately.
- **Right to restriction of processing** – in the following cases you can ask us to restrict the processing of your data:
  - if you contest the accuracy of the personal data being processed – in these cases the restriction will apply for the time needed to establish the accuracy of the data;
  - we process your data without a legal basis, but instead of erasing the processed data you have requested that the processing be restricted;
  - we no longer need your data, but you require it for the establishment, exercise or defence of your legal claims;
  - you have objected to your data being processed by us.
- **Right to data portability** – when we process your data on the basis of your consent or perform a contract concluded between us and you, and the processing in question is carried out by automated means, you can ask us to provide you with the processed data for the purpose of transferring it to another personal data controller. We will provide you with the data in a structured, commonly used and machine-readable format, in the volume and within the time frame in which this is possible.
- **Right to object** – you can object to the processing of your data in cases where we process your data as part of performing tasks in the public interest or in the exercise of official authority, or if we consider the processing of your data necessary for the protection of our legitimate interests. In connection with the processing of your data for direct marketing purposes, you can object at any time, without having to state the reasons for your objection.
- **Right to lodge a complaint** – if you believe that by processing your data we violate your rights or European and national legislation in the field of personal data protection, please do not hesitate to contact us in the ways for contact indicated in this policy. We will answer your questions.

In addition to the rights listed above, you have the right to lodge a complaint with the Commission for Personal Data Protection, using the following contact details:

Commission for Personal Data Protection
Address: Sofia 1592, 2 Prof. Tsvetan Lazarov Blvd.
Information and Contact Centre – tel. 02/91-53-518
Registry office: tel. 02/91-53-515, 02/91-53-519
Fax: 02/91-53-525
E-mail: kzld@cpdp.bg
Website: www.cpdp.bg

To address to the Company questions, enquiries, requests, requests to exercise rights and other communication, please contact us at: Sofia, 26A Knyaz Alexander Dondukov Blvd. We will respond to each of your requests without undue delay within thirty days of receiving the request. If we are unable to comply with the stated time limit, we will notify you in good time, and the notification will also state the reasons for the delay.

You can contact us in the following ways:

Address: Sofia, 26A Knyaz Alexander Dondukov Blvd.
E-mail: office@medstom.com
Telephone: 0896693222