

PRIVACY NOTICE

NOMAD ENERGY COMPANY LTD, as a data controller, considers the protection of your privacy and the security of your personal information top priority.

This Privacy Notice describes how we collect and use your personal information before, during and after the termination of our business relationship in connection with the supply of electricity, legal commercial relations, employment or other legal relations with you. All the activities described here are in line with the General Data Protection Regulation (GDPR - REGULATION (EU) 2016/679 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC). The Privacy Notice contains useful information for all future, current and former electricity customers.

NOMAD ENERGY COMPANY LTD is a data controller and bears the responsibility for the decisions it makes regarding the storage and use of your personal information. We have an obligation under data protection law to provide you with the information contained in this Privacy Notice.

This Privacy Notice does not constitute a part of the contractual relations for the supply of electricity or any other contract with us. We may update this Privacy Notice at any time.

It is **IMPORTANT** that you read this Privacy Notice carefully to understand how and why we use your personal information.

DATA PROTECTION PRINCIPLES

We will comply with the data protection legislation, according to which data should:

1. be processed lawfully, fairly and transparently;
2. only be collected for valid purposes clearly explained by us and should not be used in any other way that is not compatible with these purposes;
3. be appropriate, related and limited to what is necessary for the purposes we have indicated;
4. be accurate and up to date;
5. be kept for a period not longer than necessary for the purposes we have indicated;
6. be properly protected.

WHAT PERSONAL DATA AS INFORMATION DO WE COLLECT AND KEEP OF FOR YOU?

"Personal data" or "personal information" shall mean any information about a natural person through which that person is or can be identified.

According to the type/specifics of the contract, we will collect, store and use the following categories of personal data about you:

- Names, address, telephone number;
- Date of birth, PIN;



- For the property supplied with electricity – information and documents about the ownership right or the real right to use the property, certified by a copy of the document;
- Other categories, if the law authorizes us to collect such.

HOW AND WHEN DO WE COLLECT YOUR PERSONAL DATA?

We collect your personal data in connection with the supply and sale of electricity to the property supplied with electricity and when changing the supplier/coordinator of the balancing group. The information is provided either directly by you as an applicant and/or through an authorized person.

HOW WILL WE USE YOUR PERSONAL DATA?

We will only use your personal data when it is permitted by law. We will use your personal data on the following grounds, but not limited thereto:

1. to implement the contract concluded with you;
2. to comply with a legal obligation;
3. when it is necessary to protect our legitimate interests or those of third parties, for example when it is necessary to seek judicial protection;
4. to protect your interests (or the interests of someone else) when the processing of personal data is in the public interest.

PURPOSES AND SITUATIONS IN WHICH WE WILL USE YOUR PERSONAL DATA

We will use the categories of personal data listed above primarily to implement our contractual obligations to you and to comply with our legal obligations. Situations in which we will process your personal data include:

- Deciding on the contractual terms to be offered to you;
- Paying your liabilities for the electricity supply;
- Carrying out business management and planning, including accounting and auditing;
- Carrying out inspections by competent and authorized bodies regarding the commercial relations with electricity customers /e.g. EWRC, Ombudsman, NRA, etc./;
- Complying with the legal requirements in connection with the purchase and sale of electricity;
- Other situations provided for in the relevant regulations.

For some of the activities listed above, we may have more than one legal basis for the processing of your personal data.

IF YOU DO NOT PROVIDE US WITH THE PERSONAL INFORMATION WE REQUIRE

Your failure to provide the personal information requested may prevent us from performing the service of electricity supply to your property. Your REFUSAL to provide the necessary information for the implementation of the rights and obligations under the contract may be a reason for the non-conclusion of the contract or for its termination.



CHANGE OF THE PURPOSE

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we should use it for another reason, and this reason is consistent with the original purpose. If we need to use your personal data for another purpose, we will notify you and explain the legal basis for such use.

DO WE NEED YOUR EXPLICIT CONSENT?

We have no legal obligation to obtain your consent when we processing personal data in order to implement our contractual obligations. Is we collect additional data from you for purposes other than the contractual ones, we will need your consent, for which we will explicitly contact you.

INFORMATION RELATED TO COURT RULINGS AND/OR DEEDS OF ENFORCEMENT OFFICERS

We may use information related to court rulings and/or deeds of enforcement officers only in cases where the law allows it and this processing is necessary to implement our legal obligations.

DATA SHARING

We may disclose your personal information to third parties, including service providers (e.g. electricity distribution companies, etc.), when required by law, when necessary for the administration of the commercial relations between us in connection with the supply of electricity or when we have another legitimate interest in this. We require all third parties to respect data security and comply with the relevant data protection legislation.

Your personal data will not be disclosed and/or transferred to recipients outside the EU.

HOW DO WE ENSURE THE SECURITY OF YOUR INFORMATION WHEN WE PROVIDE IT TO THIRD PARTIES?

All service providers to whom personal data is disclosed are required to take appropriate security measures to protect your personal information. They may not use your personal data for their own purposes, but only for the purposes we have defined and in compliance with our instructions.

DATA SECURITY

We have put in place appropriate measures to prevent any accidental loss, use or unauthorized access, alteration or disclosure of your personal data. In addition, we limit the access to your personal data to those employees and third parties who need to receive this information. They will process personal data only on the basis of our instructions and in accordance with their obligation for confidentiality.

HOW LONG WILL WE USE YOUR PERSONAL DATA?

We will only retain your personal data for the period for which we need it to implement the purposes for which we have collected it, including to comply with the requirements of the civil, commercial, accounting and tax legislation.

In determining the appropriate retention period, we take into account the potential risk of harm resulting from unauthorized use or disclosure of the data, the purposes for which we process them or whether we could achieve these purposes by other means, as well as the applicable legal requirements.

RIGHT OF ACCESS, CORRECTION, DELETION AND RESTRICTION

It is important that we keep your personal information accurate and up to date. Please notify us of any changes to your personal data.

YOUR RIGHTS IN RELATION TO YOUR PERSONAL DATA:

- **Access to information:** this right allows you to obtain a copy of the personal data we store about you and to check whether we have a legal basis for their processing.
- **Correction:** this right allows you to ask us to correct any incomplete or inaccurate information about you.
- **Deletion:** this right allows you to require us to delete or remove your personal data when we have no valid reason to continue processing them. You also have the right to request that your data be deleted or removed when you have exercised your right to object to their processing.
- **Objection to processing:** in cases where we rely on our legitimate interests as a basis for processing, you may object to such processing.
- **Limitation of processing:** this right allows you to ask us to temporarily suspend the processing of your personal data if, for example, you want us to establish the accuracy of the data or the reasons for their processing.
 - **Data portability:** this right is limited to cases where the data are provided to us by you for the purposes of a contract and allows you to require us to provide your electronically stored data to a third party.
 - Right to be "**forgotten**" - deletion of personal data related to the CUSTOMER without undue delay by the controller, where it is applicable in the cases specified in the Regulation.

To exercise any of your rights specified above, please contact the Company's Data Protection Officer at +359 2 890 4277, dpo@nec.bg

You have the right to file a complaint at any time to the Bulgarian data protection regulator - the Commission for Personal Data Protection, address: 2 Profesor Tsvetan Lazarov Blvd., Sofia 1592 (www.cdpd.bg).

RIGHT TO WITHDRAW YOUR CONSENT

If you have given your explicit consent to the processing of your personal data for a specific purpose, you have the right to withdraw this consent. To withdraw your consent, please contact the Company's Data Protection Officer at +359 2 890 4277, dpo@nec.bg

After receiving your request, we will suspend the processing of the data for the purpose(s) for which you have initially agreed, unless we have another legal basis to continue processing of which we will notify you in a timely manner.

DATA PROTECTION OFFICER



We have appointed a Data Protection Officer to monitor the compliance with the requirements of the personal data protection legislation in our organization. You can contact the DPO as follows:
+359 2 890 4277, dpo@nec.bg

AMENDMENTS TO THIS PRIVACY NOTICE

We reserve the right to amend and update this Privacy Notice at any time. We will provide you with a new notice each time we make changes thereto.

Year 2021