

PRIVACY POLICY

I. General Information

This policy is intended to inform individuals (“data subjects”) about how Information Services JSC collects, uses, stores, and protects their personal data, in accordance with the requirements of Regulation (EU) 2016/679 (General Data Protection Regulation - GDPR).

Information Services JSC is a personal data controller (CONTROLLER). The company is registered in the Commercial Register under company identifier 831641791 and has its registered office and principal place of business at 2, Panayot Volov Street, Sofia. To contact the CONTROLLER and the Data Protection Officer, please send an email to: dpo@is-bg.net.

II. Categories of personal data processed by Information Services JSC. Purposes and legal basis for processing.

1. Personal data of visitors to the company’s buildings

As a data controller, Information Services JSC processes the personal data of visitors to its buildings in strict compliance with the provisions of 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 (General Data Protection Regulation).

Upon entering a building of Information Services JSC, visitors provide their personal data via an identity document, which is read either by machine or manually, and the data contained therein - names, personal number (or other identifier in accordance with the laws of the relevant country), and identification document number are processed in the “Access to the Buildings of Information Services JSC” register. The processing of personal data is carried out pursuant to Article 6, paragraph 1, letter “f” of the General Data Protection Regulation for the purposes of the CONTROLLER’s legitimate interests in controlling access to the buildings of Information Services JSC and protecting the company’s employees and property.

Video surveillance is conducted in the buildings. By recording video footage of individuals, the CONTROLLER collects and subsequently processes, in the “Video Surveillance” register, personal data related to the physical identity of visitors to the buildings. The processing of personal data is carried out pursuant to Article 6, paragraph 1, letter “f” considered together with Article 9, paragraph 2, letter “e” of the General Data Protection Regulation for the purposes of the CONTROLLER’s legitimate interests in controlling access to the buildings of Information Services JSC and protecting the company’s employees and property.

Retention period for the personal data of visitors to the buildings: 60 days.

Disclosure of Personal Data

The CONTROLLER may disclose the personal data of visitors to its buildings that it processes to judicial authorities, the Ministry of the Interior, and the State Agency for National Security upon their request and where there is a legal basis for doing so.

Right of Access of the Data Subject

The data subject has the right to obtain from the CONTROLLER confirmation as to whether personal data relating to him or her is being processed and, if so, to access such data.

Right to Rectification, Erasure, or Restriction of Processing of Personal Data

The data subject has the right to rectification of inaccurate personal data concerning them.

The data subject has the right to request from the CONTROLLER to erase personal data concerning him or her without undue delay if the data subject objects to the processing of personal data pursuant to Article 21, paragraph 1 of the General Data Protection Regulation and there are no legitimate grounds for the processing that take precedence.

The data subject has the right to request from the CONTROLLER to restrict processing on any of the following grounds:

- The accuracy of the personal data is contested by the data subject, for a period enabling the CONTROLLER to verify the accuracy of the personal data;
- The CONTROLLER no longer needs the personal data for the purposes of the processing, but the data subject requires it for the establishment, exercise, or defence of legal claims;
- The data subject has objected to the processing pursuant to Article 21, paragraph 1 of the General Data Protection Regulation pending verification of whether the CONTROLLER's legitimate grounds override the data subject's interests.

Right to Object to the Processing of Personal Data

The data subject has the right, at any time and on grounds relating to his or her particular situation, to object to the processing of personal data concerning him or her.

Right to Lodge a Complaint

The data subject has the right to lodge a complaint with a supervisory authority if he or she believes that the processing of personal data concerning him or her violates the General Data Protection Regulation.

Mandatory Provision of Personal Data

The data subject must provide their personal data in order to be granted access to the building; in return, they will be issued an access card for the common areas of the building. Otherwise, access to the building may be denied, even if accompanied by another person.

Automated Decision-Making

The CONTROLLER does not engage in automated decision-making, including profiling.

2. Personal Data of Customers Using Certification Services

In its capacity as a certification service provider, Information Services JSC issues qualified certificates for electronic signatures, qualified certificates for electronic seals, and qualified certificates for website authenticity.

The certificates are issued in strict compliance with the provisions of the Law on Electronic Documents and Electronic Certification Services and Regulation (EU) No. 910/2014 of the European Parliament and of the Council of 23 July 2014, on electronic identification and trust services for electronic transactions in the internal market and repealing Directive 1999/93/EC. Pursuant to Article 24, paragraph 1 and paragraph 2, letter "h" of Regulation (EU) No. 910/2014 of the European Parliament and of the Council of 23 July 2014, on electronic identification and trust services for electronic transactions in the internal market and repealing Directive 1999/93/EC, and for the purpose of establishing the identity of persons to whom certificates are issued, providing evidence in legal proceedings, and ensuring continuity in the provision of certification services, Information Services JSC collects and further processes the following categories of personal data of its customers: full name, personal number, ID card number, date of issuance and issuing authority, email address, and phone number.

Retention Period for Personal Data

The CONTROLLER retains the personal data provided upon the issuance of a qualified certificate for a period of 10 years, including after the cessation of its activities.

Disclosure of Personal Data

The CONTROLLER may disclose the personal data it processes regarding its customers to judicial authorities, the Ministry of the Interior, and the State Agency for National Security upon their request and where there is a legal basis for doing so.

Right of Access of the Data Subject

The data subject has the right to obtain from the CONTROLLER confirmation as to whether personal data relating to him or her is being processed and, if so, to access such data.

Right to Rectification

The data subject has the right to rectification of inaccurate personal data concerning them in cases where the data is not included in the content of the certificate (qualified certificate for electronic seal and qualified certificate for website authenticity).

In cases where personal data is included in the content of the qualified certificate (qualified certificate for electronic signature), such data may be corrected at the request of the data subject within 3 days of the certificate's publication in the register of issued certificates, and a new certificate shall be issued at the CONTROLLER's expense. After the 3-day period has expired, correcting the personal data requires the issuance of a new certificate, the cost of which shall be borne by the person to whom the certificate containing the inaccurate personal data was issued.

Right to File a Complaint

The data subject has the right to file a complaint with a supervisory authority if they believe that the processing of personal data concerning them violates the General Data Protection Regulation.

Mandatory Nature of Providing Personal Data

As a provider of qualified certification services, Information Services JSC is under obligation, pursuant to the Law on Electronic Documents and Electronic Certification Services and Regulation (EU) No. 910/2014 of the European Parliament and of the Council of 23 July 2014, on electronic identification and trust services for electronic transactions in the internal market and repealing Directive 1999/93/EC, to verify, by appropriate means and in accordance with the national law, the identity and, where applicable, all specific data regarding the natural or legal person to whom the qualified certificate is issued.

The provision of personal data by natural persons is a mandatory condition for the issuance of a qualified certificate, so that their identity can be established upon issuance of the certificate, and the personal data is stored for the purpose of fulfilling the qualified certificate service provider's obligation to provide evidence in legal proceedings and to ensure continuity in the provision of certification services. When a qualified certificate for an electronic signature is issued, personal data is also recorded in the certificate itself for the purpose of identifying the individual to third-party relying parties with whom the individual will use the certificate.

Automated Decision-Making

The CONTROLLER does not engage in automated decision-making, including profiling.

3. Personal Data of Individuals Who Have Entered into Employment Contracts with the Company

As a data controller, Information Services JSC processes the personal data of individuals with whom it enters into employment contracts, in strict compliance with the provisions of 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 (General Data Protection Regulation).

For the purposes of concluding and performing employment contracts, individuals provide the following categories of personal data: full name, personal number, permanent address, current address, postal code, place of birth, the individual's telephone number, ID card number, date of issuance of the ID card and the issuing authority, data regarding the individual's health status, type and level of education, qualifications, employment history, marital status, data regarding the individual's criminal record, IBAN, and data related to the individual's physical identity. The processing of personal data is carried out pursuant to Article 6, paragraph 1, letters "b" and "c" and Article 9, paragraph 2, letters "b" and "h" of the General Data Protection Regulation. Video surveillance is conducted on the premises of the CONTROLLER. By recording video footage of individuals, the CONTROLLER collects and subsequently processes, in the "Video Surveillance" register, personal data related to the physical identity of its employees. The processing of personal data is carried out pursuant to Article 6, paragraph 1, letter "f" considered together with Article 9, paragraph 2, letter "e" of the General Data Protection Regulation for the purposes of the CONTROLLER's legitimate interests in controlling access to the buildings of Information Services JSC and protecting the company's employees and property.

The purposes of processing personal data are:

- Individualization of employment relationships;
- Compliance with the regulatory requirements of the Labour Code, the Social Security Code, the Accounting Act, the National Archives Act, and others;
- Carrying out all activities related to the establishment, modification, and termination of employment relationships;
- Providing preventive and occupational health services and assessing employees' work capacity;
- Preparing all types of documents for data subjects in connection with employment relationships (employment contracts, supplementary agreements, memos, reports, certificates, etc.);
- Contacting the individual by phone, sending correspondence related to the fulfilment of the individual's obligations under the employment contract;
- Maintaining accounting records regarding compensations under employment contracts.

Retention Period for Personal Data

The personal data of individuals who enter into employment contracts with Information Services JSC is retained for a period of 50 years.

Recipients of Personal Data

The CONTROLLER may provide the personal data it processes to the National Social Security Institute and the National Revenue Agency for the purpose of fulfilling statutory obligations.

Personal data may also be provided to banks for the purpose of making payments. The personal data provided in such cases include the person's full name, personal number, and IBAN, and are provided to identify the person in whose favour the payment is made.

Employees' personal data is provided by the CONTROLLER to the Occupational Health Service for the purposes of preventive and occupational medicine, as well as for assessing employees' work capacity.

Personal data may also be provided to courier companies in connection with the use of courier services. For the purposes of providing courier services, the CONTROLLER provides the courier company with the following data: full name, address, postal code, and name of the town or city.

Personal data may be provided to the Centre for Urban Mobility JSC in connection with the issuance of public transportation subscription cards.

The CONTROLLER may provide the processed personal data of its employees to Benefit Systems Bulgaria Ltd in connection with the use of Multisport cards, to Starting Point Ltd in connection with the use of cards under the "Club Pulse" Program, as well as to Sodexo Pass Bulgaria Ltd in connection with Andjoy subscriptions.

The CONTROLLER may provide the personal data it processes to judicial authorities, the Ministry of the Interior, and the State Agency for National Security upon their request and where there is a legal basis for doing so.

Right of Access of the Data Subject

The data subject has the right to obtain from the CONTROLLER confirmation as to whether personal data relating to him or her is being processed and, if so, to access such data.

Right to Rectification or Restriction of Processing of Personal Data

The data subject has the right to rectification of inaccurate personal data concerning them .

The data subject has the right to request from the CONTROLLER to restrict the processing on any of the following grounds:

- The accuracy of the personal data is contested by the data subject, for a period enabling the CONTROLLER to verify the accuracy of the personal data;
- The CONTROLLER no longer needs the personal data for the purposes of the processing, but the data subject requires it for the establishment, exercise, or defence of legal claims.

Right to File a Complaint

The data subject has the right to file a complaint with a supervisory authority if he or she believes that the processing of personal data concerning him or her violates the General Data Protection Regulation.

Mandatory Nature of Providing Personal Data

The provision of personal data by the data subject is a mandatory condition for entering into an employment contract.

Automated Decision-Making

THE CONTROLLER does not engage in automated decision-making, including profiling.

4. Personal Data of Individuals Enrolled at the Vocational Training Centre of Information Services JSC

Information Services JSC processes the personal data of individuals enrolled in the Cisco Academy at the Vocational Training centre (VTC) and the personal data of individuals taking certification exams at the Pearson VUE (PVUE) Testing Centre.

In accordance with the requirements of the Cisco Networking Academy and the internal regulations, data necessary for registration on the Cisco NetAcad platform for participation in training courses, the administration of exams, the issuance of certificates, and identity verification upon certificate issuance by the platform is processed.

The PVUE Testing Centre's policy governs the processing of personal data of candidates taking certification exams. This data is necessary for identity verification during the exam. A candidate's personal data is processed only when registration is performed by the administrator at the Test Centre.

The VTC processes the personal data of individuals to whom it provides training, pursuant to Article 6, paragraph 1, letter "a" of the General Data Protection Regulation.

The VTC, which administers the activities at the Cisco Academy and the PVUE Test Centre, collects and processes the following categories of personal data: full name; personal number; phone number; level of education completed or certification.

Retention Period for Personal Data from Training Courses

The CONTROLLER retains personal data provided in connection with training courses at the Cisco Academy for a period of 5 years.

In accordance with PVUE's policies, the data is retained for a period of 1 year.

Recipients of Personal Data

The CONTROLLER provides the personal data it processes to the Cisco Networking Academy, instructors, and administrators with restricted access. The platform is encrypted, with restricted access and login credentials.

The ADMINISTRATOR provides the personal data it processes to PVUE when registering a candidate to take an exam. In cases where the candidate registers in person, the data is not provided to third parties but is used solely for identification purposes.

Right of Access of the Data Subject

The data subject has the right to obtain confirmation from the ADMINISTRATOR as to whether personal data relating to them is being processed and, if so, to access that data.

Right to Rectification

The data subject has the right to rectification of inaccurate personal data concerning them

Right to Restriction of Processing

The data subject has the right to request from the CONTROLLER to restrict the processing on any of the following grounds:

- The accuracy of the personal data is contested by the data subject, for a period that allows the CONTROLLER to verify the accuracy of the personal data;

- The CONTROLLER no longer needs the personal data for the purposes of the processing, but the data subject requires it for the establishment, exercise, or defence of legal claims.

Right to File a Complaint

The data subject has the right to file a complaint with a supervisory authority if they believe that the processing of personal data concerning them violates the General Data Protection Regulation.

Mandatory Nature of Providing Personal Data

As a Cisco Academy at Information Services JSC, the Training Centre is under obligation to collect personal data from individuals who have registered for training. The provision of personal data by individuals is a mandatory requirement for enrolment in training programs aimed at acquiring skills and competencies, as well as for the issuance of documents (certificates) upon completion of training.

Automated decision-making

The CONTROLLER does not engage in automated decision-making, including profiling.

VI. Supervisory Authority

Data subjects have the right to file a complaint with the supervisory authority, the Commission for Personal Data Protection (CPDP), at the following address: Sofia 1592, 2, Prof. Tsvetan Lazarov Blvd., website: www.cpdp.bg

VII. Data Security

Information Services JSC implements appropriate technical and organizational measures to protect personal data against:

- unauthorized access;
- loss or destruction;
- unlawful disclosure.

VIII. Changes to the Policy

This policy may be updated in the event of changes in the legislation or in the controller's business activities. The current version is published on the website of Information Services JSC.