

PRIVACY POLICY

This privacy policy regulates the processing of personal data of natural persons by "KUMINYANO FRUIT" OOD, EIC: 832099347, with registered office and management address: Katunitsa village, Sadovo municipality, Plovdiv region, Iskra street #8, represented by the Manager Roberto Santorelli, available by visiting the company's website www.santorelli.eu. The policy also covers the processing of personal data of visitors, customers and suppliers of the company.

Kuminiano Fruit Ltd. (referred to as the Administrator for short) processes the personal data of natural persons in accordance with the requirements of Regulation (EU) 2016/679 of the European Parliament and of the Council of April 27, 2016 on the protection of natural persons in connection with the processing of personal data and on the free movement of such data and on the repeal of Directive 95/46/EC (General Data Protection Regulation/GDPR or "the Regulation"), the Personal Data Protection Act, as well as all other legal acts, guidelines and instructions related to the processing and protection of personal data of natural persons.

Contact person	Iliana Awramova
Contact phone number	0889 30 30 85
E-mail	gdpr@santorelli.eu

With this privacy policy, we aim to provide you with comprehensive information regarding the processing of your personal data in accordance with Art. 13 and Art. 14 of the Regulation in a transparent, accessible and easily understandable manner. This information includes, but is not limited to, the types of personal data we process, the purposes and legal basis for the processing, the categories of data recipients, the security measures we apply, your rights and how you can exercise them in accordance with the requirements of the Regulation and the relevant applicable legislation.

❖ DEFINITIONS

You should note that the meaning of the terms used in this policy is as follows:

- "Administrator of personal data" means a natural or legal person, public body, agency or other structure that alone or jointly with others determines the purposes and means of processing personal data;
- "Domain" is a part of the hierarchical space of the global Internet network that has its own unique name (domain name) that must meet certain requirements. In order to load a specific web page, the domain name is written in the browser field, and in the context of these general conditions, the domain name is www.santorelli.eu.
- "**Deletion**" is the irreversible deletion of the information from the respective medium; "**Personal data**" means any information relating to a natural person that enables his or her identification, including identifiers such as name, identification number (TIN, LNCH, etc.), location data (geolocation), online identifier (e.g. IP address) or by one or

more characteristics specific to the physical, physiological, genetic, psychic, mental, economic, cultural or social identity of that natural person;

- *The processing of special categories of personal data is prohibited, except in a few express hypotheses described in Art. 9, § 2 of the Regulation. Such data are personal data revealing racial or ethnic origin, political*
- *views, religious or philosophical beliefs or trade union membership, as well as the processing of genetic data, biometric data for the sole purpose of identifying an individual, health data or data about the sex life or sexual orientation of the natural person.*
- **"Supervisory Authority"** is an independent public body responsible for monitoring the implementation of the Regulation in order to protect the fundamental rights and freedoms of natural persons in relation to processing and to facilitate the free movement of personal data within the Union. On the territory of the Republic of Bulgaria, the competent supervisory authority is the Commission for the Protection of Personal Data.
- **"Personal Data Breach"** means a security breach that results in the accidental or unlawful destruction, loss, alteration, unauthorized disclosure or access of personal data that is transmitted, stored or otherwise processed.
- "Processing" means any operation or set of operations performed on personal data or a set of personal data by automatic (electronic) or other means (hard copy) such as collection, recording, organization, structuring, storage, adaptation or modification , retrieval, consultation, use, disclosure by transmission, distribution or other way in which the data becomes available, arrangement or combination, restriction, erasure or destruction **“Обработващ лични данни“** означава физическо или юридическо лице, публичен орган, агенция или друга структура, която обработва лични данни от името на администратора.
- "Recipient" means a natural or legal person, public body, agency or other structure to which personal data is disclosed, whether or not it is a third party. At the same time, public authorities that may receive personal data within the framework of a specific investigation in accordance with Union law or the law of a Member State are not considered "recipients"; the processing of this data by the specified public authorities complies with the applicable data protection rules in accordance with the purposes of the processing.
- **"Risk"** is the possibility of property or non-property damage to the data subject under certain conditions, assessed in terms of its severity and probability.
- **“Съгласие на субекта на данните“** означава всяко свободно изразено, конкретно, информирано и недвусмислено указание за волята на субекта на данните, посредством изявление или ясно потвърждаващо действие, което изразява съгласието му свързаните с него лични данни да бъдат обработени.
- "Data subject" within the meaning of this privacy policy is a natural person whose personal data is subject to processing by the personal data controller when carrying out its activities, as well as when visiting the website www.santorelli.eu.
- **"Destruction"** is irreversible physical destruction of the material carrier of information.

Terms not defined above have the meaning given to them in Regulation (EU) 2016/679, the content of which is available at <https://eur-lex.europa.eu/legal-content/BG/TXT/?uri=celex%3A32016R0679>, as well as in the Personal Data Protection Act or the corresponding normative act regulating the matter.

I. INFORMATION ABOUT THE ADMINISTRATOR OF PERSONAL DATA

Kuminiano Fruit Ltd. is the controller of personal data within the meaning of Art. 4, § 7 of the Regulation, as it determines the purposes and means of processing the personal data of natural persons within the framework of its activity, incl. through the website www.santorelli.eu.

Наименование на администратора на данните	“Куминяно Фрут“ ООД
UIC	832099347
Contact person	Илиана Аврамова
Contact phone number	0889 30 30 85
E-mail	gdpr@santorelli.eu

In case you have questions, need additional information or suggestions related to the processing of personal data or their protection, you can contact us at the coordinates indicated above.

II. CATEGORIES OF DATA SUBJECTS

- Through the website www.santorelli.eu we process the personal data of the following categories of natural persons:
- persons loading the domain“www.santorelli.eu ” in your browser.
- persons making inquiries through our contact form or by sending a message by email/to our correspondence address;

This policy also examines the data processed by the company regarding the following categories of subjects:

- visitors;
- customers;
- providers;

The administrator does not process personal data of persons under the age of 14. In case you detect such processing, please inform us immediately so that we can take the necessary actions.

III. TYPES OF PERSONAL DATA. PURPOSES AND LEGAL BASIS OF PROCESSING. STORAGE PERIOD.

A.) Personal data received by the subject when visiting the website www.sanorelli.eu:

№	Категория и вид на данните	Цел/и	Правно основание	Срок за съхранение
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1	Physical identity and contact details: Name, e-mail, other information voluntarily provided by the subject;	Identifying the subject, processing his inquiry and providing feedback on the inquiry.	Art. 6, §1, letter "b" of the Regulation: contractual basis or Art. 6, § 1, letter "f" - legitimate interest;	Up to 3 months after the end of the correspondence (<i>except when a contract is concluded as a result of the correspondence</i>)
2	Physical identity: three names, address, e-mail;	Exercising any of the rights provided for in the Regulation in favor of the subjects; Processing the application, satisfying the request; maintaining a register of applications;	Art. 6, §1, letter "c" of the Regulation: statutory obligation	Up to 2 years from the last action taken on the request
3	Physical identity: three names, address, e-mail;	Maintaining a register of violations; Taking action in the event of a breach; Notifying the CPLD and the persons affected by the violation (<i>when applicable</i>);	Art. 6, §1, letter "c" of the Regulation: statutory obligation	Up to 5 years from the detection of the violation
4	Log files of the following actions:	Storage of information in accordance with the requirements of the Personal Data Protection Act.	Art. 6, §1, letter "c" of the Regulation: statutory obligation	Up to 5 years from the performance of the relevant action

Through www.sanorelli.eu do not process special categories of personal data. We do not process personal data through profiling or other automated decision-making methods.

After the expiration of the terms for processing personal data, the same is anonymized or deleted/destroyed, unless it is necessary for pending judicial, arbitration, administrative or enforcement proceedings.

B.) Personal data obtained automatically through cookies

The website www.sanorelli.eu uses cookies. Cookies are small files consisting of letters and numbers that are saved on your computer or mobile device when you visit a website.

The website uses the cookies described in the table below.

COOKIE	ВИД	ОПИСАНИЕ/ЦЕЛ
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You can control and manage cookies in various ways using your web browser. For more information on how to change your browser settings to block or filter cookies, please visit:

<https://www.pcmag.com/how-to/how-to-control-and-delete-cookies-on-your-browser>

or <https://www.aboutcookies.org>.

В.) Лични данни на посетители, клиенти и доставчици

№	Category and type of data	Purpose/s	Legal basis	Storage period
1	<p>Physical identity and contact details: Three names, personal identification number (PIN) address, telephone number, e-mail;</p> <p>Bank details: IBAN, servicing bank, etc. information regarding the payment of the due remuneration.</p> <p>Regarding agricultural producers, in addition to those described above, data related to social identity are also processed: location of agricultural plantations, type and area; information on how to array processing and other related information.</p>	<ul style="list-style-type: none"> • Identification of the subject; • Conclusion and execution of a contract for purchase and sale and delivery of decoration for the home or office; • Information provision of activities related to the existence, amendment and termination of legal relations and preparation of all types of documents in this connection (contracts, handover protocols, invoices, etc.); • Establishing contact with the person by phone or sending correspondence related to the fulfillment of contractual obligations; • Fulfillment of the regulatory requirements of the Commercial Law, the Accounting Law; 	<p>Art. 6, §1, letter "b" of the Regulation: contractual basis</p> <p>Art. 6, §1, letter "c" of the Regulation: legal basis</p>	До 5 години от прекратяване на договора;
2	<p>Physical identity and contact details: Three names, social security number, address, telephone number, e-mail;</p>	Exercising any of the rights provided for in the Regulation in favor of the subjects; Processing the application, satisfying the request;	Чл. 6, §1, буква "в" от Регламе	До 2 години от последното предприятие

		maintaining a register of applications;	нта: нормати вно задълже ние	то по искането действие
3	Физическа идентичност: три имена, ЕГН, адрес, телефон, e-mail;	Maintaining a register of violations; Taking action in the event of a breach; Notifying the CPLD and the persons affected by the violation (<i>when applicable</i>);	Art. 6, §1, letter "c" of the Regulation: statutory obligation	Up to 5 years from the detection of the violation
4	Video surveillance footage	Ensuring the security of property, staff and visitors and control of the production process in compliance with a bioterrorism procedure.	Art. 6, §1, letter "f" of the Regulation: legitimate interest	Up to 2 months
5	Reg. Vehicle number for visitors who access the facility by vehicle	Ensuring the security of property, personnel and visitors and control of the production process in compliance with a bioterrorism procedure.	Art. 6, §1, letter "f" of the Regulation: legitimate interest	Up to 2 months

IV. DATA RECIPIENTS

Your personal data may be provided to:

- competent public authorities in fulfillment of legal provisions or other legally established obligations;
- our partners with whom we have concluded contracts for the provision of various services, such as: couriers, persons carrying out the technical support of the website, financial institutions, etc.

All our partners comply with the requirements of Regulation (EU) 2016/679, having made such commitments through the agreements concluded with us for the protection of personal data (in accordance with Article 28, §3 of the Regulation).

V. "Kumignano Fruit" Ltd. does not provide personal data to other persons within the EU, nor to third countries or international organizations.

VI YOUR RIGHTS

As a data subject, you have the following rights, which you can exercise free of charge at any time:

1. Right of Access

You have the right to receive confirmation as to whether we are processing personal data relating to you. In the event that we process such data, we will provide you with a copy of the documents containing personal data (on the relevant medium), as well as the following information:

- the purposes of processing;
- relevant categories of personal data;
- the recipients or categories of recipients to whom the personal data has been or will be disclosed;
- when possible, the expected period for which the personal data will be stored, and when not possible - the criteria for its determination;
- the existence of a right to request from the administrator the correction or deletion of personal data or to limit the processing of personal data related to the data subject, or to object to such processing;
- the right to appeal to a supervisory authority;
- where the personal data is not collected from the data subject, any available information about its source;
- the existence of automated decision-making, incl. profiling (with relevant information about the logic used and the meaning and intended consequences of this processing)

In the event that the documents containing personal data of the subject contain personal data of other persons, they will be deleted in an appropriate manner.

2. Right to rectification

You have the right to request that we correct the personal data we process about you where it is inaccurate. In the event that you wish to supplement your personal data, we will need you to submit a declaration containing the relevant information or to fill in the correct data in the application for exercising the right of correction.

Once we receive your request, we will correct/supplement the data as soon as possible.

3. Right to erasure (so-called “Right to be forgotten”)

You have the right to request the deletion of your personal data. In order for us to delete your personal data, any of the following grounds must apply:

- the personal data are no longer necessary for the purposes for which they were collected or otherwise processed;

- You withdraw your consent on which the processing of the data is based and we have no other legal basis for the processing;
- You object to the processing and there are no overriding legal grounds for the processing. When you have objected to processing for marketing purposes, the grounds are not analyzed.
- your personal data has been processed unlawfully;
- personal data must be deleted in order to comply with a legal obligation under EU law or Bulgarian law;
- personal data were collected in connection with the provision of information society services; An information society service is any service normally provided for a fee, at a distance, by electronic means and at the individual request of the recipient of the services.

Even if one of the scenarios described above is present, we will not delete your personal data when the processing is necessary for:

- to exercise the right to freedom of expression and the right to information;
- to comply with a legal obligation that requires processing provided for in EU law or Bulgarian law, or for the performance of a task of public interest, or in the exercise of official powers of the controller;
- for the establishment, exercise or defense of legal claims;
- two more specific hypotheses set forth in Art. 17, § 3, letters "c" and "d" of the Regulation.

4. Right to restriction of processing

You have the right to ask us to restrict processing where one of the following applies:

- You dispute the accuracy of the personal data. In this case, the limitation takes place for the period we need to verify the accuracy of the data.
- The processing is unlawful, but you want the use of the personal data to be restricted instead of deleted.
- The administrator no longer needs the personal data for the purposes of processing, but you require them for the establishment, exercise or defense of legal claims.
- You have objected to the processing and are awaiting verification of whether the administrator's legitimate interests take precedence over your interests.

The administrator will inform any person to whom data has been disclosed that it has been corrected, deleted or restricted, except in cases where this is impossible or requires a disproportionate effort. In case you wish, we will let you know who these persons are.

5. Right of Portability

You have the right to receive the personal data you have provided to us in a structured, widely used and machine-readable format, and to request that we transfer it to another controller of your choice. In order to take such actions, the following two prerequisites should be present:

- the processing is based on consent or contractual obligation and
- data to be processed in an automated manner.

6. Right to object

You have the right to object to the processing of your personal data when it is based on:

- performance of a task of public interest or in the exercise of official powers granted to the controller or
- legitimate interest.

We will stop processing your data immediately if we are unable to demonstrate that there are compelling legal grounds for the processing that override your interests, rights and freedoms, or for the establishment, exercise or defense of legal claims.

Where the processing is for marketing purposes, we will stop processing your data at the moment we process your request.

7. Right to Withdraw Consent

When the processing of your data is based on consent, you have the right to withdraw the given consent at any time by notifying us of this at the indicated contacts.

How to exercise any of the rights described above?

Step 1. In case you wish to exercise any of your rights, please download the application from [HERE \(hyperlink\)](#) and fill in the necessary information. The application has been created for your convenience, but is not mandatory for you.

If you wish, you can send us a free-form request, which must contain the following information:

- your three names;
- Social Security Number (if you have provided us with a similar identifier so far);
- address;
- mailing address;
- description of the request;
- preferred form of receiving response and information;
- signature;
- date of submission.

Step 2. Please submit your application in one of the following ways:

- by e-mail to Iliyana.avramova@santorelli.eu under the terms of the Law on Electronic Document and Electronic Authentication Services (EDU), the Law on Electronic Government or the Law on Electronic Identification (i.e. electronic signature, with an electronic identifier or under other way).

- by mail, courier or in person at the address: Plovdiv region, Sadovo municipality, Katunitsa village 4120, "Iskra" street No. 8. When the application is submitted by an authorized person, a power of attorney should be attached to it.

Step 2. After reviewing your application, we will analyze its content and, if necessary, ask you for additional information. You will receive information about its processing within one month of sending it in the way you indicated as your preferred communication.

Step 3. In case you need assistance in completing the form we offer, you can contact us at the contact details provided in this policy.

You should bear in mind that the Administrator may refuse to fully or partially satisfy any of the rights described above, when their satisfaction would create a risk to public order and security, the prevention, investigation, detection or prosecution of crimes or the execution of the imposed penalties, including the protection against and the prevention of threats to public order and security, other important purposes of broad public interest and in particular an important economic or financial interest, including monetary, budgetary and tax matters, public health and social security, the protection of the data subject or the rights and freedoms of others or the enforcement of civil claims.

In addition to the rights described above, you have the opportunity to take the following actions:

8. File a complaint with the Personal Data Protection Commission

In case you have doubts or concerns that we are processing your personal data unlawfully, you can contact us at the above contacts. Each data subject has the right to file a complaint with the Personal Data Protection Commission (PCPD) if he/she considers that the processing of personal data concerning him/her violates the provisions of the Regulation or the Personal Data Protection Act (PDPC). The subject should refer the CPLD within 6 months of becoming aware of the violation, but no later than 2 years after its commission, by submitting a complaint by letter, fax or electronically in accordance with the procedure of ZEDEUU.

After the entry into force of the Regulation, the subjects of personal data may also submit complaints to other supervisory authorities in the territory of the European Union, when this is provided for in the Regulation.

9. File a complaint with the competent administrative court

Without prejudice to your right to appeal to the GDPR described in item 8, you have the opportunity to file a complaint with the competent administrative court when you believe that your rights under the Regulation/GPRDP have been violated as a result of the processing of your personal data.

10. Right to compensation and liability for damages

In the event that you have suffered material or non-material damages as a result of a violation of the Regulation, you have the right to receive compensation from the administrator for the damages caused.

VI. INFORMATION REGARDING THE SUPERVISORY AUTHORITY

The supervisory authority competent on the territory of the Republic of Bulgaria is the Commission for the Protection of Personal Data .

Contact details for the Personal Data Protection Commission

Address: Sofia 1592, Prof. Blvd. Tsvetan Lazarov" No. 2

Email: kzld@cpdp.bg

Website: www.cdpd.bg

Center for information and contacts - tel. 02/91-53-518

VII. DATA PROTECTION MEASURES

In order to guarantee the security of your personal data, numerous protection measures have been taken, including:

- integrated TLS certificate;
- all administrator accounts are password protected with a high security level;
- maintenance of operating systems in an up-to-date state;
- maintaining anti-virus programs in an up-to-date state;
- limited access to the data of persons whose official duties require such access;
- documented procedures for processing personal data of natural persons, etc.

VII. FINAL PROVISIONS

1. Taking into account modern trends, as well as changes in the regulatory framework, this privacy policy may be changed.
2. All amendments and additions to the Privacy Policy will be applied after publication of its current content available through our website. In the event that the changes are material, in accordance with the Guidelines on transparency under Regulation 2016/679 of the Article 29 Working Party (now the European Data Protection Board), adopted on 29.11.2017, last revised on 11.04.2018. , we will notify you about them via a pop-up message on our website, or via email to the email address you provided.
3. This privacy policy is effective from 04/01/2021.

Update 2024