



### Privacy Policy of KUMINIANO FRUIT

This privacy policy regulates the processing of personal data of natural persons by "KUMINIANO FRUIT" EOOD, EIC: 832099347, with registered office and management address: Katunitsa village, Sadovo municipality, Plovdiv region, 8, Iskra str., represented by the Manager Michele Santorelli, available by visiting the company's website [www.santorelli.eu](http://www.santorelli.eu). The policy also covers the processing of personal data of the company's visitors, customers, and suppliers.

Kuminiano Fruit Ltd. (referred to as the Administrator for short) processes the personal data of natural persons by 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 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..

<b>Contact person</b>	Iliyana Avramova
<b>Contact phone number</b>	0889 30 30 85
<b>E-mail</b>	<a href="mailto:gdpr@santorelli.eu">gdpr@santorelli.eu</a>

With this Privacy Policy, we aim to provide you with comprehensive information about how we process your data, by Articles 13 and 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 bases for processing, the categories of data recipients, the security measures we apply, your rights, and how you can exercise them, in compliance with the Regulation and other 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. For this policy, the data controller is "Kuminiano Fruit" Ltd.
- **"Domain"** is a part of the hierarchical space of the global Internet network that has its unique name (domain name) that must meet certain requirements. To load a specific web page, the domain name is entered in the browser field. In the context of these general conditions, the domain name is [www.santorelli.eu](http://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 to protect the fundamental rights and freedoms of natural persons concerning 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
- **"Data processor"** means a natural or legal person, public authority, agency, or other body that processes personal data on behalf of the controller
- **"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 following 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 under 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.
- **"Consent of the data subject"** means any freely given, specific, informed, and unambiguous indication of the data subject's wishes, expressed by a statement or by a clear affirmative action, by which the data subject signifies agreement to the processing of personal data relating to them.
- **"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](http://www.santorelli.eu).
- **"Destruction"** is irreversible physical destruction of the material carrier of information.

*Terms not defined above shall have the meaning given to them in Regulation (EU) 2016/679, the text 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 relevant legal act governing 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 The processor of personal data on behalf of the Administrator is Santorelli AD, according to the Agreement.

<b>Designation of the Administrator Controller</b>	<b>Kuminiano Fruit Ltd</b>
UIC	832099347
<b>Address of management</b>	Plovdiv Region, Sadovo Municipality, Katunitsa Village 4120, 8 Iskra Str.
<b>Contact person</b>	Iliyana Avramova



Contact phone number	0889 30 30 85
E-mail	<a href="mailto:gdpr@santorelli.eu">gdpr@santorelli.eu</a>

In case you have any questions, require additional information, or have suggestions related to the processing of personal data or its protection, you may contact us at the above-mentioned contact details.

## II. CATEGORIES OF DATA SUBJECTS

Through the website [www.santorelli.eu](http://www.santorelli.eu) we process the personal data of the following categories of natural persons:

- persons loading the domain “[www.santorelli.eu](http://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.santorelli.eu](http://www.santorelli.eu):

No	Category and type of data	Purpose(s)	Legal basis	Retention period
1	<b>Physical identity and contact data:</b> Name, e-mail, and other information voluntarily provided by the data subject;	Identification of the data subject, processing of their inquiry, and providing feedback regarding the inquiry.	Article 6(1)(b) of the Regulation: contractual basis, or Article 6(1)(e): legitimate interest;	For a period of up to 3 months following the completion of the correspondence, except where a contract is concluded as a



				result of the correspondence.
2	<b>Physical identity:</b> full name, address, e-mail;	To exercise any of the rights granted under the Regulation on behalf of the data subjects; to process and fulfill their requests; and to maintain a record of all requests.;	Pursuant to Article 6(1)(c) of the Regulation: based on a legal obligation	For a period of up to 5 years from the date of the last action taken regarding the request.
3	<b>Personal identification:</b> full name, address, e-mail;	To maintain a record of breaches; to take appropriate actions in the event of a breach; and to notify the Commission for Personal Data Protection and the data subjects affected, where applicable.	Pursuant to Article 6(1)(c) of the Regulation: based on a legal obligation	For a period of up to 5 years from the date the breach was identified.
4	System log files	To store information in compliance with the requirements of the Personal Data Protection Act.	Pursuant to Article 6(1)(c) of the Regulation: based on a legal obligation	For a period of up to 3 years from the date the respective action was carried out.

Through [www.santorelli.eu](http://www.santorelli.eu) , we do not process special categories of personal data. We do not process personal data through profiling or any other automated decision-making methods.



After the expiration of the retention periods, personal data are deleted/destroyed, unless they are required for ongoing judicial, arbitration, administrative, or enforcement proceedings

## **B) Personal data collected automatically via cookies**

The website [www.santorelli.eu](http://www.santorelli.eu) uses cookies. Cookies are small files consisting of letters and numbers that are stored on your computer or mobile device when you visit a web page.

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>

## **C) Personal data of website visitors, clients, and suppliers**

<b>No</b>	<b>Category and type of data</b>	<b>Purpose(s)</b>	<b>Legal basis</b>	<b>Retention period</b>
<b>1</b>	Personal identification and contact data: full name, personal identification number (EGN), address, phone number, e-mail;  Banking data: IBAN, servicing bank, and other information related to the payment of due remuneration.  Regarding agricultural producers, in addition to the above, data concerning social identity are also	<ul style="list-style-type: none"><li>• Identification of the data subject;</li><li>• Conclusion and performance of a contract;</li><li>• Providing informational support for activities related to the establishment, modification, and termination of legal relationships, and the preparation of all types of related documents (contracts, acceptance-transfer protocols, invoices, etc.);</li><li>• Establishing contact with the individual by phone or sending correspondence related to the performance of contractual obligations;</li><li>• Compliance with the legal requirements of the</li></ul>	Pursuant to Article 6(1)(b) of the Regulation: based on a contract;	For a period of up to 5 years following the termination of the contract



	processed: location of agricultural plots, type and area; information on the method of cultivation of the plots and other related information	Commercial Act and the Accounting Act;		
2	<b>Physical identity:</b> full name, address, e-mail;	To exercise any rights granted under the Regulation for the benefit of data subjects; to process and satisfy their requests; and to maintain a record of all submitted requests.;	Pursuant to Article 6(1)(b) of the Regulation: based on a contract	For a period of up to 5 years from the date of the last action taken regarding the request
3	<b>Personal identity information:</b> full name, EGN (personal identification number), address, telephone number, e-mail	To maintain a record of data breaches; to take appropriate measures in the event of a breach; and to notify the Commission for Personal Data Protection and affected data subjects, where applicable.	Pursuant to Article 6(1)(c) of the Regulation: based on a contract	"For a period of up to 5 years from the date the breach was identified
4	<b>CCTV recordings, including audio recordings</b>	To guarantee the security of assets, staff, and visitors, and to monitor the production process in accordance with bioterrorism procedures, ensuring product quality and safety; and to fulfill obligations under the Excise Duties and Tax Warehouses Act and its subordinate regulations..	Pursuant to Article 6(1)(e) of the Regulation: based on a contract  Pursuant to Article 6(1)(c) of the Regulation:	For a period of up to 2 months



			based on a contract	
5	<b>License plate number of vehicles belonging to visitors accessing the premises.</b>	To ensure the security of assets, staff, and visitors, to oversee the production process in accordance with bioterrorism procedures, and to comply with obligations under the Excise Duties and Tax Warehouses Act (ZADS)	Pursuant to Article 6(1)(e) of the Regulation: based on legitimate interest, and Article 6(1)(c) of the Regulation: based on a legal obligation	For a period of up to 3 years
6.	<b>Health status declaration of the data subject</b>	To ensure the safety of food products and to monitor the production process in accordance with bioterrorism procedures and as part of the company's IFS certification requirements	Чл. 9, §2, буква „а“ от Регламента: съгласие	До 3 години от посещението

#### IV. DATA RECIPIENTS

##### Your data may be provided to:

- competent public authorities, in compliance with legal provisions or other statutory obligations;
- our partners with whom we have concluded contracts for the provision of various services, such as: couriers; providers of technical support for the website, the computer network, and the software used by the company; companies managing access control and video surveillance; mobile operators; financial institutions; customs authorities; auditors and audit firms; consultants, etc.





All our partners comply with the requirements of Regulation (EU) 2016/679, having undertaken such commitments through data protection agreements concluded with us (per Article 28(3) of the Regulation).

**Kuminiano Fruit Ltd. does not disclose personal data to other entities within the EU, nor third countries or international organizations.**

## **V. DATA SUBJECT RIGHTS**

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

### **1. Right of access to personal data**

You have the right to obtain confirmation as to whether we process personal data concerning you. If we do process such data, we will provide you with a copy of the data (in the relevant format), as well as the following information:

- the purposes of the processing;
- the respective categories of personal data;
- the recipients or categories of recipients to whom the personal data have been or will be disclosed;
- where possible, the envisaged retention period for the personal data, or, where not possible, the criteria used to determine that period;
- the existence of the right to request from the controller rectification or erasure of personal data, or restriction of processing of personal data concerning the data subject, or to object to such processing;
- the right to lodge a complaint with a supervisory authority;
- where the personal data are not collected from the data subject, any available information as to their source;
- the existence of automated decision-making, including profiling, with meaningful information about the logic involved, as well as the significance and the envisaged consequences of such processing.



If the documents containing your personal data also contain personal data of other individuals, such data will be redacted appropriately.

## **2. Right to rectification of personal data**

You have the right to request the rectification of your personal data processed by us where such data is inaccurate. If you wish to have your personal data completed, we may require you to provide a declaration containing the relevant information, or to complete the correct data in the application form for exercising the right to rectification.

Upon receipt of your request, we will rectify/complete the data within the shortest possible timeframe.

## **3. Right to erasure (the so-called 'Right to be forgotten')**

**You have the right to request the deletion of your personal data.** To delete your personal data, one 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 is based, and there is no other legal basis for the processing;
- You object to the processing and there are no overriding legitimate grounds for the processing. When you object to processing for marketing purposes, no assessment of grounds is required;
- Your personal data have been unlawfully processed;
- Personal data must be erased to comply with a legal obligation under EU or Bulgarian law;
- Personal data were collected in connection with the provision of services of the information society. A service of the information society is any service normally provided for remuneration, at a distance, by electronic means, and at the individual request of the recipient of the service.

Even if one of the above conditions applies, your personal data will not be deleted if processing is necessary for:

- Exercising the right of freedom of expression and information;
- Compliance with a legal obligation under EU or Bulgarian law, or for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller;
- The establishment, exercise, or defense of legal claims;



- Two additional specific cases outlined in Article 17, §3, letters (c) and (d) of the Regulation.

#### **4. The right to restriction of processing**

You have the right to request that we restrict the processing of your personal data when one of the following applies:

- You contest the accuracy of the personal data. In this case, the processing shall be restricted for a period enabling the controller to verify the accuracy of the data.
- The processing is unlawful, but you request the restriction of the use of the personal data instead of its erasure.
- The controller no longer needs the personal data for the processing, but you require them for the establishment, exercise, or defence of legal claims.
- You have objected to the processing and are awaiting verification as to whether the legitimate grounds of the controller override your interests.

The controller will inform any recipient to whom the personal data has been disclosed of any rectification, erasure or restriction of processing, unless this proves impossible or involves disproportionate effort. If you so request, we will inform you about those recipients.

#### **5. Right to data portability**

You have the right to receive the personal data you have provided to us in a structured, commonly used, and machine-readable format, as well as to request that we transmit that data to another controller of your choice. For us to take such action, the following two conditions must be met:

- the processing is based on your consent or a contractual obligation; and
- The data are processed by automated means.

#### **6. Right to object**

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

- the performance of a task carried out in the public interest or the exercise of official authority vested in the controller; or
- legitimate interest.

We will immediately cease processing your data unless we can demonstrate compelling legitimate grounds for the processing which override your interests, rights, and freedoms, or for the establishment, exercise, or defence of legal claims.



Where processing is carried out for marketing purposes, we will cease processing your data as soon as we have fulfilled your request.

## **7. Right to withdraw consent**

Where the processing of your data is based on your consent, you have the right to withdraw that consent at any time by notifying us through the contact details provided.

### **How to exercise any of the above rights?**

**Step 1.** If you wish to exercise any of your rights, please download the form from [HERE \(hyperlink\)](#) and complete the required information. The form has been created for your convenience, but it is not mandatory.

Alternatively, you may submit a request in free form, provided that it includes the following information:

- Your full name;
- Personal identification number (if you have previously provided such an identifier);
- Address;
- Correspondence address;
- Description of the request;
- Preferred method for receiving a response and information.
- Signature;
- Date of submission;

**Step 2.** Please submit your request using one of the following methods:

- **By email** to [gdpr@santorelli.eu](mailto:gdpr@santorelli.eu) by the Electronic Document and Electronic Trust Services Act, the Electronic Governance Act, or the Electronic Identification Act (i.e., using an electronic signature, electronic identifier, or another approved method).
- **By post, courier, or in person** to the following address: Plovdiv Region, Sadovo Municipality, Katuvnitsa Village 4120, 8 Iskra Street. If the request is submitted by an authorized representative, a power of attorney must be attached.

**Step 3.** If you need assistance in completing the form provided by us, you may contact us using the contact details provided in this Privacy Policy.

Please note that the Controller may refuse, in whole or in part, to comply with any of the rights described above if doing so would create a risk to public order and security, the prevention, investigation, detection, or prosecution of criminal offenses, or the execution of imposed penalties, including the protection against and prevention of threats to public order and security, other important objectives of substantial public interest, and in particular important economic or financial interests, 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 also have the option to take the following actions:

#### **8. Lodging a complaint with the Commission for Personal Data Protection (CPDP)**

If you have any doubts or concerns that we are processing your data unlawfully, you may contact us using the contact details provided above. Every data subject has the right to lodge a complaint with the Commission for Personal Data Protection (CPDP) if they believe that the processing of personal data concerning them violates the provisions of the GDPR or the Personal Data Protection Act (PDPA). The data subject must notify the CPDP within 6 months of becoming aware of the violation, but no later than 2 years from the date it occurred, by submitting a complaint via letter, fax, or electronically in accordance with the Electronic Document and Electronic Trust Services Act.

#### **9. Complaining to the competent administrative court**

Without prejudice to your right to complain to the CPDP, as described in point 8, you also have the option to submit a complaint to the competent administrative court if you consider that your rights under the GDPR/PDPA have been violated as a result of the processing of your data.

#### **10. Right to compensation and liability for damages**

If you have suffered material or non-material damages as a result of a violation of the GDPR, you have the right to receive compensation from the controller for the damages incurred.

### **VI. Information regarding the supervisory authority**

Supervisory authority

The supervisory authority competent in the territory of the Republic of Bulgaria is the Commission for Personal Data Protection (CPDP).

Contact details for the Commission for Personal Data Protection:

Address: 2 Prof. Tsvetan Lazarov Blvd., Sofia 1592, Bulgaria

Email: [kzld@cpdp.bg](mailto:kzld@cpdp.bg)

Website: [www.cdpd.bg](http://www.cdpd.bg)

Information and contact center: +359 2 91-53-518

### **VII. DATA PROTECTION MEASURES**

In order to ensure the security of your personal data, a number of protection measures have been implemented, including:



- Integrated TLS certificate;
- All administrator accounts are protected with high-security passwords;
- Keeping operating systems up to date;
- Maintaining antivirus software up to date;
- Restricted access to data for personnel whose official duties require such access;
- Documented procedures for the processing of personal data of individuals, among others.

## VII. **FINAL PROVISIONS**

1. Taking into account current trends, this Privacy Policy may be subject to changes.

2. All amendments and additions to the Privacy Policy will apply after the updated content is published and accessible on our website. If the changes are significant, by 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 and last revised on 11.04.2018, we will notify you of such changes via a pop-up message on our website or by email to the address you have provided.

3. This Privacy Policy has been in effect since 01.04.2021.

**Date:** January 2025

**Approved by:**

(Michele Santorelli)