



CONCORD CAPITAL INTELLIGENCE

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Milton Keynes, United Kingdom

+44 75 8668 1267

Sofia, Bulgaria

+359 878 730 999

contact@concordcapitalintelligence.com

Data Protection and GDPR policy

Basic Information

We approach your personal data responsibly and, therefore, in accordance with the 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, which repeals Directive 95/46/EC (General Data Protection Regulation) (hereinafter referred to as "GDPR Regulation"), and Act No. 18/2018 Coll. on the Protection of Personal Data and on Amendments and Supplements to Certain Acts (hereinafter referred to as the "Act"), we provide you, as the data subject (a natural person whose personal data are being processed), on our website with not only our identification and contact details and the contact details of the data protection officer.

In accordance with Article 24 of the GDPR Regulation and Section 31 of the Act, the controller has adopted appropriate technical, organizational, personnel, and security measures and guarantees, which particularly take into account:

- The principles of personal data processing, which include lawfulness, fairness, and transparency, limitation and compatibility of the purposes of data processing, minimization of personal data, their pseudonymization and encryption, as well as integrity, confidentiality, and availability;
- The principles of necessity and proportionality (which also apply to the scope and amount of personal data processed, retention period, and access to personal data of the data subject) in relation to the purpose of the processing operation;
- The nature, scope, context, and purpose of the processing operation;
- The resilience and recovery of personal data processing systems;
- Training of the authorized persons of the controller;
- The adoption of measures for the immediate detection of any personal data breach and prompt notification to the supervisory authority and the responsible person;
- The adoption of measures to ensure the correction or deletion of incorrect data or the exercise of other rights of the data subject;
- Risks with varying likelihood and severity to the rights and freedoms of natural persons (especially the accidental or unlawful destruction of personal data, loss or alteration of personal data, misuse of personal data—unauthorized access or unauthorized disclosure, risk assessment considering the origin, nature, likelihood, and severity of the risk related to processing, and identification of best practices to mitigate the risk).



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Office for Personal Data Protection of the United Kingdom

Address:

21 Bloomsbury Street
London
WC1B 3HF
United Kingdom
Company Number: 12345678

Reception:

- Monday – Thursday: 8:00 AM - 3:00 PM
- Friday: 8:00 AM - 2:00 PM

Telephone consultations on personal data protection:

- Tuesday and Thursday from 8:00 AM to 12:00 PM
- Phone: +44 20 1234 5678

Office Secretariat:

- Chairman's Secretariat: +44 20 1234 5679
- General Secretariat: +44 20 1234 5680
- Fax: +44 20 1234 5681

Press Officer:

- Mobile: +44 7900 123456
- Email: press.officer@dataprotection.gov.uk

Email:

- General inquiries: general.inquiries@dataprotection.gov.uk
- For information provision under the Freedom of Information Act 2000: info@dataprotection.gov.uk
- Website-related inquiries: webmaster@dataprotection.gov.uk
- To submit requests for information under the Freedom of Information Act 2000, please use the online form.
- Email address for personal data protection advice: This is intended for children, young people, students, teachers, and parents who suspect their personal data has been misused: protection@dataprotection.gov.uk



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Information on the Purpose of Processing and Retention Period of Personal Data

One of the principles of personal data processing is the principle of purpose limitation. According to this principle, personal data may only be collected for a specific, explicitly stated, and legitimate purpose and must not be further processed in a way that is incompatible with that purpose.

The processing of personal data should be closely linked to the purpose of processing the data, particularly regarding the list or scope of personal data processed, which should be necessary to achieve the intended purpose. It is not appropriate to artificially or subsequently expand the list or scope of personal data concerning the purpose. If the purpose and list or scope of personal data are established by law, they must be respected. If the controller determines the list or scope of personal data, they should ensure not to unnecessarily expand it beyond the intended purpose.

The Personal Data Protection Act obliges the controller to provide the data subject with information about the purpose of processing personal data for which their personal data is intended, even when the personal data is not collected directly from the data subject. It is necessary for this information to be provided to the data subject no later than at the time of collecting their personal data, or within a sufficient time frame, clearly and understandably, in a way that the data subject can truly understand and comprehend.

Therefore, we process your personal data for the purpose of providing private financial services.

Retention period of personal data or information on the criteria for determining it:

Personal data will be retained for the duration of the purpose and subsequently for archiving purposes for the period specified in the controller's records management plan. The data will be archived for the period required and specified in the relevant legal regulations and according to general statutory limitation periods.



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Rights of the Data Subject

Under the Data Protection Act 2018 and the UK General Data Protection Regulation (UK GDPR), you as a data subject have the following rights:

a) Right of Access:

This right allows you to:

- Obtain confirmation from the Controller (organization processing the data) whether your personal data is being processed.
- If your personal data is being processed, you have the right to access that personal data and obtain the following information:
 - The purposes of the processing;
 - The categories of personal data concerned;
 - The recipients or categories of recipients to whom the personal data have been or will be disclosed, especially if these recipients are in third countries or international organizations;
 - Where possible, the expected period for which the personal data will be stored, or, if not possible, the criteria used to determine that period;
 - The existence of the right to request from the Controller the rectification or erasure of personal data or restriction of processing of personal data concerning you, or to object to such processing;
 - The right to lodge a complaint with a supervisory authority;
 - Where the personal data is not collected from you, any available information regarding their source;
 - The existence of automated decision-making, including profiling, and, at least in those cases, meaningful information about the logic involved, as well as the significance and the envisaged consequences of such processing for you.

You also have the right to be informed about appropriate safeguards under Article 46 of the UK GDPR relating to the transfer of personal data to a third country or international organization.

You have the right to obtain a copy of the personal data undergoing processing. However, this right to obtain a copy should not adversely affect the rights and freedoms of others.

b) Right to Rectification:

This right entitles you to have inaccurate personal data corrected or to have incomplete personal data completed by the Controller without undue delay.



c) Right to Erasure (“Right to be Forgotten”):

This right allows you to have the Controller erase your personal data without undue delay if:

- The personal data is no longer necessary in relation to the purposes for which it was collected or otherwise processed;
- You withdraw consent on which the processing is based, and where there is no other legal ground for the processing;
- You object to the processing and there are no overriding legitimate grounds for the processing;
- The personal data has been unlawfully processed;
- The personal data has to be erased to comply with a legal obligation;
- The personal data has been collected in relation to the offer of information society services to a child.

d) Right to Restrict Processing:

This right allows you to obtain from the Controller a restriction of processing where one of the following applies:

- You contest the accuracy of the personal data, for a period enabling the Controller to verify the accuracy of the personal data;
- The processing is unlawful, and you oppose the erasure of the personal data and request the restriction of its use instead;
- The Controller no longer needs the personal data for the purposes of processing, but you require them for the establishment, exercise, or defence of legal claims;
- You have objected to processing pending the verification of whether the legitimate grounds of the Controller override yours.

e) Right to Data Portability:

This right allows you to receive the personal data concerning you, which you have provided to a Controller, in a structured, commonly used, and machine-readable format, and have the right to transmit those data to another Controller without hindrance from the Controller to which the personal data has been provided, where:

- The processing is based on consent or on a contract, and
- The processing is carried out by automated means.

f) Right to Object:

This right allows you to object, on grounds relating to your particular situation, at any time to processing of personal data concerning you, including profiling, based on public interest or legitimate interest. The Controller shall no longer process the personal data unless it demonstrates compelling legitimate grounds for the processing which override your interests, rights, and freedoms, or for the establishment, exercise, or defence of legal claims.



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You also have the right to object at any time to the processing of personal data concerning you for direct marketing purposes, including profiling to the extent that it is related to such direct marketing.

g) Rights Related to Automated Decision-Making and Profiling:

You have the right not to be subject to a decision based solely on automated processing, including profiling, which produces legal effects concerning you or similarly significantly affects you, unless the decision:

- Is necessary for entering into, or performance of, a contract between you and the Controller;
- Is authorized by Union or Member State law to which the Controller is subject and which also lays down suitable measures to safeguard your rights and freedoms and legitimate interests;
- Is based on your explicit consent.

h) Right to Lodge a Complaint:

If you believe that your personal data is being unlawfully processed or has been misused, you have the right to lodge a complaint with the Information Commissioner's Office (ICO). Complaints can be made in writing, in person, electronically (must be signed with a certified electronic signature), via telegraph, or fax, which must be supplemented in writing or orally within three days.

The complaint must include:

- Your name, address, and signature;
- The entity against which the complaint is directed, including name, address, and identifying information;
- The subject of the complaint, specifying which rights you believe have been violated in the processing of personal data;
- Evidence to support the claims made in the complaint;
- A copy of the document proving the exercise of rights if applicable or stating reasons deserving special attention.

The ICO will decide on the complaint within a period of up to 60 days from the start of proceedings. In justified cases, this period may be extended by up to six months. The ICO will inform the parties in writing of any extension.

A template for lodging a complaint can be found on the ICO's website.