

PRIVACY POLICY

IndustryInform

I. Introduction

Welcome to **IndustryInform!** The website is operated by Mozaika EOOD, a company registered with the Bulgarian Commercial Register under Unified Identification Code (UIC) 201669220, having its registered office at 52 Solunska Str., Sofia, Bulgaria ("**Mozaika**").

We at Mozaika are committed to protecting your personal data and respecting your privacy. We collect and further process personal data pursuant to <u>Regulation (EU) 2016/679</u> 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 ("GDPR") and the Bulgarian Act on the Protection of Personal Data.

In this privacy policy, we explain how we collect, use, share, retain and transfer the personal data you provide us when you use IndustryInform (our "service"). We also let you know your rights.

II. Which personal data do we process?

"Personal data" means any information relating to an identified or identifiable natural person; an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.

Upon registration with IndustryInform, we collect and process the following categories of personal data:

Mandatory (marked with an asterisk (*); required for website registration);

- Email address;
- First and last name.

Optional (not required for website registration; may be used for the purposes of further communication and for sending messages and information and/or calls related to our products and services, surveys, studies, initiatives, or other promotional communications):

- Job title and company (the information regarding your job title and company may be processed for the purpose of providing personalized advertisements for products and services based on the industry in which you operate. For more information on personalized advertising, see Section III, point (c).;
- Phone number.

We also process financial data of registered users of the website (including data on completed payments and issued accounting/tax documents; name, phone number, and postal address of the payer). The data is provided by registered users when paying for their selected subscription plan.



When you visit our website (regardless of whether you are a registered user), we automatically collect usage data, which may include information such as your device's IP address, browser type and version, visited pages, date and time of visit, duration of stay, unique device identifiers, and other diagnostic data.

We also use cookies and other tracking technologies to track activity in connection with the use of our service and retain certain information through them. For more information regarding cookies, see Section IX below.

Separately, for the purposes of providing our services related to access to company profiles and the preparation of reports, we also collect personal data from information databases based on publicly available data from the Bulgarian Registry Agency. These personal data include the names of owners/shareholders and legal representatives of commercial entities, to the extent that such data are publicly available in the registers maintained by the Registry Agency.

III. How and why do we process your personal data?

We process your personal data only when we have a valid lawful basis under GDPR. In practical terms, we use your data mainly for the following purposes:

(a) To create and administer your IndustryInform account.

When you register, we use your account credentials to open, maintain and secure your account and enable log-in. The legal basis is **performance of a contract** (Art. 6 (1)(b) GDPR). Without this data, we cannot provide you with an account, and you cannot take advantage of our search services, order reports or use any of the other available IndustryInform services.

(b) To process orders, deliver digital content and issue invoices.

We use financial data to fulfil the purchases of registered users and generate invoices. The legal bases are **performance of a contract** (Art. 6 (1)(b)) GDPR and **legal obligation** to keep accounting records (Art. 6 (1)(c) GDPR, in conjunction with Bulgarian tax legislation). Failure to provide these data would prevent us from completing the transaction.

(c) To send newsletters and messages and information about our products and services.

We use your email address and phone number (if you have agreed to provide your phone number as part of the optional registration information) for the purposes of sending general and non-personalized newsletters and messages and information and/or making calls related to our products and services, surveys, research, initiatives, or other promotional communications. The legal basis for this type of data processing is our **legitimate interest** (Art. 6(1)(f) GDPR).

We use your email address, phone number, and information about your job title and company to send personalized newsletters and messages and information and/or make calls related to our products and services, surveys, research, initiatives, or other personalized promotional communications. The legal basis for this processing is your **consent** (Art. 6(1)(a) GDPR). You may withdraw your consent at any time with effect for the future by emailing: <u>info@industryinform.com</u>. The provision of your personal data for this purpose is neither a legal nor contractual requirement.



However, without processing your personal data, we will be unable to send you our personalized marketing information.

(d) To provide customer and technical support.

When you contact us, we process the information you supply (support correspondence) to respond and resolve issues. The legal basis is our **legitimate interest** (Art. 6 (1)(f) GDPR) to ensure the proper functioning of our services and maintain user satisfaction.

(e) To compile and publish company profiles and sectoral intelligence.

We use corporate information—such as the names of owners, shareholders and executive directors—available in the Bulgarian Commercial Register and other official public registers in order to verify, enrich and keep up-to-date the company profiles and sector reports we provide to our registered users. The legal basis for processing is our **legitimate interest** (Art. 6 (1)(f) GDPR) in offering accurate and reliable business intelligence using data that are already lawfully in the public domain.

(f) To measure and improve the website's performance

We collect certain online identifiers that your browser necessarily transmits—most notably your IP (Internet-Protocol) address and user-agent string—to deliver the webpages you request, balance traffic, and diagnose errors. We also analyse aggregated usage data to understand how visitors interact with our content, detect broken links and plan future features. Where we use **strictly necessary cookies** or server logs, the legal basis is our **legitimate interest** (Art. 6 (1)(f) GDPR). For any analytics cookies that are not strictly necessary, we rely on your **consent** (Art. 6 (1)(a) GDPR). See more information regarding data from cookies in Section IX below.

IV. How long do we keep your personal data?

We store the data for as long as necessary for the purposes set out in this Privacy Policy, and only to the extent necessary to provide the IndustryInform services. For example, to send you non-personalized newsletters, we process your data until you unsubscribe from receiving the newsletters. With regard to personalized newsletters, we process your data until you withdraw your consent to receive them. Financial data is stored in accordance with the statutory requirements under the applicable Bulgarian law.

We also retain usage data for internal analysis. Usage data is generally retained for a shorter period of time except where this data is used to improve the security or functionality of our service or we are required by law to retain this data for a longer period, but in any event not more than 3 years.

V. With whom do we share your personal data?

We process and store your personal data in Bulgaria. Your personal data is processed by our employees, contractors or personal data processors, including in particular cloud service providers in the areas of hosting, file storage, and eMail services.



We take all reasonable steps to ensure the security of your data. We do not transfer your data to third parties unless adequate controls are in place, including the security of your personal data and other information.

In certain circumstances, we may need to disclose your information if required to do so by law or in response to lawful requests from government authorities (such as a court or government agency).

VI. Transfer of personal data to a third country

We do not transfer your personal data outside the European Union.

VII. What are your rights?

As a data subject, you have the following rights:

- **Right to be informed** you have the right to know what data will be processed for what purposes and on what basis.
- **Right of access** You have the right to access your personal data and details of how we process it.
- **Right to rectification** If the data we hold are inaccurate or incomplete, you may ask us to correct or update them
- Right to erasure ("right to be forgotten") You may request that we delete your personal
 data when, for example, the data are no longer necessary for the purposes for which they
 were collected, you have withdrawn consent, or you have successfully exercised your right to
 object (below). This right is not absolute; for instance we may need to retain certain records
 to comply with legal obligations.
- **Right to restriction of processing** You may ask us to restrict (i.e., store but not otherwise process) your personal data while we investigate: (i) its accuracy; (ii) the basis for an objection you have raised; or (iii) where you need the data for the establishment, exercise or defence of legal claims.
- **Right of data portability** When processing is based on your consent or on a contract and carried out by automated means, you can request that we provide the personal data you supplied to us in a structured, commonly used and machine-readable format, or (where technically feasible) transfer it directly to another controller.
- **Right to object** You may object at any time to processing that we base on legitimate interest. We will cease such processing unless we demonstrate compelling legitimate grounds which override your interests, rights and freedoms, or where the processing is required for the establishment, exercise or defence of legal claims
- **Right to withdraw your consent** Where we rely on your consent, you can withdraw it at any time; doing so will not affect the lawfulness of processing carried out before withdrawal.
- Right to lodge a complaint to a supervisory authority You can lodge a complaint to the
 Personal Data Protection Commission, which is the supervisory authority in the Republic of
 Bulgaria responsible for the implementation of the Personal Data Protection Act and the
 General Data Protection Regulation, at: Sofia 1592, 2 Prof. Tsvetan Lazarov Blvd., email:
 kzld@cpdp.bg, website: cpdp.bg.

A detailed overview of all of your rights is available under Chapter III of the GDPR.

VIII. Is automated decision-making, including profiling, taking place?

Automated decisions are defined as decisions for individuals that are based solely on the automated processing of data and that produce legal effects that significantly affect the individuals concerned.

We do not use automated decision making.

IX. Data from tracking cookies

Cookies are small data files that may include an anonymous unique identifier. Cookies are sent to your browser by a website and stored on your device. Other tracking technologies, such as beacons, tags, and scripts, are also used to collect and track information and to improve and analyze our

website.

You can instruct your browser to refuse all cookies or to specify when a cookie should be sent.

However, if you do not accept cookies, you may not be able to use some parts of our service.

Examples of cookies we use:

• Session cookies. We use session cookies for the purposes of operating our service.

• Preference cookies. We use preference cookies to remember your preferences and

settings.

• Security cookies. We use security cookies for the purposes of ensuring the security of

the service.

Regarding the cookies we use to collect information, all popular browsers allow you to change your cookie settings and disable cookies. You can usually find these settings in your browser's "options" or

"preferences" menu.

X. **Changes to our Privacy Policy**

This Privacy Policy is valid as of July 1st 2025. We may update our Privacy Policy from time to time,

with the Privacy Policy being current as of the date indicated in this section X.

We encourage you to review this Privacy Policy periodically for changes. Changes to this Privacy

Policy will be effective when posted on this page.

XI. How to contact us?

Mariana Damova, PhD

e-mail: info@industryinform.com

00359885796530

Address: Solunska 52, Sofia 1000, Bulgaria