Privacy policy related to the processing of personal data on www.eshopwedrop.bg (the "Privacy Policy")

Within Eshopwedrop ("ESWD") network, we respect your privacy. This Privacy Policy describes the types of personal information we collect about customers, how we may use the information, with whom we may share it, the measures we take to safeguard personal information, how we handle your rights to your personal data, when you ask us to (i) access or change the personal information we keep about you, (ii) withdraw consent you previously provided to us, (iii) restrict the processing we carry on your data, (iv) refrain from sending you certain communications, (v) ensure the portability of your personal data, or (vi) deletion of your personal data, and (vii) answer questions you may have about our privacy practices.

This Privacy Policy explains how our ESWD platform (operating under a service franchise model), hereinafter referred to as "we", "ESWD", "our" or "us", processes the personal data of the Users ("Users", "you", "your") visiting and accessing the website www.eshopwedrop.bg (the "Website"), respectively purchasing and using the Services available through the Website (the "Customers").

Unless otherwise defined herein, the terms used in capital letters shall have the meaning assigned to them under the *GENERAL TERMS AND CONDITIONS AND SPECIFIC ON-LINE SALE SERVICES TERMS*, available here (the "T&C").

Controller of your personal data (determines the purposes and means of the processing of personal data)	EshopWedrop.com Holding Ltd. (a company incorporated in the Republic of Malta, Registration number C 71443, Headquarters: BS Building, Mosta Road, Lija, LJA 9012), the owner of the Eshopwedrop franchise business, as well as of the Eshopwedrop platform, is herein acting as the <i>Controller</i> of your personal data. EshopWedrop.com Holding Ltd. has appointed, as franchisee for Bulgarua, the company <u>EshopWedrop.ro SRL</u> (a company organised and functioning under the laws of Romania, having its headquarters at 111- 115 Timisoara street, sector 6, postal code 061327, Romania, registered with the Trade Registry under no. J40/809/2011, sole registration code RO27953254). EshopWedrop.ro SRL, as the Services Provider (according to the T&C), herein acting as the <i>Processor</i> of your personal data, has been entrusted by EshopWedrop.com Holding Ltd. with operating the Website and providing the Services traded through the Website (the " E-Shop "), using the ESWD platform, under the strict instructions of the Controller. Through the Website / the E-Shop, the Service Provider addresses the Users and is mandated by the Customers to perform the Services in accordance with the T&C. When accessing the ESWD platform and the IT system, and when ensuring their development, functioning and performance, as well as the development of the franchise network under its brand-name and trademarks, the Franchisor accesses and processes your personal data, acting in its turn as controller of your personal data.
Purpose of the Privacy Policy	The Controller hereby informs the Users/Customers, as personal data subjects, with regard to the processing by the Controller (including collection, sharing, retention) of the Users'/Customers' personal data, upon the Users'/Customers'

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	using the Website/E-Shop and through the ES the Customers are acquiring and benefiting Service Provider. This Privacy Policy shall accor processing performed by the Service Provider, and, if the case, use the Website for ordering Service	of the Services provided by the dingly apply to the personal data when the Users/ Cutomers access
What is personal data	Any data or information that helps us to identify the data subjects (the Users/Customers). Some data allows us to directly identify the data subjects (<i>e.g.</i> your name and surname), while other information are less obvious (<i>e.g.</i> the IP of the device you use for surfing on the Website, the MAC address of your computer or mobile phone), but when associated with other elements, help us identify the data subjects and are therefore treated as personal data. We do not collect and/or process in any way special categories of data (<i>e.g.</i> data about health, unique identification numbers, biometric data, etc.). We deliberately do neither request, collect, nor process personal data of minors. Should we identify that such personal data of minors has been accidentally collected/procesed, such data will be immediately deleted.	
Data subjects categories (to whome does the personal data belong to)	<u>User</u> , <i>i.e.</i> any natural person of at least 18 years that intentionally reaches and benefits of the Website, irrespective of having the intention to set-up the Account and (or) to place an Order and (or) to benefit from the Website in any other way, as the case may be; <u>Customer</u> , <i>i.e.</i> any User (natural person of at least 18 years old / legal entity organized and existing according to the laws of its home country) who (a) registered with the Website; and (b) placed an Order and entered into a Distance Contract according to the T&C. <u>Representatives</u> of Users/Customers - legal entities; and <u>Persons' authorized</u> to pick-up/receive/hand over Parcels, in the name and on behalf of the Customer.	
How do we process your personal data?	What personal data of the data subject we collect and how do we process it? (information we obtain)	
Personal de	ata provided directly by the data subject / collect	ed automatically
Setting-up the Customer Account	 First stage: e-mail <u>Second stage:</u> name and surname phone number email preferred language ESWD Customer Code/Client ID (<i>i.e.</i> the unique customer code attributed to the User upon setting-up the Account) Setting-up an Account on the Website is a prerequisite for ordering Services through the 	Performance of a contract to which the data subject is party <u>or</u> in order to take steps at the request of the data subject prior to entering into a contract

Performance of the distance contract with respect to a Parcel / Returned Parcel (including ensuring exercise of the Customer's right of	Upon acceptance of the Parcel / Returned Parcel by the Service Provider at the Origin Warehouse / Destination Warehouse and notification to Customer of Order acceptance, in the ESWD platform the following personal data is processed:	contract
Placing Orders for Services / Return Mandate Services and conclusion of distance contracts for Services / Return Mandate Services	 Upon arrival of a Parcel at the Origin Warehouse / arrival of a Returned Parcel at the Destination Warehouse, the following data is processed in the ESWD platform: ESWD Customer Code; name and surname; email; telephone number. 	
	 personal data indicated as mandatory leads to the impossibility to become a User entitled to place orders for Services in the E-Shop. <u>Optional data in the Account</u>: gender fields of interests. The same data is collected when the data subject acts as representative of a legal entity, who intends to place orders in the name of such legal entity he/she is mandated to represent when ordering Services; additionally, the name, surname an position of the contact person acting on behalf of the legal entity for the performance of the contrct for Services is also provided by the data subject. The User's email address is processed when they receive confirmation on the set-up of their Account. E-mail of User is also processed when they receive e-mails as a reminder for their further input for completing Account set-up, in order to be able to place orders. 	
	E-Shop. Such mandatory data is needed for us to undertake mandates for delivering the Services. Data subject's refusal to provide the personal data indicated as mandatory leads to	

withdrawal)		
withdrawary	• ESIMD Customer Code:	
	 ESWD Customer Code; name and surname; 	
	 name and surname; amails 	
	• email;	
	telephone number.	
	The same personal data is processed upon performance of the further actions for	
	completing an express mandate given by the	
	Customer under a specific Order:	
	 Customer under a specific Order: storage of the Parcel / Returned Parcel in the Origin Warehouse / Destination Warehouse; re-packaging of Parcels / Returned Parcels, according to the T&C customs formalities in the name and on behalf of the Customer (if the case, according to the applicable laws) – additional data may be processed: <i>i.e.</i> order, invoice for the Product, personal statement regarding contents of Parcel, signature, correspondence for the execution of the customs special mandate; road transportation of the Parcel / Returned Parcel; storage of the Parcel / Returned Parcel in 	
	 storage of the Parcel / Returned Parcel in the Destination Warehouse / Origin Warehouse; informing the Customer (by e-mail and/or 	
	in his/her Account) about the Parcel / Returned status: in Origin Warehouse / in Destination Warehouse, in Transit, in	
	Intermediary Warehouse, in Destination Warehouse / in Origin Warehouse, in	
	Consolidation/ to be picked-up by the	
	Customer, Picked-up by the Customer, in	
	Consolidation /to be delivered to Courier,	
	Picked-up by Courier, in Consolidation/to be delivered to Click-and-Collect	
	point/picked up by the	
	Customer/Customer's representative;	
	• issuing the invoices for the tariffs for	
	Services / Return Mandate Services and for	
	any other applicabile tarrif (e.g. customs	
	clearance).	

	Personal data regarding payment transactions (<i>e.g.</i> details of cards) are not available / kept in the ESWD platform. The Customer's IBAN may be requested in the ESWD platform in exceptional cases (<i>i.e.</i> the Customer exercised their right to withdrawal and they must be reimbursed for the amounts already paid, an Order is cancelled after the due amounts have been paid by the Customer); nevertheless, such data is not kept in the ESWD platform, such details are deleted as soon as the reimbursement is operated.	
Customer care services	For ensuring customer care services with regard to your Account / Order for Services /	
	Return Mandate Services, the following data is	
	processed, mainly for identification of the Customer:	
	 name and surname; a mail address; 	
	e-mail address;phone number;	
	ESWD Customer Code.	
	We may process, as per your prior specific consent, your voice in the phone discussions we have, in order to grant you support as per your request.	
	We may process the same data for solving the claims you make with respect to our Services / Return Mandate Services.	
	Return Manuale Services.	
Handing-over the Parcel / Returned Parcel to the	Upon handing over of the Parcel / Returned Parcel to the Customer/Customer's authorised	
Customer/Customer's	representative, the following personal data is	
representative/authorised person	processed:	Our legitimate interest of preventing potential fraudulent
P	 name and surname; 	actions
	telephone number; ESWD Customer Code:	The Customer may oppose at
	ESWD Customer Code;delivery address (if the case).	any time to the processing of such data, by sending an e-mail
		to the following address
	Upon handing over of the Parcel / Returned Parcel to the Customer/Customer's authorised	
	representative, the Customer/Customer's	-
	representative may be asked to present valid	· ·

	identification documents (they can be asked to show ID exclusively for identity validation, in order to avoid fraud, no copies or pictures of such ID papers are to be kept/stored upon actual receipt of the Parcel / Returned Parcel). Validation of the Customer's/Customer's authorised representative's identity is required also to prevent money laundering and terrorism financing, according to the relevant laws. The same personal data of the Customer/Customer's authorised representative is processed in the paper documentation kept by the last mile delivery service provider, upon the instructions of the Servive Provider.	platform, in accordance with the legal provisions.
General commercial communications (weekely newsletters)	Sending to Users/Customers general e-mail communications (newsletters) regarding Eshopwedrop Services.	
Reminders on status of Customer Account	Sending to the Customer reminders by e-mail on the status of their Account (<i>e.g.</i> no ordering activity in the last 1 month), regarding similar Eshopwedrop Services available for ordering by the Customer on the Website, in the context where the Customer has already ordered Services and gave its e-mail address to us to this end.	The Customer may oppose at any time to receiving such e- mails, by CLICKING ON THE UNSCRIBE LINK YOU SHOULD GIVE AT THE END OF EVERY
Vouchers	The Customer may receive vouchers (discounts / benefits) for their loyalty. Such vouchers shall be visible in the Customer's Account.	
Unilateral termination of a distance contract	The e-mail address/any other address of a Customer infringing the distance contract (<i>e.g.</i> the Parcel does not meet the mandatory elements as per the T&C), may be processed	contract

	for sending them a notification of termination	
	of the distance contract for Customers' fault.	
Indemnification of the	The following data is processed when	
Customer as per CRM or	indemnifying the Customer based on CRM	contract
contractual guarantee	rules or on contractual guarantee service:	
service	 name and surname; 	
	telephone number; ECIMID Customer Codes	
	ESWD Customer Code; imusical attraction, the Customer housing	
	 invoice attesting the Customer having purchased the Product; 	
	 bank statement confirming the amount 	
	paid by the Customer / online order placed	
	for the Product.	
	No financial data of the Customer (<i>e.g.</i> IBAN	
	code) is kept in the ESWD platform.	
Commercial	Based on the social interests you choose to	Your prior consent
communication based on	share with us by personalizing your Account	
customer segmentation	(<i>e.g.</i> hoobies, age, other personal interests,	
(profiling)	etc.), we may prepare and send to you	Offers through the
	(including by using third party partners	communication channels
	specialized in such processes), on your e-mail,	preferred by the Customers (e-
	customized offers regarding Services that we	mail, sms).
	may render in connection with	
	products/services you may be interested in,	-
	including shopping tips ("Customized Offers"),	
	based on the segments/customers profiles we	
	create and in which we place you to this end.	•
	However, we shall send such Customized	
	Offers only following your specific consent to this end.	marketing purposes, by CLICKING ON THE UNSCRIBE
	this end.	LINK YOU SHOULD GIVE AT THE
	We may use such segmentation to send to you	
	surveys asking for your feedback regarding	
	various interractions you've with us, aimed at	
	improving our Services.	
	We may generate such segments based also	Our legitimate interest of
	on combining the information you choose to	aiming to constantly improve
	share with us in your Account, with the cookies	-
	placed according to our Cookies Policy	answers to our surveys.
	available on the Website.	
		You can oppose to receving
		communication for taking part
		to such surveys, by CLICKING
		ON THE UNSCRIBE LINK YOU
		SHOULD GIVE AT THE END OF

		EVERY SUCH EMAIL, on grounds relating to your particular situation. The Customer's data will no longer be processed for this purpose in the ESWD platform, in accordance with the legal provisions.
Audit and reporting	We may process personal data of our Customers for annual financial audit, reporting and other fiscal obligations (if the case). We also process personal data in the ESWD platform for generating reports aimed at improving our franchise business model.	When required under the law, for meeting specific tax obligations.
Protecting our rights in the court of law / arbitration court	When we protect our rights in a court of law / arbitration court (<i>e.g.</i> for recovering bad debts), or protect our intersts against ungrounded claims, we shall process Users'/Customers' data necessary as per the legal provisions, to prepare and sustain our legal actions.	protecting/enforcing our rights and defending us against claims
Procedures and investigations carried out by official authorities	Strictly in accordance with the law, in exceptional situations, we may provide to the competent authorities, during official proceedings/investigations or other procedures under the law, the following personal data: name and surname, address, e-mail, telephone number, Parcel details (<i>e.g.</i> investigations regarding contents of Parcel), banking details in our possession (<i>e.g.</i> case of suspicion of fraud).	
Cookies Different actions of the	Please refer to our Cookies Policies for details regarding the use of Cookies on the Website, along with the mechanisms under which you can take action regarding the Cookies.	.,
User / Customer on the Website		

	In case the User/Customer sends any other personal data, along with the review, upon their own initiative and will, we will immediately delete such personal data and will not in any way store it with us. The social media platform receives information about your account logging to our page on the social media platform.	
Find us on Facebook, Google Plus, Twitter, YouTube, Pinterest, Linkedin	If you are registered with your account on any social media platform and click the relevant pictogram, you will be directed to our profile on the respective social media platform. We do not collect / store in this process your profile on such social media platforms, or any other personal data belonging to you. The social media platform receives information about your account logging to our page on the social media platform.	
Register for our Newsletter	In case a User gives us their consent for receiving our general commercial communication newsletter, we process only the User's e-mail for sending them the general newsletter.	User's prior consent User can withdraw consent at any time, by accessing the Unscribe link shown in every newsletter.
Contact us	Any User can contact us with any query on our services, by sending a message on the Contact field; we collect their name, email address, the telephone number, their message. We keep this data exclusively for responding to the User and do not use the personal data for any other purpose. Personal data collected via "Contact Us" are deleted within maximum 6 months, unless we keep them for legal grounds.	online business
Website maintenance and security	 We use the following online identifiers for ensuring security of the Website: User IP address; MAC address; Internet browser and version of operating system of the deivce used for accessing the Website; HHTP/HTTPS protocol data; Location of the device (only if the geo- 	

	location function of the device is activated and only as consequence of such function incorporated in the device) used for accessing the Website.
	 More precisely, we process this data for (i) ensuring a better functioning of the Website, respectively for: accurate publishing of the contents of the Website; retention of the authentification details (upon the User's request); improving the Website; parametring the device to the requirements of the Website; and for (ii) ensuring the security of the Website and its protection against fraud or other IT security
	breach with respect to the Website / E-Shop and for (iii) identifying and remedying the deficiencies preventing the use of the Website or of the Account.
	When involved in correspondence with our Users/Customers, or when performing our obligations and responsabilities as per the distance contract with customers, the recipients of personal data may be even the data subjects of that data.
Recipients of the data	ESWD companies (members of our network) effectively involved in the performance of the Customer's distance contract for Services / Return Mandate Services, including in the business processes and operation of the IT systems supporting the ESWD platform and the operation of the franchise business. We share only the data necessary for carrying out the operations needed to ensure the delivery of the Services / Return Mandate Services, <i>i.e.</i> the Service Provider, franchise owner, Origin Country warehouse entity, logistic companies, land transportation company, destination warehouse company, last mile delivery services providers.
	We may share such data with third party contractors (non-members of our franchise) for the performance of the contract for Services / Return Mandate Services (<i>e.g.</i> Mailchimp, Facebook, Google).
	We use specific and strict rules when selecting our partners/third party contractors, in terms of protection of personal data and compliance with data privacy rules, including GDPR rules.
	In exceptional cases where relevant authorities (<i>e.g.</i> customs, police) request, in accordance with the legal provisions, to have access to data for carrying out

	 public tasks in accordance with their powers, we may share data in official investigations on fraud or other suspicious conducts. We may also present personal data in the court of law, when defending our cause. If we undergo a reorganization or a purchase/sale procedure, we may share your data with third parties participant to such procedures (including to auditors, consultants), during audits performed on our activity / business / companies. We will ensure such third parties undertake obligations for keeping secure and for implementing necessary measures to ensure security of data.
	Users'/Customers' personal data (including history of orders) shall be kept in the IT system for 3 (three) years since the last Order for Services/Return Mandate Services placed on the Website (but in any case no longer than necessary). After that term, personal data mandatory to be kept for longer periods (<i>e.g.</i> financial documents, invoices) shall be kept securely in accordance with the relevant legal provisions.
	Accounts that are not used for a 12-month period, are to be de-activated and corresponding personal data is to be deleted / anonymized (so as the data subject can no longer be identified), unless we are obliged by law or our legitimate interest to do otherwise. We shall notify the User/Customer in advance on the de-activation of the Account.
Retention of data	Accounts where registration was not completed (only first step was completed) are to be deleted after 6 (six) months, if the User has not completed the second step of the registration, even after receiving 3, (three) iterations of completing the Account.
	As regards the data used upon the prior consent of the data subject, we will process this data for that purpose only until the User/Customer withdraws their consent, unless we are obliged to keep such data for a longer period, according to the law, for enquiries made by relevant authorities or in order to defend our rights.
	*Consent – means the free, specific, informed agreement of the User/Customer, where they undoubtedly accept for their data to be processed by us for the specific purpose they are consenting to.
Security	 We ensure the tehnical and organizational measures necessary to collect, process and keep the personal data securely, including against un-authorised access and use of data. Such measures are at least: administrative and organizational measures to ensure confidentiality by the persons effectively accessing the data; flows and operational procedures for ensuring data subjects' exercise of
	 rights; security of data hosting environments; ensuring by reasonable measures that our partners/subcontractors define and implement adequate security with regard to personal data we

	share.
Transfer of data to third countries	Currently, our data are kept within locations in EU countries. In case the transfer of Users/Customers data to ESWD units / subcontractors / partners in non-EES countries is necessary (<i>the EES countries being the UE countries, plus Switzerland,</i> <i>lceland, Liechtenstein and Norway – considered to have equivalent laws with</i> <i>respect to privacy law</i>), in cases where the place for storing our data or the location of our ESWD units / subcontractors / partners is outside SEE. Should the data reach such non-SEE countries, we shall always ensure that a proper legal contract covering such transfer is in place, in accordance with the standards adopted by the European Commission to this end. Nevertheless, should such a third party does not have laws equivalent to the UE data protection standards, we shall ask such third party recipient to enter into a binding agreement reflecting these standards.
Data subject's rights	 In order to make sure that each User/Customer is in control of their personal data, we ensure that each data subject enjoys the following possibilities, based on available technologies: They may operate their Account and amend / delete / edit data; They may operate their Account and amend / delete / edit data; They may delete cookies from their browser; The social media platforms offer mechanisms where the User/Customer may choose their options regarding sharing data with other sites. Also, in your capacity as data subject, according to Regulation EU 2016/679, the Users/Customers enjoy the rights detailed below (Users/Customers may be asked to prove their identity and quality as Account holder, in order for their requests be analysed). We shall try to answer to requests without delay and no later than 30 days (or in another reasonable term, as per the Regulation). Right to be informed. The User has the right to receive clear, transparent, easy to understand and access, information, with respect to the manner in which we process their personal data, including details about their rights as data subject. This information is presented in this Privacy Policy. Right to access their personal data. The User/Customer is entitled to access their data we process about them; we will not charge for initial requests. If the User/Customer requests copies of the data already provided, we may charge a reasonable fee, considering the administrative costs associated with the provision of such data. We reserve the right to refuse excessive and/or repeated requests. The request for access right must be sent by the User/Customer at: E-mail: info@eshopwedrop.bg Right to object to direct marketing. The User/Customer may object at any time and un-scribe from our direct marketing materials. They may do this only by clicking the un-scribe me link provided in each such communication we sent to them

the processing based on consent, before the withdrawal taking place.
Right to object based on legitimate interest. The User/Customer may oppose at
any time to any processing based on our legitimate interest. Under the section "Legal grounds" of the table, you may identify easily the cases in which we
process personal data based on our legitimate interest. The User/Customer may
exercise their right to object by sending a written request to
info@eshopwedrop.bg
<i>Right to erasure (right to be forgotten).</i> The User/Customer is entitled to request
the deletion of their rights in any of the following situations: (a) personal data is
no longer necessary for accomplishing the purposes for which it has been
processed, (b) User/Customer withdraws consent where processing has been
based on consent, and we do not have other legal ground for continuing the
processing, (c) the User/Customer objects to processing for direct marketing
(including to profiling for direct marketing, if the case), (d) the User/Customer
objects to processing based on our legitimate interest and we cannot show a reason for which our legitimate interest prevails over their interests, rights and
freedoms, (f) personal data is processed contrary to the law; (g) personal data
must be deleted in order to comply with legal provisions.
Right to erasure is not an absolute right. We may deny the request if (i) we are
obliged by a legal provision to keep the data; or (ii) the data is necessary for
attesting, exercising or protecting our rights in a court of law.
The User/Customer may request deletion of data by sending their request by e-
mail at info@eshopwedrop.bg.
Right to ask for restriction of the processing. The User has the right to obtain from
us the restriction of processing in any of the situations below:
Dreptul de a restricționa prelucrarea. Utilizatorul are dreptul de a obține din partea noastră restricționarea prelucrării datelor sale în una din situațiile descrise
mai jos:
(a) 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;
(b) the processing is unlawful and the data subject opposes the erasure of the
personal data and requests the restriction of their use instead;
(c) we no longer need the personal data for the purposes of the processing, but it
is required by the data subject for the establishment, exercise or defence of legal
claims; (d) the data subject has objected to processing based on our legitimate interest
(d) the data subject has objected to processing based on our legitimate interest, pending the verification whether the legitimate grounds of the controller override
those of the data subject (User/Customer).
The User/Customer may exercise their right by sending their request by e-mail at
info@eshopwedrop.bg
Right to data portability. When we process a User's/Customer's personal data
based on their consent or contract performance, by automatic means, the
respective User/Customer is entitled to request to transfer their personal data:
(a) to the User/Customer or (ii) to another controller indicated by the respective
User. The User may request the transfer only of the personal data the
User/Customer themselves provided to us directly and actively (except for any

	data that we inferred or created/determined). The User/Customer may exercise their right by sending their request by e-mail at info@eshopwedrop.bg
	We may answer to any request for information with regard to this Privacy Policy. You may contact us as follows:
FAQ	 by e-mail, at: info@eshopwedrop.bg by phone, at: +359887702685
	Access, erasure, rectification or portability shall not address data of other parties.
	In case you consider yourself harmed by the processing of your data as per the terms herein, you may address to your National Data Protection Authority.
Complaint to National Data Protection Authority	In Bulgaria, this authority is Commission for Personal Data Protection, whose site is available at: <u>https://www.cpdp.bg/index.php</u>
	THE SITE OF EVERY DATA PROTECTION AUTHORITY SHOULD BE INDICATED We trust that you will choose to contact us first, in order to try and settle any aspect, at email: :info@eshopwedrop.bg
Updates to our Privacy Policy	This Privacy Policy is available on the Website. You may also request a copy by e- mail at : info@eshopwedrop.bg. The Cookies Policy shall also apply.
Version	Version available starting with 25 th of May 2018.