

**PRIVACY POLICY OF
INTERCAPITAL MARKETS AD
CHAPTER I
GENERAL PROVISIONS**

Legal basis and internal documents

Art. 1. (1) This Privacy Policy (the "Policy") is hereby approved by the company INTERCAPITAL MARKETS AD, with UIC 131057477, (the "Company") as a data controller, with a view to align the activity of the company with the requirements of 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 ("the Regulation" or "the CPD"), and applicable national legislation of the Republic of Bulgaria, including the Personal Data Protection Act and applicable regulations.

(2) In addition and in accordance with this Policy, INTERCAPITAL MARKETS AD adopts separate detailed procedures, privacy policy declarations, registers, forms and other documents in accordance with the requirements of the applicable legislation.

(3) The present Policy and the adopted procedures are made known to all employees of INTERCAPITAL MARKETS AD, who will be obliged to comply with them. Any breach of the Policy and applicable data protection law may result in disciplinary action.

Definitions

Art. 2. The definitions used in this Policy below have the following meanings:

1. **„controller“** means the natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of personal data; where the purposes and means of such processing are determined by Union or Member State law, the controller or the specific criteria for its nomination may be provided for by Union or Member State law;
2. **„data subject“** – each natural person, which data will be processed by the controller;
3. **„child“** – natural person under 16 years old, insofar as national law does not provide for a lower age. If the Bulgarian Personal Data Protection Act provides for a lower age (for example, 14 years), the latter will be applicable;
4. **„personal data“** means any information relating to an identified or identifiable natural person ('data subject'); 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

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- 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;
5. **"special categories of personal data"** - personal data revealing racial or ethnic origin, political views, religious or philosophical beliefs, or membership of trade unions and the processing of genetic data, biometric data for the unique identification of an individual, data relating to health or data regarding the sexual life of an individual or sexual orientation;
 6. **"employees"** - all persons working for the data controller, including employees under labor/ civil contracts (extra-labor relations) and members of management bodies;
 7. **„processing“** means any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organization, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction;
 8. **„processor“** means a natural or legal person, public authority, agency or other body which processes personal data on behalf of the controller;
 9. **„profiling“** means any form of automated processing of personal data consisting of the use of personal data to evaluate certain personal aspects relating to a natural person, in particular to analyse or predict aspects concerning that natural person's performance at work, economic situation, health, personal preferences, interests, reliability, behaviour, location or movements;
 10. **„personal data breach“** means a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorized disclosure of, or access to, personal data transmitted, stored or otherwise processed;
 11. **„recipient“** means a natural or legal person, public authority, agency or another body, to which the personal data are disclosed, whether a third party or not. However, public authorities which may receive personal data in the framework of a particular inquiry in accordance with Union or Member State law shall not be regarded as recipients; the processing of those data by those public authorities shall be in compliance with the applicable data protection rules according to the purposes of the processing;
 12. **„third party“** means a natural or legal person, public authority, agency or body other than the data subject, controller, processor and persons who, under the direct authority of the controller or processor, are authorized to process personal data;

Subject of the Policy

Art. 3. The present Policy is adopted for the purpose to regulate the internal rules of Intercapital Markets AD regarding:

1. The rights and the obligations of the data protection officer (Chapter II);

2. Principles of the processing of the personal data (Chapter III);
3. Rights of the data subjects (Chapter IV);
4. Technical and organizational security measures of the data (Chapter V);
5. Confidentiality of the data (Chapter VI);
6. Rules for transmission of personal data to countries outside EU (Chapter VII);
7. Processor rules (Chapter VIII);
8. Types of registers (Chapter IX) ;
9. Rules for notification of personal data breach (Chapter X).

Processing activities

Art. 4. (1) The Policy applies to all personal data processing activities of INTERCAPITAL MARKETS AD.

CHAPTER II DATA PROTECTION OFFICER

Responsible persons

Art. 5. (1) When the applicable law provides for a mandatory appointment of a Data Protection Officer ("DPO"), INTERCAPITAL MARKETS AD shall take the necessary actions to appoint a DPO who may perform his/ her duties under a contract of employment or on the basis of a service contract.

(2) The DPO should be independent of the management in the performance of his/ her data protection tasks and may not occupy other positions in INTERCAPITAL MARKETS AD that would put him/ her in a conflict of interest with his/ her independent role.

(3) Where the Regulation does not provide for a mandatory appointment of an DPO, INTERCAPITAL MARKETS AD may appoint a Data Protection Officer ("CPA") or other authorized person who may also be part of the staff on the basis of a contract of employment or may be external consultant based on a civil service contract.

(4) When no DPO has been appointed, the CPO or other authorized person shall exercise the authority and responsible for the DPO's obligations under this Policy and any procedures and other documents adopted by INTERCAPITAL MARKETS AD.

Appointment of one DPO for group of companies

Art. 6. If INTERCAPITAL MARKETS AD is part of a group of companies, and as long as easy access is provided by each of the companies, one DPO of the group of companies may be appointed.

Reporting

Art. 7. (1) The DPO must report to the management of INTERCAPITAL MARKETS AD for the management of personal data within the company and for ensuring the possibility to prove compliance with the legislation and good practices for personal data protection.

Requirements to the DPO

Art. 8. (1) The management shall appoint as a DPO an appropriate, qualified and experienced person to take responsibility for the compliance of INTERCAPITAL MARKETS AD with this Policy.

(2) The DPO is obliged to provide up-to-date expert knowledge and advice on the implementation of legislation and good data protection practices, as well as other professional qualifications, to ensure that INTERCAPITAL MARKETS AD meets the requirements of the Regulation and the applicable national legislation .

Responsibilities of the DPO

Art. 9. The DPO is obliged to carry out the following activities:

1. To advise and train all employees for their personal data processing obligations under applicable European and national personal data protection legislation, as well as the personal data protection policies, procedures and other documents adopted by the company.
2. To control the observance by all employees and the management of the applicable European and national legislation on personal data protection, as well as the data protection policies, procedures and other documents adopted by the company;
3. To advise and inform for the Data Protection Impact Assessment, including monitoring the implementation of that assessment in accordance with the requirements of the Regulation;
4. To contact and cooperate with the supervisory authority (CPDP);
5. To act as a point of contact for the CPDP on processing matters, including the prior consultation referred to in Article 36 of the Regulation and, where appropriate, to consult on any other matters;
6. To assist in the development and updating of all data protection policies, procedures and other documents adopted by INTERCAPITAL MARKETS AD;
7. To advise the management on the allocation of internal responsibilities in order to ensure the current compliance with the requirements of European and national data protection legislation;
8. To conduct periodic audits of the processes related to the management of personal data and reports to the management;

9. To act as a contact point for the data subjects regarding the processing of their personal data;
10. Is responsible for notification of personal data breaches under Art. 33 and Art. 34 of the Regulation;
11. Is responsible for the activities required in accordance with the procedures and rules of INTERCAPITAL MARKETS AD for managing the requests and complaints of the data subjects;
12. To consult and control the data protection according to the procedure and rules of INTERCAPITAL MARKETS AD for storing and destroying the data;
13. To ensure that the register of personal data processing activities is kept in accordance with Article 30 of the Regulation, the security breach register and the register of requests of the data subjects.

Providing access for fulfill obligations

Art. 10. The DPO has the right of access to all documents, information and systems at INTERCAPITAL MARKETS AD related to the processing and storage of personal data, in order to assess compliance with regulatory requirements and ensure the security of personal data.

CHAPTER III

PRINCIPLES RELATING TO PROCESSING OF PERSONAL DATA

Principles

Art. 11. The processing of personal data at INTERCAPITAL MARKETS AD is carried out in compliance with the principles set out in Article 5 of the Regulation.

Lawfulness

Art. 12. (1) INTERCAPITAL MARKETS AD defines the legal basis for processing before it begins to process personal data.

(2) The legal grounds on which INTERCAPITAL MARKETS AD processes personal data are the following:

1. Consent;
2. Execution of a contract or taking steps before concluding a contract;
3. Legal obligation of the controller;
4. Protection of the vital interests of the data subject or other individual;
5. The legitimate interests of the controller.

(3) As a rule, INTERCAPITAL MARKETS AD does not process special categories of personal data except in the presence of at least one of the following legal bases:

1. Consent;
2. The processing is necessary for the execution of the obligations and the rights of INTERCAPITAL MARKETS AD in the sphere of the labor law, social law and the social defense;
3. Protection of the vital interests of the data subject;
4. The processing involves personal data that are clearly made public by the data subject;
5. The processing is necessary for the establishment, exercise or defense of a legal claim;
6. The processing is necessary for the purposes of preventive or labor medicine, for the assessment of the employee's work capacity, medical diagnosis, provision of health or social care or treatment.

Good faith

Art. 13. INTERCAPITAL MARKETS AD provides the information required by the Regulation to the data subjects, as far as practicable, regardless of whether the personal data was obtained directly from the data subjects or from other sources.

Transparency

Art. 14. (1) When INTERCAPITAL MARKETS AD provides information to data subjects, it should be detailed and specific, using clear and comprehensible language.

(2) In order to comply with the principle of transparency, INTERCAPITAL MARKETS AD adopts a Privacy Policy declaration that is available to data subjects before or upon receipt of the data.

Specific and legitimate objectives

Art. 15. (1) The Personal data are only collected for specific, explicit and legitimate purposes and are not processed for a purpose different from the one for which they were collected.

(2) Prior to or during the collection of personal data, INTERCAPITAL MARKETS AD should determine the purpose of the processing, to inform the data subjects, and after collecting the personal data to be processed only in a manner compatible with the reported purpose.

(3) If INTERCAPITAL MARKETS AD intends to use the personal data for other purposes, the lawfulness of the processing should be agreed in advance with the DPO, after which the data subject should be provided with adequate information regarding the new purposes.

Processing the minimum volume of data required

Art. 16. (1) The personal data should be in an appropriate volume, relevant and limited only to what is necessary for its processing for the specific purpose (minimum required principle).

(2) The DPO is responsible for ensuring that INTERCAPITAL MARKETS AD does not collect information that is not strictly necessary for the purpose for which it was obtained.

(3) When a data subject completes a data collection template (either electronically or on a paper form), the data subject should be informed for the purpose of the processing by providing access to the Privacy Policy Declaration.

(4) The DPO is responsible for periodically reviewing whether the data collected remains in an appropriate volume, relevant and limited to what is necessary to process it for the specific purpose.

Accurate and updated data

Art. 17. (1) Personal data must be accurate and updated as necessary. INTERCAPITAL MARKETS AD takes the necessary measures in order to be able to delete or correct inaccurate/incomplete data in a timely manner.

(2) INTERCAPITAL MARKETS AD requires from the subjects to notify for any changes in the data with a view to the need to maintain accurate and updated the processed personal data.

(3) The DPO is obliged to respond to a request for correction by a data subject within one month. The time limit may be extended with another two months in specific cases which should be motivated. Should INTERCAPITAL MARKETS AD decide not to comply with the request, the DPO shall reply to the data subject explaining the reasons for the decision and informing him/ her for his/ her right to file a complaint to the CPDP and seek legal action.

Limited period of storage

Art. 18. (1) The personal data should be kept for a period no longer than necessary for the purposes of the processing („limitation of the storage“). Personal data could be kept for a longer period exceptionally in the presence of a legal obligation or legitimate interest therein.

(2) The personal data are stored in accordance with the adopted by INTERCAPITAL MARKETS AD procedure for storing and destroying the data which shall be erased or deleted after the expiry of the storage period according to the procedure.

Confidentiality and security of the data

Art. 19. (1) The personal data shall be processed in a manner that guarantees their confidentiality and security, including protection against unauthorized or unlawful processing and against accidental loss, destruction or damage, by applying appropriate technical or organizational measures in accordance with Art. 24 and Art. 32 of the Regulation.

(2) In determining the appropriate technical and organizational measures, the DPO shall perform a risk assessment, taking into consideration all circumstances related to the processing of data by INTERCAPITAL MARKETS AD.

Reporting

Art. 20. The processing of personal data at INTERCAPITAL MARKETS AD is carried out in compliance with the principle of accountability, according to which the controller is responsible and able to prove that the activities for processing of personal data are carried out in accordance with the principles of the Regulation and the national legislation.

Consent

Art. 21. (1) INTERCAPITAL MARKETS AD requires explicit consent for the processing of personal data whenever there is no other appropriate reason for processing.

(2) INTERCAPITAL MARKETS AD considers for valid only the consent given voluntary, specific, informed and unambiguous. The consent must be an explicit statement or clearly active confirmatory action where the subject agrees that the particularly provided data will be processed for specific purposes.

(2) INTERCAPITAL MARKETS AD informs the subject and gives him/ her the opportunity to withdraw his/ her consent at any time.

(3) In case the subject withdraws the consent for the processing of personal data, INTERCAPITAL MARKETS AD shall terminate the processing of its personal data, unless there is no other reason for processing the data.

Special rules for consent of children

Art. 22. When INTERCAPITAL MARKETS AD processes the personal data of children, consent must be obtained from the exercising parental rights (parents, guardians, etc.).

Data protection impact assessment

Art. 23. (1) Where a type of processing in particular using new technologies, and taking into account the nature, scope, context and purposes of the processing, is likely to result in a high risk to the rights and freedoms of natural persons, the controller shall, prior to the processing, carry out an assessment of the impact of the envisaged processing operations on the protection of personal data.

(2) A single assessment may address a set of similar processing operations that present similar high risks.

(3) INTERCAPITAL MARKETS AD has approved a methodology for assessing whether the processing poses a high risk or whether an impact assessment should be carried out. The methodology is contained in the Data Impact Assessment Procedure.

CHAPTER IV

RIGHTS OF THE DATA SUBJECTS

Information to be provided where personal data are collected from the data subject

Art. 24. (1) At the time of receiving personal data, INTERCAPITAL MARKETS AD provides at least the following information to the data subject:

- Data of the controller and contact details;
- Contact details of the DPO when such is appointed;
- The purposes and the legal grounds of the processing;
- The legal interests of the controller when the processing is provided only according to them;
- Persons to whom personal data may be disclosed;
- Transmit personal data to a recipient in a third country or international organization when is applicable;
- The period for which the personal data will be stored or if that is not possible, the criteria used to determine that period;
- Whether the provision of personal data is a legal or contractual requirement, and whether the subject is obliged to provide them, respectively the consequences of non-disclosure;
- Existence of automatic decision making;
- Information regarding the following rights of the data subject: access, providing a copy of the data, rectification, erasure, restriction of processing, objection of processing (including objection for processing for direct marketing purposes), right to data portability, right of withdrawing the consent, right to make a complain, right of the subject to be an object of automatic processing of data;

(2) The information under para. 1 shall be provided in writing and/ or by electronic means (including verbally, when the subject agrees) in the form of a Privacy Policy declaration or other appropriate way.

Assistance in the exercise of the rights

Art. 25. (1) INTERCAPITAL MARKETS AD assists in the exercise of the above rights of the data subjects.

(2) The procedure for providing assistance for the exercise of the data subjects' rights is described in details in the procedure for managing the requests and complaints of the data subjects, approved by INTER INTERCAPITAL MARKETS AD.

CHAPTER V.

TECHNICAL AND ORGANIZATIONAL MEASURES FOR DATA SECURITY

Responsible persons

Art. 26. The management and all employees of INTERCAPITAL MARKETS AD are obliged to be acquainted with and to monitor for the compliance with the technical and organizational data security measures introduced in accordance with this Policy.

Technical and organizational measures

Art. 27. (1) After coordination with the DPO, the management of INTERCAPITAL MARKETS AD introduces appropriate and proportionate technical measures for the protection of personal data, which depending on the type of personal data may include the following measures:

1. Password protection of the computer devices;
2. Automatic locking of idle computer devices;
3. Encrypting sensitive files as well as large-scale databases of personal data;
4. Security of local and wide area networks;
5. Anti-virus software and firewalls on computer devices, including ensuring that the software is constantly updated;
6. Ensuring of physical security of the paper data by storing them in lockable cabinets and their prohibition to be removed from office premises without express permission;
7. Providing security alarm and/ or video surveillance;

(2) After coordination with the DPO, the management of INTERCAPITAL MARKETS AD introduces appropriate and proportionate organizational measures for the protection of personal data, which depending on the type of personal data may include the following measures:

1. Introducing guidelines for the processing of personal data (purpose limitation; data minimization; data quality; retention period limitation; enabling subjects to exercise their rights);
2. Introducing policies, procedures and rules that are consistent with the guidelines for personal data processing;
3. Training of the employees on their personal data protection responsibilities;
4. Periodic review of compliance with the Data Protection Policy and Procedures;
5. Limitation of the right of access of employees to personal data only insofar as the data is necessary for the performance of specific official duties;
6. Prohibition of using personal computer devices from the employees at the workplace;
7. Disclosure of personal data to external processing personal data only if a personal data protection contract/ confidentiality agreement has been concluded in advance;

8. Designation of a team for responding to personal data security breaches;
9. The imposing of disciplinary measures for personal data processing breaches;

Security measures for deletion/ destruction

Art. 28. (1) The personal data on a paper in respect of which the storage period has been expired (including no legitimate interest or legal obligation to store) shall be destroyed by a special shredder device and the data on the hard drives of the computer devices shall be deleted.

(2) A detailed description of the rules for storing, deleting and destroying personal data is contained in the Data Retention and Destruction Procedure.

Processing of personal data outside work premises

Art. 29. The processing of personal data outside of the work premises of the controller poses a potentially bigger risk of loss, theft or breach of personal data security. The employees must obtain explicit permission to process personal data outside work premises.

CHAPTER VI.

CONFIDENTIALITY OF THE DATA

Prohibition of disclosure

Art. 30. (1) The personal data processed by INTERCAPITAL MARKETS AD are confidential and would not be disclosed to unauthorized third parties, including but not limited to: family members, friends, government bodies, even investigating such, if there is reasonable doubt that are not required in the prescribed manner.

(2) All employees who process personal data are obliged to:

- observe full confidentiality and not to disclose personal information they have learned in the course of or in connection with the performance of their work responsibilities;
- get acquainted with and comply with the present Policy and the established data protection procedures of INTERCAPITAL MARKETS AD;
- endeavor to maintain ongoing awareness of regulations and best practices for the protection of personal data.

Permission

Art. 31. All requests from third parties for the provision of data must be accompanied by appropriate documentation, and any eventual disclosure of data should be authorized by INTERCAPITAL MARKETS AD after coordination with the DPO.

CHAPTER VII.

TRANSMISSION OF DATA

Transmission out of EU

Art. 32. The transmission of personal data to non-EU countries (referred to in the Regulation as "third countries") is illegal, except in the cases explicitly provided for in the Regulation where transmission is allowed.

Allowed transmission

Art. 33. (1) The transmission of personal data outside EU is permitted when the European Commission has adopted an adequacy decision according to which the country concerned provides an adequate level of protection.

(2) Countries that are members of the European Economic Area (EEA) but not of the EU are accepted as eligible for the adequacy decision.

Transmission in US

Art. 34. (1) The transmission outside EU to third country in the US is subject to the rules between EU-US Privacy "Shield Agreement".

(2) Prior to the transmission of personal data to an organization in the United States, INTERCAPITAL MARKETS AD verifies that the organization has been signed the Privacy Shield Framework Agreement with the US Department of Commerce. The US Department of Commerce is responsible for managing and administering the Privacy Shield and ensuring that companies comply with their commitments. In order to be certified by the ministry, the companies must have a privacy policy in accordance with the principles of the Regulation, e.g. use, store and transmit personal data in accordance with a set of strict data protection rules and safeguards.

Mandatory corporate rules or approved standard contractual clauses

Art. 35. INTERCAPITAL MARKETS AD may transmit personal data outside the EU on the basis of approved binding corporate rules or approved standard contractual terms, which must be approved by the relevant competent authority in accordance with the Regulation.

Exceptions

Art. 36. In the absence of the above grounds in this Chapter, INTERCAPITAL MARKETS AD may only transmit personal data in the presence of at least one of the following conditions:

- the data subject has explicitly agreed to the proposed transmission after being informed of the potential risks of such transmissions;
- the transmission is necessary for the performance of a contract between the data subject and the controller or for the implementation of pre-contractual measures taken at the request of the data subject;

- the transmission is necessary for the conclusion or performance of a contract concluded in the interest of the data subject between the controller and another natural or legal entity;
- the transmission is necessary for important public interest reasons;
- the transmission is necessary for the establishment, exercise or defense of legal claims;
- the transmission is necessary to protect the vital interests of the data subject or of others when the data subject is physically or legally incapable of giving his or her consent;
- the transmission is made by a register which, in accordance with EU or Member State law, is intended to provide information to the public and is accessible for providing information by the public in general or by any person who can demonstrate that it has a legitimate interest in doing so; but only to the extent that the conditions of reference laid down in the Union or Member State law are fulfilled in the particular case.

CHAPTER VIII. PROCESSOR

Relations with the processor

Art. 37. (1) When the processing of personal data is carried out by an external processor on behalf of INTERCAPITAL MARKETS AD, as administrator, INTERCAPITAL MARKETS AD uses only processing personal data that provide sufficient guarantees for the implementation of appropriate technical and organizational measures that the processing is carried out in accordance with the Regulation and national legislation.

(2) The processor does not include other processing data without the prior specific or general written consent of INTER INTERCAPITAL MARKETS AD.

(3) The relations between the processor and INTERCAPITAL MARKETS AD shall be settled in a written agreement in accordance with the requirements of Article 28 of the Regulation, which shall regulate at least the following:

1. subject and term of the processing;
2. the nature and the purpose of the processing;
3. the type of the personal data and the data subject categories;
4. the responsibilities and the rights of the controller and the processor.

Processing only at the lawful instructions of the controller

Art. 38. (1) The processor and any person acting under the authority of the controller or the processor who has access to the personal data, processes the data only at the instruction of the controller, unless the processing is required by a regulatory obligation.

CHAPTER IX. TYPE OF REGISTERS

Maintained registers

Art. 39. INTERCAPITAL MARKETS AD maintains the following registers in connection with its obligations under the Regulation:

1. registers of personal data processing activities;
2. register of the data subjects' requests;
3. register of personal data breaches.

(2) DPO is obliged to keep and maintain the registers.

Registers of personal data processing activities

Art. 40. The register of personal data processing activities includes at least the following data:

- the names and contact details of the controller, the joint controllers and the data protection officer, when such is appointed;
- the purposes of the processing;
- a description of the categories of data subjects;
- a description of the categories of personal data;
- the recipients or categories of recipients of the personal data;
- the legal ground of the processing;
- sources of the personal data;
- whether the personal data of the relevant category data subjects are subject to transfers outside the EU;
- the envisaged time limits for erasure of the different categories of data;
- technical and organizational security measures for personal data protection;

- whether it is necessary or, accordingly, whether a data protection impact assessment has been carried out.

(2) The controller or the processor and, where applicable, the controller's or the processor's representative, shall make the record available to the supervisory authority on request.

Register of the data subjects' requests

Art. 41. (1) The data subject's request register shall record each request of a data subject, describing the identifying information and any other data relevant to the request.

(2) The controller or the processor and, where applicable, the controller's or the processor's representative, shall make the record available to the supervisory authority on request.

Data security breach registry

Art. 42. (1) The data security breach register shall record every single breach, describing at least the following:

- the facts related to the breach;
- time of recognition and estimated time of occurrence;
- the consequences of the breach;
- measures taken to deal with the breach.

(2) The controller or the processor and, where applicable, the controller's or the processor's representative, shall make the record available to the supervisory authority on request.

CHAPTER X.

Rules for notification of personal data breach

Obligation to notify the management

Art. 43. All employees are obliged to notify immediately the management of INTERCAPITAL MARKETS AD, as well as the DPO, in case of a detected breach of data security.

Consideration of notifying the supervisory authority

Art. 44. (1) Upon receipt of the security personal data breach, INTERCAPITAL MARKETS AD, after coordination with the DPO, shall consider whether it is necessary to notify the supervisory authority for the breach.

(2) The decision shall assess the nature of the breach and the possible risk to the data subject, taking into account the requirement of the Regulation according to which there is no need to send a notification if there is no expectancy the breach of personal data security to create a risk to the rights and the freedoms of individuals.

Notification to the supervisory authority and documenting the breach

Art. 45. If there is a risk to the rights and freedoms of the data subjects, INTERCAPITAL MARKETS AD shall, without undue delay and no later than 72 hours after having heard of the breach, to notify the Commission for personal data protection.

(2) The notifications consists at least the following:

- description of the breach nature;
- the categories and the approximate number of data subjects affected;
- the categories and approximate amount of personal data records affected;
- the names and the contact details of the DPO or other person from whom more information can be received;
- the names and the contact details of the DPO;
- description of the consequences of the breach;
- description of the measures taken to deal with the breach.

(3) A record of the security data should be kept.

(4) The persons authorized to process personal data, including the DPO, are obliged to take immediate measures to limit the consequences of the breach and to enter the necessary data in the register.

Consideration of notifying the data subject

Art. 46. (1) When the controller determines that the breach of the security of the personal data can create a high risk for the rights and freedoms of the data subjects, INTERCAPITAL MARKETS AD shall without undue delay inform the data subject for the breach.

Notification to the data subject

Art. 47. (1) The message to the data subject should include the description of the breach and at least the following information:

- the names and the contact details of the DPO or other person from whom more information can be received ;
- description of the breach nature ;
- the categories and the approximate number of data subjects affected ;
- the categories and approximate amount of personal data records affected ;
- description of the consequences of the breach ;

- description of the measures taken to deal with the breach .

(2) The information in the notification to the data subject shall be described in the most clear and comprehensible language.

This Privacy Policy is approved by the Company's Board of Directors on 25.05.2018 and confirmed by Order of the Legal Representatives of INTERCAPITAL MARKETS AD.

DECLARATION

I, the undersigned,.....
with PIN/ date of birth, hereby I declare that:

1. The Data Protection Policy as of 25.05.2018 of IP INTERCAPITAL MARKETS AD was duly provided to me for acquaintance;
2. I am acquainted and I agree with the Data Protection Policy as of 25.05.2018 of IP INTERCAPITAL MARKETS AD.

Date: _____

Signature: _____