



PRIVACY POLICY AND PROTECTION OF PERSONAL DATA

I. Introduction

This privacy policy aims to inform you about what personal data we collect as an administrator, for what purpose, term, what rights you have and how the law and we protect these rights. The policy enters into force on March 13, 2022.

Information for the administrator: Gray Stone Bulgaria OOD, UIC 205865234, is registered in the Commercial Register and the Register of Non-Profit Legal Entities, Bulgaria, with registered office and address of management: Sofia, 103 James Boucher Blvd., fl. 1, of. 3. Contact phone: 02 980 10 59 e-mail: office@graystone.bg This policy affects the activities of the Company arising from the mobile application Wink Charging and the website www.winkcharging.com

The main normative acts related to the protection of personal data are Regulation 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of individuals with regard to the processing of personal data and on the free movement of such data and repealing it. of Directive 95/46 / EC (General Data Protection Regulation) and the Personal Data Protection Act.

II. What personal data we collect

Personal data is any information that can be used to identify a person. In the process of providing the requested service and fulfilling the concluded contract "Gray Stone Bulgaria" Ltd. collects, uses, stores and transfers various types of personal data to its customers:

- three names;
- date of birth;
- contact data;
- telephone;
- e-mail;
- economic identity data: bank information (bank accounts, cards);
- data in connection with the contract for the sale of electricity from the charging stations for electric vehicles, including information on the history of charging, which will be available in your account;



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- in cases where it is necessary to issue certain documents, such as an invoice, you may be asked for additional information in accordance with the requirements of the regulations.

Personal data that may be processed by the Administrator also includes all kinds of letters, emails, emails, requests, complaints, etc.

When using the application of "Gray Stone Bulgaria" Ltd. Wink Charging, it is possible to collect and process information about your location provided to us by third party services or a GPS enabled device with which you have agreed to. If you do not wish to provide such information, you should set up your device.

The administrator may collect and process information about your computer, including - your IP address, operating system and browser type - for the purpose of system administration and improving our products.

By using the application of Gray Stone Bulgaria Ltd. Wink Charging and the related website www.winkcharging.com you declare that you are at least 18 years old. Otherwise, we must give the consent of your parents or guardians.

If you do not want to provide us with your personal data

We process the personal data we receive from you in the process of the pre-contractual and contractual relations we have established with you.

If you do not wish or choose not to provide us with some of the requested information, we may be forced not to enter into a contract with you or to refuse to perform an existing contract and therefore terminate it, as we will not be able to fulfil our contractual and legal obligations.

III. How we collect your personal data

Gray Stone Bulgaria Ltd. collects personal data personally from personal data subjects in various ways, such as: by creating a profile in the Wink Charging application, by e-mail.

Before registering in the mobile application, the user is obliged to familiarise himself with the necessary information in the company's privacy policy in connection with the processing of his personal data, published on the mobile application and on the website. Upon termination of registration, we may continue to process your personal data as set out in this policy.



IV. How we use your personal information

When processing your personal data, Gray Stone Bulgaria Ltd. and its employees strictly follow the following principles:

- legality, good faith and transparency throughout the process of personal data processing;
- the data are processed only in the presence of legal, contractual grounds, with the explicit consent of the data subject, for the protection of your vital interests or for the protection of our legitimate purposes;
- the data are processed in relation to specific, explicit and legitimate purposes, in a way compatible with those purposes;
- the data to be processed are minimal, specific and accurate, strictly in accordance with the purposes of processing;
- the data are processed in the volume necessary for the fulfilment of the respective goal;
- up-to-dateness of the personal data that are processed; take all reasonable steps to ensure the timely erasure or correction of inaccurate personal data, taking into account the purposes for which they are processed;
- the data are processed for a period not longer than that necessary for the purpose for which they were collected;
- ensuring an appropriate level of security, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, applying appropriate technical and organisational measures.

Gray Stone Bulgaria Ltd. processes personal data independently or by assigning data processors, determining the objectives and scope of obligations, in accordance with the requirements of the Regulation and in compliance with national law.

Processors on behalf of Gray Stone Bulgaria Ltd. are, for example, accounting firms, providers of accounting and other computer software, marketing companies, IT companies, whose rights and obligations in connection with the processing of personal data of individuals are properly regulated in separate written contracts.

Payments are made through banks and / or other payment institutions, which is why they will be provided with your personal data. If necessary, in order to collect receivables, your personal data may be provided to lawyers, private or public bailiffs.



Your personal data may be provided to a prospective seller or buyer if we sell or purchase business or assets in whole or in part.

Summary data on the use of a specific charging station are provided to the owners of the sites, and the same information does not contain personal data.

When we share personal data with other organisations, we require them to keep it confidential, as well as to store the data by taking the highest possible measures for organisational and technical safety, not to use your personal data for their own marketing purposes. We share only the minimum personal data that allows our suppliers and partners to provide you with our services.

V. Grounds for processing personal data

Your personal data is processed for the following reasons:

- Pre - contractual relations and concluding a contract with you;
- in order to comply with regulatory obligations arising from the current Bulgarian legislation (the administrator may provide information to the Consumer Protection Commission, the Personal Data Protection Commission and other public authorities in accordance with applicable law);
- Acknowledge (for marketing purposes; when making an inquiry; when sending a newsletter; for account registration). When data is processed on the basis of consent you can withdraw the same at any time in the manner in which you provided it, or by contacting us at the specified contact details;
- protection of your vital interests (in case of emergency);
- to protect our legitimate interests (when collecting information on preferences in order to personalise our services).

VI. Purposes of personal data processing

Regarding its clients at the moment, Gray Stone Bulgaria Ltd. collects and processes personal data for the following purposes:

- To conclude and execute a contract for the sale of a product / service;
- compliance with legal requirements - providing information to competent authorities, institutions and third parties, within the powers they have, as well as in court proceedings, in accordance with the requirements of the procedural and substantive legal acts applicable to the



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proceedings; obligations provided for in the Accounting Act and the Tax and Social Security Procedure Code and other related normative acts in connection with the maintenance of proper and lawful accounting;

- to make a payment; for issuing accounting documents for the payment made; for refunds;
- to contact you, including to give you information about services provided and orders placed, changes in the General Terms and Conditions and other important communications that directly reflect on our contractual relationship;
- communicating with you about updates to our products and informing you of any promotions we offer, insofar as it is in our legitimate interest or you have agreed to receive such communications, and unless you choose to opt out of them;
- in case you have agreed to participate in certain events (competition, raffle, game, survey, etc.), we process the data provided by us to administer these activities.

VII. Use of personal data for a purpose other than the original

The company declares that personal data are processed only for the purposes for which they were originally collected. In case there is a need for the collected data to be processed for another purpose, the Company will make an individual assessment of the compatibility of the objectives for each case and, if necessary, will seek the consent of its data subjects in clear and concise form.

VIII. Term in which we will store your personal data

We process your personal data for the entire duration of the Agreement you have concluded with us and store them for a period of 5 (five) years after its termination, in order to comply with the expiration of certain limitation periods for claims and obligations for providing information to the court, competent state authorities and other grounds provided for in the current legislation. After the expiration of the above deadlines, the Administrator will delete or anonymise your personal data. Deleting the account created by you in the Wink Charging mobile application may not automatically lead to the deletion of your personal data in view of the existence of concluded contracts and the expiration of the statute of limitations on them.

The data is stored on a web-based cloud. It has been specially selected in view of the guarantees provided for the protection of personal data. The rules of the same are available here: <https://www.iubenda.com/privacy-policy/52836814>



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IX. International transfers of personal data

Gray Stone Bulgaria Ltd. as an administrator will not transfers your personal data outside the European Economic Area.

X. Cookies

Cookies help us explore and improve our Website: www.winkcharging.com, to provide you with better quality and personalised content so that:

- the site to function correctly and securely on the device from which it is used;
- display appropriate suggestions through our web browsing banners;
- to compile statistics on the effectiveness of the website, which makes it easier and more convenient to use.

What is a cookie?

When a website is loaded from a website, it creates and sends a cookie to its visitor. The information in this cookie is saved as a text file in the user's web browser / device and may contain an identifier to distinguish different browsers.

Pixels are small blocks of code in site pages and emails. They are most often used in conjunction with cookies to help manage the site or emails, as well as to gather information about online work.

Are cookies safe?

Because cookies are text files, they cannot harm a specific computer or gain access to files stored on a specific device.

What types of cookies exist?

Cookies are divided into 2 main types according to their duration:

- session cookies - they are stored temporarily while you browse the pages of the site to ensure its proper functioning or to personalise the information you see during this particular visit. Session cookies are deleted when you close the browser.
- persistent cookies - they are stored on the device for a certain period of time or until they are deleted. It is these cookies that help us analyse the traffic data on our site, monitor its proper behaviour and improve it.

According to their need, cookies are:

- Cookies necessary for the functioning of the site - they are responsible for the proper functioning of the site and its capabilities that the user wants to use. Without these cookies, the site and its services cannot perform the actions desired by the user;



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- security cookies - serve to protect user information from unauthorised parties, protect the site itself from malicious attacks. These cookies are also mandatory for sites that have registration forms and user profiles to ensure the security of the personal data provided;
- cookies that help the development of the business - these cookies help the development of the site and the company - its owner. They allow you to analyse and evaluate the user experience of the site, monitoring various indicators such as traffic, visits and dropouts of certain pages, conversions and more. In addition, they contribute to better service and communication with consumers, such as involvement in appropriate marketing campaigns. These cookies may be suspended.

Our website uses the following types of cookies to provide a complete user experience and to improve our services:

- Mandatory cookies related to the functionality of the site - these cookies are created by our site and allow you to seamlessly browse the pages of it, to send a request or request for information, to remember the preference for consent to the use of cookies. Without these cookies, the site cannot function. If they are deleted or blocked, the site will not be able to be used fully.
- Cookies that allow us to analyse and keep statistics on our site.

These cookies are used to report traffic and various actions that take place on our site. Through them we keep statistics on how the site is used, how our ads are presented, we analyse the data and make improvements. For this purpose we use external services:

- Google Analytics - Google's web analytics service. Through it and its cookies, we understand how the site is used and understand the demographic characteristics and interests of users in general. The information is stored on servers in the United States, and our site has integrated code that anonymises IP addresses (IP masking is enabled). This means that the IP address has been abbreviated (partially deleted) by Google in the EU and the European Economic Community countries before it is stored. Only in exceptional cases is the full IP address transferred to a Google server in the United States and truncated there. The information we receive is used to assess the status of the site; generate reports on traffic and activities performed on the site. You can find the Google Privacy Policy [here](#).
- Cookies that allow us to display banner ads relevant to our users while browsing the web, as well as analyse the results to make even more relevant suggestions.

How can you manage cookies?



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Cookies can be managed through the settings of browsers or through the settings of the sites you visit.

It is important to keep in mind that if you refuse to use certain cookies, this will limit their future creation, but will not remove the current and already created cookies. In addition, to maintain a preference, this also happens by saving in a cookie.

Are there cookies on the links that lead to other sites?

We use links to external pages in order to, for example, watch the videos on our site, our official pages on social networks - Facebook, Instagram, LinkedIn, Google Plus, Youtube, or to provide additional information on various topics related to our activities. We do not have access to cookies that may be contained on these sites and the information they record. Clicking on these links may allow third parties to collect or share information about you. Gray Stone Bulgaria Ltd. has no control over these web pages and is not responsible for their data protection policies. It is therefore recommended that you read their policies carefully.

XI. Rights of data subjects

Individuals whose personal data are processed have the following rights:

- Right of access and information about your personal data - You have the right to ask us what information (if any) we process about you and, if so, to provide you with a message in an understandable form containing your personal data being processed, as well as and any available information about their source and a copy of the personal data that are being processed. You can submit a request for access to your personal data to the administrator's address or by sending an email to the administrator's e-mail address. We will confirm your request and respond to you within one month of submitting your application.
- **Right to correction of personal data:** if you find that the personal data we process about you is inaccurate or incomplete, you have the right to make us correct or supplement this personal data.
- **Right to delete personal data (right to be forgotten):** in certain circumstances, such as if your personal data is no longer needed for the purposes for which they were collected or processed, when they were processed illegally or you withdrew your consent (if the processing of personal data is based on consent), you have the right to request and receive deletion of your personal data from us. This request will be granted provided that we have no legal obligation to



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retain this data and / or that the limitation periods that we are obliged to comply with in accordance with applicable laws and regulations do not apply to them..

- **Right to limit processing:** In certain circumstances, such as if you have doubts about the accuracy of your personal data or have objected to our legitimate purpose of processing your personal data, you have the right to request that we restrict the processing of your personal data until a solution is found. However, such an objection may not prevent us from storing your personal data.

- **Right to object to the processing** of your personal data in the presence of a legal basis for this, as well as in the processing of your personal data for the purposes of direct marketing. When the objection is justified, your personal data can no longer be processed, unless the Company proves that there are compelling legal grounds for processing.

- **Right to data portability:** you have the opportunity to ask the administrator to provide the personal data you have given us, in an organised and readable format if the processing is based on the Agreement or is based on a declaration of consent. When exercising your right to data portability, you have the right to receive a direct transfer of your personal data from one controller to another when technically feasible.

- **Right to lodge a complaint with a control body:** The supervisory body for the Republic of Bulgaria, which exercises control over the activities related to the protection of personal data, is the Commission for Personal Data Protection. In case you are not satisfied with the way your personal data is processed, you have the right to file a complaint to the Commission for Personal Data Protection (CPDP) - Sofia, p.k. 1592, Blvd. "Prof. Tsvetan Lazarov "№2 or kzld@cpdp.bg.

The Company assists the data subjects in exercising their rights by informing them about them and strives to satisfy their requests and give them an answer within the statutory period, when these requests are justified.

XII. Personal data protection measures

Gray Stone Bulgaria Ltd. takes technical and organisational security measures to protect your data from unlawful processing, accidental loss, destruction, damage or disclosure. Some of the measures we take to ensure a high level of security with regard to the management of personal data include:

- minimisation - the personal data we request from you are relevant and limited to what is necessary in relation to the purposes for which they are processed;



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- strict internal control over access to personal data - access to your personal data is allowed only to those of our employees or persons with whom a civil contract has been concluded, who need this information in order to properly perform their professional duties. They have an obligation to protect the confidentiality of your data;
- providing ongoing training on personal data protection to all our employees and constant internal control over the implementation of confidentiality measures.

This policy has been adopted by the Manager of Gray Stone Bulgaria OOD on March 13, 2022. It is subject to review and update according to the applicable legislation and good practices in the field. We will post changes to this page and encourage you to review this Policy regularly to stay informed.