

# PRIVACY POLICY

## I. INTRODUCTION

- In the course of its business activity, "I DO ADV" Ltd., UIC 201596256, with headquarters and management address in Sofia City, region Krasno selo, 10-12 Ami bue Str., correspondence address: Sofia City, 10 Ivan Marinov Yonchev Str. ("the Company", "I Do Adv", "we", "us"), processes information, part of which is personal data.
- The website <https://www.flip-light.net/> is owned by "I DO ADV" Ltd., and is managed by the Company in accordance with the provisions of the Personal Data Protection Act and the related legal framework including but not limited to Regulation (EC) 2016/679 ("GDPR").
- This Policy aims to inform you about the way we process your personal data in the capacity of administrator, and your rights as well.
- Personal data protection is of utmost importance to us. I Do Adv not sell your data to other companies or individuals. If we provide your data to third parties, these are our contractors who process the information on our behalf following our instructions and applying our privacy standard.

## II. DEFINITIONS:

**‘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 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;

**‘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;

**‘processor’** means a natural or legal person, public authority, agency or other body which processes personal data on behalf of the controller;

**‘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;

**“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 authorised to process personal data;

**‘consent of the data subject’** means any freely given, specific, informed and unambiguous indication of the data subject's wishes by which he or she, by a statement or by a clear affirmative action, signifies agreement to the processing of personal data relating to him or her;

**‘personal data breach’** means a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, personal data transmitted, stored or otherwise processed;

### **III. WHAT PERSONAL DATA WE COLLECT**

- In the course of our commercial relations, we receive from you, in your capacity as representatives and employees of the counterparty companies of I Do Adv, your name, as well as your business contacts - telephone, e-mail, position, office address.
  
- When signing a Contract with you, we receive your three names, as in some cases your bank account as well.
- In case you make a request to us via our web site <https://www.flip-light.net/>, we receive your e-mail to which we could send an reply and information to the request you have made.

### **IV. PURPOSES FOR WHICH I DO ADV COLLECTS PERSONAL DATA**

The main purposes for which I Do Adv processes personal data are:

- I Do Adv collects, uses, stores and processes your personal data that is required by the Company for the performance and delivery of our services and products.
- I Do Adv collects, uses, stores and processes your personal data when presenting and selling our services and products.
- The personal data that you provide us through the website <https://www.flip-light.net/> is used so we could able to send a reply and information that we have received from you.
- The personal information we collect allows us to keep you informed about our latest services and products. It also helps us to improve our services, products and advertising. If you do not want to appear in our address list, you can unsubscribe at any time.
- We use personal information to develop and improve our products, services, and advertisements.
- In defined cases, we may use your personal information to send important messages as notifications about our services and products.
- We may also use your personal information for internal purposes such as checks, data analysis, and research to improve the products and services of I Do Adv.

### **V. GROUNDS ON WHICH I DO ADV PROCESSES YOUR PERSONAL DATA**

- Processing is based on your consent, including on the basis of personal data provided by you;
- The processing of your data is necessary for the performance of a contract with you, or in your capacity as a representative or employee of a counterparty company of I Do Adv, or with a view to concluding a Contract with you or with a potential counterparty of I Do Adv , whose representative or employee you are.

## **VI. YOUR RIGHTS AS PERSONAL DATA SUBJECT**

You have the following rights regarding your personal data that I Do Adv processes:

- ✓ You have access to your personal data as well as to check the accuracy, completeness and timeliness of your personal data we process;
- ✓ You have the right to request a copy of your personal data from I Do Adv and the right of access at any time to your personal data;
- ✓ You have the right to object at any time against the processing of your personal data when there are legitimate reasons for doing so;
- ✓ You have the right to request appropriate correction, deletion or blocking of your personal data;
- ✓ You have the right to data portability in a structured, widely used and machine-readable format;
- ✓ You have the right to withdraw your consent to the processing of your personal data at any time with a separate request addressed to I Do Adv;
- ✓ You have the right to make a complaint before the Personal Data Protection Commission if you believe that your data protection rights have been infringed.

▪ If you want to exercise your rights or opt out of receiving marketing communications, you can contact us by sending a message to [office@i-doadv.com](mailto:office@i-doadv.com) or by sending a letter to the following address: Sofia, zh.k. Hadzhi Dimitar, 10 Ivan Marinov Yonchev Str.

## **VII. PERSONAL DATA OF CHILDREN**

▪ I Do Adv does not provide its services and products to persons under 18 years of age. We do not collect personal data from children under the age of 16. If we learn that we process personal information of a child under the age of 16, we will take steps to delete the information as soon as possible. If parents and / or legal representatives of children find out that children under their guardianship have given their data to I Do Adv, contact us at the contact addresses listed in this policy. We will delete the information as soon as possible.

## **VIII. DISCLOSURE OF YOUR PERSONAL DATA**

▪ In some cases, I Do Adv may disclose certain personal information to its subcontractors who work with us and who provide products and services related to the activities of I Do Adv. Personal information will only be shared by us in order to improve our products, advertising and services.

▪ When I Do Adv shares information about you with third parties - subcontractors of I Do Adv, we conclude contracts with these third party subcontractors and take steps to ensure that they provide a level of data protection according to the agreed standard for that. Your data is also considered confidential for our partners.

▪ It may be necessary - by law, in court proceedings, in litigation and / or on request by public and governmental authorities in or outside your country of domicile – I Do Adv to disclose your personal information. We may also disclose information to you if we find that such disclosure is necessary or appropriate for purposes of national security, law enforcement or other matters of public concern.

## **IX. TRANSFER IN THIRD PARTIES**

▪ I Do Adv does not transfer your personal data to third countries outside the EU as a rule. In the event that there is a need to transfer your personal data to third countries outside the EU, I Do Adv may only make this transfer after receiving your prior consent.

## **X. PERSONAL INFORMATION PROTECTION**

▪ I Do Adv takes precautions - including administrative, technical and physical measures - to protect your personal information from loss, theft and misuse, as well as from unauthorized access, disclosure, alteration or destruction.

▪ All employees of I Do Adv are required to protect the confidentiality of your information and to comply with applicable organizational and technical measures to protect it. Access to your data is limited to the necessity of performing its duties.

▪ For those cases where I Do Adv shares information about you with third-party suppliers of I Do Adv, the Company has mechanisms to ensure that they provide a level of data protection according to the agreed standard.

## **XI. PERSONAL DATA STORAGE**

▪ I Do Adv processes and stores personal data for a period necessary to meet the objectives set forth in this Privacy Policy unless we are legally required to keep it for a longer period. Depending on the type of data and the purposes for which they are collected, a storage period is defined, with the expiration of which the information is permanently deleted.

## **XII. PRIVACY POLICY UPDATES**

I Do Adv has the right to periodically update this Privacy Policy. In the event of a change in the current policy, a notice will be published on our website as well as the updated Privacy Policy.

## **XIII. CONTACTS DATA**

If you would like to contact us and have any questions regarding this Privacy Policy, you can contact us in the following way:

- to email address: [office@i-doadv.com](mailto:office@i-doadv.com)

- by letter sent by post to: Sofia, zh.k. Hadzhi Dimitar, 10 Ivan Marinov Yonchev Str.