

PRIVACY POLICY

Who is the Data Controller?

This website is owned and maintained by Nortia Ventures Limited, 111 B Tsarigradsko Shosse, 1784 Sofia, Bulgaria hereinafter referred as “**NORTIA VENTURES**”. The company is a limited liability established under the Laws of Bulgaria, with its principal place of business in Sofia, Bulgaria.

The person responsible for data processing on this website is:

Nortia Ventures Limited
Sofia Tech Park, Incubator Building,
111 B Tsarigradsko Shosse,
1784 Sofia, Bulgaria

e-Mail: info@nortiaventures.com
www.nortiaventures.com

In this Privacy Policy, references to “we”, “our”, “us” relate to Nortia Ventures Limited and references to “you” and “your” relate to the visitors of the website.

Respecting Your Privacy

Nortia Ventures Limited is committed to respect the privacy and protect the personal data of everyone wanting to access our website www.nortiaventures.com, so we

would like to let you know about the type of data that we collect from visitors to our site and how we use and protect this information. We comply with the EU 2016/679 General Data Protection Regulation (GDPR) and the Bulgarian data protection law.

Scope and Coverage of this Privacy Policy

This Privacy Policy applies to Nortia Ventures Limited. Some privacy statements of the company websites may differ from this one and/or contain additional information as required by local law. This Privacy Policy sets the standards for how we collect, handle, store, share and protect your personal information, when you visit and use our web site.

Personal Data

“Personal data” or “Personal information” in the context of this policy is information related to the visitors of the website, which can be used to directly or indirectly them, e.g. name, email address, phone number, company name, role, CVs, etc.

Children Personal Data

We do not knowingly or intentionally collect, process and maintain personal information about children under 18 years old. We kindly request from any visitors under the age of 18 not to submit any personal information to our site without preliminary parental consent.

Collection and Processing of Personal Data

In principle, we collect and use personal data of our visitors only to the extent necessary to provide a functional website and our content and services.

Server log files

When you access our website, the web server automatically collects and stores information to its log files. This is technical information that your web browser automatically transmits. It includes:

- Browser type and version
- Operating system used
- IP address
- Date and time of access request
- Referrer URL from which the request was initiated

This data is primarily used to ensure secure and error-free presentation of the website. The data can also be used for analysis and optimization of the web server operation. This is legitimate interest of NORTIA VENTURES and the data processing is based on (Art. 6 Para. 1 lit f GDPR).

Contact form

You may use different contact forms on our website to submit enquiries about our products, services or other information. We will collect and process the details from the enquiries form together with the contact details you provided there (Name, Email, Telephone, Company, Position), in order to properly respond to your request and handle further follow-up questions. We do not transfer this data to any parties without your prior consent. You may also consent to receive information about our products and services in future.

The processing of the data provided in your enquiry is based on your exclusive consent (Art. 6 Para. 1 lit a GDPR). You can revoke your consent at any time by sending email to info@nortiaventures.com

Job Application

Visitors of NORTIA VENTURES website may take the opportunity to apply for any open jobs listed in the Careers section. The data provided by the candidate through the application form on our website is then processed by NORTIA VENTURES HR department, in order to evaluate the application. The data may include name, address, contact details, CV, motivation letter, etc.

This processing of applicants' data is based on their interest to enter into employment contract with NORTIA VENTURES (Art. 6 Para. 1 lit b GDPR).

Events registration

You can register and participate to different events organized by us and listed on our website, e.g. webinars, trainings, surveys, etc. The participation to such events is voluntarily. We use the collected data for the proper organization, communication and smooth execution of the event.

The processing of the data provided upon registration is based on your exclusive consent (Art. 6 Para. 1 lit a GDPR). You can revoke your consent at any time by sending email to info@nortiaventures.com

Legal Basis for Collection and Processing of Personal Data

The legal grounds on which we rely to process your personal data are:

- An agreement we have with you or to take steps to enter in agreement with you (Art. 6 Para. 1 lit. b GDPR)
- A freely given consent that you provided us upon collection of your personal data (Art. 6 Para. 1 lit. a GDPR)
- Our legitimate interests to effectively deliver information or services to you, based on our evaluation that the processing doesn't interfere with your fundamental rights and freedoms (Art. 6 Para. 1 lit. f GDPR)
- A legal or regulatory obligations to which NORTIA VENTURES is subject and must comply with (Art. 6 Para. 1 lit. c GDPR)

Retention of Personal Data

We only store your data for the length of time necessary to fulfill the purpose for which it was collected (e.g. completing an enquiry about our product/service). In some cases, we may be obliged to retain your personal data for longer time:

- legal obligations under applicable law to retain data for certain period of time
- statute of limitations under applicable laws
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You as a data subject can exercise your right for erasure at any time by sending email to info@nortiaventures.com

Transfer of Personal Data

Your data is primarily processed within EU/EEA and may be transferred to organizations in countries outside EEA only after ensuring that there is adequacy decision of European Commission (Art. 45 Para1 GDPR). During such transfer, we will take all necessary steps to ensure that your personal data is treated securely in accordance with this Privacy Policy and adequate level of protection is applied to it. In exceptional cases your personal data may be transferred based on your explicit consent after informing you of the possible risks of such transfer (Art. 49 Para. 1 lit a

GDPR). As of July 16th 2020, with the decision of the Court of Justice of the European Union, the European Commission's adequacy decision for EU-U.S. Privacy Shield Framework was invalidated. The main reason behind that decision was the unconditional access of EU citizens' personal data by U.S. authorities and security services.

Use of Cookies

NORTIA VENTURES website may use cookies to ensure it is functioning effectively and to improve the user experience.

"Cookies" are small text files that are stored on your computer or mobile device when you visit a website. The information is then sent back to the server each time the browser requests a page from the server. This enables a web server to identify and track web browsers.

There are different types of cookies:

- **Necessary Cookies** – they make the website usable by enabling basic functions like page navigation and access to secure areas of the website. The website cannot function properly without these cookies
- **Statistics** – they help website owners to understand how visitors interact with the website by collecting and reporting information anonymously
- **Marketing** – they are used to track visitors across websites. The intention is to display ads that are relevant and engaging for the individual user

Upon your first visit of our website and thereafter you can manage your cookie preference to accept only certain cookies through the Cookie Manager on the down left side of your screen. By default, only the necessary cookies are enabled, without which the website cannot operate properly.

The legal basis for usage of cookies is consent (Art. 6 Para 1 a GDPR for EEA and Art. 49 Para 1 a GDPR for third countries). You can manage your consent through accepting or declining cookies within the Cookie Manager.

Google Analytics

We use Google Analytics service from Google Ireland Limited, Gordon House, Barrow Street, Dublin 4, Ireland. This cookie generates information about your usage of our website (e.g. time and date of visit, page views, time spend on certain page, referral link, etc.). This information is transmitted and stored on the Google servers. Google uses this information on our behalf to create reports about our website

activity and usage by visitors. The data from this cookie is not combined with the personal data of any visitor. Additionally, we use the setting “anonymizeIP” for Google Analytics on our website, which anonymizes the IP address of the visitor. You can prevent Google from collecting the data generated by this cookie by downloading and installing the browser plug-in available on the following link: <https://tools.google.com/dlpage/gaoptout?hl=en>

Additionally, every modern browser has functionalities to see what cookies you have stored, delete them and block certain sites from storing cookies on your computer. You can prevent the storage of cookies by configuring your web browser accordingly. These settings are generally in the “Security and Privacy” sections of the browser settings.

Google’s Privacy Policy: <https://policies.google.com/privacy?hl=en-US>

LinkedIn

This website uses the Insight tag from LinkedIn. This service is provided by LinkedIn Ireland Unlimited Company, Wilton Plaza, Wilton Place, Dublin 2, Ireland.

We use the LinkedIn Insight tag to obtain information about visitors to our website. This enables LinkedIn to collect statistical, pseudonymous information about your visit and use of our website and to provide us with anonymous reports for us on our advertising activities and their effectiveness. For example, the LinkedIn Insight Tag enables us to evaluate campaigns and collect anonymous information about our web visitor target audience that found us through our LinkedIn campaigns. In addition, this information is used to provide you with offers and recommendations that are specific to your interests and relevant after you have informed yourself about certain services, information and offers on the website.

LinkedIn members can control the use of their personal information for promotional purposes in the account settings. To prevent LinkedIn from linking information collected on our site to your LinkedIn account, you must log out of your LinkedIn account before you visit our site.

You can object to LinkedIn’s analysis of user behavior and targeted advertising at the following link: <https://www.linkedin.com/psettings/guest-controls/retargeting-opt-out> .

LinkedIn’s Privacy Policy: <https://www.linkedin.com/legal/privacy-policy>

Twitter

On our website, we use the Conversion Tracking Service of Twitter Inc. (1355 Market Street #900, San Francisco, California 94103, "Twitter"). This tracking records if a user of our website clicks on a link posted by Twitter. Twitter stores a cookie on the visitor's computer to enable an analysis of the use of our online products and services. Twitter Conversion Tracking tracks the actions of visitors after they have viewed ads or interacted with ads on Twitter. Twitter's Conversion Tracking allows us to assign conversions such as link clicks, retweets or "like" data. Data is also transmitted to Twitter during this process. We would like to point out that we, as operator of this website, are not aware of the content of the data transmitted or the purposes for which it is used by Twitter. For more information, please refer to Twitter's Privacy Policy.

You can change your privacy settings at Twitter in the account settings at <https://twitter.com/account/settings> and <https://twitter.com/settings/account/personalization>.

Twitter's Privacy Policy: <https://twitter.com/privacy>

Usage of Social Media Buttons

Our website may have integrated social media buttons, through which you can visit and follow our profile in the respective social media. These buttons are configured in such a way, that they remain inactive until the visitor clicks them. In this regard, no personal data is being processed before the explicit action (click) over these buttons from the visitor.

The usage of social media buttons on our site is completely under your discretion. If you use them, personal data may be processed by these third party social media platforms. After you click such a button the processing of personal data happens outside the control of NORTIA VENTURES and under the control of the respective social media platform. We do not process or store any data related to this activity.

Since the usage of social media buttons are only active after your explicit click on them, we expect you to consent to the processing by that third party. We advise you to read the privacy policies of these third parties to get more information on how they collect, store and process your personal data.

Facebook

There are integrated “Follow-us” buttons for the Facebook social network on our website, with data controller: Facebook Ireland Limited, 4 Grand Canal Square, Dublin 2, Ireland. The buttons can be recognized by the Facebook logo. These buttons are links to the NORTIA VENTURES profile in the social network, and after clicking any of them, you will get to the Facebook page of NORTIA VENTURES. There you can follow NORTIA VENTURES on this social network.

The Facebook “Follow-us” buttons are configured in such a way, that there is no data transmission until the button is pressed. Even if you are logged to the Facebook social network at the same time of your visit to our website, no data will be transmitted to Facebook. However, if you press the button on the NORTIA VENTURES website and you are logged on or then login, Facebook can recognize from which NORTIA VENTURES website page this button is pressed. In this way, Facebook can collect and save further data if necessary and relate it to your Facebook profile. We would like to point out, that we have no knowledge of what this data is and how exactly it is used by Facebook.

For further information on data usage by Facebook, please refer to their privacy policy at: <https://www.facebook.com/about/privacy/>

LinkedIn

There are integrated “Follow-us” buttons for the LinkedIn social network on our website, with data controller: LinkedIn Ireland Unlimited Company, Wilton Plaza, Wilton Place, Dublin 2, Ireland. The buttons can be recognized by the LinkedIn logo. These buttons are links to the NORTIA VENTURES profile in the social network, and after clicking any of them, you will get to the LinkedIn page of NORTIA VENTURES. There you can follow NORTIA VENTURES on this social network.

The LinkedIn “Follow-us” buttons are configured in such a way, that there is no data transmission until the button is pressed. Even if you are logged to the LinkedIn social network at the same time of your visit to our website, no data will be transmitted to LinkedIn. However, if you press the button on the NORTIA VENTURES website and you are logged on or then login, LinkedIn can recognize from which NORTIA VENTURES website page this button is pressed. In this way, LinkedIn can collect and save further data if necessary and relate it to your LinkedIn profile. We would like to point out, that we have no knowledge of what this data is and how exactly it is used by LinkedIn.

For further information on data usage by LinkedIn, please refer to their privacy policy at: <https://www.linkedin.com/legal/privacy-policy>

Integrated Tools

Google Maps

This site uses the map service of Google Maps via an API. It is operated by Google Inc., 1600 Amphitheatre Parkway, Mountain View, CA 94043, USA.

The use of Google Maps is in the interest of making our website more functional and user friendly, enabling our website visitors to easily find the locations of our offices and get in live contact with us, in regard to their enquires and questions.

To use the functions of Google Maps, it is necessary to save your IP address. This information is generally transmitted to Google servers in the USA and stored there. We have no influence on this data transfer. To enable Google Maps on our website, you need to provide us with your consent for the above described transfer. The legal basis for it is (Art. 49 Para 1 a).

For more information on how user data is dealt with, refer to Google's Privacy Policy: <https://www.google.de/intl/de/policies/privacy>.

HubSpot

We use HubSpot for our online marketing activities. This is an integrated software solution which we use to cover various aspects of our online marketing. The registration service allows visitors of our website to learn more about our company, download content and provide their contact information and other demographic information. This information is stored on servers of our software partner HubSpot. We may use this information to contact visitors of our website and to determine which services of our company are of interest to them. All information collected by us is subject to this Privacy Policy.

For more information, visit the following HubSpot page: <https://legal.hubspot.com/privacy-policy>. We use all collected information exclusively to improve our marketing.

HubSpot is a software company located in the USA with a subsidiary in Ireland. Contact: HubSpot, 2nd Floor 30 North Wall Quay, Dublin 1, Ireland, Phone: +353 1 5187500, <https://www.hubspot.de>. HubSpot is subject to TRUSTe's Privacy Seal.

Your Data Protection Rights

Under GDPR you have certain rights in relation to your personal data. These rights include:

- **Access** – You can ask us whether we process your personal data, and if so, to provide you more information on that.
- **Rectification** – You can at any time request that we correct your personal data in case of inaccuracy.
- **Erasure** – You can request from us to delete all your personal information that we process. We will do so without undue delay, unless there is some legal obligation to the company that requires your data to be kept.
- **Restriction of processing** – You can request that we temporary restrict processing of your personal data if you contest the accuracy of your personal data, prefer to restrict processing rather than erasing personal data, or you need that we keep your data for you to establish, exercise or defend a legal claim.
- **Data portability** – You can request that we transmit your personal data (in a structured, commonly used and machine-readable format) to another controller. This right applies only when processing is based on consent or on a contract or is carried out by automated means.
- **Right to object** – You can object to our use of your personal data for direct marketing purposes including profiling.
- **Automated individual decision-making** – You can object to a decision based solely on automated processing, including profiling, which affects you
- **Right to withdraw consent** – You can, at any time withdraw the consent you have previously provided to us. This will not affect the lawfulness of processing based on that consent before its withdraw.
- **Right to lodge a complaint** - If you are not satisfied with the result from exercising your rights, you can lodge a complaint to the supervisory authority: CPDP – www.lda.bayern.de

Information Security

NORTIA VENTURES has implemented generally accepted organizational and technical measures to protect your personal data from unauthorized access, loss, alternation, misuse, destruction. Only authorized persons who have been properly trained and made aware of NORTIA VENTURES privacy standards and obligations are provided access to personal data. Despite the best effort we make, security cannot be guaranteed against all threats. We have implemented Secure Socket Layer (SSL) certificate to ensure encryption of the information transmitted between your browser and our web server.

Links to External Sites

NORTIA VENTURES website may contain hypertext links to other external sites. The links have been carefully checked before being published on our website. When you use those links, you leave our website and we are unable to control how your data is processed by the owners of these external websites. We do not make any commitment in respect to any other website that you may access via our website and we cannot be held liable under any circumstances for the contents of such sites, their operation privacy practices or processing of data.

Acceptance of this Privacy Policy

By using the NORTIA VENTURES website, you agree with the terms set in this Privacy Policy. If you do not agree, please do not provide us any information nor use the website.

Data Privacy Contact

Please address all enquiries related to data privacy to: info@nortiaventures.com

Changes to this Privacy Policy

We will regularly review this Privacy Policy and update it when needed. All updates will be published to this web site. We encourage you to check this Privacy Policy on regular basis when you visit NORTIA VENTURES website.

Privacy Policy last update: 10.01.2021