

PRIVACY POLICY

Please read the Privacy policy (“**Policy**”) to understand our policies and practices regarding your Personal Data and how we will collect and process it. This Policy applies to individuals who interact with GLOBULINKS services as consumers (“**you**”). This Policy explains how your Personal Data is collected, used, and disclosed by GLOBULINKS (“**GLOBULINKS**”, “**We**”, “**Us**”). It also informs you how to access and update your Personal Data and make certain choices about the usage of your Personal Data.

This Policy aims to give you information on how GLOBULINKS collects and processes your personal data through your use of this website, including any data you may provide through this website when you purchase a product or service. This Policy covers both our online and offline data collection activities, including Personal Data that GLOBULINKS collects through our various channels such as the website and our commercial contacts with you.

If you do not provide necessary Personal Data to us GLOBULINKS may not be able to provide you with our goods and/or services. This Policy can change from time to time.

This Policy provides important information in the following areas:

1. Sources of personal data
2. Types of personal data that we collect and process and how we receive it
3. Business contacts
4. Disclosure of your personal data
5. Retention of personal data
6. Storage of your personal data
7. Your rights
8. Your choices about how we use and disclose your personal data
9. Contact details

1. Sources of personal data

This Policy applies to Personal Data GLOBULINKS collects from or about you from the following sources:

- a) **Our website.** Consumer-directed websites operated by or for GLOBULINKS, including sites that We operate under our own domains/URLs (“**Websites**”).
- b) **E-mail, text and other electronic messages.** Interactions with electronic communications between you and GLOBULINKS.
- c) **Data we create.** In the course of our interactions with you, we may create Personal Data about you (e.g. records of your orders or other commercial relationships).
- d) **Data from other sources.** Third party social networks (e.g. such as LinkedIn, Google), market research (if feedback not provided on an anonymous basis), GLOBULINKS partners and public sources

2. Types of personal data that we collect and process and how we receive it

Depending on our interaction (online, offline, over the phone, etc.), We collect various types of information from you, as described below.

- a) **Personal contact information.** This includes any information you provide to Us that would allow Us to contact you, such as your name, postal address, e-mail address, social network details, or phone number.
- b) **Information from computer/mobile device.** GLOBULINKS web servers might track of the pages visited on our website, the amount of time spent on those pages and the types of searches done on them. This automatically captures and stores the information transmitted by the visitor's internet browser or browsing activity, depending on the selection of privacy settings upon visiting GLOBULINKS website.

Additional personal data processing may take place following your preferences such as:

- Date and time of the server request
- Type/version of browser and operating system
- Accessed links and their status

This information is captured using automated technologies such as cookies, and is also collected through the use of third party tracking for analytics purposes. You have the right to object to the use of such technologies, for further details please see below. In accordance with our [Cookies Policy](#) GLOBULINKS uses the information to prevent potentially illegal activities and to enforce our terms and conditions. GLOBULINKS also uses a variety of technological systems to detect and address anomalous activity and to screen content to prevent abuse, such as spam. GLOBULINKS uses this information for statistical purposes, to find out which pages users visit and what products and services are of interest or could be of value to GLOBULINKS web servers' visitors. We collect and process this data for the purpose of ensuring the security of this website, which is a legitimate interest in terms of GDPR. We delete or anonymize this kind of personal data automatically after 14 days.

- c) **Market research and commercial partners feedback.** Any information that you voluntarily share with GLOBULINKS about your experience of using our products and services.
- d) **Payment and Financial information.** Any information that We need in order to fulfill an order, or that you use to make a purchase. In any case, our payment processing provider(s) handle payment and financial information in a manner compliant with applicable laws, regulations and security standards.

3. Business contacts

When we do business with you or the company you work for, we collect and use your information as follows. If not mentioned otherwise, we have received your data from you personally, your employer, or from publicly available sources. We have set out below, in a table format, a description of all the ways we use your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data. Please contact us if you need details about the

specific legal ground we are relying on to process your personal data where more than one ground has been set out in the table below.

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
To register you as a new customer/supplier., including responding to your initial enquiries. This typically requires the use of certain personal contact information and information regarding the reason for your inquiry (e.g. order, technical issue, product question/complaint, general question, etc.).	(a) first name, surname (b) business contact details like e-mail and business address	Performance of a contract with you
To process and deliver orders including: (a) Manage payments, fees and charges (b) Collect and recover money owed to us	(a) first name, surname (b) business contact details like e-mail and business address (c) Financial, company bank account (d) Transaction details	(a) Performance of a contract with you (b) Necessary for our legitimate interests (to recover debts due to us)
To manage our relationship with you which will include: (a) Notifying you about changes to our terms or privacy policy (b) Asking you to leave a review or take a survey	(a) first name, surname (b) business contact details like e-mail and business address	(a) Performance of a contract with you (b) Necessary to comply with a legal obligation (c) Necessary for our legitimate interests (to keep our records updated and to study how customers use our products/services)
To enable you to partake in a prize draw, competition or complete a survey	(a) first name, surname (b) business contact details like e-mail and business address	(a) Performance of a contract with you (b) Necessary for our legitimate interests (to study how customers use our products/services, to develop them and grow our business)

4. Disclosure of your personal data

Outside GLOBULINKS we share your Personal Data with the following types of third party organizations:

- a) **Service providers.** These are external companies GLOBULINKS uses for support to run our business (e.g. order fulfillment, payment processing, fraud detection and identity verification, website operation, market research companies, support services, website development, legal advisors, data analysis, etc.). Service providers, and their selected staff, are only allowed to access and use your Personal Data on Our behalf for the specific tasks that they have been requested to carry out, based on our instructions, and are required to keep your Personal Data confidential and secure.

- b) **Third party companies using Personal Data for their own marketing purposes.** We do not license or sell your Personal Data to third party companies outside GLOBULINKS for their own marketing purposes, unless you provide us with your consent
- c) **Third party recipients using Personal Data for legal reasons.** We will disclose your Personal Data to third parties for legal reasons

5. Retention of personal data

GLOBULINKS takes every reasonable step to ensure that your personal data is only processed for the minimum period necessary for the purposes set out in this Policy. The criteria for determining the retention period for your Personal Data is:

We will retain copies of your Personal Data in a form that allows for identification only for as long as:

- i. We maintain an ongoing relationship with you;
- ii. Your Personal Data is necessary in connection with the purposes set out in this Policy and we have valid legal grounds to do so.

The period will be extended if any relevant legal claims are brought, we may continue to process your Personal Data to a limited extent for such additional time necessary in connection with that claim. Following the expiration of the retention, we will either permanently delete or destroy the relevant Personal Data or anonymise the relevant Personal Data.

6. Storage of your personal data

GLOBULINKS implements reasonable physical, technical and administrative security controls to protect your Personal Data against loss, misuse, unauthorized access, disclosure, alteration or destruction. Your data will be stored in a secure operating environment and it will be processed by our authorized staff or agents, on a need-to-know basis, depending on the specific purposes for which your Personal Data have been collected

However, GLOBULINKS cannot guarantee the security of information on or transmitted via the internet as it relies on the security of the system you have used in communication with our systems. We use measures to enhance security and attempt to encrypt information to protect against data breaches.

7. Your rights

We shall honor your data subject's right in accordance with legal obligations and subject to the exemptions defined in applicable laws and regulations. These rights are:

- a) Right to access your Personal Data
- b) Right to correct or amend or update your Personal Data
- c) Right to be forgotten (right to erasure)
- d) Right to obtain Personal Data in a portable form (right to data portability)

- e) Right to restriction of processing, according to the regulation
- f) Right to object of processing of personal data concerning you, according to the regulation, and
- g) Right not to be subject to a decision based solely on automated processing, including profiling.

If you wish to exercise any of these rights, please contact us. For contact details see below. You will not have to pay a fee to access your personal data. However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

8. Your choices about how we use and disclose your personal data

We strive to provide you with choices regarding the Personal Data that you provide to Us. The following mechanisms give you the following control over your Personal Data:

- a) **Cookies/Similar Technologies.** You manage your consent via our consent management solution or your browser so as to refuse all or some cookies/similar technologies, or to alert you when they are being used. Please see our [Cookies Policy](#)
- b) **Advertising, marketing and promotions.** You can consent for your Personal Data to be used by GLOBULINKS to promote its products or services by answering the question(s) presented by our representatives. If you decide that you no longer wish to receive such communications, you can subsequently unsubscribe from receiving marketing-related communications at any time, by following the instructions provided in each such communication or by contacting us. Please note that, even if you opt-out from receiving marketing communications, you will still receive administrative communications from GLOBULINKS, such as order or other transaction confirmations and other important non-marketing related announcements.

9. Contact details

To ask questions regarding our Privacy Policy or to make a complaint about our compliance with applicable privacy laws, please at office@gobulinks.com or write to us at GLOBULINKS, UIC 131177940, 5 Pozitano Str, 1000 Sofia, Bulgaria

We will acknowledge and investigate any complaint about the way GLOBULINKS manages your Personal Data, including a complaint that we have breached your rights under applicable privacy laws.