



Personal data protection policy of Bilitis Resource Center Foundation

Bilitis Resource Center Foundation is a non-profit legal entity, registered as a public benefit organisation in the Department of Justice under number 016/26.05.2011., registered in the Commercial register and Bulstat register under number 131221510, with headquarters and main address in Sofia, Mladost 2 residential area, bl. 243, entrance A, apt. 17, contact telephone number 0888243666, email address: bilitis@bilitis.org and website: <https://bilitis.org>.

The mission of Bilitis Resource Center Foundation is eliminating all forms of discrimination and achieving full equality for LGBTI in Bulgaria.

In order to achieve its mission, Bilitis Resource Center Foundation:

- Works on changing the legal frame and policies that will increase the equality of LGBTI people by partnering with other non-profit organisations, activists, donors, institutions and citizens.
- Works on activation and self-empowerment within the LGBTI community.
- Within the society it works on spreading the values of feminism and diversity and overcoming heteronormative structures, including gender stereotypes.

Bilitis Resource Center Foundation is an administrator of personal data under the Personal Data Protection Law, registered by Personal Data Protection Commission and entered in the public register of personal data.

I. Goals and coverage of Policies for personal data protection

Article 1. With the current policy, Bilitis Resource Center Foundation marks the inviolability of the person and undertakes the necessary measures for protection against the illegal processing of personal data of individuals. In accordance with the current European and national legislation and good practices, the foundation applies the necessary organizational and technical measures for protection of personal data.

Article 2. With the current policy, Bilitis Resource Center Foundation aims to inform every interested person about the aim of personal data processing, the reasons for its processing, the categories of recipients, whom data can be revealed, the consequences of a refusal to provide the policies, as well as information for the right to access, correction, deletion and objection, in accordance with Regulation (EU) 2016/679 and Personal Data Protection Law.

II. Personal data, processed by Bilitis Resource Center Foundation

Article 3. Bilitis Resource Center Foundation processes personal data as an administrator of personal data; processes personal data, structured in different registers that are announced in the Public register of the entered administrators of personal data.

Article 4. Bilitis Resource Center Foundation processes personal data, provided personally by the subjects of personal data that it applies to in connection with keeping a legal obligation that is only applied by the administrator.

Article 5. Bilitis Resource Center Foundation processes personal data, provided personally by the subjects of personal data, in those cases, when the subject has consented to the processing of their data for one or more specific purposes, when processing is needed based on contractual requirements or for the purpose of the legitimate interests of the administrator.

Article 6. Bilitis Resource Center Foundation also processes personal data that have not been received by the personal data subject but have been provided by a third party in relation with the carry out of a certain legal contractual obligation on the realisation and management of programs and projects for free or activities on the carry out of other contractual obligations. In these cases the individual providing this data to Bilitis is obligated:

1. To provide the subject of personal data with information about the administrator - Bilitis Resource Center Foundation
2. To notify the subject of personal data about the aims, categories of personal data and categories of personal data recipients
3. To provide information for the right of access and correction of personal data by the person it relates to

Article 7. (1) Differentiated by the specific activity or normative requirement are the following personal data categories, processed by Foundation Bilitis Resource Center Foundation:

1. Physical identity: name, personal identification number, identification document data, place of birth, address, phone number, email address;
2. Social identity: education, qualification, legal capacity, professional position, work – internship and professional biography, citizenship, participation in management bodies of legal entities;
3. Economical identity - bank account number (IBAN)

(2). In relation with compliance with legal obligations, Bilitis Resource Center Foundation collects physical and economical identity data.

(3). Within the frame of a contractual obligation, related to the realisation of a project/program, with the specific consent of the person, can be requested information related to meeting certain requirements for their participation (education, belonging to a vulnerable group, ethnicity).

Article 8. Bilitis Resource Center Foundation creates and announces information about the type of personal data it collects and processes for different programs and projects, which it runs.

III. Personal data processing

Article 9. As an administrator of personal data, Bilitis Resource Center Foundation processes personal data through multiple actions that can be carried out regarding personal data with automatic or non-automatic means, such as collection, enlisting, organisation, storage, adaptation or adjustment, consultation, use, blockage, erasure and determination, while complying with the following principles:

1. Legality of personal data processing;
2. Proportionality of personal data processing;
3. Relevance of the personal data that is being processed

Article 10. Bilitis Resource Center Foundation processes personal data independently. Processors on behalf of the foundation are, for example, its employees whose rights and obligations, related to personal data of people, are properly regulated within the Inner rules of the foundation.

IV. Aim of the personal data processing

Article 11. The aim of personal data processing is to have unequivocally identified the people, current and future employees of Bilitis Resource Center Foundation, counterparties, beneficiaries from contracts for financing without compensation, people invited or participating in events, trainings and other activities, conducted in relation to the achievement of the foundation's goals. Personal data processing is in consequence of:

1. Performance of normatively established obligations of the administrator of personal data, originating from the specifics of legal requirements that regulates financial-accounting reporting, pension, health and socio-insurance activities, the activity on human resources management;
2. The execution of a contract that the personal data subject is a party in or for undertaking steps on the personal data subject's request before entering the contract;
3. In the execution of activities of Bilitis Resource Center Foundation – for one or more specific purposes with the consent of the personal data subject; for the aim of the

legitimate interests of the administrator or for a third party in agreement with the personal data subject.

V. Consequences of refusal to provide personal data:

Article 12. Expressly consent of the people, whose personal data is being processed is not required if the administrator has a legal reason to process personal data. Such reasons are, for example, normatively established obligations related to the requirements of work, tax and socio-insurance law, the Law on Obligations and Contracts, Accounting Act, Money Laundering law, Anti-Terrorist Financing Measures Act, etc.

Article 13. In case of refusal for deliberate providing of the required personal data, Bilitis Resource Center Foundation will not be in the position to carry out its normative and contractual obligations, including not being able to provide service of financing to the subject, refusing to provide data, who is a beneficiary on the foundation's project or program for financing without compensation.

VI. Disclosure of personal data

Article 14. Bilitis Resource Center Foundation as an administrator of personal data has the right to disclose the processed personal data only to the following categories of people:

1. People the personal data relates to;
2. People, who have the legal right to access;
3. People, who have the right to access based on a contract.

VII. Right of the subjects of personal data

Article 15. People, whose personal data is being processed have the following rights:

1. Right to be informed about the data that identify the administrator, the aim of the processing of personal data, the recipients or categories of recipients to whom the data can be disclosed, obligations or the voluntary nature of providing personal data and the consequences of their refusal.
2. Right of access to data, concerning them. When providing the right of access to personal data to the subject, the data of a third party can be disclosed, the administrator must provide partial access to it, without disclosing the third party's data.
3. Right of correction and editing incorrect or incomplete data.
4. Right of deletion of personal data, which processing does not comply with the regulated requirements or with a lapsed legal basis (expired storage deadline, withdrawn consent, completed initial purpose of personal data collection, etc.), as well as the right to require third parties, to whom their data has been disclosed, to

be notified, for every deletion, correction or blockage that has taken place, with the exception of the cases, when this is impossible or entails excessive effort.

5. Right of objection to the administrator against the processing and/or the disclosure of personal data of the subject, when there is a legal reason for this. Right of notification, when the person's personal data will be disclosed to third parties, when there is a legal reason for this.
6. Right of protection by Personal data protection commission or in court.

VIII. Procedure for exercising rights

Article 16. (1) People exercise their rights by submitting a written application to Bilitis Resource Center Foundation (in paper format or by email), containing the following information as a minimum:

1. Name, address and other data that identifies the person;
2. A description of their request;
3. Preferred format for providing the information;
4. Signature, date of submission of the application and correspondence address.

(2) The whole procedure of exercising the rights of the subject is free of charge.

(3) In order to avoid misuse, when an application is submitted by an authorized person, they also need to apply a notarized authorisation.

Article 17. The time scale for consideration of the application and ruling of the administrator on it is 14 days from the date of submission of the application, 30 days, when more time is needed for collection of the requested data based on the complexity of the query.

Article 18. Bilitis Resource Center Foundation creates a written response and announces it personally to the person, who has submitted the request – against a signature or by post/courier with a receipt, considering the option, requested by the applicant.

Article 19. When the requested data does not exist or providing them is legally prohibited, access is denied to the applicant.

Article 20. If Bilitis Resource Center Foundation does not respond to the applicant within the established time scale or the applicant is not happy with the response received and/or believes their rights on personal data protection are violated, they can exercise their right of protection by the authorities.

IX. Used terms and definitions

Article 21. For the purposes of this Policy:



1. "Personal data" is every information, related to identified person or a person that can be identified directly or indirectly, more specifically through an identifier such as a name, identification number or through one or more specific signs.
2. "Personal data processing" is every operation or group of operations, executed on personal data through automatic or other means, such as collection, consultation, use, disclosure by transmission, spreading or another way in which the data becomes accessible, stacking or combining, restricting, deleting or destroying.
3. "Administrator of personal data" is Bilitis Resource Center Foundation
4. "Personal data register" is every structured collection of personal data, accessible based on certain criteria, in accordance with the Inner rules of Bilitis Resource Center Foudation that can be centralized or decentralized and is distributed on a functional principle.

The current Personal data protection policy of Bilitis Resource Center Foundation is approved by Order of the Chair of the Board on 24/0/2018 and is valid from the same date.