



E-Shop Privacy Policy

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1. Introduction

- 1.1.** This **Privacy Policy** (*hereinafter also may be referred to as: the/this/these 'Privacy Terms', 'Policy', and/or 'Document', where context permits*) regulates the processing of Personal Data provided by **Customers** (*hereinafter defined as, "an able-bodied natural person who has reached 18 (eighteen) years of age, visits the BullionZ website, and/or is interested in and/or has already purchased BullionZ's goods via its online eCommerce store or e-shop located on the website" and may therefore also be referred to as: 'you', 'yourself', 'him/self', 'her/self', 'they', 'them', 'their', 'buyer(s)', 'visitor(s)', 'user(s)', 'client(s)', 'consumer(s)', and/or 'shopper(s)', where context permits*) of the **Online eCommerce Shop** (*hereinafter may also be referred to as: 'e-shop', and/or 'online store', where context permits*) located on the website, <https://store.bullionz.com> (*hereinafter may also be referred to as: 'website', where context permits*), which is owned and operated by **BullionZ** (*hereinafter may also be referred to as: 'we', 'us', 'our', 'Brand', where context permits*) a Brand operated by **BT EXCHANGE (LT) UAB**, Registration Number 306321553, whose registered address is at Gedimino pr. 20, LT-01103 Vilnius, Lithuania (*hereinafter may also be referred to as: 'The Company', where context permits*), which is owned and operated by **AG Bullion EOOD** (*hereinafter may also be referred to as: 'The Parent Company', and/or 'Parent', where context permits*) who holds registered offices at Office 801, 251G Okolovrasten pat, Mladost District, Sofia, Bulgaria, 1766.
- 1.2.** This Policy, together with the e-shop's **Terms and Conditions** (*hereinafter may also be referred to as: 'the/this/these Terms and Conditions', 'Terms', 'T&C', and/or 'Agreement', where context permits*), and all other documents mentioned on the e-shop and website, sets out the rules that the Company will comply with when processing Personal Data, it collects from customers.
- 1.3.** This Policy does not affect, restrict, or revoke a customer's rights under Regulation (EU) 2016/679 of the European Parliament, the Council of 27 April 2016 on the protection of individuals concerning the processing of Personal Data, the free movement of such data and repealing according to Directive 95/46/EC (General Data Protection Regulation) (GDPR), Personal Data Protection Act ("LPPD"), or any other applicable European and international data protection regulations.
- 1.4.** For any questions or comments about this Policy, please contact the Company's Data Protection Officer via email at office@BullionZ.com.
- 1.5.** This policy intends to define:
- a.** The principles that BullionZ will adhere to when processing Personal Data;
 - b.** The groups of persons for whom Personal Data are processed;
 - c.** The categories of Personal Data processed by BullionZ;
 - d.** The purposes for which BullionZ processes Personal Data;
 - e.** The legal grounds for the processing;
 - f.** Consumer rights in relation to Personal Data collected, including the existence of the right to request from BullionZ to access, correct, or delete their Personal Data, the right to restrict the processing of such data, the right to object to the processing of such data, the right to transfer such data, and the right to file a complaint to the Commission for Personal Data Protection;

- g.** The period for which consumer Personal Data will be stored and, where this is not possible, the criteria used to determine this period;
 - h.** The cookies used by the e-shop and website; and
 - i.** The categories of third parties to which BullionZ may provide Personal Data.
- 1.6.** Please read this Policy carefully before using the e-shop and website. If a customer does not agree to have their Personal Data processed in the manner as described in this Policy, please do not provide it to us and halt operations with us and our products and services.
- 1.7.** The provision of Personal Data provided by all customers is voluntary, with respect to the use of certain products and services on the e-shop and website, including, but not limited to, the BullionZ e-shop, access to it, or certain parts/segments/modules of it.
- 1.8.** Any refusal to provide Personal Data would mean a technical and legal inability for the Company to provide its relevant services, access to the e-shop and website, or certain parts/segments/modules thereof.
- 1.9.** In certain cases, customer consent to the processing of Personal Data may not be necessary if BullionZ has another basis to obtain such data, such as compliance with statutory, regulatory, and legal obligations like in accordance with the implementation of the Anti-Money Laundering Act and Rules legislation.
- 1.10.** BullionZ complies with the following principles when processing customer Personal Data:
- i.** Legality, integrity, and transparency;
 - ii.** Limitation of processing objectives;
 - iii.** Relevance to the purposes of processing thereby minimizing the data collected;
 - iv.** Data accuracy and timeliness;
 - v.** Storage limitation to achieve the objectives;
 - vi.** Integrity and confidentiality of the processing procedure;
 - vii.** Guaranteeing an appropriate level of Personal Data security; and
 - viii.** Accountability.
- 1.11.** As a Personal Data controller BullionZ meets all the requirements of arranging the protection of Personal Data, collecting only data of customers as may be required for the purpose of providing its products and services, and safeguarding them responsibly and legally.
- 1.12.** BullionZ maintains internal order as a Personal Data controller, applying technical and organizational measures to its staff, premises, software, hardware, networks, encryption, control, reporting, monitoring, vulnerability checks, and more.
- 1.13.** BullionZ have ensured comprehensive and reliable physical, personal, documentary, and cryptographic protection of all Personal Data it collects and processes, against risks such as, but not limited to, unauthorized or incidental access, loss, alteration, disclosure, or destruction of data.
- 1.14.** All employees of BullionZ have undertaken an obligation of confidentiality regarding Personal Data that they have access to in the course of their employment.

2. Terminology

2.1. Within the context of this Policy, the following words will hold the meanings as listed below:

- a. "Personal Data"** – any data that may be used to authenticate a customer directly or indirectly, such as identifiers like full name, identification number, location data, IP address, physical, physiological, genetic, mental, cultural, social traits, and economic/financial information.
- b. "Processing"** – any operation or set of operations BullionZ performs with a customer's Personal Data through automatic or other means such as, but not limited to, collection, recording, organizing, structuring, storing, adapting, modifying, extracting, consulting, using, transmitting, distributing, arranging, combining, restricting, deleting, and destroying.

3. Groups of Persons

3.1. In connection with the products and services available on and through the e-shop and website, BullionZ may collect and process customer Personal Data if they fall into any of the following categories:

- a.** Individual person customer, users, and/or visitors of the e-shop and website, who may or may not hold registration, and may or may not have placed an order;
- b.** Individual persons who placed an order through the e-shop with or without registration;
- c.** Representatives, proxies, or employees of legal entities on whose behalf an order has been placed through the e-shop and website;
- d.** Individuals who contact and corresponded with BullionZ by any contact method available, on any matter relating to the products and services available on and through the e-shop and website, this Policy, as well as regarding technical issues, complaints, support related matters etc.; and
- e.** Individuals or legal entities, who in rare instances, necessitate correspondence with BullionZ.

4. Categories

4.1. When a customer provides Personal Data via the e-shop and website or to a BullionZ representative, for themselves, in connection to a legal entity, or any other individual other than themselves, the customer hereby declares that they have the necessary authorization and consent to do so, especially in instances where information is provided about another individual, and that they have informed and familiarized themselves with this Policy before doing so.

4.2. Taking the aforementioned into consideration, BullionZ may collect and process the following Personal Data concerning customers:

- a.** Information a customer provides or updates by completing registration forms, payment, and delivery fields, or posting content on the e-shop and website, including but not limited to:
 - i.** Full names;
 - ii.** Permanent address;
 - iii.** Delivery address;

- iv. Date of birth;
 - v. Telephone or fax number; and
 - vi. E-mail.
- b. Information related to payments made and owed, such as, but not limited to, bank name, bank account number, (IBAN), bank card information, a preferred method of communication, invoice data, order history, site settings, and notifications, etc.;
 - c. Information provided when subscribing to BullionZ's services, purchasing goods through our e-shop, posting materials, requesting new services, and publicly available information received, including, but not limited to, if a customer links their BullionZ account to their social media profiles or any third-party application, insofar as such technical ability allows for it;
 - d. Information provided when reporting a problem to the Company, reporting against another user of the e-shop or website, or contacting the Company for any other support related reason. Contacting the Company directly results in our recordkeeping of the conversation for quality assurance purposes, as well as the result of this processing of information in order to resolve the highlighted issue;
 - e. Details of visits to the e-shop and website, including, but not limited to, date and time of a customer's access to the e-shop or website, pages viewed, IP address, hardware, software used, traffic data, location data, blog, along with other communication data used and resources;
 - f. Mobile device information about the customer's location, as well as information about the customer's device identification number and type, if the customer accesses the e-shop or website via a mobile device.
 - g. If a customer wishes to opt out of sending tracking information, they may do so by turn off the appropriate features on their device that permit tracking, if the device offers such a feature;
- 4.3.** When required and on the basis of applicable legislation and/or when requested by an authorized legal and/or governmental body the Company may, in addition to the information in the preceding Clause and Sub-Clause, request the collection of more Personal Data about a customer, including, but not limited to, information about:
- a. An official identification document whose validity has not expired and which has the customer's photograph, a unique identification or civilian number, alien's personal number, and document number as given by the competent authorities of the issuing country;
 - b. Passport data including passport series, passport number, customer name, customer date and place of birth, date of issue and expiration, and legal stamps attesting to the validity of the document by the issuing governing authority from where it originates from;
 - c. Country of residence and address;
 - d. A customer's participation and holding of shares or securities in companies (if applicable);
 - e. Information about the origin of the funds used to make a payment transaction for an order, and the purpose and nature of the customer's involvement in the business relationship they enter into with BullionZ's e-shop;

- f.** Any citizenships the customer possess;
 - g.** Marital status;
 - h.** Data on the customer's professional and work activity - profession, place of work (employer);
 - i.** Information on whether the customer holds a senior political position as defined within the Anti-Money Laundering Act;
 - j.** Signature; and
 - k.** Any additional documents, data, or information that are required by law to collect and may vary depending on the case.
- 4.4.** When managing and maintaining the e-shop and website, <https://store.bullionz.com>, BullionZ does not knowingly collect or process:
- a.** Personal Data of persons under the age of 18, as the services available on and through the e-shop and website, are not intended for such persons;
 - b.** Special categories of sensitive Personal Data revealing racial or ethnic origin, political, religious, or philosophical beliefs, union membership, genetic, biometric data, health status, sex life, sexual orientation, convictions, or consumer abuse on the e-shop and website.
- 4.5.** BullionZ does not make decisions based solely on automated processing of Personal Data but relies also on real-person review and analysis of provided data.
- 4.6.** BullionZ does not make decisions about Personal Data provided, which may have legal or similar effects on a customer, such as profiling, or affecting a customer's use of its e-shop and website, unless there are regulatory and legal grounds for Personal Data protection within applicable privacy laws, and whereas appropriate safeguards are set in place to protect the rights, freedoms, and legitimate interests of the customer.

5. Storage

- 5.1.** BullionZ stores customer Personal Data only to the extent necessary for the specific purposes of the data processing in order to provide them with the services available on and through their e-shop and website, to ensure their security and reliability, and to meet customer needs in accordance with our legal or regulatory obligations so that we can manage our rights (for example, to sue) or for tax and accounting purposes.
- 5.2.** When BullionZ no longer needs a customer's Personal Data and have no legal reason to continue to store them, we take the necessary care to delete them from our system and destroy them without undue delay, or to make them anonymous so that they can no longer be used to identify the customer.
- 5.3.** In the event that the storage period of Personal Data is required to be extended in order to fulfill predefined processing purposes, to fulfill our contract with a customer for the provision of distance financial services, legitimate interests of BullionZ, or for any other reason, the customer will be notified in advance.
- 5.4.** Below lists information on the criteria BullionZ applies to determine the retention periods of different types of Personal Data, the most important of which is the specific quality of BullionZ as a financial institution and who and what is obliged to implement measures against money laundering and terrorist financing:

- a.** Some of the products and services available on and through the e-shop and website, namely the sale of precious metal coins and bullions, are provided by the Company in accordance with the precious metals dealer license which it holds.
- b.** Even when a customer purchases gold through BullionZ's e-shop and website via the internet, any and all transactions of such nature are subject to all rules of the legislation in force in the Republic of Bulgaria.
- c.** In addition to the basic rules applicable to the conclusion of all such transactions, in certain cases, as regulated by law, BullionZ has the obligation to identify its customers. "Identification" is a legal concept and according to the Law on Measures against Money Laundering, it is expressed in the requirement of documents, data, and information from the customer.
- d.** In order to carry out proper identification in each transaction, as well as to be in constant readiness to provide all the required information to the legislative and regulatory control bodies, BullionZ is obliged to store the customer previous purchase information from the e-shop and website and to consider it in every subsequent order.
- e.** In this connection, all Personal Data collected during or in connection with the purchase of precious metal products through the e-shop and website, including during the identification process, as well as all customer Personal Data required for tax and accounting purposes, will be retained by BullionZ for the appropriate period provided by applicable law, which may exceed the term of a customer's registration on the e-shop and website.
- f.** Without limiting the generality of the previous point, BullionZ retains all customer Personal Data that is not within the scope of the previous point until their account is deleted from the e-shop and website. Specifically, this includes data that is used by the customer to log in to the e-shop and website and used to access it, such as, but not limited to:
 - i.** Password;
 - ii.** Information provided when subscribing to our products and service or requesting a new service;
 - iii.** Data provided when posting materials on the e-shop and website;
 - iv.** Any publicly available information BullionZ receives, including, but not limited to, linking a customer's e-shop and website account to their social media accounts or third party application, insofar as such technical ability is available on the e-shop and website;
 - v.** Information provided when a customer reports a problem about the e-shop and website, reports against another user of the e-shop and website, or contact BullionZ for any other reason, including correspondence records made to resolve the problem and the result of the processing of the information;
 - vi.** The details of a customer's visits to the e-shop and website from fixed or mobile devices where no purchase was made during the visit, including, but not limited to, date and time of access to the e-shop and website, pages viewed, IP address, hardware and software provided, used, such as their device ID and

type, traffic data, location data, blog, and other communications and resources used¹.

- g. When BullionZ use cookies, we keep them for as long as it is necessary to fulfill their goals.
- h. When a customer has consented to receive communications for direct marketing and advertising purposes, they will receive them until they unsubscribe or request to be unsubscribed from such lists.

6. **Objectives & Legal Grounds**

6.1. Depending on the purpose for which the data is used, the legal basis for BullionZ processing customer Personal Data may be one or more of the following:

- a. Creating a customer's e-shop and website profile;
- b. Providing access to the e-shop and website or parts/segments/modules of the e-shop and website and the ability to use the products and services (or part of them) and all available functions;
- c. Individualization and/or customization of a party to the contract for the provision of the respective service and ensuring its performance;
- d. Contacting customers about items they have ordered through the BullionZ e-shop;
- e. Communication with customers regarding a report they have made against another user of the e-shop and website, a problem with the e-shop and website, or if they have contacted the Company for another reason (for example, to request additional information about a service available through the e-shop and website);
- f. Personalizing a customer's visit to the e-shop and website;
- g. To notify customers of changes to the functionality of the e-shop or website, or to provide them with other information related to its use. BullionZ may provide on the e-shop or website directly, or on third party platforms, information, products, services, news, newsletters, and special promotions that we believe customers would be interested in, as well as respond to their requests;
 - i. A customer may request the termination of their Personal Data for such purposes, in accordance with provisions stipulated in **Article 7** of this Policy.
- h. To fulfill BullionZ's statutory obligations (for example, customer identification and other obligations arising from the Anti-Money Laundering Act, tax legislation, etc.);
- i. Financial and accounting activity;
- j. For the purpose of direct marketing and advertising of BullionZ products and services, and customers may receive messages from us by regular mail, email, or telephone (depending on the information provided).
 - i. Customers have the right to withdraw consent to the processing of their Personal Data for direct marketing purposes, in accordance with provisions stipulated in **Article 7** of this Policy.

¹ If part of the data mentioned in this Sub-Clause has a legal obligation to store it (see the previous Clause), then this part of the data will not be deleted or destroyed when a customer's account is deleted.

- k.** The e-shop and website may sometimes contain links or hyperlinks to other sites. BullionZ in no way manages or operates or endorses any linked sites.
 - i.** BullionZ recommends usage of such sites be done carefully and with due care for their content and terms of use. If a customer is transferred to another site through a link from our e-shop or website, we may receive aggregated or otherwise anonymous statistical information about the traffic on those sites. BullionZ is not responsible for the privacy policies or content of such sites, and we encourage all customers to review their privacy policies.
- l.** Consent to the processing of customer Personal Data for one or more of the specific purposes of the said, in which case their Personal Data will be processed to the extent and under the conditions provided for in that consent.
- m.** The need to execute a contract to which a customer is a party or to take steps at their request prior to the conclusion of such a contract, including the processing of Personal Data required for registration, account creation, and service activities, available on and through the e-shop and website. In addition, these goals include communicating with customers, including by email, required to provide these services and/or notifying customers of changes to them.
- n.** The need to comply with a legal obligation that applies to BullionZ and/or to a third party.
 - i.** Due to the specific scope of BullionZ's activity, regulations often require us to request more detailed Personal Data about our customers. This information is needed by BullionZ and the regulatory authorities to ensure the security of customer funds and to provide them with services in accordance with applicable law.
- o.** The need to protect and pursue the legitimate interests of BullionZ or a third party. These legitimate interests may include, but are not limited to:
 - i.** Ensuring the proper functioning and use of the e-shop and website by customers;
 - ii.** Maintaining and administering products and services available on and through the e-shop and website;
 - iii.** Resolving disputes;
 - iv.** Identifying and preventing malicious actions;
 - v.** Detecting and resolving technical or functional issues, development, and improvement of products and services available on and through the e-shop and website;
 - vi.** Communication with customers, including by electronic means, on important issues related to BullionZ's products and services;
 - vii.** Receiving and processing any alerts or requests a customer sends for further information;
 - viii.** Exercising and protecting the rights and legitimate interests of BullionZ, including in court; and
 - ix.** Assisting in the exercise and protection of the rights and legitimate interests of other customers or third parties of the e-shop and website.

7. Customer Rights

- 7.1.** In connection with the processing of Personal Data, customers retain the following rights as listed in the subsequent Clauses, that can be exercised by submitting a hard copy application to the BullionZ correspondence address listed in **Article 1** of this Policy or electronically via office@BullionZ.com.
- a.** Said application should be in free text and, if necessary, BullionZ's Data Protection Officer will be fully assisting in formulating it.
 - b.** BullionZ is committed to timely responding to all customer requests regarding their Personal Data.
 - c.** Any received application, request, inquiry, or any other communication related to the protection of Personal Data will be answered within one month.
 - i.** The customer will be informed of any delays or extensions required if necessary.
- 7.2.** To avoid abuse, BullionZ reserves the right to request additional data and actions from its customers with a view to establishing the identity of the applicant and the data subject, such as, for example, presenting an identity card or entering their Personal Data for login to the data subject's profile in front of a BullionZ employee.
- 7.3.** The customer's right to request access to their Personal Data, particularly the right to request to receive from the Company, include, but are not limited to:
- a.** Confirmation that the Personal Data relating to them are being processed;
 - b.** Information about the purposes of such processing;
 - c.** The categories of Personal Data;
 - d.** Recipients or categories of recipients to whom Personal Data relating to them are
 - e.** disclosed;
 - f.** Communication in an understandable form containing their Personal Data and
 - g.** any available information about their source;
 - h.** Information about the logic behind any automated processing of Personal Data relating to them.
- 7.4.** The provision of access for a customer to their Personal Data is free of charge, however BullionZ reserves the right to impose an administrative fee in the event of repeated or excessive requests.
- 7.5.** The right to request that the Company delete, correct, or block Personal Data concerning them, if the processing of which does not meet the requirements of the LPPD, and to request the Company to notify third parties to whom their Personal Data have been disclosed, for any deletion, correcting or blocking, except where this is impossible or involves excessive effort. Customers may also correct or fill in any inaccurate or incomplete Personal Data relating to them directly through their website user profile account.
- 7.6.** The right to request that their Personal Data be deleted without undue delay ("right to be forgotten") based on any of the following grounds:
- a.** When their Personal Data is no longer needed for purposes for which they were otherwise collected or processed;

- b.** When the processing of their Personal Data is no longer legally necessary for the purposes of the legitimate interests of BullionZ or a third party;
 - c.** When their Personal Data is processed for the purposes of direct marketing, and there are no legal grounds for the processing;
 - d.** To have an advantage;
 - e.** When processing was unlawful;
 - f.** When their Personal Data must be deleted in order to comply with a legal obligation under European Union or Member State law that applies to BullionZ;
 - g.** When they have withdrawn consent on which the processing of their Personal Data is based and there is no other legal basis for the processing;
 - h.** When their Personal Data has been collected in connection with the provision of information society services; and
 - i.** When they have informed the Company in writing of their desire to have such information deleted from our records and such request have been made lawfully.
- 7.7.** BullionZ may refuse to delete a customer's Personal Data for the following reasons:
- a.** To comply with a legal obligation requiring processing as provided for in European Union law or the law of the Member State applicable to BullionZ;
 - b.** For the performance of a public interest task;
 - c.** For the exercise of official powers conferred on BullionZ; and
 - d.** To establish, pursue, or defend legal claims.
- 7.8.** BullionZ does not delete Personal Data that has a legal obligation to be kept, including for the protection of legal claims against it or for proving their own rights.
- 7.9.** When the processing of a customer's Personal Data is restricted as a result of their request to that effect, such data shall be processed by BullionZ, with the exception of their storage, only with the customer's consent, or for the establishment, exercise or defense of legal claims, or for the protection of the rights of another natural person or on important grounds of public interest to the European Union or a Member State.
- 7.10.** When a customer has requested a restriction on the processing of their Personal Data, BullionZ will inform the customer prior to the cancellation of the restriction on processing.
- 7.11.** The right at any time and on grounds related to their specific situation, to object to the processing of their Personal Data, which is necessary for the purposes of the legitimate interests of BullionZ or a third party, including profiling based on such interests.
- a.** In such cases, BullionZ will cease processing the customer's Personal Data unless it proves that there are compelling legal grounds for processing that take precedence over the customer's interests, rights, and freedoms, or for the establishment, exercise, or defense of legal claims.
- 7.12.** The right to object at any time to the processing of their Personal Data, including if it is processed for the purposes of profiling or direct marketing and advertising and to the disclosure of their data to third parties and their use on their behalf for the purposes of profiling or direct Marketing and Advertising.
- a.** In these cases, the processing of a customer's Personal Data will be terminated in the future.

- 7.13.** The right to receive Personal Data that concerns them and which they have provided to BullionZ in a structured, widely used, and machine-readable format, and the right to transfer this data to another administrator without hindrance by BullionZ ("right to data portability"), where the processing is carried out in an automated manner and is: based on the customer's consent to the processing of their Personal Data for one or more specific purposes, or necessary for the performance of a contract to which the customer is a party, or necessary to take taking steps at the customer's request before concluding such a contract.
- 7.14.** When a customer exercises their right to data portability, they have the right to receive a direct transfer of their Personal Data from the Company to a third party data controller, when this is technically feasible.
- 7.15.** The right to not be the subject of a decision based solely on the automated processing of the customer's Personal Data, including profiling, which has legal consequences for the customer or similarly affects the customer significantly, unless provided for in the applicable Personal Data protection legislation, and where appropriate safeguards have been provided to protect the customer's rights, freedoms, and legitimate interests.
- 7.16.** The right to ask BullionZ to inform them of any recipients to whom Personal Data for which correction, erasure, or restriction of processing has been requested have been disclosed.
- 7.17.** The right to be notified by BullionZ without undue delay when, due to a breach of security of their Personal Data, high risk to their rights and freedoms may be created, including the right to be informed of the measures taken or are about to be taken.
- 7.18.** Following the aforementioned Clause, BullionZ has no obligation to notify the customer if:
- a.** It has taken appropriate technical and organizational safeguards with respect to data affected by a security breach;
 - b.** Subsequently took measures to ensure that the violation would not pose a high
 - c.** risk to the customer's rights;
 - d.** A notification on the Company's part would require a disproportionate effort.
- 7.19.** The right to be notified should BullionZ find that for any reason it is unable to fulfill its obligations under this Policy or the applicable data protection regulations.
- 7.20.** The right to be notified in advance in the event of a merger, acquisition, or sale of an asset of BullionZ affecting the processing of their Personal Data.
- 7.21.** Right to contact BullionZ's Data Protection Officer at the address: Office 801, 251G Okolovrasten pat, Mladost District, Sofia, Bulgaria, 1766; via e-mail at office@BullionZ.com, or via phone at +359 88 958 2450.
- 7.22.** Right to lodge a complaint with the competent supervisory authority - Commission for Personal Data Protection, via the contact details below, if the customer believes that their rights related to the protection of Personal Data have been violated.
- a.** Address: 1592 Sofia, Prof. Tsvetan Lazarov № 2, Phone: +359 2 915 35 18;
 - b.** E-mail: kzld@government.bg, kzld@cpdp.bg;
 - c.** Website: www.cdpd.bg.

8. Cookies

- 8.1.** In order for the e-shop and website to work according to the functionality set by the BullionZ team, as well as to improve customer experiences on the e-shop and website, and to personalize customer visits, the Company sometimes store small data files on customer devices, called "cookies". This is a standard practice widely used in almost all sites around the world. This Article will explain how this is done.
- 8.2.** What are cookies? Cookies are small text files saved by a browser to a device's hard drive. They allow us to identify the device of the customer and to achieve the correct behavior of a web page according to the customer's individual preferences. This improves the functionality of the e-shop and website. For example, using cookies can save the password for each session, so a customer will not have to enter it every time they visit the e-shop and website. Cookies usually contain the website name, storage time of the device used to access it, and a unique number. In certain cases, cookies also allow for the personal identification of customers.
- 8.3.** How does BullionZ use cookies? Cookies are used to adapt the content of the e-shop and website to the customer's preferences and to optimize their use of the e-shop and website. They are also used to create anonymous statistics (about customer behavior on the e-shop and website) in order to improve the structure, design, appearance, and content displayed.
- 8.4.** BullionZ uses the following types of cookies:
 - a.** "Session Cookies" – are temporary and are usually deleted by a customer's device when they leave the relevant web page, close the web browser, or turn off the device; and
 - b.** "Persistent Cookies" – are stored on the customer's device for a specified period of time, which are specified in the cookie parameters and may exceed one year, or until the customer manually deletes them. These cookies can be used again the next time the customer visits the e-shop or website.
- 8.5.** BullionZ may also allow the use of third-party cookies. These are cookies associated with software products that record anonymous user statistics, such as, but not limited to, Google Analytics, CrazyEgg, Kissmetrics, and others.
- 8.6.** Additionally, third-party cookies may be linked to social buttons and plugins that allow for page sharing and interaction with social networks. In order for these tools to work, social networks (such as Facebook, Twitter, Instagram, etc.) may record cookies through the e-shop and website to interact with the customer's anonymous profile on a network or to add data to the information collected in a manner and with goals outlined in their respective policies and sites.
- 8.7.** Some images, graphics, content, materials, and videos displayed on our e-shop and website may be provided by third parties (such as YouTube) and may use cookies to collect anonymous information, such as how a customer accessed a video, what videos they watched, and more.
- 8.8.** BullionZ does not have access to or control over cookies that are used and provided by third parties. This Policy does not apply to the way in which a third party collects and treats such information. As such, customers must familiarize themselves with the relevant policies of the third parties in question in order to be aware of their practices and behavior.
- 8.9.** The Personal Data collected from cookies may only be used to perform specific functions on the e-shop and website related to the customer. Such Personal Data is encrypted to

prevent access to it by unauthorized persons and to guarantee the anonymity of the customer using the e-shop and website.

8.10. Most sites automatically accept cookies, but if a customer does not want to accept cookies, they can configure their browser to reject, block, and delete them. Most web browsers allow cookies to be controlled through the settings of the browser itself.

a. Doing so, may require manual adjust to some settings each time the customer revisits the e-shop and website, as well as limiting the functionality of some services and features. Unfortunately, in most cases there is no universal option to disable cookies without restricting the functionality they provide to the e-shop and website.

8.11. To learn more about cookies, including how to control them, visit <http://aboutcookies.org>

9. Third-Party Policy

9.1. In some cases, in order for BullionZ to fulfil its obligations under a contract or legal agreement with customers, we may be obliged or may need to disclose Personal Data they provide to third parties, such as our trusted partners or competent authorities, specifically including:

a. To a competent state or local authorities and their administrations, including, but not limited to, the Commission for Personal Data Protection, the Commission for Consumer Protection, the State Agency for National Security, the National Revenue Agency, the Minister of Finance, the Bulgarian National Bank, customs bodies, bodies of the Ministry of the Interior, judicial bodies.

i. Consumer Personal Data may be provided to such authorities in order to comply with their order, to fulfil a legal obligation or to protect the rights, property, or security of BullionZ, our customers, or others;

b. IT service providers, hosting services, our database maintenance services, technical equipment, software and applications that may contain data about customers (such services are sometimes associated with access to customer Personal Data to perform these tasks), social networks, web analytics, and search engines, use of tools to refine user-generated content;

c. For the purposes of carrying out various promotional activities, advertising and marketing campaigns, PR initiatives and implementation of similar events, as well as for analyzing their effectiveness through the use of external services of specialized companies and organizations (advertising, marketing, digital) and social media agencies), with a view to fulfilling their contractual obligations and responsibilities.

9.2. BullionZ may also provide a customer's Personal Data to selected third parties unrelated to BullionZ for the implementation of the pre-defined and specific purposes of the processing, provided that these third parties are committed to providing an adequate level of Personal Data protection, to comply with the regulations in force at European and national level and our instructions in accordance with this Privacy Policy, and refrain from processing a customer's Personal Data for any purpose except in connection with the services provided to us.

9.3. BullionZ may also provide aggregated statistics on customers, sales, browser types, operating systems, the internet, domain, demographic or profile data, traffic patterns, and related information from third party sites, but these statistics do not contain identifiable customer Personal Data.

9.4. BullionZ will notify customers if they intend to share some or all of their Personal Data with a third country or an international organization, in which case it will outline the

possible risks of data transfer to a third country in the absence of adequate protection and adequate means of protection.

10. Non-Applicability

10.1. This Policy does not apply to third parties who view/use content generated by a customer of the e-shop and website, after it has been posted on the e-shop and website, including, but not limited to, information on a customer's account, the material they have posted/submitted, and etc. The provision of a customer's Personal Data to other users of the e-shop and website is at their own risk and BullionZ is not responsible for any damages or violations suffered as a result of such provision.

11. Concluding Provisions

11.1. BullionZ reserves the right to change and/or supplement this Policy at any time. Changes will take effect immediately upon their publication on the e-shop and website unless otherwise stipulated in the updated version of this Policy.

11.2. All customers should periodically visit this Policy page. Since this Policy may be updated at any time without special notice to customers in advance, BullionZ is therefore not responsible nor can be held liable if a customer has not read the latest version of this Policy.