

PRIVACY POLICY OF WWW.ITMETAMORPHOSIS.COM

In force from 01.12.2021

[/Българска версия/](#)

The current policy for the protection of personal data regulates the processing of personal data of natural persons who register for participation and participate in organized trainings as well as the visitors of the website www.itmetamorphosis.com.

The website www.itmetamorphosis.com is property of **Power Partner Solutions Ltd., CCI 205877724**, with a seat and address of management: Sofia 1784, Lyulin district, residential are Lyulin 10, block 136, entrance 1, floor 2, flat 3, represented by the manager Nadezhda Ivanova Myashkova and it is managed completely in accordance with the requirements of Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (General Data Protection Regulation), called the Regulation, as well as all other normative acts linked to the processing and protection of personal data of natural persons.

Power Partner Solutions Ltd. (called “the company”, “the controller”, “we”), in its capacity of an owner of the website, is a controller of personal data pursuant to the Regulation because it determines the purposes and the means of processing of your personal data.

Linked to the organisation and conducting of trainings via the website www.itmetamorphosis.com, the company processes the personal data connected to you lawfully, in good faith and in a transparent manner by striving to guarantee an appropriate level of security of these data, including protection against unauthorized or unlawful processing and against random loss, destruction or damage of your data. To this, end we apply appropriate technical and organisational measures.

By the current policy, we strive to provide you with the necessary information, linked to the processing of your personal data, received via the website www.itmetamorphosis.com, in a transparent, accessible and easily understandable manner.

In case you need additional information regarding the processing of your personal data, you can contact us at the contacts indicated below.

DATA ABOUT THE ADMINSTRATOR OF PERSONAL DATA	
Name	Power Partner Solutions ltd.
CCI	205877724
Seat and address of managements	Sofia, postcode 1784, Lyulin district, residential are Lyulin 10, block 136, entrance 1, floor 2, flat 3
Contact person	Nadezhda Myashkova
Telephone	+359 889 409 999
E-mail	privacy@uppsgroup.com

I. DEFINITIONS AND EXAMPLES

For the purposes of the current policy, the used terms have the following meaning:

➤ “**personal data**” means any information, linked to a natural person, which leads to his identification or identifies him, including identifiers like name, an identification number (Personal No (ЕГН), personal ID number of a foreigner (ЛНЧ) or others), location data (geolocalization), an online identifier (for example IP) or one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person;

➤ “Breach of the security of personal data” means a breach of the security which leads to accidental or unlawful destruction, loss, alteration, unauthorized disclosure or access to personal data transmitted, stored or otherwise processed.

➤ “**processing**” means any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as *collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction*;

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

➤ “**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;

➤ “**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;

The terms, which are not defined in the text above, have the meaning given to them in Regulation (EU) 2016/679(<https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=celex%3A32016R0679>).

II. WHAT CATEGORIES OF PERSONAL DATA DO WE PROCESS?

In order to provide you with access to the educational services offered through the website www.itmetamorphosis.com, you create a profile on the website by entering name and surname, username, e-mail and password. Your e-mail is used for the purpose of restoring access, for customer and technical maintenance as well as for notifications.

We process the following categories of personal data, which you provide to us:

- linked to **your physical identity**, namely: three names, Personal No (EGH)/personal ID number of a foreigner (JIHЧ) or another analogous identifier, address for correspondence, permanent address, e-mail, profile picture;

Please bear in mind that:

✓ Your three names, Personal No (EGH), address for correspondence and permanent address are necessary for us **solely in the cases**, in which we are obliged to identify you in an indisputable manner, when you exercise your rights under Articles 15-22 of the Regulation. For the realization of all other purposes, your name and surname are quite sufficient and we do not process the other types of personal data (middle name, Personal No (EGH), address for correspondence and permanent address).

✓ On buying paid options (trainings) in the services we collect information about the purchase, in particular identification number of the transaction and dates of payment. Power Partner Solutions ltd. does not process card details in connection with the payments you make online. The data are collected with a legal purpose, tax regulations or for the provision of technical maintenance.

✓ By creating a user profile you will have the opportunity to use all web services and products, including forums, blogs and networks, linked to www.itmetamorphosis.com and the training for which you have registered.

✓ In order to personalize your user profile you have the opportunity to add a profile picture. The inclusion of a picture in your profile is entirely up to you as long as its processing is not mandatory in order to provide you with access to the educational services offered through the website.

Power Partner Solutions **does not process** personal data, falling within the scope of the special categories of personal data, also called sensitive data, namely: personal data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, and the processing of genetic data,

biometric data for the purpose of uniquely identifying a natural person, data concerning health or data concerning a natural person's sex life or sexual orientation.

The company does not process personal data of persons under the age of 14. In case we find out that such a person has provided his own personal data, we will undertake the necessary actions with a view to their erasure. In case a parent or a guardian of a person under the age of 14 finds out that this person has provided his personal data, we ask him to contact us via the contact details set out in the current policy.

III. COOKIES

The “cookie” constitutes a small quantity of data, which the website stores on the computer or on the mobile device of the visitor.

On our website we use the following “cookies” linked to its functioning:

Name	Type	Description	Term of storage
ci_session	First Party Cookie	The session cookie, whose purpose is to identify your session.	Till the end of the session
_ga _gali _gat _gid	Universal Analytics (Google)	These cookies are used for the collection of information regarding how the visitors use our website. We use the information for the compilation of reports and in order to help us improve the website. The cookies collect information in a manner that does not directly identify anyone, including the number of visitors of the website and the pages, which they visited. For more information read the Google review on privacy and personal data protection.	2 years

You can find more information regarding how the “cookies” are used in the internet space here: www.aboutcookies.org.

IV. WHAT ARE THE PURPOSES FOR WHICH WE PROCESS PERSONAL?

- registration for participation in trainings;
- organizing the payment of the owed tuition fee, accounting purposes;
- organisation and conducting of trainings;
- In case of inquiries sent by e-mail – processing of the inquiry and sending an answer and information related to it;
 - Sending information about upcoming events and trainings, organized by Power Partner Solutions ltd.;
 - Processing of applications for the exercise of rights according to Regulation (EU) 2016/679, deposited with Power Partner Solutions ltd. – in its capacity of a controller of personal data;
 - Coverage and promotion of the platform for trainings and the pursued aims by the company, advertisement purpose;

We can process your personal data for the purpose of establishment, exercise or defence of legal claims, whether in court proceedings or in an administrative or out-of-court procedure as well as in the cases in which we are obliged to do it according to a normative act.

V. ON WHAT LEGAL GROUNDS DO WE PROCESS YOUR PERSONAL DATA?

PURPOSE of processing	Types of personal data	Legal ground for the processing
1. Registration for participation in trainings; 2. Organisation and conducting of the trainings; 3. Payment of the owed tuition fee.	<ul style="list-style-type: none"> ➤ two names ➤ e-mail ➤ photo ➤ bank reference about payment; ➤ other banking information, necessary for the realization of the payment; 	Pre-contractual relations, conclusion and execution of a contract – Article 6 (1) (b) from the Regulation;
Sending information about upcoming trainings and events, organized by Power Partner Solutions ltd.	<ul style="list-style-type: none"> ➤ e-mail 	Legitimate interest – Article 6 (1) (f) of the Regulation;
In case of inquiries sent by e-mail – processing of the	<ul style="list-style-type: none"> ➤ e-mail ➤ two names ➤ other information, 	Legitimate interest – Article 6 (1) (f) of the

inquiry and sending an answer and information related to it;	which you provided in your inquiry (which cannot be identified in advance)	Regulation <i>or</i> Pre-contractual relations – Article 6 (1) (b) of the Regulation <i>depending on the nature of the inquiry;</i>
Processing of applications for the exercise of rights according to Regulation (EU) 2016/679, deposited with Power Partner Solutions ltd.;	<ul style="list-style-type: none"> ➤ three names ➤ Personal No (ΕΓΗ) ➤ Address for correspondence ➤ Permanent address 	Compliance with a legal obligation – Article 6 (1) (c) of the Regulation;

We have a right to process your personal data in the cases in which such an obligation of Power Partner Solutions ltd. is provided for in a normative act (in accordance with Article 6 (1) (c) of the Regulation).

VI. WHAT RIGHTS DO YOU HAVE?

The subjects of personal data/the visitors of the website www.itmetamorphosis.com /registered students and others/, whose personal data we process, have the rights described below.

In case you make a request for the exercise of any of these rights, we will provide you with information about the actions we have undertaken related to it within one month from receiving the relevant application.

In case your request is linked to the undertaking of more complicated or numerous actions, this period may be extended by two more months, for which we will inform you in a timely manner.

The exercise of these rights is free of charge unless in the cases of repeated or excessive requests. In this case Power Partner Solutions ltd. can demand the payment of a certain fee for the reimbursement of the additional administrative expenses.

● RIGHT OF ACCESS

You have a right to receive from Power Partner Solutions ltd. a confirmation whether the company processes personal data related to you. In case we find out that we process personal data related to you, we will provide you with the following information (when it is applicable):

- the purpose(s) of the processing;

- categories of recipients of personal data;
- the recipients or categories of recipients in third countries or international organisations (if such a transfer is going to be realized);
- the envisaged period for which the personal data will be stored or the criteria used to determine that period;
- the existence of the right to request from the controller rectification or erasure of personal data or restriction of processing of personal data concerning the data subject or to object to such processing;
- the right to lodge a complaint with a supervisory authority;
- where the personal data are not collected from the data subject, any available information as to their source;
- the existence of automated decision-making, including profiling;

If you explicitly state such a request in your application, the controller shall provide a copy of the personal data undergoing processing. Please bear in mind that if you want to receive more than one copy of the relevant documents, you will be charged a fee of 0,50 lv. per page.

- **RIGHT TO RECTIFICATION**

You have a right to obtain from Power Partner Solutions Ltd. without undue delay the rectification of inaccurate personal data concerning you. Taking into account the purposes of the processing, you have the right to have incomplete personal data completed, including by means of providing a supplementary statement.

- **RIGHT TO ERASURE (the so-called right to be forgotten)**

You have the right to request the erasure of the personal data concerning you where one of the following grounds applies:

- your personal data are no longer necessary in relation to the purposes for which they were collected or otherwise processed;
- you withdraw your consent on which the processing is based and there is no other legal ground for the processing;
- you objected to the processing and there are no overriding legitimate grounds for the processing or where the data are processed for the purposes of the direct marketing;
- your personal data have been unlawfully processed;
- your personal data have to be erased for compliance with a legal obligation to which the controller is subject;
- the personal data have been processed in relation to the offer of information society services;

- **RIGHT TO RESTRICTION OF PROCESSING**

You have a right to demand a restriction of processing of personal data related to you, that is marking the relevant personal data for the purpose of restriction of their future processing, where one of the following applies:

- you contest the accuracy of the personal data and you want a restriction on the personal data related to you for a period, which will enable us to verify their accuracy;
- the processing of the personal data related to you is unlawful but you do not want them to be erased;
- we do not need the personal data related to you for the purposes of the processing but they are required by you for the establishment, exercise or defence of legal claims;
- you have objected to processing (when it is applicable) and you anticipate a verification whether the legitimate grounds, which are applicable to us, override your interests;

The methods of restriction that we use are temporary relocation of the chosen personal data to another system of processing, termination of the users' access to them as well as a temporary removal of the published data from the website (when it is possible).

In case we rectified or erased personal data related to you or we restricted their processing, we will inform every recipient, to whom they were disclosed, unless this proves impossible or involves disproportionate effort. We will inform you about those recipients if you so request.

● **RIGHT TO DATA PORTABILITY**

You have the right to receive the personal data concerning you in a structured, commonly used and machine-readable format and you have the right to transmit those data to another controller of personal data of your choice. In order to execute your request, the processing of your personal data should be based on explicit consent or a contractual obligation and should be carried out by automated means. In order to realize your request for direct transfer of personal data to another controller, this controller should have technical means, enabling him to receive your personal data.

● **RIGHT TO OBJECT**

You have the right to object to the processing of personal data related to you, when the processing is based on the legitimate interest of Power Partner Solutions Ltd. We will no longer process the personal data unless we demonstrate compelling legitimate grounds for the processing which override your interests, rights and freedoms or for the establishment, exercise or defence of legal claims.

How to exercise the abovementioned rights?

In case you want to exercise any of your rights, please download the application from [HERE](#) and fill in the necessary information. The application is created for your convenience but it is not mandatory.

If you prefer, you can also send a request in a free form, which must contain the following information:

- your three names;
- Personal No (ЕГН)/personal ID number of a foreigner (ЛНЧ) or date of birth (*only if you have provided us with such information so far*);
- address;
- address for correspondence;
- description of the request;
- preferred form for receiving an answer and information;
- signature;
- date of lodgment.

Please send the application in one of the following ways:

- via e-mail to privacy@uppsgroup.com under the conditions of the Law on the electronic document and the electronic certification services (Закон за електронния документ и електронните удостоверителни услуги (ЗЕДЕУУ)), the electronic governance law (Закон за електронното управление (ЗЕУ)) or the electronic identification law (Закон за електронната идентификация (ЗЕИ)).
- by mail or in person at: Sofia, postcode 1784, Lyulin district, residential area Lyulin 10, block 136, entrance 1, floor 2, flat 3

*When the application is lodged by an authorized person, a **trust deed** should be attached to it.*

After we review your application we will analyze its content and we will ask for additional information if necessary. You will receive information about its processing within 1 month from the moment of its sending via the way of communication you indicated as preferred.

In case you need assistance when filling in the form that we offer, you can contact us via the contact details set out in the current policy. We prepared short instructions for the application (page 3) for your convenience: [application](#)

You should bear in mind that Power Partner Solutions Ltd. can refuse in full or partially the satisfaction of any of the abovementioned rights, when their satisfaction would cause a risk to public order and security, the prevention, investigation and prosecution of criminal offences or the execution of criminal penalties, including the

safeguarding against and the prevention of threats to public security, other important objectives of general public interest, in particular an important economic or financial interest, including monetary, budgetary and taxation matters, public health and social security, the protection of the data subject or the rights and freedoms of others or the enforcement of civil law claims.

Besides the rights described above, you also have the opportunity to:

- file a complaint with the Commission for Personal Data Protection (CPDP) when you consider that we violated your rights for the protection of personal data, guaranteed by the Regulation or any other normative act in force;

Contact details of the CPRD:

Sofia 1592, blvd. “Professor Tsvetan Lazarov” №2

Center for information and contacts - telephone 02/91-53-518

E-mail: kzld@cpdp.bg

Website: www.cdpd.bg

- in the cases, in which you consider that we violated your rights by processing your personal data, guaranteed by the Regulation or any other normative act, besides filing a complaint with CPDP, you have a right to file a complaint with the administrative court at the seat of Power Partner Solutions ltd. You do not have the right to refer the case to the court in case there are pending proceedings in front of the commission for the same violation or a decision of the commission is appealed and there is no court judgment in force;

- to claim compensation for incurred material and immaterial damages as a result of a violation of your rights for data protection – in the cases in which you consider that we violated your rights for data protection, guaranteed by the Regulation or any other normative act in force, and you file a complaint with the competent court, in the same court proceedings you can claim compensation for the incurred damages when such damages occurred.

When there is a personal data breach that is likely to result in a high risk to your rights and freedoms, Power Partner Solutions ltd. will communicate the personal data breach to you without undue delay.

VII. TO WHOM DO WE PROVIDE THE PERSONAL DATA RELATED TO YOU?

Your personal data are provided to our partners, with which we concluded contracts for providing different services, connected to the organisation and conducting of trainings. All our partners comply with the requirements of Regulation (EU) 2016/679 by making such commitments through the contracts for the protection

of personal data which they concluded with us (in accordance with Article 28 (3) of the Regulation).

Your personal data are neither provided to third persons within the European Union, nor to third parties or international organisations.

The company may provide the personal data, related to you, to competent authorities, which based on a normative act have powers to require from the company the provision of information, containing personal data.

VIII. HOW LONG DO WE STORE YOUR PERSONAL?

Type of personal data	Term of storage
Name and surname	Till your profile is active or till the data are necessary in order to provide the necessary service;
E-mail	Till your profile is active or till the data are necessary in order to provide the necessary service;
Photo	Till your profile is active or till the data are necessary in order to provide the necessary service;
Bank reference about payment; other banking information, necessary for the realization of the payment;	According to the Accountancy Act (Закон за счетоводството) – up to 5 years after the expiration of the limitation period for the repayment of the public debt, certified by these documents;
Three names, Personal No (EGH), address for correspondence and permanent address (indicated in the application for the exercise of rights)	Up to 5 years from the receipt of the application – for the purpose of providing the relevant evidence in court proceedings or administrative procedure;

We store your personal data for the period, indicated in the table above. This term is necessary in order to have the objectives, set out in the current Policy for the protection of personal data, met unless it is required by law to store them for a longer period. After expiration of the terms for the processing of personal data, the latter are erased/destroyed unless:

- they are necessary for a pending court, arbitration, administrative or enforcement proceedings, or in case of a received complaint from the relevant subject of personal data, which should be reviewed by Power Partner Solutions Ltd.;
- or the relevant subject of personal data has exercised his right to request a restriction of the processing of personal data, concerning him/her;

IX. GENERAL INFORMATION

Power Partner Solutions Ltd. strives to ensure that the processed personal data, relating to all natural persons, are updated (and rectified if necessary) as well as that data, which are not necessary for meeting the objectives, described above, are not stored.

The current Policy for the protection of personal data may be amended or supplemented due to amendments of the applicable legislation, on the initiative of the company or of a competent authority (for example the Commission for Personal Data Protection).