



PERSONAL DATA PROCESSING AND SECURITY POLICY

The purpose of this Personal Data Processing and Security Policy (the “Policy”) is to inform individuals about what personal data “M.O. RUSE” EAD (the “Controller”) processes in connection with the company’s activities. The Policy also covers the personal data processing activities carried out by the Controller when data subjects use the Controller’s website (www.mallrousse.bg), on the social media pages which the Controller maintains and operates in connection with the activities of the Mall Rousse shopping centre (“**Mall Rousse**”), located at: Ruse, postcode 7000, 121-D Lipnik Boulevard, access to and use of external links to our partners’ websites, as well as matters relating to the marketing, management and CCTV surveillance of Mall Rousse.

In this Policy, you can find out about your rights as a data subject in relation to the personal data collected, processed and stored by us as a Data Controller. In our capacity as a Data Controller, we process your personal data for the purposes, for the periods and in the ways described below, in compliance with the principles and rules laid down in the applicable European and Bulgarian legislation on the protection of personal data.

1. PURPOSE AND SCOPE

This Policy (‘the Policy’) informs individuals how ‘**M.O. ROUSSE**’ EAD (‘the Controller’) processes their personal data in connection with the operation and management of the **Mall Rousse** shopping centre (address: Ruse, postcode 7000, 121-D Lipnik Boulevard), including via the website **www.mallrousse.bg**, official social media pages, marketing activities, contact forms and **CCTV surveillance** of communal areas and the car park.

2. LEGAL FRAMEWORK AND DEFINITIONS

This policy complies with **Regulation (EU) 2016/679 (GDPR)**, the **Personal Data Protection Act** and relevant Bulgarian and European legislation.

Supervisory authority: **Commission for Personal Data Protection (CPDP)**.

The terms ‘controller’, ‘processor’, ‘data subject’, ‘personal data’, ‘security breach’, ‘processing’ and ‘supervisory authority’ have the meanings assigned to them under the GDPR.

3. DATA CONTROLLER

‘M.O. ROUSSE’ EAD is a single-shareholder company, incorporated and existing under the laws of the Republic of Bulgaria, with its registered office and business address at: Sofia, district “Vazrazhdane”, 43 Bregalnitsa Street, 2nd floor, registered in the Commercial Register at the Bulgarian Registry Agency under UIC 175322411. “M.O. RUSE” EAD is the owner of Mall Rousse. “M.O. RUSE” EAD is the Data Controller of your personal data and the owner of the website www.mallrousse.bg.

4. DATA PROTECTION OFFICER

The Controller’s Data Protection Officer is: Lyudmila Nedelcheva, email address: lyudmila.nedelcheva@mor-management.bg.

If you have any questions regarding your rights and legitimate interests in relation to the processing of personal data, including questions relating to this Policy, you may contact us in the following ways: by email at office@resb.bg, and by post at: Sofia, Vazrazhdane district, 43 Bregalnitsa Street, 2nd floor.

5. TYPES OF PERSONAL DATA

Personal data comprises:

1. Ordinary personal data; and
2. Special categories of personal data – personal data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, as well as the processing of genetic data, biometric data for the sole purpose of identifying a natural person, data concerning health, or data concerning a natural person's sex life or sexual orientation.
3. For individuals under the age of 14, a specific assessment and consent from a parent or guardian are required under Bulgarian law.

The Regulation generally prohibits the processing of special categories of personal data, except where there are explicitly and exhaustively described grounds (Article 9 of the Regulation). For the purposes of the Controller's activities, the processing of special categories of personal data is permissible only where:

1. explicit consent has been given for the processing of special categories of personal data for one or more specific purposes, unless European Union or Bulgarian law provides that the data subject cannot withdraw such consent;
2. the processing is necessary for the purposes of fulfilling the obligations and exercising the specific rights of the Controller or the data subject under Bulgarian law;
3. the processing relates to personal data which the data subject has manifestly made public;
4. the processing is necessary for the establishment, exercise or defence of legal claims;
5. the processing is necessary for the purposes of preventive or occupational medicine, for the assessment of the data subject's fitness for work, medical diagnosis, the provision of health or social care or treatment, or for the purposes of the management of health or social care services and systems on the basis of a statutory provision or pursuant to a contract with a healthcare professional, and subject to the following conditions and safeguards: processing by or under the supervision of a professional bound by a duty of professional secrecy under European Union law or the law of the Republic of Bulgaria, as established by the competent national authorities, or by another person also bound by a duty of secrecy under a statutory provision.

6. PRINCIPLES OF PERSONAL DATA PROCESSING

1. Compliance with the principles of processing laid down in the Regulation is paramount and mandatory in all and any actions relating to the processing of personal data
 - a. Lawfulness, fairness and transparency – processing must be carried out on a lawful basis, with due care and with the data subject being informed;
 - b. Purpose limitation – personal data may only be collected and processed for specific, explicitly stated and legitimate purposes, with an explicit prohibition on further processing in a manner incompatible with the original purposes;
 - c. Data minimisation – data must be adequate, relevant and limited to what is necessary for the purposes of the processing;
 - d. Accuracy – data must be kept up to date and all reasonable measures must be taken to ensure that inaccurate data is erased or rectified in a timely manner, taking into account the purposes of the processing;
 - e. Storage limitation – data must be processed for the shortest possible period consistent with the purposes of the processing.
 - f. Integrity and confidentiality – safeguards must be put in place to ensure an appropriate level of security for personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, by applying appropriate technical or organisational measures.
2. Accountability – processing is carried out in compliance with all principles, including internal instructions, rules, procedures, the personal data protection policy, and contracts with data processors. We maintain internal rules, contracts with data processors, and carry out periodic reviews and updates.

7. CONDITIONS FOR THE LAWFULNESS OF DATA PROCESSING

Data processing is lawful only where at least one of the grounds for processing set out in the Regulation applies. The grounds for processing listed below do not constitute an exhaustive list of all the grounds set out in the Regulation, but merely indicate those most commonly applicable to the Controller's activities.

When processing data, an assessment should be carried out on a case-by-case basis; it is not necessary for more than one of the grounds to apply. Consent from the data subject should be sought only and exclusively in the absence of any other ground provided for in the Regulation.

1. Consent of the data subject

Consent of the data subject means any freely given, specific, informed and unambiguous indication of the data subject's wishes, by means of an explicit written statement. When processing data on the basis of consent, the Controller must be able to establish beyond doubt, cumulatively, that the consent is:

- a) freely given – not under pressure or threat of adverse consequences;
- b) specific – explicit and separate consent is required for each specifically stated purpose of the processing;
- c) informed – given by the data subject on the basis of complete, accurate and easily understandable information;
- d) unambiguous – indisputable and must not be inferred or assumed on the basis of other statements or actions by the data subject;
- e) given by a positive act – tacit consent is not acceptable; it must be given by an explicit statement.

It is not permissible for consent to be subject to preconditions or to result in adverse consequences for the individual in the event of a refusal to give consent or a subsequent withdrawal of consent by the data subject. Consent may be deemed invalid where there is an imbalance of power between the controller and the data subject (for example, an employer employee).

Consent may be ..

2. A contract to which the data subject is a party and where processing is necessary for the performance of the contract. Processing is also permitted prior to the conclusion of a contract if this is at the initiative of the data subject.
3. A legal obligation on the Controller, based on European Union law or the law of the Republic of Bulgaria.

Processing is necessary for the purposes of the legitimate interests of the Controller or of a third party.

8. TYPES OF PERSONAL DATA AND CATEGORIES OF DATA SUBJECTS WHOSE PERSONAL DATA WE PROCESS. LEGAL BASIS FOR PROCESSING AND RETENTION PERIOD OF PERSONAL DATA.

We process personal data relating to the following groups of individuals:

1. Tenants of Mall Rousse, and their respective representatives, authorised agents and contact persons

The processing of personal data by the Controller is carried out for the purposes of fulfilling the tenancy agreements concluded between the Controller and the tenants of retail premises at Mall Rousse, as well as to protect the Controller's legitimate interests in the event of a breach of a tenancy agreement. The Controller retains the personal data of natural persons provided by tenants for a period of 5 years following the termination of the tenancy agreements, unless a longer period is provided for in the relevant legislation. Where personal data is contained in accounting records, the retention period for such personal data is 10 years, unless a longer period is provided for under the relevant legislation. Upon expiry of the aforementioned periods, the Controller erases the personal data, unless there is another legal basis for its processing.

The personal data of the non-owners of Mall Rousse, and their representatives, authorised representatives and contact persons, are provided to the company managing Mall Rousse for the purposes of managing the shopping centre, providing professional customer service and maintaining the shopping centre's appeal to current and potential customers; as well as to the company responsible for security at Mall Rousse, for the purposes of safeguarding the shopping centre and ensuring the safety of persons and property within it. With the exception of what is stated in the previous sentence, personal data may be disclosed to third parties only where the Controller has legal obligations to do so and to protect the Controller's rights and interests. There are no plans to transfer the data to a third country outside the European Union and the European Economic Area. The management company of Mall Rousse and the security company of Mall Rousse retain the personal data provided by individuals until the basis for its processing ceases to apply, unless a different period is provided for in the relevant legislation. Upon expiry of the specified period, the personal data is erased. Upon termination of

Under the relevant service agreement concluded with the Controller, the Management Company of Mall Rousse or the security company of Mall Rousse, as the case may be, shall erase the personal data without delay.

There may be several grounds for processing personal data, depending on the circumstances:

- a) the data subject has given consent to the processing of their personal data;
- b) processing is necessary for the performance of a contract to which the data subject is a party, or for taking steps at the request of the data subject prior to entering into a contract;
- c) the processing is necessary for compliance with a legal obligation to which the Controller is subject;
- d) the processing is necessary to protect the vital interests of the data subject or of another natural person;
- e) the processing is necessary for the purposes of the legitimate interests of the Controller or of a third party.

2. Subcontractors, suppliers of goods and services to Mall Rousse, and their respective representatives, authorised agents and contact persons

The processing of personal data by the Controller is carried out for the purposes of fulfilling the relevant contracts concluded between the Controller and the subcontractor/supplier of goods and/or services, as well as to protect the Controller's legitimate interests in the event of a breach of contract. The Controller retains the personal data of individuals provided to it for a period of 5 years following the termination of the relevant contract, unless a longer period is provided for in the relevant legislation. Where personal data is contained in accounting documents, the retention period for such personal data is 10 years, unless a longer period is provided for under the relevant legislation. Upon expiry of the aforementioned periods, the Controller erases the personal data, unless there is another basis for its processing.

There may be several grounds for processing personal data, depending on the circumstances:

- a) the data subject has given consent to the processing of their personal data;
- b) processing is necessary for the performance of a contract to which the data subject is a party, or for taking steps at the request of the data subject prior to entering into a contract;
- c) the processing is necessary for compliance with a legal obligation to which the Controller is subject;
- d) the processing is necessary to protect the vital interests of the data subject or of another natural person;
- e) the processing is necessary for the purposes of the legitimate interests pursued by the Controller or by a third party.

3. Visitors to Mall Rousse

The data controller, or its subcontractor, processes the personal data of visitors to Mall Rousse (including its car park) by carrying out video surveillance of the shopping centre and the surrounding area. CCTV involves the collection and processing of video footage of visitors to Mall Rousse (including its car park), as well as video footage of cars and other vehicles located in the car park at Mall Rousse, including the registration number details of all motor vehicles.

The purposes of processing the aforementioned data are: to ensure a consistently high level of protection and security for visitors to Mall Rousse and their property; to protect the legitimate interests of the Controller; to protect and assist in the assertion of legal claims; to prevent and thwart criminal and other unlawful acts; to ensure public order is maintained at Mall Rousse; and to organise the flow of motor vehicles in the shopping centre's car park.

The period for which visitors' personal data, processed via CCTV, is retained can be divided into two categories:

- a) the retention period for personal data obtained through CCTV in the publicly accessible areas of Mall Rousse is 1 month. Upon expiry of this period, the video files are destroyed.
- b) Personal data obtained through CCTV, in cases where a breach of public order, a criminal offence or any other act prohibited by law has been established, or where an incident has been recorded, is retained for a period of 5 years from the occurrence of the relevant anti-social act (incident) or until the completion of the actions and procedures undertaken by the law enforcement authorities to investigate and identify the perpetrators, as well as until the conclusion of any legal proceedings.

There may be several grounds for processing personal data, depending on the circumstances:

- a) the data subject has given consent to the processing of their personal data;
- b) processing is necessary for compliance with a legal obligation to which the Controller is subject;
- c) the processing is necessary to protect the vital interests of the data subject or of another natural person;
- d) the processing is necessary for the purposes of the legitimate interests of the Controller or a third party.

You have the right to object to the processing of your personal data carried out through the operation of CCTV for the duration and for the purposes set out above.

Signs have been placed at Mall Rousse indicating that the premises are under CCTV surveillance.

4. Persons taking part in games, events, promotions, competitions, campaigns and other marketing activities organised by Mall Rousse

The Data Controller organises events, games, competitions, promotions, campaigns and other activities (hereinafter collectively referred to as 'Activities'), in which you may participate if you wish. If you wish to take part in our Activities held on the premises of Mall Rousse or on any of our social media platforms (Meta – Instagram/Facebook), your personal data may be collected and processed by the Controller; details of this will be set out in the rules of the Activity itself. By participating in the manner specified in the Activity itself, you consent to your personal data being processed for the purposes of the relevant marketing activities and in accordance with the rules of the relevant Activity.

The types of personal data processed in the course of a particular Activity, the purposes of the processing, the persons who process the data, the time limits, the grounds for

processing, and your rights in relation to the processing are set out in detail in the rules for the relevant Activity.

5. Visitors to the website www.mallrousse.bg

As a visitor to the website www.mallrousse.bg, you are able to browse all its sections and menus and search for information on the site without having to enter any of your personal data or register on the website. The fact that you are not registered on our website does not in any way restrict your online activity, your navigation of the site, or your access to its content.

The website www.mallrousse.bg uses so-called 'cookies' in order to offer you higher-quality, optimised and up-to-date services, information on products and terms and conditions, as well as to provide personalised content to users of our website. Through 'cookies', including other similar technologies, the Controller may obtain specific information about you, such as: the pages you view; the items you download; the links you follow; the duration of your visit to the site; your IP address; the domain from which you access our website; and so on. This information helps us to learn more about how you use our technologies and to provide you with appropriate services and information. For further information regarding the 'cookies' we use, please read the 'Cookie Policy' published on our website.

6. Users who use the contact form provided on the website www.mallrousse.bg

In the 'Contact' section, you can send us a message by entering your name and email address. Entering this personal data does not constitute registration on our website. Consequently, no profile will be created for you in which your personal data is stored or by which you can be identified at a later date. Each time you wish to send us a message via the form on the website, you must re-enter your name and email address in the relevant fields. Your name and email address may be stored on the website if you have consented to the use of the relevant cookies. For further information regarding the 'cookies' we use, please read the 'Cookie Policy' published on our website.

The purpose of processing your name and email address is to manage, process and respond to your message.

The period for which we process and store your personal data is determined by the content of your message, with the minimum period being that required to manage and respond to your message. If your message gives rise to an obligation on our part to carry out certain actions or activities (for example, to investigate a report, etc.), the period for which we process your personal data will be extended until the relevant activities or actions have been completed, or until another period prescribed by law, in connection with our legitimate obligations, rights and interests.

There may be several grounds for processing personal data, depending on the circumstances:

- a) the data subject has given consent to the processing of their personal data;
- b) processing is necessary for the purposes of the legitimate interests of the Controller or a third party.

7. Users of social media platforms on which Mall Rousse maintains relevant pages and/or has an account

Mall Rousse has a Facebook page. This brings us closer to our customers. The page allows us to communicate with our customers quickly and interactively, and to promote events, games and other similar activities organised by us and our partners at Mall Rousse. On our page, you can rate our shopping centre, share your views on the standard of service in the shops, communicate with one of our representatives via Facebook, and keep up to date with the latest services and products we offer. We monitor our visitors' activity on our Facebook page, such as the number of 'likes' on our posts, the number of times our posts are shared, and other similar metrics. By 'liking' our Facebook page, you grant us access to some of the personal data you have entered in your Facebook profile.

The purpose of processing your data is to manage our Facebook page, analyse information from our visitors' activity on it, and for marketing purposes. The period for which this data is processed is until you stop following, liking and sharing posts on our page, or until you delete your Facebook profile.

There may be several grounds for processing personal data, depending on the circumstances:

- a) the data subject has given consent to the processing of their personal data;
- b) processing is necessary for the purposes of the legitimate interests of the Controller or a third party.

The website www.mallrousse.bg features a button providing direct access to Mall Rousse's Facebook page in order to make it easier for our users who wish to access the content on the Facebook page, as well as to make it easier for you to share your opinion about us and our partners directly, should you wish to do so.

7.1. Users of the social media platform Instagram, on which Mall Rousse maintains a page and/or has an account

Mall Rousse has an official Instagram page. This brings us closer to our customers. The page allows us to communicate with our customers quickly and interactively, and to promote events, games and other similar activities organised by us and our partners at Mall Ruse. On our page, you can leave comments, like posts, follow our profile and stay informed about the latest services and products we offer. We monitor our visitors' activity on Instagram based on the publicly available data provided by the platform – for example, likes, comments, shares and other similar actions. By following or liking our Instagram profile, you do not grant access to any of the personal data you have entered in your profile, apart from that which is publicly available via the platform.

The purpose of processing your data is to manage our Instagram page, analyse visitor activity on it, and for marketing purposes. The period for which this data is processed is until you stop following or liking

or until you interact with our Instagram page, or until you delete your Instagram account.
There may be several grounds for processing personal data, depending on the circumstances:
a) the data subject has given consent to the processing of their personal data;
b) processing is necessary for the purposes of the legitimate interests of the Controller or a third party.

7.2. Users of Google services where Mall Rousse maintains a listing – Google Business Profile / Google Maps / Google Reviews

Mall Rousse maintains a business profile on Google's platforms – including Google Maps and Google Business Profile. Through these services, users can access up-to-date information about the shopping centre, opening hours, events, services and other similar details. The platform also allows visitors to leave ratings, reviews, questions and other feedback.

We only have access to the information that Google makes publicly available to business profile administrators – such as ratings, reviews, comments, questions and aggregated statistical information on profile traffic or searches. Mall Rousse **does not have access to any additional personal data** that Google does not make publicly available.

The purpose of processing this data is to manage our business profile on Google, analyse user feedback and improve the quality of our services. The processing period covers the time during which comments, ratings or other information remain publicly available via Google, or until Google removes them.

's grounds for processing of personal data may be :

- a) the data subject has given consent (for example, by publishing a review or rating);
- b) processing is necessary for the purposes of the legitimate interests of the Controller or a third party.

8. Other

Our website www.mallrousse.bg contains links to other websites owned by other data controllers (tenants of retail premises at Mall Rousse, etc.). The Controller is not responsible for the collection and processing of your personal data by other controllers, nor for the personal data you provide to those controllers, the content of their websites or the advertisements displayed on them.

9. RIGHTS OF DATA SUBJECTS

We endeavour to ensure that your personal data is always processed lawfully, fairly and in a transparent manner, that it is collected for specific, explicitly stated and legitimate purposes, and that we limit the collection, processing and storage of your data to the minimum necessary. We ensure that your personal data is always processed in a manner that guarantees an appropriate and adequate level of security.

As the controller of your personal data, we are ready to answer your questions regarding the processing and storage of your data, so that you are always aware of what data we collect, process and store; for what purpose and for how long we do so, who else may have access to it, and what your rights and our obligations are.



Data subjects have rights under current European and Bulgarian legislation:

If you believe that your rights regarding the protection of your personal data have been infringed, you have the right to lodge a complaint with the competent data protection supervisory authority in the Republic of Bulgaria, namely the Commission for Personal Data Protection (CPDP). You may contact the CPDP in the following ways:

- postal address: Sofia, postcode 1592, 2 Prof. Tsvetan Lazarov Boulevard;
- telephone number: 02 915 35 18; email: kzld@cpdp.bg; website: www.cdpd.bg

10. EXERCISING THE RIGHTS OF DATA SUBJECTS

You may exercise all your rights by sending a written request to the Data Protection Officer at the email address provided above. In your request, please state your full name, contact telephone number and the email address at which you wish to be contacted, as well as the details of your request.

We may refuse or charge a fee for requests that are manifestly unfounded or excessive. Should a request be refused, we will notify you in writing (by email or post, depending on what you have specified in your request).

Your requests will be processed without undue delay and you will receive a written response within two weeks of your request being received by our system. Please note that there may occasionally be delays due to the large volume of information our staff have to process. We will do our utmost to respond to your enquiries and requests as quickly and accurately as possible, whilst complying with the requirements of European Union and Bulgarian legislation.

11. RECIPIENTS OF YOUR PERSONAL DATA

Your personal data may be disclosed to third parties – known as recipients of personal data. Such recipients of personal data include public authorities and institutions to which the Controller has a legal obligation to disclose personal data.

Apart from the above cases, your personal data may be provided to other parties – controllers or processors – outside our team. For example, advertising agencies, marketing experts and business partners, in connection with the Controller's legitimate interests.

The disclosure of your personal data to third parties is fully in accordance with the requirements of the Regulation. The recipients of your personal data may be parties to whom the Controller is legally obliged to disclose such data (e.g. the Consumer Protection Commission, the Personal Data Protection Commission, judicial and law enforcement authorities, etc.). Your personal data will not be transferred to recipients based in third countries or to international organisations where there is no adequate level of protection, in accordance with Article 45 of the Regulation.

12. Technical and organisational security measures

To ensure integrity and confidentiality, we implement a range of measures, including:



- **Access control** and the ‘need-to-know’ principle;
- **Encryption** during transmission/storage (where applicable);
- **Access and activity logs** (logging and auditing);
- **Incident management** with escalation procedures and reporting within 72 hours;
- **Management of contracts with data processors** and impact assessments where necessary;
- **Staff training** and periodic checks;
- **Physical security** – CCTV, perimeter control, access control (where necessary);
- **Minimisation and** pseudonymisation/anonymisation where applicable;

13. Document control and updating

- The policy is **reviewed annually** or where significant change in activities or legislation.
- The latest versions are published at **www.mallrousse.bg**, with **the version number and date** of update clearly indicated.

14. CHANGES TO THIS POLICY

Should there be any subsequent updates to this Policy, the changes will be published on the website www.mallrousse.bg and the date of the update will be indicated.

Last updated: 6 November 2025

Appendix: Data subject request form:

To: ‘M.O. ROUSSE’ EAD

Re: Exercising rights under the GDPR

First name and surname:

Telephone:; **Email:**

Preferred method of response: Email / Post (please select)

I wish to exercise the following right(s):

- **Description of the request (please specify the data/activity):**

.....

Attachments (at the data subject’s discretion):

.....

Date: **Signature:**