

# ABLERA

Privacy Statement  
November 2018

# TABLE OF CONTENTS

- 1. Introduction .....3
- 2. General Information .....3
  - 2.1. Why we ask you to share your Personal Data? .....3
  - 2.2. What Personal Data we collect? .....3
  - 2.3. How we use Personal Information that we collect? .....4
  - 2.4. Security of your Personal Information.....4
  - 2.5. Retention of Personal Information .....4
  - 2.6. Disclosure and transfer of Personal Data with Third Parties.....4
  - 2.7. Information about children.....4
  - 2.8. How we protect your personal data .....5
- 3. Legal grounds for processing personal data .....5
  - 3.1. What are your Data protection rights .....5
- 4. Changes to this privacy notice .....5
- 5. How to contact us .....5



## 1. Introduction

Thank you for visiting Ablera! Your trust is important to us and we're committed to protecting the privacy and security of your personal information.

This site is published by Ablera OOD, a company with UIC 204728396 with registered office in the city of Sofia, Bulgaria, 16 "Cherni Vrah" Blvd.

Ablera protects your privacy in accordance with our obligations under data protection legislation according to the General Data Protection Regulation (GDPR) effective from 25th May 2018 and the Bulgarian data protection law. This privacy notice applies to all Personal Data that Ablera collects when you interact with our website, when you use products or services provided by Ablera. This includes, without limitation, all online and offline collection of all types of Personal Data.

This Policy recognizes the new rights of individuals under GDPR.

If you have any questions, comments or concerns about data protection, please contact us at [privacy@ablera.com](mailto:privacy@ablera.com)

## 2. General Information

### 2.1. Why we ask you to share your Personal Data?

We ask you to share your Personal Data with us for purposes that include, but are not limited to:

- Buying Ablera products and services
- Receiving information about Ablera products and services
- Storing your preferences for future interactions and communications from Ablera
- Receiving messages, offers and advertisements based on the information you have shared with us and on information we have collected regarding your use of the Ablera websites/social media/blogs.

We will use your information to respond to you, regarding the reason you contacted us. We will not share your information with any third party outside of our organization, other than as necessary to fulfill your request.

We process your Personal Data only for those purposes that we have communicated with you. If we use it for other (closely related) purposes, additional data protection measures will be implemented as required by law.

### 2.2. What Personal Data we collect?

"Personal data" is information that identifies an individual or relates to an identifiable individual.

When you navigate through our website, Ablera may ask for or receive certain data, such as: your name, your email address, your telephone number, information about the products and services you have purchased or you are interested in.



### 2.3. How we use Personal Information that we collect?

We use the information we collect only in compliance with the Ablera Data Protection Policy.

The personal data that we collect when you visit our website (<http://ablera.com>) are used by Ablera solely to improve our website and to supply you with services and information that meet your needs more effectively. We can send information to you which we think may be of interest to you by post, email, or other means or send you marketing communications, which might include content offers, surveys or event details, relating to our business.

### 2.4. Security of your Personal Information

We use marketing platform Salesforce that is scrupulous about the safety of the data we store with them, using a variety of security technologies and procedures to help protect your Personal Information from unauthorised access, use or disclosure. You can contact us at [privacy@ablera.com](mailto:privacy@ablera.com) to understand more about the security provisions of the platforms we use.

### 2.5. Retention of Personal Information

We try to keep Personal Information that you provide us as long as we consider it potentially useful in contacting you about our services, or as needed to comply with our legal and regulatory obligations (e.g. audit, accounting and statutory retention terms), resolve disputes and enforce our agreements, and then we securely delete the information.

### 2.6. Disclosure and transfer of Personal Data with Third Parties

We may share your personal information with third parties who provide services on our behalf, companies in our group, business partners, suppliers and sub-contractors to respond to your requests and inquires or for the performance of a contract, we enter into with them or you, in accordance with the applicable law.

When you interact with Ablera as a business customer, supplier or business partner, Ablera may disclose Personal Data available in reports and other materials provided by you and/or your company pursuant to an engagement with another business partner and/or a supplier.

All third parties with which we share personal data are bound to maintain appropriate level of organizational and technical protection measures.

If we are required by law to obtain your consent, or otherwise believe that your consent is appropriate in the circumstances, we will obtain your consent before we share your Personal Data.

We reserve the right to use or disclose your Personal Information if required by law or if we reasonably believe that use or disclosure is necessary to protect our rights, protect your safety or the safety of others, investigate fraud, or comply with a law, court order, or legal process.

Where we work with clients outside of the European Economic Area, we may collect, transfer and access Personal Information from around the world. This Privacy Policy shall apply even if we transfer Personal Information to other countries.

### 2.7. Information about children

Ablera understands the importance of children's privacy and do not collect or store information for anyone under the age of 18. If you are a parent or guardian and you are aware that



your child has provided us with Personal Information, please contact us. If we become aware that we have collected Personal Information from a child under age 18 without verification of parental consent, we take steps to remove that information from our servers.

## 2.8. How we protect your personal data

We recognize and take seriously our responsibility to protect the Personal Data you entrust to Ablera from loss, misuse or unauthorized access. Ablera uses a variety of security technologies and organizational procedures to help protect your Personal Data. For example, we implement access controls, use firewalls and secure servers, and we encrypt certain types of data, such as financial information and other sensitive data.

## 3. Legal grounds for processing personal data

The legal grounds on which we rely to process your personal data are:

- An agreement we have with you or to take steps to enter in agreement with you
- A freely given consent that you provided us upon collection of your personal data
- Our legitimate interests to effectively deliver information or services to you, based on our evaluation that the processing doesn't interfere with your fundamental rights and freedoms
- A legal or regulatory obligation to which Ablera is subject and must comply with

In the majority of circumstances, we will collect and process your personal information via our website or other marketing activity using the "Consent" legal processing basis.

We may occasionally send outreach emails to prospective clients where we will notify recipients of helpful and educative content.

### 3.1. What are your Data protection rights

Under GDPR, once you have provided us with your Personal Data, you have reasonable access to that information so you can update, modify or, if legally possible, delete it.

You always have a choice as to whether and how you want to receive communications about our content and services. Your permission or consent is important to how we engage with you.

## 4. Changes to this privacy notice

In case Ablera extend or change the nature of the services then Ablera may change the privacy notice. For this reason, we reserve the right to change or add to this privacy notice. All updates will be published to this web site. We encourage you to check and review the latest version.

## 5. How to contact us

For queries, suggestions or precise requests for altering, disabling or deleting personal data, please contact us at [privacy@ablera.com](mailto:privacy@ablera.com)