

Privacy Policy

Last updated: 01 April 2025

Introduction

Xpeq Ltd. respects the right to privacy and is committed to protecting the personal data of individuals it interacts with. This Privacy Policy is intended to inform you about the personal data we process, the reasons for collecting it, how we use it, and your rights under the General Data Protection Regulation (GDPR).

1. Data Controller Information

Xpeq Ltd.
Address: 2 Samokovsko Shose Blvd., 1138 Sofia, Bulgaria
Email: dkp@xpeq.com
Phone: +359 889 501 030

Data Protection Officer: Diana Petrova

2. What Personal Data We Collect

In the course of our operations, Xpeq Ltd. may process the following categories of personal data:

- First and last name
- Email address
- Phone number
- IP address
- Other data voluntarily provided when communicating with us

We do not collect personal data via contact forms, user registrations, or newsletters on our website.

We may automatically collect data during your visit to our website, such as device type, operating system, browser type, access date and time, features used, referring URLs, and error messages.

We may also collect data when you interact with us as a representative of a legal entity—such as a client, supplier, or partner—in connection with support, contractual relationships, or participation in events. In such cases, we may also process information related to your job title, role, workplace, and professional profile.

3. Purpose of Processing

We process your personal data only when necessary and in accordance with the law, including:

- Responding to inquiries via email or phone
- Conducting business correspondence

- Fulfilling legal obligations
- Ensuring the security of our systems and infrastructure

We may also process personal data to pursue or protect our legitimate interests, including dispute resolution, conducting audits, or internal controls. Additionally, we may use your data for market research and to improve service quality.

Personal data may be processed during recruitment or employment, as well as for workplace health and safety purposes.

4. Legal Basis

We process your personal data based on one or more of the following legal grounds:

- Your explicit consent
- Necessity for the performance of a contract
- Compliance with a legal obligation
- Legitimate interests pursued by Xpeq Ltd.

In some instances, we may process data based on our commitment to social responsibility or to safeguard premises and information security.

5. Sharing Personal Data

We may disclose your personal data to third parties only when necessary, such as:

- Hosting or IT service providers
- Public authorities when required by law

We may also share data with partners or subcontractors with whom we have data processing agreements in place, ensuring appropriate technical and organizational data protection measures.

We always conclude data protection agreements with such third parties. When data is provided to public authorities, we verify the existence of a valid legal basis.

6. Data Retention

We retain your personal data only for as long as necessary to fulfill the purposes for which it was collected, unless a longer retention period is required by law (e.g., for accounting purposes).

After the retention period expires, the data is securely deleted or anonymized. We maintain an internal policy for reviewing and managing retention periods.

If you apply for a job, your data is stored for up to 6 months. If you visit a building under video surveillance, footage is retained for up to 30 days.

7. Your Rights

Under the GDPR, you have the following rights:

- Right of access to your personal data
- Right to rectification of inaccurate or incomplete data
- Right to erasure (“right to be forgotten”)
- Right to restriction of processing
- Right to data portability
- Right to object to processing
- Right to withdraw consent (where processing is based on consent)
- Right to lodge a complaint with the Data Protection Commission

If you object to data processing based on legitimate interests, we will review your request and cease processing unless we demonstrate compelling legal grounds to continue.

8. Security

We implement appropriate technical and organizational measures to protect your personal data against unauthorized access, loss, alteration, or disclosure.

Only authorized employees and authorized external consultants have access to personal data, and such access is subject to strict confidentiality and security requirements. We use encryption, password protection, antivirus software, and regular monitoring of our information infrastructure.

We apply internal policies and procedures to ensure a consistent and high level of personal data protection across all departments and systems.

9. International Data Transfers

If personal data needs to be transferred outside the European Economic Area (EEA), such transfer will only take place if an adequate level of protection is ensured or through the use of Standard Contractual Clauses approved by the European Commission.

10. Contact Information

If you have any questions about the processing of your personal data or wish to exercise your rights, you may contact us:

Data Protection Officer:

Email: dkp@xpeqt.com

Phone: +359 889 501 030

Address: 2 Samokovsko Shose Blvd., 1138 Sofia, Bulgaria

Supervisory Authority:

Name: Commission for Personal Data Protection (CPDP)

Address: 2 Prof. Tsvetan Lazarov Blvd., 1592 Sofia, Bulgaria

Phone: +359 2 91 53 518

Email: kzld@cpdp.bg

Website: www.cdpd.bg