

# Privacy and Personal Data Protection Policy

Last updated: 11.08.2025

This Privacy Policy aims to inform you about what personal data we collect through our website Stojer.com, why we process it, how we protect it, what your rights are, and how you can exercise them in accordance with the **General Data Protection Regulation (GDPR)**.

We collect and process this data based on your **consent**, the **performance of contractual or legal obligations**, and/or our **legitimate interests** in accordance with **Article 6 of Regulation (EU) 2016/679**.

We use automated algorithms to analyze user interests, **without having any legal or significant effect on the user**.

## Data Controller and Contact Information:

Stojer.com is owned by **Stojer Group Ltd.**, UIC: 208024701, with registered office and management address at: 11 Trapezitsa Street, Novi Iskar, 1280, Bulgaria, email: [office@stojer.com](mailto:office@stojer.com)

## Article 1. What Personal Data Do We Collect?

(1) Depending on the type of service you use, we collect the following categories of personal data:

### 1. Registration and basic use of the website:

- First and last name
- Email address
- Phone number (optional)
- Username and password

### 2. When publishing listings or using paid services:

- Property address
- Type of property and technical specifications
- Cadastral number / property identifier
- Documents related to the property (including plans and notarial deeds)
- Identity card (when verification is required)
- Payment information (including IBAN, account holder)
- Personal Identification Number (EGN) or Foreign Citizen Number (for issuance of tax documents)

### 3. Technical information:

- IP address
- Browser and operating system
- History of searches and listings viewed
- Behaviour while using the website (e.g., visited pages) and data collected via cookies and pixels – please refer to our **Cookie Policy** on the website.

### 4. Special categories of data:

Stojer.com does **not collect or process special categories of personal data** as defined in **Articles 9 and 10 of Regulation (EU) 2016/679 (GDPR)**.

This means you **should not submit** information through the website that reveals:

- Racial or ethnic origin
- Political opinions
- Religious or philosophical beliefs
- Union membership
- Genetic or biometric data
- Health-related data
- Information about sexual orientation
- Data related to convictions or criminal offenses

(2) By accessing and using the website, you agree **not to enter, store, or transmit such data** through contact forms, profiles, or any other communication channels on the platform.

### (3) Public visibility of published data:

By publishing a listing on the website, you agree and allow other users of the website to view the data you provide in the listing. Furthermore, you grant permission and consent for other users to contact you through the communication methods you have provided.

### (4) Data accessibility outside the EU:

The data published on Stojer.com may be accessible to users outside the European Union.

## Article 2. For What Purpose Do We Process Personal Data?

(1) We collect and process your personal data to provide you, as users, with access to all functionalities of our website—for example, browsing listings, creating profiles, requesting services, and more.

(2) In addition to the primary purpose (provision of the requested services), your data is also necessary for the following purposes:

- Maintaining the security and integrity of content – preventing incorrect or fraudulent listings and abuse;
- Verification of sellers for security and fraud prevention;
- Notifying users via email and/or messages (SMS) about important information, the status of requests or services;
- Administration of user profiles and their settings;
- Processing inquiries and communication with you upon your request;
- Fulfilling contractual obligations towards the users of the platform;
- Submission, publication, and management of property listings you create and publish;
- Delivery of additional services (e.g., photography and/or video services, legal consultations) when requested;
- Issuing payment documents (e.g., invoices, receipts) for completed payments;<sup>®</sup>
- Personalized offers and marketing – only with your consent;
- Analysis of user behaviour to improve the website and the services offered.

### Article 3. Legal Basis for Processing Personal Data

(1) For each specific purpose of processing, the **applicable legal basis** may vary. We process personal data on the following grounds pursuant to Article 6 of the GDPR:

**1. Performance of a contract:** when processing is necessary to provide the services you have requested and to fulfill our contractual obligations to you. For example, this basis applies when creating and managing your user profile, publishing a listing, providing requested services, and similar activities.

**2. Legal obligation:** when we are required by law to process certain data—for instance, for accounting purposes when issuing invoices, to comply with tax or other regulatory requirements, or to provide data to competent state authorities as legally required.

**3. Consent:** when you voluntarily provide personal data and give explicit consent for us to process it for a specific purpose. This includes, for example, receiving our newsletter or marketing communications, as well as publishing personal data in publicly accessible sections of the website (e.g., your listing or profile) for which you have explicitly consented. You may withdraw your consent at any time (see the section on the right to withdraw consent below).

**4. Legitimate interest:** when processing is necessary for the purposes of our legitimate interests as a data controller (or the legitimate interests of a third party), provided that your fundamental rights and freedoms are not disproportionately affected. For example, we have a legitimate interest in improving the services and functionalities of the platform, preventing fraud, ensuring the website's information security, and protecting our rights and interests in case of claims. For any such processing, we carefully assess whether our interest overrides your privacy rights and expectations. You have the right to object at any time to processing based on legitimate interest (see the section that describes the right to object below).

(2) **Mandatory or voluntary provision:** Providing personal data is **voluntary**; however, in some cases, it is **necessary** for us to provide a specific service or to comply with a legal requirement. For example, to **register** on the website, you must provide at least an email address (and a name), without which we cannot create your user profile.

(3) When requesting a paid service, we may require payment or identification data—if you do not provide these, we will not be able to fulfill the service.

(4) By law, we are also required to collect certain data for the **issuance of accounting documents**—refusal to provide such data may prevent us from completing the relevant transaction. If you choose not to provide certain personal data that we have informed you is **mandatory**, we may be unable or may refuse to provide the requested service or functionality. In all other cases, the provision of data is voluntary and at your discretion.

#### **Article 4. How We Protect Your Data**

(1) We implement the necessary technical and organizational measures to ensure the security and confidentiality of your personal data. These measures include:

- Using SSL encryption to protect communication between your device and our server;
- Storing data on secure servers located within the EU;
- Limiting access to personal data—only authorized employees and collaborators who require access to perform their official duties have access to your data;
- Conducting regular security tests and providing staff training on data protection and best security practices.

(2) We apply privacy policies and procedures for incident management, including readiness to respond to data breaches, in which case we will notify you and the competent authorities in accordance with Articles 33 and 34 of the GDPR.

#### **Article 5. How Long We Store Your Data**

(1) We retain your personal data no longer than necessary to fulfill the purposes described in this Privacy Policy, unless a longer retention period is required or permitted by law. Specifically:

1. **During the period your account remains active:** While your user account on the website is active, we will store the provided data in order to provide you with our services.
2. **Up to 5 years after your last activity:** If you close your account or are inactive for a prolonged period, we will retain your data for up to 5 years following your last activity. This period is determined with regard to applicable limitation periods for potential legal claims and our legitimate business needs (e.g., record-keeping) after the termination of our relationship.
3. **Longer retention if required by law:** In certain cases, we are legally obliged to retain data for a specific period, e.g., accounting or tax documents. In such cases, we may keep the relevant data until the expiry of the legally required retention period, which may exceed the 5 years mentioned above.

(2) You may request deletion of your account and associated personal data at any time (see the right to erasure below). Upon receiving such a request and if there is no other legal basis to continue processing, Stojer.com will take the necessary steps to delete or anonymize all your data without undue delay—at the latest within 60 days of confirming the deletion request. In certain cases, some of your data may need to be retained for a longer period (e.g., if required by law or in the event of an ongoing dispute/claim until its resolution), in which case we will inform you separately.

#### **Article 6. Sharing Data with Third Parties**

(1) We do not sell your personal data to third parties. In certain cases, in order to provide you with high-quality and professional services, the platform may share your personal data with external contractors or partners whose services you have requested. Such cases include sharing data with:

- **External specialists** – e.g., real estate appraisers, lawyers, photographers, credit consultants, or other partners with whom the platform cooperates to provide additional services, but only when you have expressly requested their services;
- **Accountants and consultants** – for the purpose of processing accounting operations, invoicing, drafting contracts, or obtaining consultancy in relation to our activities;
- **Banks and payment institutions** – to process online payments and money transfers when you make a payment through our website (e.g., your card data may be processed directly by a certified payment operator under the necessary security measures);
- **Technical infrastructure providers** – e.g., hosting providers, cloud services, or technical support companies that ensure secure data storage and website functionality;
- **Public authorities** – when we are legally required to provide data (e.g., to courts, police, regulatory authorities, or the Data Protection Commission, based on a lawful basis);

- **Other partners providing services on our behalf** – e.g., external teams for photo/video capturing of properties, courier companies for document delivery, or other contractors assisting in the provision of the service you requested.

## **Article 7. What Data Do We Share?**

(1) Depending on the nature of the service you have requested, we share only the minimum necessary personal data with external recipients. We do not provide unnecessary data that is not required for the purpose. For example, we may share:

- Name and contact phone number;
- Email address;
- Property address;
- Property description or your requirements related to the requested service;
- Other information directly related to the provision of the specific service.

### **(2) Why do we share it?**

1. Personal data is shared solely for the purpose of providing the requested service and only to the extent necessary for its correct and efficient execution.
2. External partners use your data only under our instructions or as agreed with us and are not permitted to use it for other incompatible purposes.

### **(3) How do we protect the data when sharing?**

All external contractors entrusted with the processing of personal data are contractually obliged to comply with applicable data protection legislation and our security requirements. Under these agreements, they are required to:

- Process the provided data only for the purposes and according to the instructions set by Stojer.com;
- Use the data solely for the provision of the specific service;
- Not use the data for their own purposes outside the contract;
- Not retain the data longer than necessary for the execution of the service;
- Not share or disclose the data to third parties without consent or other lawful basis;
- Apply appropriate technical and organizational security measures to protect the data.

### **(4) Legal basis for sharing data:**

1. In most cases, when we share your data with external contractors, this is based on the contract between you and the platform (Art. 6(1)(b) GDPR) – i.e., the sharing is necessary for you to receive the requested service.
2. In other cases, sharing may be based on a legal obligation (if we are required by law to provide data to a public authority) or on your explicit consent (if required for specific data sharing). In all circumstances, we adhere to the principle of minimizing shared data and ensure its protection when provided.

#### (5) Transfer of data outside the EU:

Whenever possible, we store and process your personal data within the European Economic Area (EEA). All our primary servers are located in the EU. However, in certain situations, data may become accessible outside the EU—for example, when you publish an ad with publicly visible contact information or when we use a third-party service established outside the EEA. In such cases, we will take the necessary measures to ensure that your data is protected in accordance with the requirements of the GDPR.

#### Article 8. Your Rights as a Data Subject

(1) As a data subject under the GDPR, you have the following rights regarding your personal data:

- **Right of Access:** You have the right to obtain confirmation as to whether we process your personal data, and if so, access to the data itself and information about its processing.
- **Right to Rectification:** You may request the correction of inaccurate or incomplete personal data concerning you so that it is up to date and accurate.
- **Right to Withdraw Consent:** Where processing is based on your consent, you have the right to withdraw your consent at any time. Withdrawal does not affect the lawfulness of processing carried out based on consent before the withdrawal.
- **Right to Erasure (“Right to be Forgotten”):** You may request the deletion of your personal data from our systems under certain circumstances – for example, if the data is no longer necessary for the purposes for which it was collected, or if the processing is unlawful.
- **Right to Restriction of Processing:** You may request the temporary suspension of the active processing of your personal data (except for storage) in certain cases – for instance, while a dispute regarding the accuracy of the data or the lawfulness of the processing is being resolved.
- **Right to Object:** You have the right to object at any time to the processing of your personal data based on our legitimate interest (including profiling), for reasons related to your specific situation. Upon objection, we will cease the relevant processing unless we can demonstrate compelling legitimate grounds that override your interests, rights, and freedoms, or if processing is necessary for the establishment, exercise, or defense of legal claims. If you object

to processing for direct marketing purposes, we will immediately cease using your data for such purposes.

- **Right to Data Portability:** You have the right to receive the personal data you provided to us in a structured, commonly used, and machine-readable format and to transmit it to another data controller of your choice. Where technically feasible, you may also request a direct transfer from us to another controller. This right applies when processing is based on your consent or a contract and is carried out in an automated manner.
- **Right to Lodge a Complaint with a Supervisory Authority:** If you believe that we are violating your rights regarding your personal data or applicable law, you have the right to lodge a complaint with the competent supervisory authority. In Bulgaria, this is the **Commission for Personal Data Protection (CPDP)**. You also have the right to effective judicial protection against unlawful actions via the controller or the supervisory authority, as well as to compensation for damages suffered due to a violation.

(2) Supervisory Authority Contact Details (CPDP):

Commission for Personal Data Protection (CPDP)

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

**Website:** [www.cpdp.bg](http://www.cpdp.bg) **Email:** [kzld@cpdp.bg](mailto:kzld@cpdp.bg)

**Telephone:** +359 2 915 3580

#### **Article 9. How You Can Exercise Your Rights**

(1) To exercise your rights, you may send a written request by email to [office@stojer.com](mailto:office@stojer.com) specifying which right you wish to exercise and the personal data to which it relates. Please describe your request clearly and provide information that will help us identify you.

(2) You will receive a response within 30 calendar days of receipt of your request.

(3) If necessary, this period may be extended by up to 2 months, taking into account the complexity and number of requests (you will be notified within the initial 30-day period). Exercising your rights is free of charge.

(4) The Administrator reserves the right to impose a reasonable administrative fee or to refuse to act on requests that are manifestly unfounded or excessive (including repeated requests), in accordance with Article 12(5) of the GDPR.

#### **Article 10. Legal Services and Joint Data Controllers**

(This section applies only if you use the platform to request legal services, e.g., consultation with a lawyer, provided jointly by Stojer.com and an external lawyer.)

(1) By requesting a legal service through the Stojer.com platform, you expressly consent that your personal data may be processed jointly by us and by an independent external lawyer with whom the platform cooperates to provide the requested service.

(2) The platform only shares essential identification and contact data with the lawyer, necessary for communication and coordination with you. All documents containing legal content, as well as sensitive information (e.g., notarial deeds, plans, contracts, etc.), are provided directly by you to the lawyer without passing through or being stored on the platform.

(3) In accordance with Article 26 of Regulation (EU) 2016/679 (GDPR), in this case the platform and the lawyer act as **joint controllers** of personal data, each being responsible for the data it processes within the scope of its activities.

(4) You may exercise your rights (e.g., access, correction, deletion, restriction) either through the platform or directly with the lawyer, whose contact details will be provided by us.

(5) The lawyer, acting as an independent data controller and bound by professional secrecy, is obliged to maintain the confidentiality of the information received and to comply with the applicable provisions of the Bar Act, the GDPR, and other relevant data protection legislation.

(6) The platform is not responsible for legal opinions, interpretations, or advice provided by the lawyer, nor for any legal consequences arising therefrom. Any objections or disputes related to the quality or content of the legal service should be addressed directly to the executing lawyer.

#### **Article 11. Contact Information**

If you have any questions regarding this Privacy Policy, please contact us at [office@stojer.com](mailto:office@stojer.com)

#### **Article 12. Final Provisions**

(1) The Administrator reserves the right to modify and update this Privacy Policy at any time. All changes will be reflected here. In the event of significant changes, you will be notified in an appropriate manner (e.g., via a message on the website or by email). Each change takes effect on the date specified at the time of its announcement; if no date is specified, it becomes effective 5 business days after publication on the website.

(2) By using the Stojer.com website, you confirm that you have read and accept this Privacy Policy (together with the Terms of Use). If you do not agree with any of the rules described herein, please do not use the services of the website.

In the event that a translation into another language than Bulgarian is provided, please note that the Bulgarian version shall prevail in case of any discrepancies.

## **Cookies Policy**

The Stojer.com platform uses cookies.

This Cookie Policy aims to inform you about the technologies we use on the website, why we use them, and how you can manage your preferences. We are committed to complying with the requirements of the General Data Protection Regulation (GDPR) and the ePrivacy Directive.

#### **Article 1. What are cookies?**

Cookies are small pieces of information or text files that are temporarily stored on your device (computer, tablet, phone) when you visit websites.

## Article 2. Why do we use cookies?

At Stojer.com, we use cookies to collect statistical information, improve the user experience, recognize your preferences, and facilitate your subsequent visits. Cookies allow us, for example, to display more relevant listings or guide you to information that may be useful when buying or selling a property.

## Article 3. Types of cookies we use

### A. Strictly Necessary (Essential) Cookies

These cookies are essential for the website to function and cannot be disabled in our systems. Without them, some functionalities, such as logging into a user account or submitting requests, would not work properly. They are usually set only in response to actions you take – such as setting privacy preferences, logging into a profile, or filling out forms.

- **Purpose:** Ensure basic functionality and security of the website, maintain user sessions, protect against abuse and spam.
- **Required:** Yes (do not require your consent).
- **Examples:** PHPSESSID (user session), cookieConsent (stores your cookie preferences)

### B. Functional Cookies

These cookies allow the website to remember your settings and preferences (e.g., language, region, saved properties).

- **Purpose:** Improve functionality and provide personalized content and a better user experience.
- **Required:** No (require your consent).
- **Examples:** preferred\_language, savedProperties, user\_theme

### C. Analytical (Statistics) Cookies

These are used to collect anonymous information about how visitors use the website – for example, which pages are visited most often, how long users stay, etc.

- **Purpose:** We use this information to improve website functionality and optimize content and structure.
- **Required:** No (require your consent).
- **Examples:** \_ga, \_gid (Google Analytics), matomo\_id

### D. Marketing / Advertising Cookies

These cookies are used to display personalized advertisements based on your interests and browsing behaviour. They track your activity across different websites and can be set by third parties.

Purpose: Display relevant property offers or additional services, as well as retargeting campaigns.

Required: No (require your consent).

Examples: \_fbp (Facebook pixel), IDE (Google Ads), 1P\_JAR

Our website uses retargeting through Google Ads, which allows us to show our ads to users who have previously visited our site. This means that when you browse other websites, you may see our ads reminding you of products or services you viewed. If you wish, you can opt out of this function by visiting the Google Ads opt-out page: [www.networkadvertising.org/choices/](http://www.networkadvertising.org/choices/)

#### **E. Social Media Cookies**

These cookies enable embedding and interaction with content from social networks (e.g., sharing listings on Facebook, embedded YouTube videos from video shoots, etc.).

- **Purpose:** Integration with social platforms and extending the reach of listings.
- **Required:** No (require your consent).
- **Examples:** YSC, VISITOR\_INFO1\_LIVE (YouTube), fbm\_\*, xs (Facebook)

#### **Article 4. Third-Party Cookies**

Sometimes our website uses third-party services that may also set their own cookies (e.g., YouTube, social networks, analytics and advertising providers). We do not control these cookies. Please refer to their respective policies for more information.

#### **Article 5. Managing Cookies**

Upon your first visit to our website, you will see a banner allowing you to accept or reject the use of different categories of cookies. You can change your preferences at any time in the "Cookie Settings" section.

Your browser settings also allow you to control cookies – usually found in the "Privacy" or "Security" sections.

Please note that disabling cookies may affect the proper functioning of the website, and some services or features may not work correctly. You may also need to manually configure many site settings during each visit.

#### **Article 6. Your Rights**

Under the General Data Protection Regulation (GDPR), you have the right to:

- Obtain information about the types of data we collect through cookies;
- Withdraw your consent at any time;
- Lodge a complaint with the Data Protection Authority:

#### **Commission for Personal Data Protection (CPDP)**

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

Email: [kzld@cpdp.bg](mailto:kzld@cpdp.bg)

Website: [www.cpdp.bg](http://www.cpdp.bg)

**Article 7. Contact**

If you have any questions regarding our Cookie Policy, please contact us using the phone number or email address provided on our website.

