

# Purpose

This document will be referred to as the “Privacy Policy” and its purpose is to describe what personal data and information is collected through the registration form and later processed in order for you to be duly registered for the Sofia Information Integrity Forum (<https://sofia-info-integrity.eu/>), hereinafter referred to as the “Forum”.

We believe that you should have control of Your Personal Data. Control starts with information. This is why you should know what data we collect from you and how we use it.

# Who are we?

The registration process for the Forum is carried out collectively by **Identrics AD**, registered in the Bulgarian Commercial Register with UIC 205246132, with headquarters in 1303 Sofia, Bulgaria, company address: 117 Hristo Botev Blvd., and **Ontotext AD**, registered in the Bulgarian Commercial Register with UIC 200421236, with headquarters in 1700 Sofia, Bulgaria, company address: 79 Nikola Gabrovski Blvd., 3rd Floor, as joint controllers. The collected data is shared with and managed in compliance with the terms below by the other organizing partners, namely Center for the Study of Democracy, CoDE project, GATE Institute, HSSF Sofia, and Sensika. Wherever in this Privacy Policy it is referred to “we” or “us”, it shall be understood collectively as all the organizations described in this paragraph.

# Privacy Policy

By filling out the form at <https://sofia-info-integrity.eu/> and registering for the Forum, you expressly and knowingly consent to the information collection and use practices as described in this Privacy Policy. The lawful basis we rely on for processing Your Personal Data is your consent under article 6(1)(a) of Regulation (EU) 2016/679 (General Data Protection Regulation).

Our goal is to collect as little personal data as meaningfully possible in order to not impact or endanger your data privacy in any manner. Furthermore, we use industry standard technological means (including hardware and software, best practices, etc.) to protect Your Personal Data.

# Our Privacy Commitment

Our commitment to your privacy is based on the following principles which we apply to our use of both your personally identifiable data (“Your Personal Data” or generally “Personal Data”) and to certain anonymous information we collect when you visit our sites (“Technical Information”, and together with Personal Data, “Your Data”):

- We will describe Your Data that we will collect.
- We will inform you clearly about our collection and use of Your Data.
- We will either seek your express informed consent or rely on other legally permissible bases for the use of Your Data – either way, we will inform you of the basis for our use of Your Data.
- We will give you control over the privacy preferences that apply to Your Data, including the rights to (a) change your mind about our use, (b) have the opportunity to change or correct inaccurate aspects of Your Data, and (c) require that we delete all or parts of Your Data (d) request Your Data in a portable format.
- We will not sell or rent Your Data to others.
- We endeavor to maximize the protection of Your Data and provide you with prompt notice in the unlikely event that a data loss incident or breach occurs; and
- We will endeavor to be completely transparent and open about our data privacy policies and practices.

## What information does this Privacy Policy cover?

This Privacy Policy covers information we collect from you through the registration form for the Forum accessible at <https://sofia-info-integrity.eu/> and cookies when visiting the website. You can browse the site freely without any of Your Personal Data being collected, except for data processed through functional cookies that ensure our website can function properly, as explained in the Cookies section of this Privacy Policy. If you wish to register for the Forum, there is some mandatory data that we will need to collect

and process. We will rely on your freely given, informed, and unambiguous consent for that.

Your Personal Data that we will collect and process can include information such as your name and email address, among other things. We use this information to facilitate the event and provide you with an acceptable service. We also need this information so we can respond to you.

You are responsible for ensuring the accuracy of the information you submit to us. Inaccurate information may result in us not being able to grant you physical access to the Forum and our ability to contact you with important information about it. For example, your email address must be kept current because that is one of the primary means in which we communicate with you.

## How do we collect information?

- We collect Your Data in the following ways:
- You provide it to us when you register for the Forum.
- You provide it to us in email exchanges or phone enquiries.
- We automatically collect Technical Information through functional cookies when you visit the site of the Forum.

## What information do we collect?

Your registration for the Forum will require that you provide your explicit consent for us to collect and process the following Personal Data:

- Email address.
- First name.
- Last name.
- Name of the organization that you work at.
- Job title.

In addition, we enrich the Personal Data above with Technical Information, related to:

- Conversion point (when, where, what campaign, source).

- Activity (dates of contact, email opens, link clicks, website pages visits, etc.).
- Opt-in Date to trace your consent.
- CRM identifiers.
- Consent mode.
- Record of any personal communication via email.

## How do we use Your Data collected at our sites?

We will use Your Personal Data to:

- Provide information in the weeks and months following to the Forum.
- Comply with relevant contractual obligations with you and other third parties on a need-to-know basis in regard to the organization of the Forum.
- Facilitate your attendance at and participation in the Forum.
- Comply with legal requests by governmental or municipal authorities.
- Your Personal Data will be processed in a lawful, fair and transparent manner in compliance with the General Data Protection Regulation.

## With whom do we share Your Personal Data?

With your consent, which can be withdrawn at any time, Your Personal Data will be disclosed to the following third parties, who will process these data in their capacity as independent data controllers:

- **Institute "Big Data for Smart Society" (GATE)**, an autonomous structure of Sofia University St. Kliment Ohridski, BULSTAT register number 000670680, represented by Prof. Dr. Sylvia Ilieva, Director of the GATE Institute and proxy of the Rector of Sofia University St. Kliment Ohridski with power of attorney 70-56-46 dated 07.02.2024
- **Foundation for Humanitarian and Social Research – Sofia**, registered in the Commercial Register and the Register of Non-Profit Entities with UIC 121170665,

with registered office and address at 4 Slaveykov square, 1000 Sofia, represented by Vanya Akgün

- **Center for the Study of Democracy**, an association registered in the Commercial Register and the Register of NGOs with UIC 200421236, with registered office and address at 5 Alexander Zhendov str., 1113 Sofia, represented by Ognyan Shentov, Chairman of the Board
- **CoDE Project**, a non-entity organization existing within the Faculty of Economics at Sofia University, registered in the Commercial Register and the Register of Non-Profit Organizations with UIC 000670680, represented by Prof. Dr .Georgi Valchev, Rector of Sofia University
- **Sensika Technologies Ltd.**, registered in the Commercial Register with UIC 202229035, with registered office and address in Sofia, 18A Zlatostroy str., floor 4, office 6, represented by Vassil Velichkov.

These data controllers may process Your Personal Data only on the same lawful basis and for the same purposes as the joint controllers Identrics AD and Ontotext AD. In case any of these data controllers seeks to process Your Personal Data for any other purpose and/or on any other lawful basis, you will be notified and consulted within a reasonable period.

## What are your rights to control Your Data?

You have the right to request that we:

- Provide access to any of Your Personal Data we hold about you.
- Prevent the processing of Your Personal Data for direct-marketing purposes.
- Update any of Your Personal Data, which is out of date or incorrect.
- Delete Your Personal Data, which we are holding about you (“right to be forgotten”).  
This can be done only after the Forum is completed. If done before the completion of the Forum, you will not be able to take part in it.
- Whenever you have given your consent for the collection and processing of Your Personal Data, you may withdraw your consent.
- Restrict the way that we process Your Personal Data.
- Provide Your Personal Data to a third-party provider of services.

- Provide you with a copy of Your Personal Data, which we hold about you.

We try to answer every email promptly where possible and provide our response within the time period stipulated in the applicable law. Keep in mind, however, that there will be residual information that will remain within our databases, access logs and other records, which may or may not contain Your Personal Data. Please also note that certain parts of Your Personal Data may be exempt from such requests in certain circumstances, which may include if we need to keep processing Your Personal Data to comply with a legal obligation.

When you email us with a request, we may ask that you provide us with information necessary to confirm your identity. Any such request should be addressed to [contact@sofia-info-integrity.eu](mailto:contact@sofia-info-integrity.eu).

## Cookies

The website of the Forum may store cookies on your computer/device in order to collect Technical Information regarding your preferences when you are using the page.

Cookies are small text files that are placed on your computer by websites that you visit. They are widely used in order to make websites work, or work more efficiently, as well as to provide information to the owners of the site.

The collected Technical Information is used to customize your browsing experience and optimize your interactions with the website. You can refuse the cookies placed on your device in which case we will not collect Technical Information.

In such a case a single cookie will be saved on your computer/device in order to remember your preference that you would not like us to collect Technical Information from your activity on the website.

## What data do we retain?

We will only retain Your Data stored on our servers as required or permitted by applicable law, specifically Regulation (EU) 2016/679 (General Data Protection Regulation). We will not retain any unused Personal Data on our systems longer than necessary for legitimate business purposes.