

PRIVACY POLICY

INFORMATION ABOUT THE DATA CONTROLLER

This Privacy Policy is independently applied by the companies operating under the trade mark **“Flais”** - “Power Ronic” EOOD., UIC 204417833, and “Next Level Fitness” OOD., UIC 204479347, which manage the facilities operating under the same trade mark (jointly and individually referred to as the “Controller”, “Flais Fitness”, or “Flais”).

Throughout this Policy, the terms “Controller”, “Flais Fitness”, “Flais”, “We”, “Us”, and “the Company” shall mean the specific company operating under the trade mark “Flais” - “Power Ronic” EOOD., UIC 204417833, or “Next Level Fitness” OOD., UIC 204479347, which manages the facility/facilities operating under the same trade mark and with which you are in a legal relationship and/or have concluded a Sports Services Agreement or a Distance Contract.

“Power Ronic” EOOD., UIC 204417833, manages and administers the following facilities: Premium Fitness Flais Amaya, Premium Fitness Flais Mladost 1, Fitness Flais Strelbishte, Premium Fitness Flais Millennium, Fitness Flais Mladost 4, Premium Fitness Flais Sky City, Premium Fitness Flais Veslets, and Premium Fitness Flais Hadzhi Dimitar.

“Next Level Fitness” OOD., UIC 204479347, manages and administers the following facilities: Premium Fitness Flais Nadezhda, Premium Fitness Flais Krasna Polyana, Fitness Flais Knyazhevo, Fitness Flais Manastirski Livadi, and Premium Fitness Flais Central Park.

Each company acts as an independent and sole controller of the personal data processed in relation to the individuals with whom it has entered into a legal relationship, unless expressly stated otherwise in this Policy.

Flais processes your personal data if you are a natural person and fall within one of the following categories:

- visitors and customers of the respective Flais Fitness Facility, being one of the facilities listed on the following website: <https://www.flaisfitness.bg/lokacii/>;
- minors (under 14 years of age), represented by a parent or legal guardian;
- individuals who have voluntarily provided their personal data for the implementation of the marketing activities of Flais Fitness;
- participants in group classes or users of the fitness facilities;
- individuals registered in the customer areas of the website <https://www.flaisfitness.bg/>;
- visitors to Flais Fitness Facilities using services provided by third parties;
- individuals who have submitted a question, comment, request to exercise their rights as a data subject, or any other statement to the respective e-mail address of a company operating under the trade mark “Flais”;

- fitness instructors providing services related to the organisation and conduct of group classes;
- representatives or contact persons of legal entities that have entered into agreements with Flais Fitness (e.g. agreements for sale, services, or other arrangements).

The above means that Flais determines the purposes and means of processing personal data.

All companies operating under the trade mark “Flais” - “Power Ronic” EOOD., UIC 204417833, and “Next Level Fitness” OOD., UIC 204479347, managing facilities operating under the same trade mark, jointly process your personal data in their capacity as joint controllers if you are a natural person and fall within the following category:

- an individual who has submitted a question, comment, or other statement to Flais by completing the contact form available at <https://www.flaisfitness.bg/kontakti> and/or through the profiles and fan pages operating under the trade mark “Flais” on social media platforms.

The essence of the arrangement between the joint controllers is available to data subjects.

This Privacy Policy reflects our commitment and responsible approach to the protection of your personal data that you share with Flais.

Flais makes every effort to ensure the lawful processing of your personal data in compliance with the applicable provisions of Bulgarian law and European Union law, including Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data and repealing Directive 95/46/EC (General Data Protection Regulation), hereinafter referred to as the “GDPR”.

This document contains information regarding what personal data is processed, by whom, for what purposes, to whom your data may be disclosed, and what rights you have in relation to the protection of your personal data.

For the purposes of this document, a “Sports Services Agreement” shall mean an agreement concluded with the respective company operating under the trade mark “Flais” and managing a facility operating under the same trade mark, pursuant to which you are entitled to use sports services at one of the Flais Fitness Facilities for a specified period or for a specified number of visits to sports activities.

For the purposes of this document, “Flais Fitness Facilities” shall mean all fitness centres and the fitness equipment located therein, as well as specialised halls and relaxation areas equipped with specialised equipment and areas designated for group training sessions, owned and operated by Flais Fitness under the trade mark “Flais”.

FOR WHAT PURPOSES AND ON WHAT LEGAL BASIS DO WE PROCESS YOUR PERSONAL DATA? FOR WHAT PERIOD IS YOUR PERSONAL DATA STORED?

1. Processing of Personal Data of Visitors to Flais Fitness Facilities

- **Personal data processed for the purposes of concluding and performing a Sports Services Agreement**

In order to use sports services at Flais Facilities, you must conclude a Sports Services Agreement at one of our facilities. Such agreement may also be concluded through the Flais Fitness website and the Fitness Flais App mobile application, which allow you to purchase memberships online.

In order for the requested sports services to be provided under the concluded Sports Services Agreement, you may be required to provide certain personal data necessary for the conclusion and performance of the agreement.

The provision of personal data is entirely voluntary; however, if you choose not to provide it, you will not be able to conclude a Sports Services Agreement.

Following the conclusion of a Sports Services Agreement, the personal data you provide is also used to automatically create a profile (account) in the online customer area of the respective Flais fitness club. This profile is used for the performance of the Sports Services Agreement (for example, access to Flais fitness centres is managed through the online customer profile).

Scope of the processed data

To conclude a Sports Services Agreement, we process a minimum set of your identification data.

We process personal data to the extent necessary for the performance of the agreement to which you are a party: first name, last name, e-mail address, personal identification number (EGN), and telephone number.

Date of birth and gender, if voluntarily provided by you, will be processed for purposes arising from our legitimate interests, such as statistical and analytical purposes (including the optimal adjustment of each fitness club's offering to the needs of customers using our sports services).

In addition, for the purpose of verifying your identity when using services provided by a company operating under the trade mark "Flais" and managing a facility operating under the same trade mark, Flais processes your photograph, which is taken on-site by reception staff. The provision of such photograph enables verification that your membership is not being used by another person without the need to collect additional personal data from you.

A unique QR code may also be generated within each individual Flais customer account in the mobile application, through which customers may identify themselves and gain access to Flais Fitness Facilities.

In addition to the duration of the Sports Services Agreements concluded with you, we store the above data in a software system for a period of up to five (5) years after the termination of your last Sports Services Agreement with Flais, provided that you have not concluded a new Sports Services Agreement during that period.

The purpose of this retention is to provide improved customer service and facilitate the process of concluding Sports Services Agreements. In this way, you will not be required to provide your personal data every time you conclude a subsequent Sports Services Agreement with Flais Fitness.

At the same time, in order to protect your interests, we limit the retention period of your identification data to the period during which it is reasonably likely that, following a temporary interruption, you will resume attending Flais fitness centres.

Data Related to Visits to Fitness Centres

Given that each Sports Services Agreement relates to a specific type of sports activity at a specific Flais Fitness Facility, during the performance of the agreement the respective company with which the agreement has been concluded, where it manages more than one fitness facility operating under the trade mark “Flais”, receives general information regarding your sports preferences and where and when you engage in sports activities.

Accordingly, for the purposes of performing the Sports Services Agreements concluded with you, the respective company with which you have entered into an agreement has information, for example, regarding which of the fitness centres it manages under the trade mark “Flais” your membership is valid for, whether your membership covers fitness services or group classes, and the time of day at which the sports service used by you is provided.

As, depending on your membership, a specific sports service must be provided to you at a particular Flais Fitness Facility and at a specified time, the above-mentioned personal data is used solely for the purpose of performing the respective contractual obligations and providing you with access to the activity for which you have purchased a membership.

Bank Card and Bank Account Data

Where you make a payment by bank card for a purchased membership, Flais processes the data relating to such bank card and the associated bank account in order to process your payment and provide the paid service.

Where Flais uses the services of a third-party payment service provider, Flais will not process your bank card or bank account data.

Purposes of Processing

The personal data described above is necessary for us to conclude and perform our obligations under the Sports Services Agreements concluded with you in the respective Flais Fitness Facilities.

More specifically, the personal data provided by you is processed for the following purposes:

- conclusion and performance of Sports Services Agreements;
- issuance of membership cards;

- provision of access for visitors holding membership cards and personal QR codes to their profiles (accounts) within the online customer area of Flais fitness clubs, including the relevant mobile application, and to the sports activities and fitness centres covered by the relevant agreement;
- performance of our obligations to provide sports services under the relevant memberships and compliance with legal obligations applicable to the Company;
- online application, payment and conclusion of a Sports Services Agreement;
- processing of payments made by bank card;
- verification of your identity when using the services provided by the Company and, in particular, facilitating identity checks at the entrances to sports facilities (including access by club members using membership cards and personal QR codes available through the online customer area);
- statistical and analytical purposes.

Legal Basis for Processing

The legal basis for the processing of the above personal data is the conclusion and performance of the agreement between you and the respective company operating under the trade mark “Flais” for the provision of sports services by subscription (Article 6(1)(b) GDPR).

The creation of an account (profile) in the Company’s Customer Area on the website <https://www.flaisfitness.bg/> and, optionally, within the mobile application, is carried out for the purpose of performing the concluded Sports Services Agreement (Article 6(1)(b) GDPR).

The retention of your personal data after the termination of your last agreement is based on the legitimate interests of the Controller in providing improved customer service, facilitating the conclusion of individual Sports Services Agreements, and thereby improving the quality of the services provided (Article 6(1)(f) GDPR).

The legal basis for processing your photograph is also the legitimate interest of the Controller (Article 6(1)(f) GDPR) in establishing your identity when using Flais services and facilitating checks at the entrances to sports facilities, as well as the performance of the agreement concluded between you and Flais for the provision of sports services by subscription (Article 6(1)(b) GDPR).

The legal basis for processing data required for issuing invoices for received payments is compliance with legal obligations under applicable tax legislation (Article 6(1)(c) GDPR).

Where your data is processed for direct marketing purposes, the legal basis is your freely given, specific and informed consent, where you choose to provide such consent (Article 6(1)(a) GDPR).

We process your personal data, including date of birth and gender, where voluntarily provided by you, on the basis of our legitimate interests relating to statistical and analytical purposes (Article 6(1)(f) GDPR).

Retention Period

Following the termination of your Sports Services Agreement, your personal and contact data will be retained in our electronic customer database for a period of five (5) years after termination of your last agreement, provided that no new Sports Services Agreement has been concluded in the meantime.

This is done for the purpose of facilitating and expediting the conclusion of future agreements and the issuance of membership cards and invoices for purchases made by you.

Accordingly, when you conclude a new Sports Services Agreement, we will not need to collect your personal information again but will instead use the data initially provided by you, thereby improving customer service and convenience.

Upon expiry of the above five-year period, all of your personal data will be deleted from all software and electronic systems.

The personal data provided by you in connection with the conclusion of an agreement with the Controller, your acceptance of the General Terms and Conditions, and your acknowledgement of this Privacy Policy may also be retained for the longer periods specified below in the section relating to personal data processed for the protection of the legitimate interests of Flais or on another legal basis.

Your personal data relating to payments made by bank card, where necessary for compliance with our obligations under tax and accounting legislation, may be retained for the maximum period of ten (10) years provided by applicable tax and accounting laws.

Personal data processed for direct marketing purposes shall be retained and processed until you expressly withdraw your consent.

- **Where a Sports Services Agreement is concluded for a minor under 14 years of age, the child's personal data shall be provided by a parent or legal guardian through the signing of the relevant declaration/agreement.**

The parent or legal guardian provides the child's personal data for the purposes of concluding and performing the Sports Services Agreement and declares that they possess the necessary authority to provide such data.

Scope of Processed Data

Where personal data relating to minors is processed, only the minimum amount of personal data necessary for the provision of sports services under the relevant agreement shall be processed, including:

- the child's first and last name;

- the child's date of birth;
- attendance history.

Where the agreement is concluded by a parent or legal guardian, the Company processes:

- data relating to the parent or legal guardian;
- signature and data contained in the relevant declaration/agreement.

Purposes of Processing

The personal data described above is processed for the following purposes:

- conclusion and performance of a Sports Services Agreement;
- provision of access to the relevant sports activities;
- protection against potential legal claims.

Legal Basis for Processing

The legal basis for processing the personal data is the conclusion and performance of the agreement between the parent or legal guardian and the respective company operating under the trade mark "Flais" (Article 6(1)(b) GDPR).

The data is also processed on the basis of the Controller's legitimate interest in demonstrating the existence of valid consent and defending against potential legal claims (Article 6(1)(f) GDPR).

Retention Period

The personal data contained in declarations/agreements and collected in connection with the provision of services shall be retained for the duration of the Sports Services Agreement and for the period necessary to defend against legal claims in accordance with applicable legislation.

• Personal Data Processed on the Basis of Your Consent for the Sending of Electronic Newsletters and/or Other Marketing Activities

In order to receive information regarding current offers and promotions, new products and services, and special offers, you may subscribe to receive our electronic newsletter.

For this purpose, it is necessary to provide your e-mail address during the process of concluding a Sports Services Agreement or at a later stage. If you subscribe, we will process your e-mail address in order to send you our electronic newsletter.

In addition, where you have provided your explicit consent, we may use the telephone number provided by you for the organisation of special marketing events.

Information relating to your e-mail address and telephone number is processed for the purposes described in this section on the basis of your consent, given either at a Flais Fitness Facility and/or electronically.

Personal data processed for the purpose of sending electronic newsletters shall be processed until you unsubscribe from the newsletter by using the unsubscribe link contained in the electronic communications sent by us.

You may also withdraw your consent to receive information regarding current offers and promotions, new products and special offers by contacting us using the contact details set out below.

Furthermore, for the purpose of promoting and advertising our services and products, we may organise various games, raffles, prize draws and other marketing activities.

For the purpose of participating in such activities, you may provide us with various identification and contact details, which we will use in order to:

- identify you;
- verify that you meet the conditions of the respective game or promotion;
- select winning participants;
- publish the names of winning participants;
- deliver prizes to winning participants.

We process such data on the basis of your consent, provided through your participation in the respective promotional activity and in accordance with its rules and terms and conditions.

Data relating to participants in promotional activities shall be deleted six (6) months after the end of the respective campaign and the distribution of prizes to the winning participants.

The provision of the personal data described in this section is entirely voluntary. However, if you choose not to provide such data, you will not be able to receive our newsletter or participate in the respective marketing activities.

We process general information regarding your sports preferences and where and when you engage in sports activities within Flais Facilities for the purpose of conducting analyses and generating statistical information. Subsequently, such information may be used to prepare offers tailored to your interests.

The legal basis for this type of processing is our legitimate interest (Article 6(1)(f) GDPR) in improving the quality of sports services and developing the products and services we offer.

Nevertheless, the sending of personalised offers by e-mail, telephone call, or any other communication channel selected by you is carried out solely on the basis of your consent, which may be withdrawn at any time.

• Personal Data Processed in Connection with Group Photography After Training Sessions

At certain Flais Fitness Facilities, group photographs may be taken following the completion of group classes.

Scope of Processed Data

Within the framework of this activity, the following personal data is processed:

- image (photograph) of participants included in the group photograph.

Purposes of Processing

The images are processed for the following purposes:

- publication on Flais official social media profiles;
- publication on the social media profiles of the respective instructor;
- presentation and promotion of group classes and Flais activities.

Legal Basis for Processing

The processing of images is carried out solely on the basis of your explicit consent pursuant to Article 6(1)(a) GDPR.

Participation in group photographs is entirely voluntary. Individuals who do not wish to be photographed may inform the instructor in advance and refrain from participating in the group photograph.

By participating in the photography session, you provide your explicit consent to the processing and publication of your image for the purposes and in the manner described above.

Retention Period

Photographs shall be retained until the photographed individual withdraws their consent or until the purposes for which the photographs were collected cease to exist, after which they shall be deleted from all channels controlled by the Controller.

Following publication on social media platforms, it is possible that the content may be shared or reproduced by third parties outside the Controller's control.

Personal Data of Visitors Using Services Provided by Third Parties at Flais Fitness Facilities

Certain Flais Fitness Facilities may host additional services provided by third parties (for example, massage services) within the premises of the relevant facility.

In this connection, individuals who are not customers of Flais may visit the Facilities solely for the purpose of using such services.

Scope of Processed Data

Within the framework of this activity, personal data is processed in a limited scope necessary to ensure access control and safety within the Facilities, including:

- first and last name;
- signature;
- data contained in declarations completed during the visit;
- images captured through video surveillance systems operating within the Flais Fitness Facilities.

Purposes of Processing

The personal data is processed for the following purposes:

- access control to Flais Fitness Facilities;
- maintenance of order and security;
- protection of the life and health of visitors and employees;
- protection of the Controller's property.

Legal Basis for Processing

The legal basis for processing the personal data is the legitimate interest of the respective Controller (Article 6(1)(f) GDPR) relating to ensuring security and controlling access to Flais Fitness Facilities.

Retention Period

Personal data collected through completed declarations is retained for a period of up to thirty (30) days from the date of the visit and thereafter for the period necessary to defend against legal claims.

Data collected through video surveillance systems is retained in accordance with the periods specified in the section "Personal Data Relating to Video Surveillance at Flais Fitness Facilities".

• Personal Data Relating to Video Surveillance at Flais Fitness Facilities

Types of Personal Data

Flais Fitness Facilities are equipped with a limited number of video surveillance cameras.

Through recordings from the installed cameras, we may process images captured through video surveillance and video recording.

Purposes and Legal Basis for Processing

The purpose of video surveillance is to ensure the security of the fitness centres, protect both our property and yours, and maintain order and safety within the Facilities.

We process your personal data relating to video surveillance on the basis of our legitimate interest in protecting our commercial premises, maintaining order within them, and safeguarding both our property and yours against unlawful interference (Article 6(1)(f) GDPR).

In order to ensure that the protection of Flais' legitimate interests does not override your interests, fundamental rights and freedoms requiring protection of personal data, we have implemented a number of measures and safeguards.

These measures include, among others, the installation of surveillance cameras only at a limited number of locations within the Flais Fitness Facilities. Accordingly, cameras are installed solely:

- at the entrances to the Facilities;
- above reception desks;
- above the entrances to group training rooms; and
- above the entrances to changing rooms (without visibility into the changing rooms themselves),

for the purpose of identifying, where necessary, individuals who have gained unauthorised access or interfered with our property or the property of our customers.

Additional safeguards implemented by us include the placement of clearly visible notices informing you about the existence of video surveillance and where this Privacy Policy may be consulted.

We also use camera settings (including coverage area, recording angle and zoom level) designed to minimise unnecessary interference with your privacy.

Furthermore, we ensure that only a limited number of authorised individuals have access to surveillance recordings, that such recordings are not disclosed to third parties, and that recordings are reviewed only in the event of an incident requiring investigation.

Video surveillance recordings from each Flais Fitness Facility are retained for a maximum period of two (2) weeks from the date of recording.

Only where a violation or incident has been identified may recordings be retained until the relevant proceedings have been completed, but in no event longer and then, until they are necessary for the performance of our legitimate interests consisting in exercising, establishing or defending legal claims.

• **Personal Data Processed for Compliance with Our Legal Obligations**

When you conclude a Sports Services Agreement or purchase a product from Flais, certain legal obligations arise for us.

In order to comply with these obligations, we must process certain personal data relating to you, including, for example, identification data, contact details and other information provided by you.

For example, we may process your personal data for the purpose of issuing invoices and complying with our obligations as a supplier within the meaning of the Value Added Tax Act. In addition, pursuant to applicable accounting and tax legislation, we are required to record issued invoices and reflect them in our accounting and tax records.

Your data may also be processed in order to comply with obligations arising under consumer protection legislation, including, for example:

- handling complaints;
- processing contract withdrawals;
- accepting returns of purchased products and issuing refunds;
- resolving consumer disputes;
- sending notifications concerning amendments to the General Terms and Conditions for the provision of sports services; and
- other similar activities.

The legal basis for processing such personal data is compliance with legal obligations to which we are subject (Article 6(1)(c) GDPR).

Your personal data processed for invoicing purposes and for compliance with tax, accounting, consumer protection and other legal obligations may be retained for the maximum statutory period of ten (10) years.

• **Personal Data Processed for the Purposes of Our Legitimate Interests**

We may process your identification data, written declarations and consents signed by you, data relating to orders and purchases made by you in our fitness centres, payment information, questions, complaints and other communications submitted by you, in order to defend ourselves against legal claims brought by you.

We may also process your identification data for inclusion in our electronic customer database in order to facilitate and accelerate the conclusion of Sports Services Agreements and the issuance of membership cards and invoices for purchases made at any Flais Fitness Facility.

We will process such personal data only where our legitimate interests are not overridden by your interests, fundamental rights and freedoms requiring the protection of personal data.

The legal basis for processing your data is our legitimate interest in defending ourselves against potential legal claims and maintaining a customer database to facilitate the

conclusion of Sports Services Agreements and the issuance of membership cards and invoices.

Data processed for the purpose of defending against legal claims (such as written declarations and consents) shall be retained until expiry of the five-year limitation period for legal claims under the Obligations and Contracts Act. Such data shall be accessible only to a limited number of individuals engaged by the relevant Controller and only where access is required in connection with a legal dispute.

• Personal Data Processed in Connection with the Registration of a Profile in Our Online Customer Areas and the Use of Profile Functionalities

The website operated by Flais at <https://www.flaisfitness.bg/>, as well as our mobile application Fitness Flais App, enables the creation of customer profiles that provide access to functionalities including:

- online conclusion of a Sports Services Agreement with the relevant company depending on the selected Facility;
- online reservation of group classes;
- access to fitness facilities through a personal QR code;
- information regarding the concluded Sports Services Agreement; and
- functionalities relating to the performance of such agreement.

Creation of a Profile in the Customer Area

A profile in the Flais customer area may be created by completing an online registration form containing mandatory fields marked as such.

A profile in the Flais customer area may also be created electronically through the online conclusion of a Sports Services Agreement via the website <https://www.flaisfitness.bg/> or through the Fitness Flais App mobile application. Customers of Flais Fitness Facilities who conclude a Sports Services Agreement at a facility reception desk automatically receive login credentials for their online customer account at the e-mail address provided by them. Through this profile and, optionally, through the mobile application, the concluded Sports Services Agreement is performed.

Holders of MultiSport cards who visit Flais Fitness Facilities may obtain a profile in the Flais customer area by completing the online registration form for a free account. Customer accounts created through <https://www.flaisfitness.bg/> may also be accessed through the Flais mobile application. The mobile application enables the use of all functionalities available to customers who have registered an account through the website. A unique QR code is generated within each individual customer account in the mobile application, through which customers identify themselves and gain access to the respective Flais Fitness Facility.

Processing of Personal Data Provided for the Creation of a Profile in a Customer Area

In order to create a profile in one of the customer areas, we must obtain your identification data and e-mail address. These data are used for maintaining your electronic profile and for sending electronic communications relating to your profile, including, for example:

- profile registration confirmations;
- password reset or password change notifications; and
- other similar communications.

The data is also used in connection with the functionalities available through your electronic profile and for the performance of the concluded Sports Services Agreement, including, for example:

- messages confirming the conclusion of a Sports Services Agreement;
- messages confirming reservations for group classes; and
- provision of a personal QR code used for customer identification and access to the Facilities.

The data collected when using the functionality for the online conclusion of a Sports Services Agreement corresponds to the personal data described above in this Policy as necessary for the conclusion of a Sports Services Agreement at a Flais Fitness Facility.

The legal bases, purposes and retention periods applicable to the processing of personal data necessary for Sports Services Agreements are described in Section 1 of this Policy under “Personal Data Processed for the Purposes of Concluding and Performing a Sports Services Agreement”.

Personal Data Processed in Connection with Online Reservations for Group Classes

Where you use the functionality allowing you to reserve participation in a group class electronically at a Flais Fitness Facility, we receive general information regarding your sports preferences and where and when you participate in sports activities due to the nature of the service itself.

Such personal data is used in order to perform our obligation to provide you with access to the selected sports activity at the relevant Facility and at the selected time.

Legal Basis for Processing

The legal basis for processing your personal data for the creation and administration of an electronic profile is the conclusion and performance of the Sports Services Agreement concluded between you and the respective Flais entity (Article 6(1)(b) GDPR).

The data obtained in connection with the online conclusion of a Sports Services Agreement and the online reservation of group classes is processed for the conclusion and performance of the relevant agreements entered into between you and Flais (Article 6(1)(b) GDPR).

The provision of personal data is entirely voluntary. However, if you do not provide the required personal data, we will not be able to provide the group class reservation service or perform the concluded Sports Services Agreement where the existence of a customer profile is necessary for its performance (for example, customer identification through a personal QR code available in the profile and access to fitness facilities through that QR code).

Retention Period

Your personal data provided during the registration of a profile on any of our websites shall be retained for the entire period during which your registration remains active.

Data relating to reservations for group classes shall be deleted after the respective class has taken place.

Retention periods applicable to data processed in connection with Sports Services Agreements are governed by the periods described in the section relating to the conclusion and performance of Sports Services Agreements.

• Processing of Personal Data of Representatives or Contact Persons of Legal Entities - Our Business Partners

If you are a representative or contact person of a supplier of goods or services or another business partner that is a legal entity, we may process a limited scope of your identification and contact data for the following purposes:

- concluding agreements with you in your capacity as a representative of the legal entity;
- maintaining contact with you in connection with the performance of the concluded agreement;
- protection against legal claims and debt collection activities;
- inclusion of the legal entity represented by you in our electronic partner database in order to facilitate and accelerate invoice issuance.

We process your personal data on the basis of the conclusion and performance of the agreement between the legal entity represented by you and the respective company operating under the trade mark “Flais”, as well as on the basis of our legitimate interest in maintaining communication with our business partners regarding the performance of agreements concluded by us and in asserting or defending legal claims relating to purchases, provision of services, payments and similar matters.

Your personal data processed for invoicing purposes and compliance with obligations arising under tax, accounting, consumer protection and other legislation may be retained for the maximum period of ten (10) years established under the Accountancy Act, the Value Added Tax Act and the Tax and Social Security Procedure Code.

Your contact data as a representative or contact person of the legal entity represented by you may be retained in our partner database until termination of the contractual and commercial relationship with the relevant business partner.

- **Personal Data Processed for the Conclusion and Performance of Agreements with External Fitness Instructors**

Personal Data Processed on the Basis of a Contract or Compliance with a Legal Obligation

Where you are a fitness instructor who has concluded an agreement with Flais for the provision of group training services, we process the following categories of personal data:

- identification data;
- contact details;
- information regarding your professional qualifications and professional experience;
- information regarding your schedule for conducting group classes;
- bank account details.

We process the above personal data on the basis of the conclusion and performance of the agreement between you and Flais, as well as for the purpose of our legitimate interest in asserting or defending legal claims. Your data is also processed in order to comply with our legal obligations relating to the withholding of mandatory social security contributions, health insurance contributions and taxes, as well as the issuance of documents required under applicable accounting and tax legislation.

Your data processed for compliance with tax and accounting obligations may be retained for the maximum period of ten (10) years established under the Accountancy Act, the Value Added Tax Act and the Tax and Social Security Procedure Code.

Your data processed for the performance of the agreement concluded with Flais may be retained in our database until termination of the respective agreement.

Personal Data Processed on the Basis of Consent

Flais may request your consent to publish your photograph and a brief description of your professional activities on Flais websites.

The purpose of this type of processing is to promote your activities as a fitness instructor and to advertise the sports activities offered in our fitness clubs. The processing of such personal data is based entirely on your consent. Where no consent has been provided, or where consent has been withdrawn, we will not process the above-described data.

Your photograph and description of your professional activities shall be published on Flais websites for the duration of your contractual relationship with Flais or until the withdrawal of your consent, whichever occurs first.

• **Personal Data Processed for Responding to Questions, Publishing Comments and Other Communications Submitted to Us**

You may send us questions and enquiries by completing the contact form available in the contact section of our websites, as well as through our social media profiles and fan pages. In order to identify you and provide a response or publish your comment, we process your identification data (name) and contact details (telephone number and e-mail address).

We process personal data provided by you when submitting questions and other communications through the contact form on our websites or through our social media profiles and pages (Facebook, Instagram and YouTube) on the basis of our legitimate interest pursuant to Article 6(1)(f) GDPR. Our processing of your personal data is separate from and independent of the processing activities carried out by the operators of the respective social media platforms for their own purposes and on their own legal bases.

Completion and submission of the contact form and the publication of questions, enquiries and comments are entirely voluntary. However, if you choose not to provide your personal data, you will not be able to submit your enquiry to us.

• **Data Collected Through Cookies**

More information regarding the use of cookies can be found in our Cookie Policy, available at:

<https://www.flaisfitness.bg/cookie-policy/>

TO WHOM MAY WE DISCLOSE YOUR PERSONAL DATA AND WHERE IS IT STORED?

We work with partners and service providers who may process your personal data either as independent data controllers or on our behalf in their capacity as data processors.

We disclose to such recipients only the personal data that is strictly necessary for the provision of the relevant service.

Furthermore, where we disclose your data to processors acting on our behalf, we take all necessary measures to ensure that your data is processed in compliance with all applicable legal requirements and that the processor has implemented the necessary technical and organisational measures to protect the data.

The entities to whom we may disclose your personal data include payment service providers that process payments relating to Sports Services Agreements and other products, IT and hosting service providers maintaining our websites, debt collection agencies, courier service providers and other similar service providers.

We may also disclose part of your data to our accounting service providers for the purpose of recording issued invoices and other accounting documents in our accounting records.

Upon request from competent public authorities acting in accordance with applicable legislation (for example, the National Revenue Agency, the Consumer Protection

Commission, courts and other public authorities), we may be under a legal obligation to disclose your personal data to such authorities.

The data that we collect and process is stored within the European Economic Area (EEA).

WHAT ARE YOUR RIGHTS IN RELATION TO THE PROTECTION OF YOUR PERSONAL DATA?

• Right of Access

You have the right to obtain confirmation from Flais as to whether we process your personal data and, where that is the case, to obtain access to such data and information regarding the purposes of processing, retention periods and recipients of personal data.

We will provide you with access to your data free of charge and, upon request, will also provide you with a copy of the data.

• Right to Rectification

You have the right to request the correction of inaccurate personal data relating to you and the completion of incomplete personal data.

• Right to Erasure (“Right to be Forgotten”)

You have the right to request the deletion of personal data relating to you that is no longer necessary for the purposes for which it was collected, or where you have withdrawn your consent to processing or exercised your right to object to processing.

In certain cases prescribed by law, we may refuse to erase your personal data.

• Right to Restriction of Processing

In certain circumstances, you may request that we restrict the processing of your personal data, in which case the data will only be stored and not otherwise processed.

• Right to Data Portability

You have the right to receive the personal data we process concerning you in a structured, commonly used and machine-readable format and to transmit that data to another controller.

• Right to Object

You have the right to object to the processing of your personal data for direct marketing purposes, as well as to the processing of personal data concerning you where such processing is based on Article 6(1)(e) or Article 6(1)(f) GDPR.

• Right to Withdraw Consent

Where we process your personal data on the basis of consent, you have the right to withdraw your consent at any time, without affecting the lawfulness of processing carried out on the basis of consent before its withdrawal.

• Right to Lodge a Complaint

You have the right to lodge a complaint with the Commission for Personal Data Protection if you believe that a violation of the applicable personal data protection legislation has occurred.

Complaints to the Commission for Personal Data Protection may be submitted:

- in person;
- by post to: 2 Prof. Tsvetan Lazarov Blvd., Sofia 1592, Bulgaria;
- by fax: +359 2 915 35 25;
- electronically via the Commission's e-mail address: kzld@cpdp.bg.

More information regarding the complaint procedure is available at:

<https://www.cdpd.bg/>

CONTACT US

You may contact us regarding any matters related to the processing of your personal data, including the exercise of your rights described in this Privacy Policy, through any of the following channels:

By post: 35 Simeonovsko Shose Blvd., Floor 3, Sofia 1700, Bulgaria

By e-mail, depending on the company operating under the trade mark “Flais” with which you are in a legal relationship:

- powerronic@flaisfitness.bg – Power Ronic EOOD., UIC 204417833, in relation to Premium Fitness Flais Amaya, Premium Fitness Flais Mladost 1, Fitness Flais Strelbishte, Premium Fitness Flais Millennium, Fitness Flais Mladost 4, Premium Fitness Flais Sky City, Premium Fitness Flais Veslets and Premium Fitness Flais Hadzhi Dimitar;
- info@flaisfitness.bg – Next Level Fitness OOD., UIC 204479347, in relation to Premium Fitness Flais Nadezhda, Premium Fitness Flais Krasna Polyana, Fitness Flais Knyazhevo, Fitness Flais Manastirski Livadi and Premium Fitness Flais Central Park.

Through the contact form available on our website:

<https://www.flaisfitness.bg/>

In order to exercise your rights relating to the protection of personal data, it is sufficient to send us a request containing at least:

- full name and personal identification number (EGN);
- description of the request;
- preferred method of receiving information;

- signature, date of submission and correspondence address.

CUSTOMER DECLARATIONS

Please refer to the customer declarations applicable when purchasing memberships from:

- Next Level Fitness OOD.;
- Power Ronic EOOD.

This Privacy Policy was adopted on 26 May 2018 and was last updated on 15 June 2026.