

# **PERSONAL DATA PROCESSING AND PROTECTION POLICY OF NEXT LEVEL FITNESS OOD**

## **INFORMATION ABOUT THE PERSONAL DATA CONTROLLER**

Next Level Fitness OOD, UIC 204479347, registered address in Sofia, 1700, 35 Simeonovsko shosse blvd., fl.3, (hereinafter referred to as "Next Level") is a controller of your personal data, if you are a natural person and fall into one of the following categories:

- natural persons – visitors and clients of our fitness centers chains – Next Level, listed on the following websites: [www.nextlevelclub.bg](http://www.nextlevelclub.bg);
- natural persons who voluntarily provide their personal data for the implementation of the marketing policy of Next Level;
- natural persons who are registered in our website client zones [www.nextlevelclub.bg](http://www.nextlevelclub.bg);
- fitness instructors, providing services in relation to the organization and conduction of group activities;
- representatives or contact persons of legal entities who have concluded agreements with NextLevel (e.g. purchase agreements, services, etc.);
- users who have made an inquiry, a comment or another statement addressed to us through filling in the contact forms on our websites [www.nextlevelclub.bg](http://www.nextlevelclub.bg) or through our profiles and fan pages on social networks.

This means, that Next Level determines the purposes and means of the processing of personal data.

The present personal data processing and protection policy of Next Level is an expression of our commitment and responsible attitude to the protection of your personal data that you share with us.

We make every effort, to ensure that your personal data are processed in accordance with the applicable provisions of Bulgarian and European Union law, including the Regulation of the European Parliament and of the Council (EU) of 27 April 2016 on the protection of individuals with regard to the processing of personal data and on the free movement of such data and the repeal of Directive 95/46 /EC (hereinafter: "GDPR"), as well as the Bulgarian Personal Data Protection Act.

In this document you can find information about what types of personal data we are processing, for what purposes, to whom we may disclose your data, as well as what your rights related to the personal data protection are.

For the purposes of the present document, “Agreement for provision of sports services” shall mean an agreement concluded with Next Level, by virtue of which you have right to use sports services in any of our fitness centers for a specific period of time, or for a certain number of visits of sports activities.

## **FOR WHAT PURPOSES AND ON WHAT BASIS ARE WE PROCESSING YOUR PERSONAL DATA? WHAT IS THE STORAGE PERIOD FOR YOUR PERSONAL DATA?**

### 1. Processing of personal data of the visitors of the fitness centers

a) personal data, processed for the purposes of concluding and performing an Agreement for provision of sports services

In order for you to use our sports services, you should conclude an Agreement with Next Level for provision of sports services in our fitness centers. You can sign such Agreement at the Fitness Centers premises or via the Company’s website and the Next Level Fitness App, that allow you to buy a Membership online.

In order for us to be able to issue to you a membership card and to provide to you the requested sports services under the concluded with us Agreement for provision of sports services, we may require from you to provide us with certain personal data, necessary for the purposes of concluding and performing the agreement on our side.

The provision of personal data is entirely voluntary but if you do not wish to provide it, you will not be able to conclude an Agreement for provision of sports services. After the conclusion of the Agreement for provision of sports services, the personal data you have provided to us is also used to automatically create a profile (account) in the online customers area of „Next Level“ fitness clubs, through which profile and the Next Level Fitness App the concluded Agreement for provision of sports services is executed (e.g. the profile in the online customer area is used to access the Company's fitness centers by identifying the person with a personal QR code that is generated in the Next Level Fitness App;

### **Scope of personal data**

In order to conclude the Agreement for provision of sports services we process a minimum set of your identification data. We process your personal data in scope which is necessary for the performance of a contract to which you are party: first name, surname, email address, personal identification number, telephone number.

Date of birth and gender we collect obligatory for purposes arising from our legitimate interests, such as statistical and analytical purposes (optimal adjustment of the offer of each Next Level fitness clubs to the needs of Clients’ using our sport services).

Collecting information on “How did you find out about our club?” helps us with improvement of our marketing activities (analytical purposes).

Moreover, for the purpose of verification your identity within using the Company's services we collect your photo, taken in the Fitness Center premises by our receptionists (taking a photo enables us to determine whether your Membership card is not used by another person, without having to collect your additional personal data. The Next Level Fitness App generates a unique QR code in each individual profile (account) in the online customers area of the Company, through which personal QR code customers are identified and gain access to the Company's gyms.

We store in our software system abovementioned personal data not only during the term of the concluded Agreements for provision of sports services but also for a period of up to 5 years after the termination of your last agreement for sports services with Next Level, as long as within this period you have not concluded a new Agreement for provision of sports services. The purpose of this storage duration is to provide to you a better service, to facilitate the process of conclusion of Agreements for provision of sports services. In such manner, it will not be necessary for you to provide your personal data every time you conclude a separate consecutive Agreement for provision of sports services. At the same time, in order to protect your interests, we limit the term during which your identification data is stored by us. We store the data only during the period in which it is likely, after a temporary break, that you resume your visits in our fitness centers.

### **Workplace**

Given the possibility of concluding promotional Agreements for provision of sports services with employees of certain employers, who have concluded an agreement with us, we may require from you to certify your workplace. This should prove your right to benefit from the promotional terms in your capacity of an employee of a certain employer.

### **Data related to visits to the fitness centers**

Taking into account that each concluded Agreement for provision of sports services refers to a type of a sports activity in a specific fitness center, in the course of the provision of our services we receive general information about your sports preferences and where and when you are doing sports. That is, for the purposes of the performance of the concluded Agreement for provision of sports services, we possess with information, for example, for which of our fitness centers you have a subscription card, whether the subscription applies to fitness services or for visiting group activities, as well as during which time of the day the sports service used by you is conducted.

Since, depending on your subscription, we have to provide to you a specific sports service in a particular fitness center and during a particular time, the above-mentioned personal data are only used so that we can perform our contractual obligations and to provide to you access to the corresponding activity for which you have paid a subscription.

### **Data related to bank cards and bank accounts**

When making a payment with a bank card for a purchased subscription card, we process the data regarding that bank card and the bank account connected to it, so that we can process your payment and provide to you the purchased service.

### **Purposes of processing**

The personal data described above are necessary so that we can conclude and perform our obligations under the concluded with you Agreements for provision of sports services in our fitness centers. The personal data, provided by you are processed for the following purposes:

- conclusion of Agreements for provision of sports services and the execution of those agreements;
- issuance of membership cards;
- providing access to visitors, holders of membership cards and personal QR codes in their profiles (accounts) in the online customers area of „Next Level“ fitness clubs, including in the mobile application Next Level Fitness App for the sports activities and sports centers, for which the respective agreement has been concluded;
- performance of our obligations to provide sports services, for which the membership cards have been issued, as well as to comply with any legal obligations applicable to the Company;
- online request, payment and conclusion of Agreement for provision of sports services;
- processing of payments for the price of the membership cards, made by bank cards;
- verification of your identity within using the Company's services, especially facilitation of entry check to the club premises (entrance of Clients-Members, to whom the Membership Card is assigned and a personal QR code for access to the gyms in the online customer area is issued);
- statistical and analytical purposes.

### **Legal ground for processing**

The legal ground for the processing of the above-mentioned personal data is the conclusion and the performance of an agreement between you and Next Level Fitness OOD for provision of sports services on subscription basis (Article 6 point 1 letter b) of the GDPR). The creation of an account (profile) in the online customers area of the Company on the website <https://www.nextlevelclub.bg/> and the mobile application Next Level Fitness App is made in order to fulfill the concluded Agreement for the provision of sports services (Article 6 point 1 letter b) of the GDPR).

The legal ground on which your identification data are being stored after the termination of your last agreement with Next Level is Next Level's legitimate interest to provide to you better services, to facilitate the process of concluding separate Agreements for provision of sports services and in such way to improve the quality of the provided services (Article 6 point 1 letter f) of the GDPR).

The legal ground on which your photograph is collected is Article 6 point 1 letter f) of the GDPR. Next Level's legitimate interest is verification of your identity within using the Company's services, especially facilitation of entry check to the club premises (entrance of Clients-Members, to whom the Membership Card is assigned) and for the execution of the agreement between you and Next Level Fitness for the provision of sports services (Article 6 point 1 letter b) of the GDPR).

The legal ground on which the data are processed for the purposes of Issuance of an invoice for the received payment is the compliance with our legal obligations under the Bulgarian tax legislation (Article 6 point 1 letter c) of the GDPR).

In cases of processing your data for the purposes of direct marketing, the basis for processing is your voluntary and informed explicit consent, if you wish to provide it (Art. 6 point 1 letter "a" of GDPR).

We process your personal data in scope of date of birth, gender and information "How did you find out about club?" on the basis of our legitimate interests, which are statistical and analytical purposes (Article 6 point 1 letter f) of the GDPR).

### **Storage period**

After the termination of your Agreement for provision of sports services and as far as meanwhile a new Agreement for provision of sports services has not been concluded, your identification and contact data are stored by us in our electronic client database for a period of 5 years after the termination of your last agreement with Next Level. This aims to make the conclusion of a following agreement easier and faster and to make faster the issuance of membership cards and invoices for your purchases. In view of your convenience and providing to you a better service, upon the conclusion of a new Agreement for provision of sports services we will not collect again your personal information, as we will use the personal data provided by you initially. After the expiration of the 5-years term described above, all your personal data are being deleted from our software and electronic systems.

The personal data which you provide in the process of concluding an agreement with the Company and giving consent with the general terms and notification for the present personal data protection policy, are stored for a longer period. The period is described in the below section regarding the personal data processed on grounds of the legitimate interests of Next Level or on other legal grounds.

Your personal data related to payments made by you through bank cards, which are necessary in order for us to perform our legal obligations under the tax and accounting legislation, may be stored for the maximum period of 10 years, established in the tax and accounting legislation.

Personal data provided for direct marketing purposes are stored and processed until you expressly withdraw your consent to this.

b) personal data processed on the grounds of your consent for the sending electronic newsletter and other marketing activities as well as processing of your data for marketing purposes.

In order for you to receive information about our current offers and promotions, new products, services and special offers, you can subscribe for the receipt of our electronic newsletter. For the purposes, you have to provide to us your email in the process of concluding an Agreement for provision of sports services or at a later stage. If you subscribe, we will process your email address for the purposes of sending our electronic newsletter. Also, with your express consent, we may use the telephone number you have provided, which will be used when organizing special marketing events.

The information about your email address and telephone number is processed for the purpose under this item on the grounds of your consent given to us in our fitness centers and/ or electronically. Personal data, processed for the purposes of sending an electronic newsletter are processed until you unsubscribe from receiving the newsletter by clicking on the unsubscribe link, present in the emails which we are sending to you.

Moreover, you have right to withdraw your consent for sending information about current offers and promotions, new products and services and special offers by contact us in the way described below.

Also, for the purposes of promotion and advertisement of our services and products, we can organize different games, lots and other marketing activities. For the purposes of your involvement in such activities you can provide to us your personal identification data and contact data, which we will use to identify you, to check whether you are eligible for the game/promotion, to draw a winner, to publish the names of the winners and to send the prizes to the winners.

We will process these data on the grounds of your consent, given through your participation in the corresponding promotional activity in accordance with its rules and general terms and conditions. The data of the participants in the promotional activities will be erased within 6 months after the end of an announced game and sending the prizes to the winners.

The provision of the personal data described above for the purpose under this item is entirely voluntarily. If you do not wish to provide to us your personal data, however, you will not be able to receive our electronic newsletter or to participate in the corresponding marketing activities.

General information about your sports preferences and when and where you are doing sports, we process for the purposes of carrying out analyses and statistics (further this information, we can prepare dedicated offers for you). The basis for this processing is our legitimate interest (Article 6 point 1 letter f) of the GDPR), involving the improvement of the quality of sports service and development of products and services offered by us. But sending this dedicated offer via email, or telephone – whatever it was chosen by you – takes place on the basis of given consent (as it is mentioned above), which can be withdrawn at any time.

c) personal data, related to video surveillance carried out in the fitness centers

### **Types of personal data**

Our fitness centers are equipped with a limited number of video surveillance cameras. Through the recordings of the installed cameras we can process your images by the video surveillance and video recording.

### **Purposes of processing**

The purpose of the video surveillance is the security of our fitness centers, the protection of our and your property and the granting of order and safety in the fitness centers.

We process your personal data, related to video surveillance, on the grounds of protection of our legitimate interest to secure our commercial premises and the order in them and to protect our and your property from unlawful actions (article 6 point 1 letter f) of the GDPR)

In order to ensure that the protection of our legitimate interests does not take precedence over your interests, fundamental rights and freedoms, which require personal data protection, we have taken a number of measures and guarantees, which include inter alia the installation of the video surveillance cameras on number of locations in our commercial properties. In this relation, the cameras are installed only at the entrances of the fitness centers, above the receptions, above the entrances of the group activities premises, as well as above the changing rooms entrances (without visibility to the changing rooms themselves), for the purposes, if necessary, of identification of persons, who have committed an unauthorized access or who have in any way encroached our or your property.

Among the other guarantees that have been undertaken are the placement of clearly recognizable signs on visible places, that notify you about the video surveillance and where you can get acquainted with the present Policy; the use of settings of the cameras (range, shooting angle, zoom scale) which reduce unnecessary interference with your privacy. In addition, we guarantee that only a limited number of our employees have access to the video recordings, the data are not disclosed to any third parties and the video recordings are opened and checked only upon the occurrence of an event, requiring their analysis.

Video recordings from video surveillance are stored for a period of 60 days from the date of recording. Only in the case of an established violation or an incident the recordings may be stored until the proceedings regarding the corresponding case have been completed, but not longer than 3 years from the date of the recording.

d) personal data, processed for the purposes of the compliance with our legal obligations

When you conclude an Agreement for provision of sports services or you purchase a product from us, there are some legal obligations that arise for us. In order to comply with them, we

have to process your personal data, including your identification data, contact data and other information, which you provide to us.

For example, we can process your personal data for the purposes of the issuance of an invoice and the compliance with our obligations in the capacity of a supplier within the meaning of the Value Added Tax Act. Furthermore, under the applicable accounting and tax legislation, we are obliged to account the issued invoices and to reflect them in our accounting and tax registers.

Your data may be processed for the performance of our obligations in accordance with the applicable consumers law – for example, upon the filing of claims, withdraw from a concluded agreement, return of purchased products and restoration of their value, resolution of consumer disputes, sending a notification for amendment of the general terms and conditions for provision of sports services, etc.

The grounds on which we are processing these data is compliance with legal obligations (Article 6 point 1 letter c) of the GDPR).

Your personal data, processed for the purposes of issuance of invoices and performance of our other legal obligations under tax, accounting, consumer and other acts, can be stored for the maximum statutory period of 10 years.

#### e) personal data, processed for the purposes of our legitimate interests

We can process your identification data, written declarations and consents provided by you, data related to orders and purchases made by you in our fitness centers, data related to payments made by you, data regarding questions, complaints, etc. sent by you, in order for us to protect ourselves upon any legal claims against us.

Furthermore, we can process your identification data in order to include you in our electronic data base with clients for the purposes of faster and easier conclusion of Agreements for provision of sports services and issuance of membership cards and invoices for purchases made by you in any of our fitness centers.

We will process these data only if your interests, fundamental rights and freedoms which require personal data protection do not take precedence over our legitimate interest.

The grounds on which your personal data is processed is protection of our legitimate interest to safeguard ourselves in case of hypothetical legal claims, to maintain a database containing data of our clients for the purposes of faster and easier conclusion of Agreements for provision of sports services and to issue membership cards and invoices.

Data, processed for the purposes of protection against legal claims (for example written declarations and consents) will be stored by us until the expiry of the 5-year limitation period for filing legal claims under the Obligations and Contracts Act. Only a limited number of



employees of Next Level will have access to these data, and they will be authorized to access them only when a legal dispute arises.

2. Personal data, processed upon registration of an account in any of our online client zones and upon the use of the features of the registered account.

The websites used by us [www.nextlevelclub.bg](http://www.nextlevelclub.bg), as well as The Next Level Fitness App provide the opportunity of creation of an account in client zones, which allow the use of features such as a possibility for conclusion of online Agreement for provision of sports services and making an online reservation for a group activity visit, access to the gyms through a personal QR code, information about the concluded Agreement for provision of sports services and opportunities for the execution of the concluded Agreement.

### **Creation of an account in any of our client zones**

The creation of an account in the client zone of the Next Level fitness clubs is possible through the filling of an online registration form which contains mandatory fields.

An account in the client zone of Next Level fitness clubs can be created electronically by concluding an online Agreement for provision of sports services - at [www.nextlevelclub.bg](http://www.nextlevelclub.bg) or through the Next Level Fitness App. Clients of Next Level fitness clubs, who have concluded an Agreement for provision of sports services on site – at the receptions of Next Level fitness clubs, receive automatically to the email address they provided login data to their profile (account) in the online customers area of „Next Level“ fitness clubs, through which, as well as through the Next Level Fitness App mobile app the concluded Agreement for the provision of sports services is executed.

Holders of Multi Sport cards, visiting Next Level fitness clubs, can obtain an account in the client zone of Next Level after completing a free profile creation form online.

Access to the client accounts created at [www.nextlevelclub.bg](http://www.nextlevelclub.bg) and <https://fitness.nextlevelclub.bg> is also possible from the Company's mobile app - Next Level Fitness App. The Next Level Fitness App provides all the features available to a user with a client zone account registered at [www.nextlevelclub.bg](http://www.nextlevelclub.bg) and <https://fitness.nextlevelclub.bg>. The Next Level Fitness App generates a unique QR code in each individual client zone account of the Company, through which personal QR code customers are identified and gain access to the Company's gyms

Processing of personal data, provided for the purposes of creating an account in any of our client zones.

In order for us to create an account in any of our client zones, we have to receive your identification data and email address. They are used in order to maintain your account, as well as for the purposes of sending electronic messages by us in relation to your account (for example messages for registration of an account, messages when restoring or changing password, etc.) or in relation to the use of the features of your account and for the purpose of fulfilling the concluded Agreement for the provision of sports services (for example

messages, confirming the conclusion of an Agreement for provision of sports services, messages, confirming reservation of a group activity visit, receiving a personal QR code to identify the client and access to the gyms, etc.).

Data that we are collecting when using the feature for online conclusion of Agreement for provision of sports services match the data, described above in the present Policy, necessary for concluding Agreement for provision of sports services on site in our fitness centers. The grounds and purposes for processing, necessary for the Agreement for provision of sports services, as well as the period for which they are stored are set out in point 1 of the present Policy, section "a) personal data, processed for the purposes of concluding and performing an Agreement for provision of sports services".

### **Personal data, processed upon creation of an online reservation for a group activity visit**

If you take the opportunity to request electronically a group activity visit in any of our fitness centers, due to the nature of the service itself, we receive general information about your sports preferences and when and where you are doing sports.

The above-mentioned personal data are used to fulfill our obligation to provide to you an opportunity to visit a particular sports activity in a particular fitness center during a particular time.

### **Legal grounds for processing**

The grounds on which we are processing your personal data for the purposes of creating and administering an account, is the conclusion and execution of the Agreement for the provision of sports services concluded between you and Next Level Fitness OOD (Art. 6 item 1, letter b) of the GDPR).

The data, received in relation to online concluding of an Agreement for provision of sports services and in relation to online reservation of a group activity visit, are processed for concluding and performing on our side the Agreement for provision of sports services and the agreement for making an online reservation for a group activity visit, concluded by and between you and Next Level Fitness OOD (art. 6 point 1 letter b) of the GDPR).

The provision of personal data is entirely voluntary. However, if you do not provide the mentioned personal data, we will not be able to provide you with the service of reservation a visit for a group activity, as well as to fulfill the concluded Agreement for the provision of sports services, for the execution of which it is necessary to have a profile in the client area of the Company (e.g. to identify the client with a personal QR code that is obtained in the profile and to access the gyms with this QR code).

### **Storage period**

Your personal data, provided when registering an account on any of our websites, will be stored by us for the entire period for which you maintain your registration.

The data for reserving a group activity visit are deleted after the conclusion of the corresponding group activity.

The storage period for the data related to the Agreement for provision of sports services are stored for the period, described in the section relating to concluding and performing an Agreement for provision of sports services.

### 3. Processing of personal data of legal entities' representatives and contact persons - our commercial partners.

If you are a representative or a contact person of our supplier of goods or services or our other commercial partner - legal entity, we can process a limited range of your personal identification data and contact data for the following purposes:

- concluding an agreement with you as a representative of the legal entity;
- contacting you in relation to the performance of the concluded agreement;
- protection upon legal claims and debt collection on our part;
- including the legal entity represented by you in our electronic data base with partners for the purposes of easier and faster issuing of invoices.

We are processing your personal data on the grounds of concluding and performing the agreement by and between the legal entity, represented by you and Next Level Fitness OOD), as well as for the purposes of our legitimate interest in contacting our contractors in relation to the performance of the agreement concluded by us and to file legal claims or to protect ourselves against such in relation to purchases made, provision of services, payments, etc. Your data, processed for the purposes of issuing invoices and performance of our other legal obligations in accordance with the tax, accounting, consumer and other acts, may be stored for the maximum period of ten years, established in the Accounting Act, Value Added Tax Act and the Tax and Social Security Procedure Code.

Your contact data as a representative or a contact person for the legal entity represented by you can be stored in our client data base until the termination of the contractual and commercial relations with the corresponding commercial partner.

### 4. Personal data processed for the purposes of conclusion and performance of agreements with external fitness instructors.

#### **Personal data, processed on the grounds of concluded agreement or fulfillment of a legal obligation**

In case you are a fitness instructor who has concluded an agreement with Next Level for provision of a service for conducting a group activity in any of our fitness clubs, we process your following personal data:

- identification data;
- contact data;

- data related to your professional skills and professional experience;
- data related to your bank accounts.

We process the personal data listed above on the grounds of concluding and performing the agreement concluded by and between you and Next Level Fitness OOD (as well as for the purposes of our legitimate interest to file legal claims or to protect ourselves against such). Part of your data is also processed on the grounds of complying with our legal obligations to withhold statutory health and social security contributions and the issuance of documents in accordance with the applicable accounting and tax legislation.

Your data, processed for the purposes of fulfilling our legal obligations under the tax and accounting acts can be stored for the maximum period of ten years, established in the Accounting Act, Value Added Tax Act and Tax and Social Security Procedure Code.

Your data, processed for the purposes of performing the agreement concluded with us, may be stored in our data base until the termination of the concluded agreement.

### **Personal data processed on the grounds of consent**

Next Level may request your consent in order to post your photograph and a brief description of your professional activity on Next Level's websites.

The purpose of this processing is advertisement of your activity as a fitness instructor as well as advertisement of the sports activities in our fitness clubs. Processing of these personal data is based on your consent. In the absence of such or its withdrawal, we are not processing the above-mentioned data.

Your photos and a description of your professional activity are published on the webpages of Next Level for the time during which you are in contractual relations with Next Level or until you withdraw your consent.

5. Data, processed for the purposes of replying to your questions, publishing of comments and other statements addressed to us

You are able to send us questions and inquiries by filling-in the contact form in the contact section on our websites, as well as through our accounts and fan pages in the social networks. In order for us to identify you and send to you our reply or to publish your comment, we process your identification data (names) and contact data (telephone and email address).

We process your personal data, provided to us when sending questions and other statements addressed to us on the grounds of your consent, given when filling in and sending the contact form on our websites or through our fan pages and accounts on the social networks (Facebook, Twitter, Instagram, Google+, YouTube, etc.) – Article 6 point 1 letter a) of the GDPR. The processing of your personal data by us is separate and different from the processing of your personal data by the corresponding social network's administrators for the purposes and on the grounds specified by them.

The filling in of the contact form, sending to us and publishing questions, inquiries and comments by you is entirely voluntary but if you do not wish to provide to us your personal data, you will not be able to send your inquiry to us.

Your personal data, processed for the purposes of sending a reply to questions, inquiries and other statements addressed to us and for the purposes of publishing your comments on our accounts and fan pages in the social networks, will be stored by us for a period of 1 year after sending a response from us, respectively, from publishing the comment.

## 6. Data collected through "cookies"

We can analyze the use of our websites [www.nextlevelclub.bg](http://www.nextlevelclub.bg) through the so-called "cookies", through which we collect information about the device or devices that you are using or you have used in order to access our webpages (for example, brand and model of your device, OS, browser or IP address), as well as in what way you are using the websites. We do not collect your email addresses, names or other personal information, we do not collect and do not access information about websites, visited by you, different than our webpage, or any other information which is not described in the present Policy.

This information is processed on the grounds of your consent for using cookies. You may find more information on the use of cookies in our Cookie policy, available on the following websites: [www.nextlevelclub.bg](http://www.nextlevelclub.bg).

## **TO WHOM WE MAY DISCLOSE YOUR PERSONAL DATA AND WHERE DO WE STORE YOUR PERSONAL DATA?**

We are working with partners and suppliers who may process your personal data as sole personal data controllers or to act on our behalf in the capacity of personal data processors. We disclose to these recipients only these personal data that are strictly necessary for performance of the corresponding service. In addition, when we are disclosing your data to processors, processing personal data on our behalf, we take all necessary measures in order to guarantee that your personal data will be processed in compliance with all legal obligations and that the processor has undertaken all necessary technical and organizational measures to protect the data.

The persons to whom we may disclose your personal data include payment services providers, who will process your payment for the concluded Agreements for provision of sports services and other products, IT services and hosting providers, who support our webpages, couriers, out-of-court debt collection companies, etc.

Also, we may disclose parts of your data to our accounting services providers for the purposes of reflecting the issued invoices and other accounting documents in our accounting registers.

At the request of state authorities under the applicable legislation (for example NRA, Consumer Protection Commission, courts, etc.) a legal obligation to disclose your data to these state authorities may arise for us.

Moreover, as Next Level is a part of multinational group – Benefit Systems Group, your personal data may be shared within the Companies, which belong to the Foreign Segment (the list of the companies can be found at <https://www.benefitsystems.pl/en/about-us/list-of-subsidiaries-and-associates-benefitsystem-group/>). Each time Next Level needs to share your personal data in this way, it will do so only when it is necessary and only with authorized employees/co-workers from the Benefit Systems Group – The Foreign Segment for fulfilling their work duties. Reasons for that may include: providing of administrative, managerial and other services by the company to us (e.g. IT support of some software systems that we use) or monitoring of the activity of the Bulgarian company by the sole proprietor or analysis and planning of the commercial strategy of the Bulgarian company.

The data that we collect from you is stored within the European Economic Area.

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

### **➤ Right of access**

You may request from us confirmation whether we are processing your personal data and where this is the case, you may receive access to these data and information in relation to the purposes of processing, processing period and the recipients of personal data. We will provide to you free access to your data and at your request we will provide to you a copy of the data.

### **➤ Right to rectification**

You have a right to rectification of any inaccuracy in your personal data or supplement of incomplete personal data.

### **➤ Right to erasure ("right to be forgotten")**

You have a right to request from us to delete personal data related to you which are no longer necessary for the purposes for which they have been collected or regarding which you have withdrawn your consent for processing or you have exercised your right to object to processing. In particular legally established cases we may refuse to erase your personal data.

### **➤ Right to restriction of processing**

In particular cases you may request from us to restrict the processing of your personal data, as in this case they will only be stored but will not be processed in other way.

### **➤ Right to data portability**

You have a right to receive the data we are processing concerning you in a structured commonly used and machine-readable format as well as to transmit them to another controller.

➤ **Right to object**

You have a right to object to processing of your personal data for the purposes of direct marketing. If you object, we will no longer process them for the purposes of direct marketing.

➤ **Right to withdraw consent**

In case we are processing your personal data on grounds of your consent, you have a right to withdraw your consent for processing of your personal data at any time, without affecting in any way lawfulness of processing based on consent, before its withdrawal.

➤ **Right to lodge a complaint**

You have a right to lodge a complaint to the Personal Data Protection Commission if you consider there is a breach of the applicable legislation regarding personal data protection.

## **CONTACT US**

You can contact us on any questions relating to the processing of your personal data, including in connection with the exercise of your rights, described in the present Policy, in one of the following ways:

**By post** - to address: in Sofia 1700, 35 Simeonovsko shosse blvd., fl.3,

**By email** - to the following email address: [info@nextlevelclub.bg](mailto:info@nextlevelclub.bg)

**By telephone** - to telephone number 0884 584 448, 0878 357 485

**Through the contact form on our webpage** - at [www.nextlevelclub.bg](http://www.nextlevelclub.bg).

In order to exercise your rights related to personal data protection, it is sufficient to send to us a statement which should include at least:

- Your name, address and other identification data which will allow us to identify you;
- Description of your request;
- Preferred form of communication.

The present policy of Next Level Fitness OOD for processing and protection of personal data was adopted on 26.05.2018, amended on 04.11.2022