

Privacy Policy for personal data processing within the loyalty program OMV MyStation

(amended on 25 July 2025, in force as of 8 August 2025 r.)

I. Information about the Personal Data Controller

For the implementation of the Program, the OMV MyStation Program personal data of the Participants is processed by the controller:

OMV Bulgaria OOD, with registered office at 2 Donka Ushlinova St., Vitosha district, gh. Malinova Dolina, Garrity Park, Office Building 4, fl. + 1, Room 411, Sofia 1766, Republic of Bulgaria, registered in the Commercial Register under No. 121759222, hereinafter referred to as "**Data Controller**" or "**OMV Bulgaria**" in the context of this policy.

II. Categories of personal data processed within the OMV MyStation Program

OMV Bulgaria collects the following categories of personal data from the participants in the OMV MyStation Program:

- (i) Other personal data that is provided by accessing the website (eg IP address, type of browser used, type of device used) which is subject to the information in the Privacy and Cookies Policy published on the website;
- (ii) First and last name
- (iii) Address (**optional**)
- (iv) Date of Birth
- (v) E-mail address
- (vi) Telephone number and fax (**optional**)
- (vii) Voice (for recording telephone conversations when calling the customer service center).
- (viii) Purchase **history** data (Products, amount paid, location and date of purchase)

(ix) Geolocation **data** for unsolicited notifications (in accordance with the "Active" status of the application installation and consent to receive such notifications) (optional)

III. Purpose of the processing

The personal data of the Participants in the OMV MyStation Program are processed by OMV Bulgaria, including through personal data processors designated by OMV Bulgaria, for:

(i) Organization, development and implementation of the the OMV MyStation Program, in accordance with the information contained in the Official Regulation of OMV MyStation Program;

(ii) facilitating the search function of participating OMV filling stations;

(iii) preparing the participant's purchase history;

(iv) registering transactions made at an OMV filling station in the participant's profile, received and used points, coupons and other benefits, etc.;

(v) offer discounts, points, and special campaigns to the participant and send information about special offers;

(vi) fulfilment of tax and financial accounting obligations of OMV Bulgaria;

(vii) providing, maintaining and updating the OMV MyStation mobile application;

(viii) participate in games and raffles within the framework of the OMV MyStation Program, as well as receive prizes and benefits in connection with them.

IV. Legal grounds for processing

The data of the participants is processed on the basis of the following legal grounds:

a. performance of a contract objectified in the Official Regulation of the OMV MyStation Loyalty Program, accepted with your enrollment in the the OMV MyStation Program in order to

successfully provide the services;

b. the legitimate interest of OMV Bulgaria in connection with the organization of contests/promotional campaigns and for the protection of the rights and interests of OMV Bulgaria;

c. compliance with applicable legal obligations to calculate, declare and award prizes;

d. Your freely expressed informed consent for the specific purposes, given by affirmative action (eg, a box that you specifically check, pursuant to a clearly visible notice given in clear and understandable language.);

We need your personal data to ensure your participation in the OMV MyStation Program. Any refusal to provide personal data makes it impossible for you to participate in the OMV MyStation Program. You may withdraw your consent at any time, in which case your participation in the OMV MyStation Program must be terminated.

V. Recipients of personal data

The collected personal data will be provided to (a) persons who process your personal data under the direction of OMV Bulgaria, to support the implementation of the the OMV MyStation Program (Processors), such as subcontractors, service providers, such as the customer service centre or, in certain cases, advertising agencies, and others, and (b) third parties who have the right to process on their own basis according to the applicable legislation, such as: companies providing products and services to OMV Bulgaria - providers of IT systems and related with them service providers, including telecommunications service providers, backup and disaster recovery services, IT security services and other outsourced service providers such as off-Controller's premises storage service providers and service providers for cloud storage;

- other entities, such as accountants, auditors, lawyers or other external experts, when their activities require such information;

- State and municipal bodies to which OMV Bulgaria, in the provided cases, is obliged by law to

provide personal data.

For processors and/or third parties to whom the personal data of the Participants is transferred or made available, according to the above paragraph, there is a limitation (by law and/or by contract) regarding the way, in which they are entitled to use this data. OMV Bulgaria guarantees that every processor under the management of OMV Bulgaria to whom personal data is disclosed is bound by confidentiality and security obligations in accordance with this Personal Data Processing Policy and the applicable law. This may not apply when the provision of personal data is a legal obligation of OMV Bulgaria.

Except as described in detail above, OMV Bulgaria does not disclose to third parties any personal data processed in connection with the OMV MyStation Program without notifying the data subjects or, where applicable, without their prior consent.

VI. Period of storage of personal data

a. Participants' personal data is stored during the participants' participation in the OMV MyStation Program and the use of the OMV MyStation Application for the OMV MyStation Program, and then for the respective applicable period until the profile is completely anonymized. In the case of appeals or notifications that are in the process of being considered, in relation to them it could be necessary to process the personal data for a period longer than the above, until the final settlement of the claim/complaint. After the **expiration** of the period for storing personal data, OMV Bulgaria deletes/destroys/anonymizes this data from the means of processing and storage, imposing similar obligations on the processors and sub-processors.

b. The account of a Participant who does not use the OMV MyStation Application and/or the OMV MyStation card or the plastic card issued by OMV and registered in the OMV MyStation Application (such as Save&Drive) is suspended for use after a period of 24 months from the last date of use and deactivated. After expiry for an additional period of 36 months the profile is deleted and its use cannot be resumed, as after 1 additional month it is anonymized completely. In the event of inactivity, the participants are notified one month prior to account suspension.

c. Upon initial activation of a participant's account upon registration (for accounts not verified by the Participant):

- The confirmation link is valid for 7 days from the moment of completing and submitting the registration form in the OMV MyStation App, during the same period the user has the option to request a resend of the link via the OMV MyStation App or through the customer service by calling on 0800 0800 12 800;
- After the expiry of the period under the preceding paragraph, the last confirmation link becomes invalid and the data entered and sent during registration in the OMV MyStation App are anonymized

d. A participant can delete their profile:

- Through the OMV MyStation App, as immediately after the use of the delete option the profile is suspended from use. For the deletion of the profile it is necessary for the participant to confirm the deletion of his profile by clicking the link in the deletion confirmation email. Upon clicking the confirmation link sent via email the profile is terminated and within one month period it is completely erased and anonymized. A profile confirmed for deletion cannot be resumed for use. In the event that the participant does not confirm the profile deletion by clicking the link in the sent deletion confirmation email, the participant's profile cannot be used and after expiry of a period of 36 months it is terminated as with expiry of 1 additional month it is anonymized and deleted.
- By written request on paper or by e-mail at mystation_bg@omv.com, in which case the profile is deleted and anonymized by an employee of the Organizer.

e. Upon deletion or deactivation of an account, as provided above, the participant may not use the already registered email to complete a new registration and create a new account in the OMV Mystation Application within the relevant data retention periods specified above. In the event that the Participant wishes to register with the same email before the expiration of the relevant data retention period, the Participant should contact the customer service centre by

calling 0800 12 800.

VII. Rights of data subjects

In order to ensure fair and transparent processing, OMV Bulgaria informs the participants about the rights they enjoy as data subjects, according to the applicable legal provisions:

a. **Right of access to processed personal data:** you have the right to receive confirmation as to whether or not your personal data is being processed and, if so, to access the type of personal data and the conditions for its processing, by submitting a request to the OMV Bulgaria.

b. **Right to request that personal data be corrected or deleted:** you may request, by sending a request to OMV Bulgaria, that personal data that is inaccurate be corrected, that personal data be added if it is incomplete, or that your personal data be deleted in situations where (i) the personal data is no longer necessary for its original purpose (and there is no new lawful purpose for processing), (ii) the lawful basis for the processing is the consent of the data subject and the data subject withdraws consent, and there is no other legal basis for the processing, (iii) the data subject exercises his right to object and OMV Bulgaria has no more important reason to continue processing them, (iv) the personal data were processed unlawfully, (v) the deletion is necessary, for to comply with EU or the Republic of Bulgaria legislation, or (vi) collected personal data in connection with the provision of information society services provided to children (if applicable) for whom consent is given according to special rules;

c. **Right to request that processing be limited:** you have the right to be processed in a limited manner in cases where: (i) you consider that inaccurate personal data are being processed, for a period allowing OMV Bulgaria to verify the accuracy of your personal data; (ii) the processing is unlawful, but you do not want your personal data to be deleted, requesting only to restrict its use; (iii) if OMV Bulgaria no longer needs your personal data to be processed for the aforementioned purposes, but you want the data to establish, exercise or defend a right in court or (iv) you have objected to the processing, for the period of time during which it is checked whether the legal grounds of OMV Bulgaria, as administrator, prevail over the rights of the data subject;

d. **The right to withdraw your consent to the processing** where the processing is based on your consent, without affecting the lawfulness of the data processing until the consent is withdrawn;

e. **The right to object to the processing of personal data** for reasons related to your specific situation where the processing is based on a legitimate interest and to object at any time to the processing of personal data for the purpose of direct marketing, including profiling;

f. **The right not to be subject to a decision based solely on automated processing**, including profiling, entailing legal consequences in relation to the data subject or similarly significantly affecting the data subject;

g. **Right to data portability**, i.e. the right to receive your personal data that you have provided to OMV Bulgaria in a structured, widespread and automatically readable format, and the right to have this data sent to another Personal Data Administrator, if the processing is based on your consent or in connection with performance of a contract and the processing is carried out by automatic means;

As regards the exercise of the rights related to the processing of personal data, as well as all other aspects related to data protection, the Participants have the right to send a written request with a date and signature to - Donka Ushlinova Street No. 2, Vitosha district, g.k. Malinova Dolina, Garrity Park, Office Building 4, fl. + 1, Room 411, Sofia 1766 or by email: privacy.bg@omv.com, to the attention of the data protection officer.

h. **The right to file a complaint** with the Bulgarian Commission for the Protection of Personal Data (CPDP) and the right to refer the relevant judicial authorities.

VIII. Security of personal data

OMV Bulgaria implements appropriate technical and organizational measures to ensure a level of security corresponding to the personal data belonging to the Participants. OMV Bulgaria imposes similar obligations on processors. In assessing the appropriate level of security, account shall be taken, in particular, of the risks posed by the processing of personal data, in

particular when they are accidentally or unlawfully generated as a result of destruction, loss, alteration, unauthorized disclosure or unauthorized access to the personal data transmitted, stored or processed.

IX. Transfer of personal data to third countries (non-EU)

In principle, OMV Bulgaria does not transfer your personal data to recipients in third countries (non-EU). If we process personal data in a third country (non-EU), or if this happens in the context of using third-party services or the disclosure or transfer of data to other persons or companies, this will only happen for the above-described reasons for data transfer. Subject to express consent or contractual necessity, we will only transfer and process the data in third countries (non-EU) with a recognized level of data protection, through standard contractual clauses for the transfer and processing of personal data.

X. Use of profiling

When sending personalized commercial/marketing messages, data about the participant's purchase history (products, amount paid, place and date of purchase) is analyzed. Also, based on the processing of location data, certain personal aspects related to a natural person are automatically analyzed. In this way, an automated decision is made based on the created profile of the Participant. This is done solely with the Participant's consent, which may be withdrawn at any time (including through the OMV MyStation App features) and is not a condition of participation in the OMV MyStation Program. The purpose of the profiling activity is for OMV Bulgaria to prepare special personalized offers that meet the potential needs or expectations of the Participants. As a result of the availability of automated decision-making based on profiling, OMV Bulgaria has conducted a Data Protection Impact Assessment (DPIA) and taken specific actions to reduce the risk of non-compliance with GDPR.

XI. Amendment of the privacy policy

OMV Bulgaria has the right to amend this Privacy Policy Policy for personal data processing within the loyalty program OMV MyStation at any time during the OMV MyStation Program, if more effective security and protection measures are found for the personal data of the data subjects and without affecting the rights and freedoms of the data subjects. Any such amendment is published on the website of OMV Bulgaria www.omv.bg, accordingly it is communicated to the participants in the same way in which they were informed about the Official Regulation of OMV MyStation Program, including through the OMV MyStation App and the approved communication channels.

XII. Various

The personal data of the Participants are processed in accordance with the applicable law in the field of personal data protection, in particular in accordance with the provisions of the Personal Data Protection Act and Regulation No. 679/2016 on the protection of natural persons in the processing of personal data and for the free movement of this data. This Policy for the processing of personal data within the loyalty program OMV MyStationMy is supplemented by the General Policy for the Protection of Personal Data of OMV Bulgaria OOD, available at: <https://www.omv.bg/bg/imprint-and-pravna-informacia>.