

Privacy Policy

VKA Solutions EOOD (ВИ КИ ЕЙ СОЛЮШЪНС ЕООД) · Effective date: 4 May 2026 · Version 1.0

1. Introduction

VKA Solutions EOOD (“we”, “us”, “our”) respects your privacy and is committed to protecting your personal data. This Privacy Policy explains who we are, what personal data we collect when you visit our website <https://vka.solutions> (the “Website”) or contact us, how we use that data, with whom we share it and what rights you have.

We process personal data in accordance with Regulation (EU) 2016/679 (the “GDPR”), the Bulgarian Personal Data Protection Act (Закон за защита на личните данни) and other applicable laws.

2. Data controller

The controller of your personal data is:

Controller: VKA Solutions EOOD (Bulgarian: ВИ КИ ЕЙ СОЛЮШЪНС ЕООД)

UIC (ЕИК): 203264441

Registered office: Veliko Tarnovo, 2 Oborishte Str., Bulgaria

Website: <https://vka.solutions>

Contact e-mail: office@vka.solutions

For all matters relating to the processing of your personal data and the exercise of your rights, please contact us at **office@vka.solutions**.

3. Personal data we collect

We only collect personal data that you provide voluntarily or that is automatically generated when you use the Website. Specifically:

3.1 Data you provide through the contact form

- **Name:** to address you correctly in our reply;
- **E-mail address:** to send you a reply;
- **Free-text message:** the content you choose to share with us. Please do not include sensitive personal data (e.g. health information, political opinions) in your message.

3.2 Data collected automatically

- **Technical data:** IP address, browser type and version, operating system, referring URL, date and time of access. This is logged for security and to ensure the Website operates correctly.
- **Anti-bot signals:** when you submit the contact form, our security provider Cloudflare collects technical signals from your browser to verify that the request comes from a human rather than an automated bot. See our Cookie Policy for details.
- **Storage data:** see our Cookie Policy. We do not use analytics or marketing tracking technologies.

3.3 Data we do not collect

We do not knowingly collect special categories of personal data (e.g. data revealing racial or ethnic origin, political opinions, religious beliefs, trade-union membership, genetic or biometric data, health data or data concerning sex life or sexual orientation). The Website is not directed to children under 16, and we do not knowingly collect their personal data.

4. Purposes and legal bases of processing

We process personal data only where we have a valid legal basis under Art. 6 GDPR. The table below summarises our processing activities.

Purpose	Categories of data	Legal basis	Retention
Responding to enquiries submitted via the contact form.	Name, e-mail, message.	Art. 6 (1) (b) GDPR (steps prior to entering into a contract) or Art. 6 (1) (f) GDPR (legitimate interest in answering enquiries).	Up to 12 months after the last contact, unless a longer period is required for an established business relationship or by law.
Operating, securing and improving the Website.	Technical data, server logs.	Art. 6 (1) (f) GDPR, legitimate interest in a secure and reliable Website.	Server logs: typically up to 6 months.
Anti-bot / spam protection on the contact form.	Cloudflare Turnstile cookies, technical signals from your device.	Art. 6 (1) (f) GDPR, legitimate interest in protecting our service against automated abuse.	Set by Cloudflare; typically minutes to weeks (see Cookie Policy).
Compliance with legal obligations and defence of legal claims.	Any of the above as required.	Art. 6 (1) (c) GDPR (legal obligation) and Art. 6 (1) (f) GDPR (legitimate interest).	As required by law (e.g. up to 5 years under the general statute of limitations).

5. Recipients of personal data

We do not sell personal data. We may share your personal data only with:

- **Service providers acting as processors on our behalf**, such as our website hosting provider, e-mail service provider and **Cloudflare, Inc.** (which provides the Turnstile bot-protection service used on the contact form). Such providers are bound by a written data processing agreement and may only process personal data on our documented instructions;
- **Competent public authorities**, where we are legally required to do so (e.g. tax authorities, law enforcement, courts);
- **Professional advisers** such as lawyers or accountants, where strictly necessary and under a duty of confidentiality.

6. International data transfers

Our primary processing of personal data takes place within the European Economic Area (EEA). However, our anti-bot provider **Cloudflare, Inc.** is based in the United States, which means certain technical data (e.g. IP address, browser signals) may be transferred to the United States when you interact with the contact form.

Such transfers are covered by appropriate safeguards under Chapter V GDPR, specifically the Standard Contractual Clauses adopted by the European Commission, supplemented by

Cloudflare's additional technical and organisational measures. You may request a copy of these safeguards by writing to office@vka.solutions.

7. How long we keep your data

We keep personal data only for as long as it is necessary for the purposes for which it was collected, including for satisfying any legal, accounting, or reporting requirements. Specific retention periods are set out in the table in section 4. After the retention period expires, the data is deleted or anonymised.

8. Security of your data

We apply appropriate technical and organisational measures to protect personal data against unauthorised access, alteration, disclosure, accidental loss or destruction. These measures include encryption in transit (TLS), access controls, restricted access on a need-to-know basis, and regular review of our security practices. Please note, however, that no transmission over the internet can be guaranteed to be 100% secure.

9. Your rights as a data subject

Under the GDPR you have the following rights, which you may exercise free of charge by contacting us at office@vka.solutions:

- **Right of access** (Art. 15 GDPR): to obtain confirmation as to whether we process personal data about you and, if so, a copy of that data;
- **Right to rectification** (Art. 16 GDPR): to have inaccurate or incomplete data corrected;
- **Right to erasure / 'right to be forgotten'** (Art. 17 GDPR): to have your data deleted, where one of the legal grounds applies;
- **Right to restriction of processing** (Art. 18 GDPR): to limit how we use your data in certain circumstances;
- **Right to data portability** (Art. 20 GDPR): to receive your data in a structured, commonly used, machine-readable format;
- **Right to object** (Art. 21 GDPR): to object to processing based on legitimate interests, including profiling;
- **Right to withdraw consent** (Art. 7 (3) GDPR): where processing is based on consent, you can withdraw it at any time, without affecting the lawfulness of processing carried out before withdrawal;
- **Right to lodge a complaint** with a supervisory authority (Art. 77 GDPR).

We will respond to your request without undue delay and in any event within one month of receipt. We may need to verify your identity before acting on your request.

10. Supervisory authority

If you believe that our processing of your personal data infringes data protection law, you have the right to lodge a complaint with the Bulgarian Commission for Personal Data Protection (Комисия за защита на личните данни):

Commission for Personal Data Protection (КЗЛД)

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

Telephone: +359 2 915 3 518

E-mail: kzld@cpdp.bg

Website: www.cdpd.bg

You may also lodge a complaint with the supervisory authority of your habitual residence, place of work or the place of the alleged infringement.

11. Automated decision-making

We do not carry out automated decision-making, including profiling, that produces legal effects concerning you or similarly significantly affects you.

12. Changes to this Privacy Policy

We may update this Privacy Policy from time to time to reflect changes in our practices or in the law. The latest version is always published on the Website with its effective date shown at the top. Where the change is significant, we will take additional steps to notify you (for example, via a notice on the Website).

13. Contact us

For any questions or requests relating to this Privacy Policy or your personal data, please contact us at **office@vka.solutions** or by post at our registered address.