

# Privacy policy

Version: v1.2 | Date: 2026-02-04

Field	Value
Organisation (public name)	BanskoLab
Legal entity name	BanskoLab
Registered address	Pirin st 1, Bansko, Bulgaria
Email	info@banskolab.com
Phone	+359 876342540
Safeguarding lead	Jose Fiallo Leon   jose@banskolab.com   +359 876342540
Complaints contact	info@banskolab.com
Emergency number (Bulgaria)	112
Version	v1.2
Effective date	2026-02-04
Next review	2027-02-04

## 1. Controller and contact

Controller: BanskoLab, Pirin st 1, Bansko, Bulgaria. Contact: info@banskolab.com.

If you want to exercise your rights, email us. For urgent safeguarding-related privacy matters, contact the safeguarding lead.

## 2. Personal data we collect

- Website inquiries: name, email, message, organisation.
- Partners: names, roles, emails, planning and delivery communications.
- Participants: application details, attendance, logistics, access needs, dietary needs, emergency contacts.
- For minors: guardian contact details and consents.
- Media: photos or video only with consent.
- Technical: IP address, device data, and server logs for security and performance.

## 3. Purposes and legal bases

Purpose	Legal basis
Respond to inquiries and manage relationships	Legitimate interest: communicating with stakeholders and improving delivery quality
Deliver activities and manage logistics	Contract steps and legitimate interest: organising participation and duty of care
Safeguarding and safety administration	Legitimate interest and vital interests where applicable

Legal and accounting obligations	Legal obligation
Newsletters (if used)	Consent
Publishing identifiable media	Consent, especially for minors

#### 4. Whether you must provide data

- Website inquiry data is voluntary. If you do not provide it, we may not be able to reply.
- Participant and guardian data needed for an activity is required for participation. If not provided, participation may not be possible due to duty of care.
- Some data is required by law for accounting and reporting.

#### 5. Recipients and categories of recipients

We share data only when necessary. Categories of recipients may include:

- Hosting and infrastructure providers (website, servers, security logging).
- Email and communication providers.
- Form and document storage providers used for administration.
- Project partners, only for delivery and reporting and only for the relevant project.
- Authorities and emergency services where required for safety or legal duties.

#### 6. International transfers

If any service provider processes data outside the European Economic Area, we use appropriate safeguards such as standard contractual clauses where required.

#### 7. Retention schedule (internal standard)

Data category	Retention
Website inquiries	24 months
Partner contact records	5 years after last interaction
Participant administration records	7 years after project end
Guardian consents for minors	7 years after project end
Incident and safeguarding logs	10 years, or longer if required due to severity or legal process
Financial records that contain personal data	10 years
Server security logs	90 days, unless needed for security investigations

#### 8. Your rights

- Access to your data.
- Correction of inaccurate data.
- Deletion where applicable.
- Restriction and objection where applicable.
- Portability where applicable.
- Withdraw consent at any time where processing is based on consent.

We may ask for identity verification before acting on a request.

## **9. Right to lodge a complaint**

You have the right to lodge a complaint with the supervisory authority. For Bulgaria this is Commission for Personal Data Protection (Bulgaria).

## **10. Automated decision making**

We do not use automated decision-making that produces legal or similarly significant effects.