

KABOOM CHILDREN'S ENTERTAINMENT CENTRE (Mall Rousse)

PRIVACY POLICY

This Privacy Policy ('the Policy') aims to inform individuals about how and what personal data we process, "M.O. ROUSSE" EAD, UIC 175322411, with its registered office and business address at: 43 Bregalnitsa Street, Floor 2, Vazrazhdane borough, 1303 Sofia in connection with the operation and management of the *KaBoom* Children's Entertainment Centre, located within the multifunctional retail and entertainment centre Mall Rousse, at the following address: 121D Lipnik Boulevard, 1st floor, 7000 Rousse (the '**Children's Centre**').

This policy also covers the processing of personal data that we carry out when data subjects use the Children's Centre's website (www.KaBoomBG.com), on the Children's Centre's social media pages, which 'M.O. ROUSSE' EAD maintains and operates in connection with its activities, and the access to and use of external links to the websites of the Children's Centre's partners, as well as matters relating to marketing, management and CCTV surveillance at the Children's Centre.

In this Policy, you can find out about your rights as a data subject in relation to the personal data collected, processed and stored by us as a data controller.

In our capacity as a controller, we process your personal data for the purposes, for the periods and in the ways described below, in compliance with the principles and rules laid down in the applicable law of the European Union (EU) and Bulgarian legislation on the protection of personal data, and in particular 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), the Bulgarian Personal Data Protection Act and the subordinate legislation implementing them.

I. WHO PROCESSES YOUR PERSONAL DATA?

(INFORMATION ABOUT THE CONTROLLER AND HOW TO CONTACT THEM)

The data controller is: 'M.O. ROUSSE' EAD, a single-shareholder company incorporated and existing under Bulgarian law, registered in the Commercial Register and the Register of Non-Profit Legal Entities with the Bulgarian Registry Agency under UIC 175322411, with its registered office and business address at: 43 Bregalnitsa, floor 2, Vazrazhdane borough, 1303 Sofia.

The contact details for the data controller, depending on your chosen method of contact, are:

address: 121D Lipnik Boulevard, 1st floor, 7000 Rousse

email: kaboom@mallrousse.bg



PLEASE NOTE! Continuous CCTV surveillance is in operation on the premises of Mall Rousse and the Children's Centre.

You can find out more about the processing of your personal data in connection with the operation of CCTV from our **Mall Rousse CCTV Policy**.

II. WHOSE AND WHAT KIND OF PERSONAL DATA DO WE PROCESS?

(DATA SUBJECTS AND CATEGORIES OF PERSONAL DATA)

ON WHAT LEGAL BASIS AND WHY DO WE PROCESS YOUR PERSONAL DATA?

(PURPOSES AND LEGAL BASES ON WHICH THE CONTROLLER PROCESSES PERSONAL DATA)

The controller processes personal data relating to:

1. Clients and visitors to the Children's Centre, including children and their adult companions

Types of personal data: full names of the child and their accompanying adult; contact telephone number for the accompanying adult; the accompanying adult's handwritten signature; the accompanying adult's standard electronic signature (image), provided via an electronic device; data on the child's age, height and weight; data on the relationship

between the child and the accompanying adult (parent, guardian or other); data collected via real-time video surveillance; data on bank and payment accounts used to make payments for goods and services offered at the Children's Centre; Personal Identification Number (PIN) or Foreign National Identification Number (FNIN) of an adult accompanying person (upon their explicit request for an invoice to be issued in their name); the accompanying person's email address; full name, telephone number and handwritten signature of a person who, on their own responsibility, brings food and drink for a celebration at the Children's Centre; an electronic signature and the associated data, where the author has chosen this method of signing an electronic declaration (waiver) in connection with a visit or other matters relating to the activities of the Children's Centre

The Data Controller processes this personal data to achieve the following purposes, which also reflect the legal bases for their processing:

- processing is carried out on the basis of your consent, which you may withdraw at any time (pursuant to Article 6(1)(a) of the General Data Protection Regulation)
- processing is necessary for the performance by us of a contract to which you are a party, including in connection with your purchase and use of goods and services offered at the Children's Centre, or to take steps at your request prior to entering into of the contract (pursuant to Article 6(1)(b) of the General Data Protection Regulation)
- processing is necessary to protect the vital interests of the data subject or of another natural person (pursuant to Article 6(1)(d) of the General Data Protection Regulation)
- compliance with a legal obligation (pursuant to Article 6(1)(c) of the General Data Protection Regulation), and
- legitimate interests, unless the interests or fundamental rights and freedoms of the data subject override such interests (pursuant to Article 6(1)(f) of the General Data Protection Regulation),

namely for the following purposes:

- establishing contact, communication and correspondence with visitors and customers of the Children's Centre and providing customer service, including in connection with bookings, enquiries regarding visits, organised events, packages, vouchers, goods and services offered at the Children's Centre, and addressing any queries you may have; sending information regarding changes to our terms and conditions and policies
- processing, verifying and providing feedback on your enquiries, reports, complaints, claims, grievances, requests, reviews and so on received by us
- to ensure high-quality customer service and to improve the customer experience and the products and services we provide
- receiving and instructing payments of amounts due via bank or payment accounts, and receiving, issuing or sending invoices or other accounting documents
- providing first aid, calling the emergency services
- where you have given your explicit consent, for direct marketing purposes, e.g. sending information about promotions, discounts, special offers and events at the Children's Centre
- verifying the details provided by the accompanying adult regarding themselves and the child in their care; verifying the details of any person bringing food and drink for a celebration at the Children's Centre at their own responsibility

- notifying the accompanying adult by telephone of the need to come to the Children's Centre to be with the child in their care
- ensuring the health, safety and physical integrity of persons on the premises of the Children's Centre and preventing accidents, including ensuring the safety of persons under the age of 18 in accordance with the applicable legislation on the protection of children in public places or during organised events, activities and functions on the premises of the Children's Centre
- protection against unlawful interference with property located within the Children's Centre
- preventing unlawful infringements of the personal integrity of individuals and damage to property located within the Children's Centre
- disclosing your personal data to a public authority where required by law or by order of such an authority
- protecting the rights and legitimate interests of the controller or third parties, in accordance with applicable legislation

Data retention period: The Data Controller shall retain the personal data provided by accompanying adults and by persons who on their own responsibility bring food and drink for a celebration at the Children's Centre for a period of **60 (sixty) months** following their visit to the Children's Centre, or following the relevant celebration at the Children's Centre, unless a longer period is provided for or permitted by law. Where personal data is contained in accounting records, the retention period for such personal data is 10 years, unless a longer period is provided for by law. Upon expiry of the aforementioned periods, the controller shall erase the personal data, unless there is another legal basis for its processing.

2. Contractors, subcontractors, suppliers of goods and services to the Children's Centre, and their respective representatives, authorised agents and contact persons

Types of personal data: names, job title, contact details (work telephone numbers, email addresses, work address), handwritten signature; electronic signature and data from electronic signatures; data from work ID cards/badges/access passes; data collected via real-time video surveillance.

The controller processes personal data for the purposes of fulfilling the relevant contracts, concluded between the controller and the contractor/subcontractor/supplier of goods and/or services, as well as to protect the rights and legitimate interests of the controller in the event of non-performance of the contract or the fulfilment of a legal obligation (grounds under Article 6(1)(b), (c) and (e) of the General Data Protection Regulation). The controller shall retain the personal data provided to it for a period of 5 (five) years following the termination of the relevant contract, unless a longer period is provided for or permitted by the applicable legislation. Where personal data is contained in accounting records, the retention period for such personal data is 10 (ten) years, unless a longer period is provided for in the relevant legislation. Upon expiry of the aforementioned periods, the controller shall erase the personal data, unless there is another legal basis for its processing.

3. Individuals who take part in games, promotions, competitions, campaigns and other marketing activities organised by the Children's Centre

The Data Controller organises games, competitions, prize draws, promotions, campaigns and other activities (hereinafter collectively referred to as 'Activities'), in which you may participate if you wish. If you wish to take part in our Activities held at the Children's Centre or on any of our social media platforms (Meta – Instagram/Facebook), your personal data may be collected and processed by the controller; details of this will be set out in the rules of the Activity itself. By participating in the manner specified in the Activity itself, you consent to your personal data being processed for the purposes of the relevant marketing activities and in accordance with the rules of the relevant Activity.

The types of personal data processed during a given Activity, the purposes of the processing, the parties processing the data, the time limits, the legal bases for processing and your rights in relation to the processing are set out in the rules of the relevant Activity.

4. Visitors to the Children's Centre's website (www.KaBoomBG.com)

As a visitor to the website www.KaBoomBG.com, you are free to browse all its sections and menus and search for information on it without having to enter any of your personal data or register on the website. The fact that you do not need to register on our website does not in any way restrict your online activity, your navigation of the site, or your access to its content.

In addition, the website provides the technical facility to complete, sign and submit informed consent (waiver) forms by a parent, guardian, another person caring for a child in accordance with the Child Protection Act, or another adult accompanying the child, in connection with a planned visit to the Children's Centre. You can find out more about how to submit a declaration of informed consent (waiver) via our website in **the General Terms and Conditions of Use for the KaBoom Children's Entertainment Centre website (www.KaBoomBG.com)**

The website www.KaBoomBG.com uses so-called 'cookies' in order to offer you higher-quality, optimised and up-to-date services, information on products and terms and conditions, as well as to provide personalised content to users of our website. Through 'cookies', including other similar technologies, the controller may obtain specific information about you, such as: the pages you view; the items you download; the links you follow; the duration of your visit to the website; your IP address; the domain from which you access our website; and so on. This information helps us to learn more about how you use our technologies and to provide you with appropriate services and information. You can find out more about the 'cookies' can be found in our **Cookie Policy**, published on our website.

5. Users of social media platforms on which the Children's Centre maintains relevant pages and/or has an account

The Children's Centre has a Facebook page (<https://www.facebook.com/p/KaBoom-61579060534973/>). This brings us closer to our users. Our page allows us to communicate with our current and potential customers quickly and interactively, and to promote events, games and other similar activities organised by us and our partners at the Children's Centre. On our page, you can rate the Children's Centre, share your opinion on the standard of service and the quality of the customer experience, communicate with one of our representatives via Facebook, and keep up to date with the latest services, packages and products we offer. We monitor our visitors' activity on our Facebook page, such as the number of 'likes' on our posts, the number of times our posts are shared, and other similar metrics. By 'liking' our Facebook page, you grant us access to some of the personal data you have entered in your Facebook profile.

The purpose of processing your data is to manage our Facebook page, to analyse information from our visitors' activity and feedback on the page, and for marketing purposes. The period for which this data is processed is until you stop following, liking and sharing posts on our page, or until you delete your Facebook profile.

The grounds for processing personal data may be as follows, as applicable:

- the data subject has given consent to the processing of their personal data;
- the processing is necessary for the purposes of legitimate interests of the controller or a third party.

The website www.KaBoomBG.com features a button providing direct access to the Children's Centre's Facebook page in order to make it easier for our users who wish to access the content on the Facebook page, as well as to make it easier for you to share your views about us and our partners directly, should you wish to do so.

5.1. Users of the social media platform Instagram, on which the relevant page for the

Children's Centre is maintained and/or the Children's Centre has an account

The Children's Centre has an official page on Instagram (https://www.instagram.com/kaboom_rousse/). This brings us closer to our users. The page allows us to communicate with our customers quickly and interactively, and to promote events, games and other similar activities organised by us and our partners at the Children's Centre. On our page, you can leave comments, like posts, follow our profile and stay informed about the latest services and products we offer. We monitor our visitors' activity on Instagram based on the publicly available data provided by the platform – for example, likes, comments, shares and other similar actions. By following or liking our Instagram profile, you do not grant access to any of the personal data you have entered in your profile, apart from that which is publicly available via the platform.

The purpose of processing your data is to manage our Instagram page, analyse the activity and feedback of our visitors on it, and for marketing purposes. The period for which the data in question is processed is until you stop following, liking or interacting with our Instagram page, or until you delete your Instagram account.

The grounds for processing personal data may be as follows, as applicable:

- the data subject has given consent to the processing of their personal data;
- processing is necessary for the purposes of the legitimate interests of the controller or a third party.

The website www.KaBoomBG.com features a button providing direct access to the Children's Centre's Instagram page, designed to make it easier for our users who wish to access the content on the Instagram page.

5.2. Users of the social media platform TikTok, on which the relevant page for the Children's Centre is maintained and/or on which the Children's Centre is registered

Children's Centre has an page on TikTok (<https://www.tiktok.com/@kaboommallrousse>). This brings us closer to our customers. The page allows us to communicate with our customers quickly and interactively, and to promote events, games and other similar activities organised by us and our partners at the Children's Centre. On our page, you can leave comments, like content, follow our profile and stay informed about the latest services and products we offer. We monitor our visitors' activity on TikTok based on the publicly available data provided by the platform – for example, likes, comments, shares and other similar actions. By following or liking our TikTok profile, you do not grant access to any of the personal data you have entered in your profile, apart from that which is publicly available via the platform.

The purpose of processing your data is to manage our TikTok page, analyse the activity and feedback of our visitors on it, and for marketing purposes. The period for which the data in question is processed is until you stop following, liking or interacting with our TikTok page, or until you delete your TikTok account.

The grounds for processing personal data may be as follows, as applicable:

- the data subject has given consent to the processing of their personal data;
- processing is necessary for the purposes of the legitimate interests of the controller or a third party.

The website www.KaBoomBG.com features a button providing direct access to the Children's Centre's TikTok page, designed to make it easier for our users who wish to access its content.

5.3. Users of the YouTube platform, on which the Children's Centre has a channel and/or an account

The Children's Centre has an official channel on YouTube

(https://www.youtube.com/KaBoom_MallRousse). By sharing various videos, we are closer to our users, which allows us to communicate with our customers quickly and interactively, and to promote events, games and other similar activities organised by us and our partners at the Children's Centre. You can leave comments, like the content, subscribe to our channel and stay informed about the latest services and products we offer. We monitor our visitors' activity on YouTube based on the publicly available data provided by the platform – for example, likes, comments and other similar actions. By subscribing to or liking our YouTube channel, you do not grant access to any of the personal data you have entered in your profile, other than that which is publicly available via the platform.

The purpose of processing your data is to manage our YouTube channel, analyse the activity and feedback of our visitors on the channel, and for marketing purposes. The period for which the data in question is processed is until you stop following, liking or interacting with our channel, or until you delete your profile on the platform.

The grounds for processing personal data may be as follows, as applicable:

- the data subject has given consent to the processing of their personal data;
- processing is necessary for the purposes of the legitimate interests of the controller or a third party.

The website www.KaBoomBG.com features a button providing direct access to the Children's Centre's YouTube channel in order to make it easier for our users who wish to access its content.

5.4. Users of Google services where the Children's Centre is listed – Google Business Profile / Google Maps / Google Reviews

The administrator maintains a business profile for the Children's Centre on Google's platforms – including Google Maps and Google Business Profile. Through these services, users can access up-to-date information about the Children's Centre, its opening hours, events, services and other similar details. The platform also allows visitors to leave ratings, reviews, questions and other feedback.

We only have access to the information that Google makes publicly available to business profile administrators – such as ratings, reviews, comments, questions and aggregated statistical information on profile traffic or searches. "M.O. Rousse" EAD **does not have access to any additional personal data** that Google does not make publicly available.

The purpose of processing this data is to manage our Google business profile, analyse user feedback and improve the quality of our services. The processing period covers the time during which comments, ratings or other information remain publicly available via Google, or until Google removes them.

The legal bases for processing personal data may be:

- the data subject has given consent (for example, by posting a review or rating);
- processing is necessary for the purposes of the legitimate interests of the controller or a third party.

!!! Your visits to and interactions with the aforementioned social networks and platforms are governed by the privacy policy of the legal entity or other legal organisation providing the relevant functionality. If you do not agree or do not wish to visit these websites and/or use their features, please do not visit or use them.

6. Other

The Children's Centre's website www.KaBoomBG.com contains links to other websites owned by other data controllers. The administrator is not responsible for the collection and

processing of your personal data by other administrators, nor for the personal data you provide to these administrators, the content of their websites or the advertisements displayed on them.

III. WHERE DO WE OBTAIN PERSONAL DATA FROM?

(SOURCES OF PERSONAL DATA)

The personal data we process is provided by the individuals to whom it relates, and in the case of children staying at and/or taking part in activities at the Children's Centre – by their adult guardians. Personal data is also collected via CCTV – for further information, please refer to the **Mall Rousse CCTV Policy**. Your personal data may be provided to us by third parties in the cases provided for by law, e.g. in documents provided to us by a public authority.

IV. TO WHOM MAY YOUR PERSONAL DATA BE DISCLOSED?

(CATEGORIES OF RECIPIENTS OF PERSONAL DATA OTHER THAN THE CONTROLLER)

Your personal data may be disclosed to third parties – so-called recipients of personal data – only if they have a legal basis for receiving it. The categories of recipients of personal data are determined on a case-by-case basis according to their legal basis for receiving the data, and may include:

- public authorities in accordance with their powers (e.g. the National Revenue Agency, Regional Health Inspectorates, the Bulgarian Food Safety Agency, the Consumer Protection Commission, the Personal Data Protection Commission, the police, the Public Prosecutor's Office, etc.)
- banks and payment institutions in connection with payments or refunds
- providers of postal, courier, hosting or software services in connection with correspondence and communication with you
- our suppliers and partners in connection with the production and delivery of products you have ordered, such as invitations, decorations, catering, photography and videography, etc.
- where necessary, operators of the single European emergency number 112, and operators of telephone numbers for contacting the police, fire service and other emergency services
- insurers with whom we have entered into a contract, in connection with the occurrence of insured events relating to the Children's Centre
- persons who process personal data on our behalf and at our instruction (data processors),
e.g. accountancy firms, auditors, solicitors, IT service providers, etc.

V. WHAT ARE YOUR RIGHTS REGARDING THE PROCESSING OF YOUR PERSONAL DATA?

(RIGHTS OF DATA SUBJECTS)

We endeavour to ensure that your personal data is always processed lawfully, fairly and in a transparent manner, that it is collected for specific, explicitly stated and legitimate purposes, and that we limit the collection, processing and storage of your data to the minimum necessary. We ensure that your personal data is always processed in a manner that guarantees an appropriate and adequate level of security.

In relation to the processing of your personal data, you have the following rights under the General Data Protection Regulation:

- **the right of access** to the personal data we process;
- **the right to rectification** of inaccurate or incomplete personal data – you have the right to request that incomplete personal data concerning you be completed, including by submitting a statement;
- **the right to erasure ('the right to be forgotten')** of personal data that is being processed unlawfully or where the legal basis for processing no longer applies (e.g. the retention period has expired, the original purpose for which it was collected has been fulfilled, the processing has been

found to be
unlawful, and others);

- **the right to restriction of processing**, in the event of: established unlawful processing, despite which you wish only to restrict the processing of your data rather than have it erased; if you wish your personal data to be retained, even though it is no longer necessary for the purposes of the processing, as you intend to use it to establish, exercise or defend legal claims; or where you have objected to the processing of your personal data, for the duration of the verification of the validity of your objection.

- **Right to object:** You have the right to object to the controller, 'M.O. ROUSSE' EAD, at any against the processing of your personal data as set out in this

Upon receipt of an objection to the processing of your personal data, you will receive a response within a reasonable period, but no later than one month, as to whether the objection has been found to be well-founded and, accordingly, whether the processing of the relevant personal data for those purposes will be discontinued. The processing of personal data will be discontinued unless it is demonstrated that there are compelling legitimate grounds for the processing which override your interests, your rights and freedoms as a data subject, or for the establishment, exercise or defence of legal claims.

- **Right to data portability:** you have the right to request that we transfer your personal data to another data controller in one of the following ways: (a) by providing it to you in a machine-readable format so that you can transfer it to the other controller; or (b) to transfer it directly to the other controller, where technically feasible.
- **Right to withdraw consent to processing** – where the processing of your personal data is based on your consent, e.g. for the purposes of direct marketing, you have the right to withdraw your consent at any time, without this affect the lawfulness of the processing based on consent prior to its withdrawal.

To exercise your rights relating to the processing of your personal data, you may submit a written or electronic request to us at the addresses set out at the beginning of this policy.

The request should include your name, address and other details enabling your unambiguous identification, a description of your request, your preferred method of communication and the actions to be taken in response to the request. The request must be signed and include contact details – a physical address, telephone number and/or email address – for feedback and correspondence with the applicant.

If the request is submitted to the controller as the owner of the Children's Centre, but its substantive consideration and the safeguarding of the submitter's rights as a data subject require action to be taken by the security firm, the request shall be forwarded to the latter, and the submitter shall be notified of the forwarding. Forwarding is not permitted if the data subject has expressly stated in their request that they do not consent to their request being forwarded to the security company.

VI. RIGHT TO LODGE A COMPLAINT WITH THE PERSONAL DATA PROTECTION COMMISSION OR THE COURT

If you believe that your rights under the General Data Protection Regulation have been infringed, you have the right to lodge a complaint with the Personal Data Protection Commission or with the competent court.

Up-to-date contact details and the conditions for lodging a complaint with the Commission for Personal Data Protection are available on the supervisory authority's official website at www.cdpd.bg. The Commission's postal address is: 2 Prof. Tsvetan Lazarov Boulevard, Sofia 1592; and its email address is: kzld@cpdp.bg.

VII. ABSENCE OF AUTOMATED DECISION-MAKING OF INDIVIDUAL DECISIONS, INCLUDING PROFILING

The controller does not carry out automated individual decision-making, including profiling.

VIII. TRANSFER OF PERSONAL DATA TO THIRD COUNTRIES OR INTERNATIONAL ORGANISATIONS

Your personal data is processed by the data controller 'M.O. Rousse' EAD solely within the EU and is not transferred to third countries or international organisations.

IX. CHANGES TO THIS POLICY

Should there be subsequent versions or updates to this Policy, the changes will be published on the website www.KaBoomBG.com, stating the date of the changes.

Version: 1.2

Date: 19.06.2026