

PRIVACY POLICY OF NEXT LEVEL FITNESS OOD FOR THE PROCESSING AND PROTECTION OF PERSONAL DATA

INFORMATION ABOUT THE DATA CONTROLLER

We, Next Level Fitness OOD., UIC 204479347, having its registered office and management address at 35 Simeonovsko Shose Blvd., Floor 3, Sofia 1700, Bulgaria (hereinafter referred to as "Next Level"), process your personal data where you are a natural person and fall within one of the following categories:

- visitors and customers of our Next Level fitness centres listed on the following website: www.nextlevelclub.bg;
- minors (under 14 years of age), represented by a parent or legal guardian;
- individuals who have voluntarily provided their personal data for the implementation of Next Level's marketing activities;
- participants in group classes or users of the fitness facilities;
- individuals registered in the customer areas of our website: www.nextlevelclub.bg;
- visitors to Next Level facilities using services provided by third parties;
- fitness instructors providing services related to the organisation and conduct of group classes;
- representatives or contact persons of legal entities that have entered into agreements with Next Level (e.g. sales agreements, service agreements or other arrangements);
- individuals who have submitted a question, comment or other communication to us through the contact form available on our website www.nextlevelclub.bg and/or through our social media profiles and fan pages.

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

This Privacy Policy of Next Level Fitness OOD. for the Processing and Protection of Personal Data reflects our commitment and responsible approach to the protection of the personal data that you share with us.

We make every effort to ensure the lawful processing of your personal data in compliance with the applicable provisions of Bulgarian law and European Union law, including 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, hereinafter referred to as the "GDPR"), as well as the Bulgarian Personal Data Protection Act.

This document contains information regarding the personal data we process, the purposes for which we process it, the persons to whom your data may be disclosed, and your rights relating to the protection of personal data.

For the purposes of this document, a “Sports Services Agreement” shall mean an agreement concluded with Next Level pursuant to which you are entitled to use sports services at one of our fitness centres for a specified period, not shorter than one month, or for a specified number of visits to sports activities.

FOR WHAT PURPOSES AND ON WHAT LEGAL BASIS DO WE PROCESS YOUR PERSONAL DATA? FOR HOW LONG DO WE RETAIN YOUR PERSONAL DATA?

1. Processing of Personal Data of Visitors to Fitness Centres

a) Personal Data Processed for the Purposes of Concluding and Performing a Sports Services Agreement

In order to use our sports services, you must conclude a Sports Services Agreement with Next Level at one of our fitness centres. Such an agreement may also be concluded through the Company’s website and the Next Level Fitness App mobile application, which allow you to purchase memberships online.

In order to issue a membership card and provide the sports services requested by you under the Sports Services Agreement concluded between us, we may require you to provide certain personal data necessary for the conclusion and performance of the agreement.

The provision of personal data is entirely voluntary. However, if you choose not to provide such data, you will not be able to conclude a Sports Services Agreement. Following the conclusion of a Sports Services Agreement, the personal data you have provided will also be used for the automatic creation of a profile (account) in the online customer area of Next Level fitness clubs. Through this profile and the Next Level Fitness App mobile application, the concluded Sports Services Agreement is performed. For example, the profile in the online customer area is used to access the Company’s fitness centres through identification by means of a personal QR code generated within the Next Level Fitness App mobile application.

Scope of Processed Data

In order to conclude a Sports Services Agreement, we process a minimum set of your identification data.

We process personal data to the extent necessary for the performance of the agreement to which you are a party: first name, last name, e-mail address, personal identification number (PIN), and telephone number.

We also collect your date of birth and gender for purposes arising from our legitimate interests, such as statistical and analytical purposes (including the optimal adjustment of the offering of each Next Level fitness club to the needs of customers using our sports services).

The collection of information regarding “How did you hear about our club?” assists us in improving our marketing activities (analytical purposes).

Furthermore, for the purpose of verifying your identity when using services provided by our Company, we process your photograph, which is taken on-site by our reception staff. The provision of such photograph allows us to verify that your membership card is not being used by another person without the need to collect additional personal data from you. A unique QR code is also generated within each individual customer account in the Next Level Fitness App mobile application, through which customers identify themselves and gain access to the Company’s fitness centres.

In addition to the duration of the concluded Sports Services Agreements, we retain the above data in our software systems for a period of up to five (5) years following the termination of your last Sports Services Agreement with Next Level, provided that no new Sports Services Agreement has been concluded during that period. The purpose of such retention is to provide improved customer service and facilitate the process of concluding Sports Services Agreements. In this way, you will not be required to provide your personal data each time you conclude a subsequent Sports Services Agreement. At the same time, in order to protect your interests, we limit the retention period of your identification data solely to the period during which it is reasonably likely that, following a temporary interruption, you will resume visiting our fitness centres.

Data Related to Visits to Fitness Centres

Given that each Sports Services Agreement relates to a specific type of sports activity at a particular fitness centre, during the performance of the agreement we receive general information regarding your sports preferences and where and when you engage in sports activities. Accordingly, for the purposes of performing the Sports Services Agreements concluded with you, we maintain information regarding, for example, the fitness centre for which you hold a membership, whether your membership covers fitness services or group classes, and the time of day at which the sports service used by you is provided.

As, depending on your membership, we are required to provide a specific sports service to you at a particular fitness centre and at a specified time, the above personal data is used solely for the purpose of performing our contractual obligations and providing you with access to the activity for which you have purchased a membership.

Bank Card and Bank Account Data

Where you make a payment by bank card for a purchased membership, we process data relating to that bank card and the associated bank account in order to process your payment and provide the service purchased by you.

Purposes of Processing

The personal data described above is necessary for us to conclude and perform our obligations under the Sports Services Agreements concluded with you in our fitness centres. More specifically, the personal data provided by you is processed for the following purposes:

- conclusion and performance of Sports Services Agreements;
- issuance of membership cards;
- provision of access for visitors holding membership cards and personal QR codes within their profiles (accounts) in the online customer area of Next Level fitness clubs, including the Next Level Fitness App mobile application, to the relevant sports activities and fitness centres covered by the respective agreement;
- performance of our obligations to provide the sports services covered by the issued memberships, as well as compliance with legal obligations applicable to the Company;
- online application, payment and conclusion of a Sports Services Agreement;
- processing of payments for memberships made by bank card;
- verification of your identity when using the services provided by the Company and, in particular, facilitating checks at the entrances to sports facilities (including access by club members holding membership cards and personal QR codes available within the online customer area);
- statistical and analytical purposes.

Legal Basis for Processing

The legal basis for processing the personal data described above is the conclusion and performance of the agreement between you and Next Level Fitness OOD. for the provision of subscription-based sports services (Article 6(1)(b) GDPR). The creation of an account (profile) in the Company's Customer Area on the website <https://www.nextlevelclub.bg/> and within the Next Level Fitness App mobile application is carried out for the purpose of performing the concluded Sports Services Agreement (Article 6(1)(b) GDPR).

The retention of your personal data following the termination of your last agreement with Next Level is based on the legitimate interests of Next Level in providing improved customer service, facilitating the process of concluding individual Sports Services Agreements and thereby improving the quality of the services provided (Article 6(1)(f) GDPR).

The legal basis for processing your photograph is also our legitimate interest (Article 6(1)(f) GDPR) in verifying your identity when using the services provided by the Company and, in particular, facilitating checks at the entrances to sports facilities (including access by club members holding membership cards), as well as the performance of the agreement between you and Next Level Fitness OOD. for the provision of subscription-based sports services (Article 6(1)(b) GDPR).

The legal basis for processing data required for issuing invoices for payments received is compliance with our legal obligations under applicable tax legislation (Article 6(1)(c) GDPR).

Where your personal data is processed for direct marketing purposes, the legal basis for processing is your freely given, explicit and informed consent, where you choose to provide such consent (Article 6(1)(a) GDPR).

We process your personal data, including your date of birth, gender and information regarding “How did you hear about our club?”, on the basis of our legitimate interests relating to statistical and analytical purposes (Article 6(1)(f) GDPR).

Retention Period

Following the termination of your Sports Services Agreement, your personal data and contact details are retained in our electronic customer database for a period of five (5) years after the termination of your last agreement with Next Level, provided that no new Sports Services Agreement has been concluded in the meantime. This is done for the purpose of facilitating and accelerating the conclusion of future agreements and the issuance of membership cards and invoices for purchases made by you. Accordingly, when you conclude a new Sports Services Agreement, we will not need to collect your personal information again but will instead use the data initially provided by you, thereby improving customer service and convenience. Upon expiry of the above five-year period, all of your personal data will be deleted from our software and electronic systems.

Personal data provided during the conclusion of an agreement with the Company, your acceptance of the General Terms and Conditions and your acknowledgement of this Privacy Policy may also be retained for the longer periods specified below in the section relating to personal data processed for the protection of the legitimate interests of Next Level or on another legal basis.

Your personal data relating to payments made by bank card, which is necessary for compliance with our obligations under tax and accounting legislation, may be retained for the maximum period of ten (10) years established under applicable tax and accounting laws.

Personal data processed for direct marketing purposes shall be retained and processed until you expressly withdraw your consent.

a¹) Minors (Under 14 Years of Age) Where a Sports Services Agreement Is Concluded Through a Parent or Legal Guardian

Where a Sports Services Agreement is concluded for a person under 14 years of age, the child's personal data is provided by a parent or legal guardian through the execution of the relevant agreement/declaration. The parent or legal guardian provides the child's personal data for the purposes of concluding and performing the Sports Services Agreement and declares that they possess the necessary authority to provide such data and that they have been informed of the conditions for the processing of personal data under this Privacy Policy.

Scope of Processed Data

Where personal data relating to minors is processed, only the minimum amount of personal data necessary for the provision of sports services under the relevant agreement shall be processed, including:

- the child's first and last name;
- the child's date of birth;
- attendance history.

Where the agreement is concluded by a parent or legal guardian, the Company processes:

- data relating to the parent or legal guardian;
- signature and data contained in the relevant declaration/agreement.

Purposes of Processing

The personal data is processed for the following purposes:

- conclusion and performance of a Sports Services Agreement;
- provision of access to the relevant sports activities;
- protection against potential legal claims.

Legal Basis for Processing

The personal data is processed on the basis of the conclusion and performance of a contract (Article 6(1)(b) GDPR), as well as on the basis of the legitimate interests of Next Level in demonstrating that valid consent has been provided and defending against potential legal claims (Article 6(1)(f) GDPR).

Retention Period

Personal data contained in the agreement/declaration and collected in connection with the provision of services shall be retained for the duration of the agreement and for the period necessary to defend against legal claims in accordance with applicable legislation.

b) Personal Data Processed on the Basis of Your Consent for the Sending of Electronic Newsletters and Other Marketing Activities

For marketing purposes, we distribute our electronic newsletter. In addition, where you have provided your explicit consent, we may use the telephone number provided by you for the organisation of special marketing events.

Information relating to your e-mail address and telephone number is processed for the purposes described in this section on the basis of your consent, provided at our fitness centres and/or electronically.

Personal data processed for the purpose of sending electronic newsletters shall be processed until you unsubscribe from receiving the newsletter by using the unsubscribe link contained in the electronic communications sent by us. You may also withdraw your consent to receive information regarding current offers and promotions, new products and special offers by contacting us in the manner described below.

In addition, for the purposes of promoting and advertising our services and products, we organize contests, prize draws and other marketing activities. In order to participate in such activities, you may provide us with various personal data, including identification and contact details, which we will use to determine whether you meet the eligibility requirements for the relevant contest or promotion, to select a winning participant, to publish the names of winning participants and to deliver prizes to the winners.

We will process such data on the basis of your consent, given through your participation in the relevant contest, prize draw or other promotional activity and your acceptance of its rules and terms and conditions. The personal data of participants in promotional activities will be deleted 6 months after the prizes have been delivered to the winning participants.

The provision of the personal data described in this section is entirely voluntary. However, if you choose not to provide such data, you will not be able to receive our electronic newsletter or participate in the respective marketing activities. We process general information regarding your sports preferences and where and when you engage in sports activities for the purpose of conducting analyses and generating statistical information and, subsequently, preparing offers tailored to your interests. The legal basis for this type of processing is our legitimate interest in improving the quality of sports services and developing the products and services we offer. However, the sending of personalised offers by e-mail, telephone call or any other communication channel selected by you is carried out solely on the basis of your consent, which may be withdrawn at any time.

c) Personal Data Relating to Video Surveillance in Fitness Centres

Types of Personal Data

Our fitness centres are equipped with a limited number of video surveillance cameras. Through recordings from the installed cameras, we may process images captured through video surveillance and video recording.

Purposes and Legal Basis for Processing

The purpose of video surveillance is to ensure the security of our fitness centres, protect both our property and yours, and maintain order and safety within the fitness centres.

We process your personal data relating to video surveillance on the basis of our legitimate interest in protecting our commercial premises, maintaining order within them, and safeguarding both our property and yours against unlawful interference (Article 6(1)(f) GDPR).

In order to ensure that the protection of our legitimate interests does not override your interests, fundamental rights and freedoms requiring the protection of personal data, we have implemented a number of measures and safeguards. These include, for example, the installation of surveillance cameras only at a limited number of locations within our facilities. Accordingly, cameras are installed solely:

- at the entrances to fitness centres;
- above reception desks;
- above the entrances to group training rooms; and
- above the entrances to changing rooms (without visibility into the changing rooms themselves),

for the purpose of identifying, where necessary, individuals who have gained unauthorised access or unlawfully interfered with our property or the property of our customers. Additional safeguards include the placement of clearly visible notices informing you about the existence of video surveillance and where this Privacy Policy may be consulted. We also use camera settings (including coverage area, recording angle and zoom level) designed to minimise unnecessary interference with your privacy. Furthermore, we ensure that only a limited number of our employees have access to surveillance recordings, that such data is not disclosed to third parties, and that recordings are reviewed only where an incident occurs that requires analysis.

Video surveillance recordings are retained for a period of sixty (60) days from the date of recording. Only where a violation or incident has been identified may recordings be retained until the relevant proceedings have been completed, but in no event longer than three (3) years from the date of recording.

d) Personal Data Processed for the Purpose of Compliance with Our Legal Obligations

When you conclude a Sports Services Agreement or purchase a product from us, certain legal obligations arise for us. In order to comply with these obligations, we must process your personal data, including, for example, your identification data, contact details and other information provided by you.

For example, we may process your personal data for the purpose of issuing invoices and complying with our obligations as a supplier within the meaning of the Value Added Tax Act. Furthermore, under applicable accounting and tax legislation, we are required to record issued invoices and reflect them in our accounting and tax records.

Your data may also be processed for the purpose of complying with obligations arising under applicable consumer protection legislation, including, for example:

- handling complaints;
- processing contract withdrawals;
- accepting returns of purchased products and issuing refunds;
- resolving consumer disputes;
- sending notifications concerning amendments to the General Terms and Conditions for the provision of sports services; and
- other similar activities.

The legal basis for processing such personal data is compliance with legal obligations imposed by law (Article 6(1)(c) GDPR).

Your personal data processed for invoicing purposes and compliance with tax, accounting, consumer protection and other legal obligations may be retained for the maximum statutory period of ten (10) years.

e) Personal Data Processed for the Purposes of Our Legitimate Interests

We may process your identification data, written declarations and consents signed by you, data relating to orders and purchases made by you in our fitness centres, payment information, and information relating to questions, complaints and other communications submitted by you, in order to defend ourselves against legal claims brought by you.

We may also process your identification data for inclusion in our electronic customer database in order to facilitate and accelerate the conclusion of Sports Services Agreements and the issuance of membership cards and invoices for purchases made at any of our fitness centres.

We will process such personal data only where our legitimate interests are not overridden by your interests, fundamental rights and freedoms requiring the protection of personal data.

The legal basis for processing your personal data is our legitimate interest in defending ourselves against potential legal claims and maintaining a customer database to facilitate and accelerate the conclusion of Sports Services Agreements and the issuance of membership cards and invoices.

Data processed for the purpose of defending against legal claims (such as written declarations and consents) shall be retained until expiry of the five-year limitation period for legal claims under the Bulgarian Obligations and Contracts Act. Such data shall be accessible only to a limited number of Next Level employees and only where access is required in connection with a legal dispute.

f) Personal Data Processed in Connection with Group Photography Following Training Sessions on the Basis of Your Consent

At certain Next Level Fitness Facilities, group photographs may be taken following the completion of group classes.

Data subjects are individuals participating in group classes.

Within the framework of this activity, the following personal data is processed:

- image (photograph) of participants included in the group photograph.

Your images are processed for the following purposes:

- publication on the official social media profiles of Next Level Fitness;
- publication on the social media profiles of the relevant instructor;
- presentation and promotion of group classes and the activities of Next Level Fitness.

The processing of images is carried out solely on the basis of your explicit consent pursuant to Article 6(1)(a) GDPR. Participation in group photographs is entirely voluntary. Individuals who do not wish to be photographed may inform the instructor in advance and refrain from joining the group photograph. By participating in the photography session, you provide your explicit consent to the processing and publication of your image for the purposes and in the manner described above.

Photographs shall be retained until the photographed individual withdraws their consent or until the purposes for which the photographs were collected cease to exist, after which they shall be deleted from all channels controlled by the Controller. Following publication on social media platforms, it is possible that the content may be shared or reproduced by third parties outside the Controller's control.

g) Personal Data of Visitors Using Services Provided by Third Parties at Next Level Facilities

At certain Next Level Fitness Facilities, additional services provided by third parties (for example, massage services) may be offered within the premises of the fitness centres.

Accordingly, individuals who are not customers of Next Level may visit the facilities solely for the purpose of using such services.

Within the framework of this activity, Next Level may process the following personal data:

- first and last name;
- signature;
- data contained in declarations completed during the visit;
- images captured through video surveillance systems operating within the facilities.

The personal data is processed for the following purposes:

- access control to the facilities;
- maintenance of order and safety;
- protection of the life and health of visitors and employees;
- protection of Next Level property.

The personal data is processed on the basis of the legitimate interests of Next Level relating to ensuring security and controlling access to the facilities (Article 6(1)(f) GDPR).

Personal data collected through completed declarations is retained for a period of up to thirty (30) days from the date of the visit and thereafter for the period necessary to defend against potential legal claims.

Data collected through video surveillance systems is retained in accordance with the retention period specified in section “c) Personal Data Relating to Video Surveillance”. Personal data may be disclosed to competent public authorities where required by law.

The services (e.g. massage services) are provided by third parties who process personal data as independent controllers. Accordingly, the relevant service provider processes personal data in accordance with its own privacy policy.

2. Personal Data Processed in Connection with the Registration of a Profile in Our Online Customer Areas and the Use of Profile Functionalities

The website www.nextlevelclub.bg and the Next Level Fitness App mobile application provide the possibility to create customer profiles that allow the use of functionalities such as:

- online conclusion of a Sports Services Agreement;
- online reservation of group classes;
- access to fitness centres through a personal QR code;
- information regarding the concluded Sports Services Agreement; and
- functionalities relating to the performance of such agreement.

Creation of a Profile in a Customer Area

A profile in the customer area of Next Level fitness clubs may be created by completing an online registration form containing mandatory fields marked as such.

A profile in the customer area of Next Level fitness clubs may also be created electronically through the online conclusion of a Sports Services Agreement via the website www.nextlevelclub.bg or through the Next Level Fitness App mobile application. Customers of Next Level fitness clubs who conclude a Sports Services Agreement at the reception desk of a Next Level fitness club automatically receive login credentials for their account (profile) in the online customer area of Next Level fitness clubs at the e-mail address provided by them. Through this profile and the Next Level Fitness App mobile application, the concluded Sports Services Agreement is performed.

Holders of MultiSport cards who visit Next Level fitness clubs may obtain a profile in the Next Level customer area after completing an online form for the creation of a free profile.

Access to customer accounts created at www.nextlevelclub.bg and <https://fitness.nextlevelclub.bg> is also available through the Company's mobile application, Next Level Fitness App. The Next Level Fitness App mobile application enables the use of all functionalities available to users holding a customer account registered at www.nextlevelclub.bg) and <https://fitness.nextlevelclub.bg>. A unique QR code is generated within each individual customer account in the Next Level Fitness App mobile application, through which customers identify themselves and gain access to the Company's fitness centres.

Processing of Personal Data Provided for the Creation of a Profile in a Customer Area

In order to create a profile in one of our customer areas, we must obtain your identification data and e-mail address. These data are used for maintaining your electronic profile and for sending electronic communications relating to your profile, including, for example:

- profile registration confirmations;
- password recovery or password change notifications; and
- other similar communications.

The data is also used in connection with the functionalities available through your electronic profile and for the performance of the concluded Sports Services Agreement, including, for example:

- messages confirming the conclusion of a Sports Services Agreement;
- messages confirming reservations for group classes;
- provision of a personal QR code used for customer identification and access to fitness centres.

The data collected through the functionality for the online conclusion of a Sports Services Agreement corresponds to the personal data described above in this Privacy Policy as necessary for concluding a Sports Services Agreement at our fitness centres. The legal bases, purposes and retention periods applicable to the processing of personal data necessary for Sports Services

Agreements are described in Section 1 of this Privacy Policy under “a) Personal Data Processed for the Purposes of Concluding and Performing a Sports Services Agreement”.

Personal Data Processed in Connection with Online Reservations for Group Classes

Where you use the functionality allowing you to reserve participation in a group class electronically at one of our fitness centres, we receive general information regarding your sports preferences and where and when you engage in sports activities.

Such personal data is used in order to perform our obligation to provide you with access to the selected sports activity at the relevant fitness centre and at the selected time.

Legal Basis for Processing

The legal basis for processing your personal data for the creation and administration of an electronic profile is the conclusion and performance of the Sports Services Agreement concluded between you and Next Level Fitness OOD. (Article 6(1)(b) GDPR).

The data obtained in connection with the online conclusion of a Sports Services Agreement and the online reservation of group classes is processed for the conclusion and performance of the Sports Services Agreement and the online reservation agreement concluded between you and Next Level Fitness OOD. (Article 6(1)(b) GDPR).

The provision of personal data is entirely voluntary. However, if you do not provide the required personal data, we will not be able to provide the group class reservation service or perform the concluded Sports Services Agreement where the existence of a customer profile is necessary for its performance (for example, customer identification through a personal QR code available in the profile and access to fitness centres through that QR code).

Retention Period

Your personal data provided during the registration of a profile on any of our websites shall be retained for the entire period during which your registration remains active.

Data relating to reservations for group classes shall be deleted after the respective class has taken place.

Retention periods applicable to data processed in connection with Sports Services Agreements shall be those described in the section relating to the conclusion and performance of Sports Services Agreements.

3. Processing of Personal Data of Representatives or Contact Persons of Legal Entities – Our Business Partners

If you are a representative or contact person of a supplier of goods or services or another business partner that is a legal entity, we may process a limited scope of your identification and contact data for the following purposes:

- concluding agreements with you in your capacity as a representative of the legal entity;
- maintaining contact with you in connection with the performance of the concluded agreement;
- protection against legal claims and debt collection activities;
- inclusion of the legal entity represented by you in our electronic partner database in order to facilitate and accelerate invoice issuance.

We process your personal data on the basis of the conclusion and performance of the agreement between the legal entity represented by you and Next Level Fitness OOD., as well as on the basis of our legitimate interest in maintaining communication with our business partners regarding the performance of agreements concluded by us and in asserting or defending legal claims relating to purchases, provision of services, payments and similar matters.

Your personal data processed for invoicing purposes and compliance with obligations arising under tax, accounting, consumer protection and other legislation may be retained for the maximum ten-year period established by the Accountancy Act, the Value Added Tax Act and the Tax and Social Security Procedure Code.

Your contact data as a representative or contact person of the legal entity represented by you may be retained in our customer database until termination of the contractual and commercial relationship with the relevant business partner.

4. Personal Data Processed for the Purpose of Concluding and Performing Agreements with External Fitness Instructors

Personal Data Processed on the Basis of a Contract or Compliance with a Legal Obligation

Where you are a fitness instructor who has concluded an agreement with Next Level for the provision of group training services at one of our fitness clubs, we process the following categories of personal data:

- identification data;
- contact details;
- information regarding your professional qualifications and professional experience;
- information regarding your schedule for conducting group classes;
- bank account details.

We process the above personal data on the basis of the conclusion and performance of the agreement between you and Next Level Fitness OOD., as well as for the purpose of our legitimate interest in asserting or defending legal claims. Part of your personal data is also processed in order to comply with our legal obligations relating to the withholding of mandatory health insurance contributions, social security contributions and taxes, as well as the issuance of documents required under applicable accounting and tax legislation.

Your personal data processed for compliance with tax and accounting obligations may be retained for the maximum ten-year period established by the Accountancy Act, the Value Added Tax Act and the Tax and Social Security Procedure Code.

Your data processed for the performance of the agreement concluded with us may be retained in our database until termination of the respective agreement.

Personal Data Processed on the Basis of Consent

Next Level may request your consent to publish your photograph and a brief description of your professional activities on Next Level websites.

The purpose of this type of processing is to promote your activities as a fitness instructor and to advertise the sports activities offered in our fitness clubs. The processing of such personal data is based entirely on your consent. Where no consent has been provided, or where consent has been withdrawn, we will not process the above-described data.

Your photograph and description of your professional activities shall be published on Next Level websites for the duration of your contractual relationship with Next Level or until the withdrawal of your consent, whichever occurs first.

5. Personal Data Processed for the Purpose of Responding to Questions, Publishing Comments and Other Communications Submitted to Us

You may send us questions and enquiries by completing the contact form available in the contact section of our websites, as well as through our social media profiles and fan pages. In order to identify you and provide a response or publish your comment, we process your identification data (name) and contact details (telephone number and e-mail address).

We process your personal data provided when submitting questions and other communications through the contact form available on our websites or through our fan pages and social media profiles (Facebook, Twitter/X, Instagram, YouTube and others) on the basis of your consent, given through the completion and submission of the contact form or through your interaction with our social media profiles (Article 6(1)(a) GDPR). Our processing of your personal data is separate from and independent of the processing activities carried out by the operators of the respective social media platforms for their own purposes and on their own legal bases.

Completion and submission of the contact form and the publication of questions, enquiries and comments are entirely voluntary. However, if you choose not to provide your personal data, you will not be able to submit your enquiry to us.

Your personal data processed for the purpose of responding to questions, enquiries and other communications submitted to us, as well as for the publication of comments on our social media profiles and fan pages, shall be retained for a period of one (1) year following the provision of our response or the publication of the relevant comment.

6. Data Collected Through Cookies

We may analyse the use of our website [www.nextlevelclub.bg](<http://www.nextlevelclub.bg>) through the use of cookies, by means of which we collect information regarding the device or devices you use or have used to access our websites (for example, the make and model of your device, operating system, browser type or IP address), as well as information regarding the manner in which you use our websites. We do not collect your e-mail address, name or other personal information through cookies, nor do we collect or access information regarding websites visited by you other than our own websites, or any other information not described in this Privacy Policy.

This information is processed on the basis of your consent to the use of cookies. Further information regarding the use of cookies is available in our Cookie Policy at: www.nextlevelclub.bg

TO WHOM MAY WE DISCLOSE YOUR PERSONAL DATA AND WHERE IS IT STORED?

We work with partners and service providers who may process your personal data either as independent controllers or on our behalf in their capacity as processors. We disclose only the personal data that is strictly necessary for the provision of the relevant service. Furthermore, where we disclose your data to processors acting on our behalf, we take all necessary measures to ensure that your data is processed in compliance with applicable legal requirements and that the processor has implemented the necessary technical and organisational measures to protect the data.

The entities to whom we may disclose your personal data include payment service providers that process payments relating to Sports Services Agreements and other products, IT and hosting service providers maintaining our websites, debt collection agencies, courier service providers and other similar service providers.

We may also disclose part of your data to our accounting service providers for the purpose of recording issued invoices and other accounting documents in our accounting records.

Upon request from competent public authorities acting in accordance with applicable legislation (for example, the National Revenue Agency, the Consumer Protection Commission, courts and other public authorities), we may be under a legal obligation to disclose your personal data to such authorities.

In addition, Next Level forms part of the multinational Benefit Systems Group. Accordingly, your personal data may be shared with companies belonging to the international segment of the Group (a list of such companies is available at: <https://www.benefitsystems.pl/en/about-us/list-of-subsidiaries-and-associates-benefit-system-group/>).

The sharing of your personal data in this context takes place only where expressly necessary and only with authorised employees and colleagues within Benefit Systems Group who require access in order to perform their professional duties.

Such sharing may be necessary for purposes including:

- the provision of administrative, management or other support services by companies within the Group;
- IT support and maintenance of software systems used by Next Level;
- monitoring of the activities of the Bulgarian company by its sole shareholder for the purposes of analysis and business strategy planning.

The personal data we collect and process is stored within the European Economic Area (EEA).

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

➤ Right of Access

You have the right to obtain confirmation as to whether we process your personal data and, where that is the case, to obtain access to such data and information regarding the purposes of processing, retention periods and recipients of personal data. We will provide you with access to your personal data free of charge and, upon request, will also provide you with a copy of the data.

➤ Right to Rectification

You have the right to request the correction of inaccurate personal data relating to you and the completion of incomplete personal data.

➤ Right to Erasure (“Right to be Forgotten”)

You have the right to request the deletion of personal data relating to you that is no longer necessary for the purposes for which it was collected, or where you have withdrawn your consent to processing or exercised your right to object to processing. In certain cases prescribed by law, we may refuse to erase your personal data.

- Right to Restriction of Processing

In certain circumstances, you may request that we restrict the processing of your personal data, in which case the data will only be stored and not otherwise processed.

- Right to Data Portability

You have the right to receive the personal data we process concerning you in a structured, commonly used and machine-readable format and to transmit that data to another controller.

- Right to Object

You have the right to object to the processing of your personal data for direct marketing purposes.

If you exercise this right, we will cease using your personal data for direct marketing purposes.

- Right to Withdraw Consent

Where we process your personal data on the basis of consent, you have the right to withdraw your consent at any time without affecting the lawfulness of processing carried out before such withdrawal.

- Right to Lodge a Complaint

You have the right to lodge a complaint with the Commission for Personal Data Protection if you believe that a violation of the applicable personal data protection legislation has occurred.

CONTACT US

You may contact us regarding any matters relating to the processing of your personal data, including the exercise of the rights described in this Privacy Policy, through any of the following channels:

By post: 35 Simeonovsko Shose Blvd., Floor 3, Sofia 1700, Bulgaria

By e-mail: info@nextlevelclub.bg

By telephone: +359 2 491 0095

Through the contact form available on our website: www.nextlevelclub.bg

In order to exercise your rights relating to the protection of personal data, it is sufficient to send us a request containing at least:

- your name, address and other identification data enabling us to identify you unambiguously;
- a description of your request;
- your preferred method of communication.

This Privacy Policy of Next Level Fitness OOD for the Processing and Protection of Personal Data was adopted on 26 May 2018 and last amended on 15 June 2026.