Privacy Statement

Controller and contact details

Forability Ltd. (“Forability”, “we”, “us”, “our”) is a company established in Sofia, Bulgaria, providing consulting services in the planning and management of IT infrastructure and SAP systems.
Forability acts as a “controller” for personal data processed in connection with its website, marketing, and client relationship management activities within the meaning of Regulation (EU) 2016/679 (General Data Protection Regulation – “GDPR”) and the Bulgarian Personal Data Protection Act.
Contact details: Forability Ltd., Sofia, Bulgaria, Email:contact@forability.com, Phone: +359899990333; if a Data Protection Officer (DPO) or privacy contact is appointed, their contact details will be published here.

Scope and categories of data

This Privacy Statement applies to personal data of website visitors, prospective and existing clients, suppliers, business partners, and job applicants whose data Forability processes in the context of its business operations.
Typical categories of personal data include identification and contact details (such as name, position, company, email address, telephone number), communication content, billing and contract data, IP address and other online identifiers, and recruitment data (such as CV information and application history).

Purposes and legal bases

Forability processes personal data only for specified, explicit, and legitimate purposes and does not further process data in a manner incompatible with those purposes. Main purposes and corresponding legal bases under Article 6 GDPR include: performance and administration of contracts with clients and suppliers (contractual necessity), responding to enquiries and providing requested information (contractual necessity or legitimate interests), maintaining and improving the website and IT systems (legitimate interests), sending business communications and event information (consent or legitimate interests with opt-out), fulfilling legal obligations under EU and Bulgarian law (legal obligation), and recruitment and selection of candidates (contractual necessity, legitimate interests, and legal obligations).

Data sources and mandatory provision

Personal data is obtained directly from data subjects (for example through contact forms, email communications, or contractual documents) and, where appropriate, from publicly available sources such as professional networking platforms or public registers, as well as from business partners in the context of joint projects.

Where the provision of personal data is required by contract or law, Forability will indicate this and explain the possible consequences of failure to provide such data, such as the inability to enter into or perform a contract.

Recipients and international transfers

Personal data may be shared, on a need-to-know basis, with categories of recipients such as IT service providers, cloud and hosting providers, professional advisers (lawyers, auditors, accountants), and other consulting partners involved in the delivery of projects, always under appropriate contractual safeguards.
If personal data is transferred to recipients outside the European Economic Area, Forability ensures an adequate level of protection through EU adequacy decisions or by implementing appropriate safeguards, such as the European Commission's Standard Contractual Clauses, and will inform data subjects of the applicable mechanism.

Retention periods

Forability retains personal data only for as long as necessary for the purposes for which it was collected, taking into account statutory limitation periods and mandatory retention obligations under EU and Bulgarian law (for example, accounting and tax legislation). After the expiry of the relevant retention period, personal data is securely deleted, anonymised, or archived in a way that prevents further use for incompatible purposes.

Data subject rights

Under the GDPR and the Bulgarian Personal Data Protection Act, individuals have the right to request access to their personal data, rectification of inaccurate data, erasure ("right to be forgotten") in the cases provided by law, restriction of processing, data portability, and to object to processing based on legitimate interests or to direct marketing at any time.
Where processing is based on consent, individuals may withdraw their consent at any time without affecting the lawfulness of processing before withdrawal, and they may also request not to be subject to decisions based solely on automated processing, including profiling, where applicable.

Security measures

Forability implements appropriate technical and organisational measures to ensure a level of security of personal data appropriate to the risk, including measures relating to access control, secure configuration of IT infrastructure and SAP systems, encryption and backup where applicable, staff confidentiality obligations, and incident response procedures.
These measures are periodically reviewed and updated to reflect technological developments, business practices, and regulatory expectations in the EU and Bulgaria.

Cookies and online tracking

The Forability website may use cookies and similar technologies to enable core site functionality, to collect usage statistics, and, where applicable, to support marketing activities.
Where required by EU law, non-essential cookies are used only on the basis of prior consent, which users can manage via the cookie banner or browser settings, and additional information is provided in a separate Cookie Notice.

Compliance, supervision and complaints

Forability processes personal data in accordance with the GDPR and the Bulgarian Personal Data Protection Act, under the supervision of the Bulgarian Commission for Personal Data Protection, which is the competent supervisory authority in Bulgaria. Data subjects who believe that their rights have been infringed may contact Forability using the contact details above and also lodge a complaint with the Commission for Personal Data Protection or another competent EU supervisory authority of their habitual residence or place of work.

Changes to this statement

Forability may update this Privacy Statement from time to time, for example to reflect changes in applicable law, guidance from supervisory authorities, or changes in its services and processing activities, and will indicate the date of the latest update at the top of the statement.
Significant changes affecting how personal data is processed will be communicated by appropriate means, such as website notices or direct communication where feasible