

## INFORMATION ON DATA PRIVACY

Your data privacy is important to us. We have initiated the needed organizational and technical measures, in order to process your personal data in a lawful, appropriate and transparent manner, as well as guarantee your rights. The present information document on the processing of personal data aims to inform you what personal data of yours we are going to process, for what reasons and on what grounds, to what recipients we may provide those and over what periods we store such data.

We recommend that you should carefully read the present information, as well as acquaint yourself with the manner in which your personal data is being processed in your capacity as user of insurance services (Policyholder, Insuree, third party beneficiary, injured third party, other persons, with regard to whom rights have originated under an insurance contract, as well as a natural person, who has stated his/her interest in using insurance services), representative or proxy of a counterparty -legal entity or another interested person/party. This document also contains information about your rights and the ways you may exercise those.

Upon need DZI is going to update the present information on data privacy, as its most recent version you may find on our website, [www.dzi.bg](http://www.dzi.bg). More information in line with the application of the data privacy legislation is available on the website of the Commission for Personal Data Protection: [www.cpdp.bg](http://www.cpdp.bg).

### **1. Information about the DZI companies and their Data Protection Officer**

The company **DZI - Life Insurance JSC**, Company ID: 121518328, address: city of Sofia, 89B, Vitosha Blvd., has been registered as personal data controller as per Certificate № 0000425, issued by the Commission for Personal Data Protection on 05.05.2004.

The company **DZI - General Insurance JSC**, Company ID: 121718407, address: city of Sofia, 89B, Vitosha Blvd., has been registered as personal data controller as per Certificate № 0000426, issued by the Commission for Personal Data Protection on 05.05.2004.

The above companies, in their capacity as personal data controllers, perform their activity while strictly abiding by the requirements of the Personal Data Protection Act and Regulation (EU) 2016/679 of the European Parliament and of the Council on the protection of natural persons with regard to the processing of personal data and on the free movement of such data („The Regulation”) in view of ensuring privacy and lawful processing of your personal data in accordance with the principles, pertaining to the processing of personal data, stated in Art. 5 of Regulation (EU) 2016/679.

Both companies are part of KBC Group, a bank-assurance group of companies, which through cooperation create and distribute banking, investment and insurance products and offer financial services, related to those products. The following companies also belong to KBC Group in Bulgaria: UBB AD, KBC Asset Management – Bulgaria Branch, UBB Interlease AD, UBB – Insurance broker EAD, UBB Factoring EOOD and “Pension Insurance Company UBB. The main groups of clients, targeted by KBC Group, are individuals, small and medium-sized enterprises and corporate clients.

KBC Group operates on the territory of the following countries - Belgium, the Czech Republic, Slovakia, Hungary, Bulgaria and Ireland.

DZI -Life Insurance JSC and DZI – General Insurance JSC are joint personal data controllers, which jointly determine purposes and means for the processing of personal data, as well as their responsibilities for execution of the obligations, concerning the exercising of data subjects' rights and ensuring awareness and transparency. The above companies also define standalone purposes and means for the processing of personal data by preparing a common information document on data privacy, which encompasses their activities on the processing of personal data in their capacity as standalone and joint controllers. In their capacity as joint personal data controllers:

- The companies determine common purposes for the processing of personal data: testing of new and changes of existing software applications, demo platforms and internal portals of the above mentioned companies – in regards to their actualization, validation, incident resolution, data protection, employee trainings and others; research and development of products and services and analysis of market trends of with the purpose of offering better products to the clients of the above mentioned companies; client relationship management with the aim to offer appropriate common insurance products and services, by taking into account the individual wishes of every client; ensuring a better and quality oriented customer service, which includes sending messages via mobile phone, e-mail, SMS, letters and others, in regards to the products, used from the client, including conducted marketing researches; direct marketing of standard insurance products of DZI to existing clients; drafting an insurance contract and the fulfillment of the statutory obligations in regards to it's conclusion and execution; scoring of the insurance risk; drafting an individual proposal for concluding an insurance contract; handling insurance claims in regards to insurance events; client relationship management with the purpose of offering suitable insurance products and services or with the purpose of offering a better service in the different distribution channels of the company (direct sales, insurance agents, contact centres); analysis of common or identical products and the planned distribution strategy, including whenever client researches are conducted via some of our channels – DZI offices, contact center, e-mails, SMS, telephone, online channels, with the purpose of scoring, at least if the product is still suitable to the client's need of the selected targeted market and if the planned distribution strategy is still appropriate; internal accountability, management information and optimization of the processes in the organization, including data transfer of activities, outsourced by the company; creation of analytical business models with the purpose of developing new products and services for the clients and scoring of the offered products through the usage of pseudonymized data (data, that cannot lead to the identification of a data subject, without any other additional information);

physical security – processing of personal data with the purpose of video surveillance in the offices of the above mentioned entities; prevention and discovery of frauds; usage of products and services (applications, portals, participation in lucky draws, competitions, etc.), created with the purpose to ease up the access to them and enhancing the customer experience;

- The companies determine a common purpose for the processing of personal data with another KBC Group entity in Bulgaria - UBB AD. The purpose is to calculate and draft a report for the stable bank-assurance and pension-insurance clients of UBB AD, "Pension Insurance Company UBB" EAD, DZI Life Insurance JSC and DZI General Insurance JSC.
- The companies determine a common purpose for the processing of personal data with another KBC Group entities in Bulgaria – UBB AD, KBC Asset management – Bulgaria branch, UBB Interlease AD, UBB – Insurance broker EAD, UBB Factoring EOOD and "Pension Insurance Company UBB" EAD. The purpose is to offer personalized products and services to existing clients of the companies within KBC Group in Bulgaria by profiling and creating a personalized client profile. More information is provided in item 6 of the existing document;
- The companies employ common technical measures (IT solutions) for the processing of personal data for the above-stated purposes;
- During the fulfillment of their obligations to inform data subjects and ensure transparency the above companies prepare jointly the needed documents as per the Regulation, including the documents, in line with the practical exercising of the data subjects' rights. Data subjects may exercise their rights in the data privacy domain with regard to any and against any of the controllers. More information on the rights of data subjects is available in Item 3.

**As regards issues, linked to personal data processing, you may contact our Data Protection Officer at the companies' head office address or by emailing to: [dpo@dzi.bg](mailto:dpo@dzi.bg).**

## 2. Definitions

**"Personal data"** shall mean any information, relating to a natural person /data subject/, who has been identified or is identifiable, directly or indirectly, through an identifier, such as: name, personal identification number, location data, sex, address, telephone number, online identifier or through one or more features, specific to the physical, physiological, genetic, psychological, mental, economic, cultural or social identity of that natural person.

**„Processing of personal data “** shall mean any act or set of actions, performed with personal data through automated or other means, such as collection, recording, organizing, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making the data available, alignment or combination, blocking, erasure or destruction.

**„Data subject“** shall mean a natural person, who is identifiable either directly or indirectly, and in particular through an identifier, such as name, identification number, location-related data, online identifier or by one or more features, specific to the physical, physiological, genetic, psychological, mental, economic, cultural or social identity of that natural person.

## 3. Rights of Data Subjects:

Should you be a data subject, whose personal data is being processed by DZI as per the Regulation, you have the following rights:

- **Right of access** – based on your request DZI shall provide the following information: Confirmation as to whether your personal data is being processed, information about the purposes of processing, the personal data categories, recipients or recipient categories, to whom personal data is being disclosed, storage deadlines, the sources, from which the data has been obtained, other than the cases when such data has been directly provided by you.
- **Right to withdraw your consent** to the processing of your personal data at any time, when such processing is being made on the basis of your consent.
- **Right to rectification** – you may request rectification of your personal data, in case those are incorrect or incomplete.
- **Right of deletion (right to “be forgotten”)** – you may request your personal data to be deleted upon availability of the following grounds: the personal data is no longer needed for the purposes, which they have been collected /processed for; upon withdrawal of your consent, based on which the data is being processed and there are no other legal grounds for their processing, upon objection to the processing and upon lack of prevailing lawful grounds for the processing; when the personal data has been unlawfully processed, etc. There is no available obligation for erasure of data, in the cases when the processing is needed for the controller’s abiding by a statutory obligation, for ascertainment, exercising or protection of legal claims, etc.
- **Right to restrict the processing** - you are entitled to request restriction of the data processing within a certain period, when the accuracy of data is disputable or there is objection to their processing on grounds of the controller’s lawful interests.
- **Right of personal data portability** – in your capacity as data subject you have the right to receive the personal data, pertaining to you, in a structured, widely used and machinereadable format, as you are entitled to deliver/transfer those data to another personal data controller. You may exercise your right with regard to personal data, which is being processed in an automated way, only on grounds of provided consent or contractual obligation, upon availability of a technical possibility for data provision.
- **Right to object** - in your capacity as data subject you have the right to file an objection to the processing of your personal data when such processing is based on the controller's legitimate interest. DZI shall consider you objection and shall provide you with its opinion in writing within a 30-day period, unless extension of such period is needed, of which you shall be informed in due time. After considering the objection, DZI shall discontinue the processing of your personal data for the stated purpose, as well as shall inform all interested parties, to which the personal data has been delivered, of the received objection and of the measures, initiated to this end. In certain cases, however, DZI has legal grounds to continue processing your personal data even after receipt of an objection (for example, for ascertainment, exercising or protection of legal claims). In such cases you shall be informed of the reasons and grounds, due to which we shall continue processing your personal data. In case your objection concerns processing of personal data for direct marketing and customer relationship management purposes, DZI shall unconditionally discontinue their processing for such purposes.
- **Right to complain before the Commission for Personal Data Protection (CPDP) or to the court** – in your capacity as data subject you are entitled to file a complaint with the Commission for

Personal Data Protection (CPDP), or to judicial bodies in line with the processing of your personal data. Should you disagree with the opinion of DZI on a submitted inquiry or should you wish to obtain more information, you may visit the website of the Commission for Personal Data Protection: [www.cpdp.bg](http://www.cpdp.bg), where you could file a complaint and obtain detailed information about your rights.

### **Exercising of your rights**

In the cases when, as data subject you are exercising your rights, you need to fill out an application for exercising the respective right according to a sample format, which application you should file on paper at an office of ours. The application template forms are available at any office of ours and will be provided to you by our employees upon request. Requests for exercising of your rights shall be submitted personally or by a person, explicitly authorized by you. Upon exercising of your rights DZI shall be obliged to identify you, as well as verify your identity in your capacity as data subject. For the purpose DZI may demand from you a valid identification document upon acceptance of an application for exercising of a certain right and upon provision of the information, requested by you. In accordance with the requirements of the Regulation, DZI shall not reply to an application by a data subject, in case DZI is not in a capacity to identify the person and verify his/her identity.

You may exercise at any time the right to withdraw your consent to the processing of your personal data for the purposes, which require consent-based processing, as follows:

- You may withdraw your consent for direct marketing purposes with offering of personalized products and services and creating a client profile through filing a Consent Withdrawal Statement on paper, available at the offices of any of the personal data controllers - DZI and/or UBB.
- You may withdraw your consent to receiving the e-newsletter ads of DZI at any time, by sending an email to the following address: [unsubscribe@dzi.bg](mailto:unsubscribe@dzi.bg).

Applications for exercising of rights by data subjects can be filed on paper at any office of DZI, or at its Head Office. More information about DZI service locations is available on our website in *Contacts* section.

DZI provides information about the actions, initiated in line with the submitted application for exercising of rights, within a period of one month of the application's receipt. Upon need this period may be extended with another two months, while taking into account the applications' complexity and number. DZI shall inform you of each extension of the period within one month of the application's receipt.

You may ask in writing your questions about the processing of personal data, both at your servicing office, as well as electronically, by emailing to: [dpo@dzi.bg](mailto:dpo@dzi.bg).

The exercising of your rights shall not be binding upon the obligation of DZI to provide your personal data to the competent authorities for the purpose of prevention, investigation and disclosing of crimes, frauds and other unlawful acts.

## **4. Processing of personal data by DZI – General Insurance JSC**

#### **4.1. Categories of personal data**

DZI processes various categories of personal data, pertaining to your physical, social, economic and other identity, including health-related data. Data can be received from you in your capacity as data subject or from third parties by virtue of concluded contracts with the personal data controller (insurance intermediaries, healthcare establishments etc.), including such from publicly accessible sources (Commercial Register and others), in view of the determined purposes for the data processing. The various personal data categories are being processed depending on the determined purposes of data processing, for example:

- Basic data, which includes: full name, telephone number – mobile/fixed/home/business number, e-mail address, current and permanent residence (street, number, post code, city, state), information for the used products and services, offered by DZI. Most of all, we are using this data to offer you standart products and services, similar or connected to the ones, used from you. Additionally we are using the data to conduct client researches and to make our products, services and client experience better.
- Extended data, which includes: with the purpose of identification (identification data): full name, date of birth, citizenship, current and permanent residence, data from Personal ID and/or another identification document (passport, driving licence, residence permit,), Unique identification number (UIN)/other identification number, according to the applicable legislation, IP address of the device with access to internet, from which there is an access to services, supplied from the entity; place of work; risk profile, source of income (when it's applicable), family status; contact data: telephone number – mobile/fixed; e-mail address, current and permanent address, data of the contact person, connected to the client; with the purpose of scoring the insurance risk: data, connected to the client needs; age,; health status; insured property and others; with the purpose of providing consultation, products & services: identifiable data, contact details; health-related data; data for your needs, qualification, knowledge, professional experience, used products and services, property status, ability to undertake risks (when it's applicable), feedback, comments, suggestion, previous complaints; with the purpose of fulfilling contractual obligations for insurance contracts and handling insurance claims: data, received from third parties (insurance intermediaries, employer, doctors, health clinics, public institutions, clients, partners, counterparty and others), including and information from public registers, location and others; with the purpose of participating in competitions, lucky draws and others: identification data, contact data, data for received products/services (depending of the specific competition), photos – with the explicit consent (if it's needed for the competition); with the purpose of ensuring the security of process, client relationship management, product analysis and distribution strategy, client experience and satisfaction – telephone calls in connection to the main activity of the company, for proof of provided client instructions, complaints, training of personel and improving quality products. With the purpose for physical security – video images from cameras for security; data, collected through the corporate website of the company, received from the digital portals/feedback forms, signals and questions, calculators with the purpose of of providing products and services, improving the processes, analysis of products and their distribution strategy, client relationship management, improving the client satisfaction and experience: identification data, contact data, information for the used products/services, information for

a client/person, who is not client of the company, additional information, based on the judgement of the data subject (the responsibility for the information, including whenever it's send to third party recipients, lies with the data subject, who provided this information); social media and third party websites (whenever you are accessing the official company page in social medias such as Facebook, Instagram, LinkedIn, information in regards to the person, who accessed the respective social network; data, connected to the usage of mobile applications of the company with the purpose of providing products and services, improving the process, client relationship management, improving the client experience and satisfaction: identification data, contact data, Push notifications (messages from the application, which pops up in the mobile device of the user, incl., whenever he is not logged in the application, with the purpose of reminding to finalize the product/service request, for information and others) and others notifications from the applications, for whom the client gave his consent (this consent can be withdrawn by deactivating the services); additional collection of information, for which the client is responsible; data, collected through the usage of "cookies", such as behavioral information, searches, stay and others (the volume of the information depends from the cookie preferences, set up from the client. The data is processed for the respective purposes, shown in the respective channel).

- Processing of special category of data (health-related data)

The processing of health-related data of the users of insurance services is required for the conclusion and execution of insurance contracts (under the applicable legislation of the Bulgarian Insurance Code). Before the conclusion of an insurance contract and during the duration of the contract, the insurer has the right to receive detailed and correct information about the health condition of the person, whose life, health and bodily integrity are subject to the insurance. Whenever an insurance event has occurred, the insurer has the right to access the whole medical documentation in regards to the health condition of the person, whose life, health and bodily integrity is insured. This information can be required from anyone (doctors, health clinics and institutions), who is keeping records for such information, including according to the Medical-Treatment Facilities Act, the Health Insurance Act, the Health Act and others. DZI process health-related personal data as an data controller on the grounds of and for the purposes of a contract performance and legal obligation

## ***4.2. Purposes of personal data processing***

### ***4.2.1 The main purposes of personal data processing, based on the Controller's statutory obligations, involve:***

- Enhanced customer due diligence (identification, verification and acceptance) of users of insurance services;
- Preparation of reports to regulatory authorities;
- Exerting of control and prevention of insurance frauds and conflicts of interest;
- Data privacy and information systems' protection;
- Provision of personal data to government and controlling authorities, upon exercising of their statutory powers.

- Analysis of the client needs with the purpose of adhering to the statutory obligations of the Bulgarian Insurance Code to provide a suitable product.
- Analysis of the products and the planned distribution strategy, including to conduct client researches through some of the channels, incl. DZI offices, contact center, e-mail, SMS, telephone, online channels, with the purpose of scoring at least if the product is still suitable to the client needs of the respective target market and if the planned distribution strategy is still appropriate.

With regard to the stated purposes the processing of personal data is being based on statutory obligations as per the following legislative acts - the Insurance Code, the Measures Against Financing of Terrorism Act, the Obligations and Contracts Act, the Accountancy Act, the Natural Persons Income Tax Act and others.

#### ***4.2.2 The main purposes of personal data processing, based on contractual grounds, involve:***

- Insurance risk assessment and calculation of the insurance premium;
- Preparation of an individual insurance proposal;
- Preparation of an insurance contract and fulfillment of the statutory obligations, in line with its conclusion;
- Analysis of the needs of the users of insurance services;
- Processing of insurance claims in line with occurred insured events;
- Use of DZI products and services – (applications, portals, participation in lucky draws, competitions and others), created with the purpose to make the access to the offered products and services easier and to enhance the client experience.

With regard to the stated purposes the processing of personal data is being based on the concluded insurance contract, while observing the provisions of the Insurance Code.

#### ***4.2.3 The main purposes of personal data processing, based on the Controller's lawful interests, involve:***

- Testing of new and of changes in the company's existing software applications, demo platforms and internal portals of the entity with the purpose in view of their updating, creation of new and testing of changes in existing functionalities, testing software application in protected environment with validation purpose (in this case it is possible that the testing can be outsourced to external supplier, with whom the company has contract. The rights and obligations of the parties are stipulated in such contracts, including the necessary technical and organizational security measures and the protection of personal data, processed for a specific purpose), resolving of incidents, protection of data, training of employees, etc.;
- Research and development of products/services and analysis of market trends with the aim to provide better products to our clients;
- Direct marketing of standard insurance products of DZI, which involves offering of products and services to existing clients of the company in view of ensuring better and higher quality services to clients, while catering for their needs. For this purpose the company uses only the Basic data of clients, as defined in item 4.1. of this document;



- Customer relationship management with the aim to offer appropriate insurance products and services, while taking into account the individual preferences of every single user, ensuring better and higher quality services to clients, which involves sending of messages over the phone, email, SMS, via letters etc., with regard to the products, used by the particular user, including through carrying out marketing surveys;
- Calculating and drafting report for stable bank-assurance and pension-insurance clients of UBB AD, “Pension Insurance Company UBB” EAD, DZI Life Insurance JSC and DZI General Insurance JSC – as part of a group strategy for providing an unique client experience. The companies, acting in their capacity of joint data controllers, are working together in order to analyse what part of their joint clients are preferring to use their bank and insurance products together. The purpose of this information is to direct efforts to the offering of complex services and some products to cover different client needs. In order to realise this purpose a minimum amount of data for used products is processed and the final result of the analysis does not suggest sending marketing messages and does not influence the client relationships. The company ensures and guarantees to the data subjects, whose information falls under the scope of the data processing with this purpose, the possibility to exercise their rights without any problems.
- Internal reporting, management information and streamlining of the organization’s processes, including transfer of data in regards to outsourced activities;
- Legal disputes - ascertainment, exercising and protection of the company’s rights during legal proceedings and resolving of legal disputes;
- Creation of analytic business models, aimed at development of new products and services for clients and assessment of the offered products through using pseudonymized data, i.e. data, which cannot entail identification of a data subject without availability of additional information. The collected data of everyone or of big group of clients is grouped in a specific way, with the aim to develop models/define connections/algorithms/reasons, without interfering with the client interests
- Physical security – processing of personal data for video surveillance purposes at the company’s offices.
- Fraud prevention and fraud detection – the company processes personal data of clients with the purpose of fraud protection and criminal activities. The measures to prevent and detect frauds are handled in light of the internal security measures, implementation of control, providing a reliable information security, kept in physical and electronic means, as well in online portals;
- Client relationship management – personal data of clients, stored in different data bases, could be grouped in a certain way and be processed through the different distribution channels of the company (direct sales, insurance agents, contact centres). The purpose of the grouping is to facilitate and develop these channels for information access and client service.

Each data subject has the right to object to the processing of his/her personal data for purposes, based on the controller’s legitimate interests. During the processing of personal data for direct marketing and customer relationship management purposes, in your capacity as data subject you shall be entitled to object at any time to the processing of your personal data, as DZI shall

discontinue the use of your data for those purposes. More information is available in Item 3 of the present document.

#### **4.3. Personal data recipients**

The recipient categories outside the company, to which personal data is being disclosed, involve:

**4.3.1.** Personal data controllers, which are obliged to provide personal data by virtue of the Republic of Bulgaria's applicable legislation, are the following government authorities, institutions and organizations: Financial Supervision Commission, Commission for Personal Data Protection, Financial Intelligence Directorate with the State Agency for National Security, National Revenue Agency, National Social Security Institute, Consumer Protection Commission, bodies of the judiciary, Prosecutor's Office, Ministry of Interior, external auditors and others.

**4.3.2.** Personal data controllers and processors, which process personal data by virtue of a concluded contract with DZI, while applying appropriate technical and organizational measures, as per the requirements of the Regulation:

- Suppliers of products and services to the company, including suppliers of information and communication solutions, trusted service centres, assisting companies, external attorneys-at-law and law offices, consultants, appraisers, marketing and market survey agencies, etc.;
- Insurance agents by virtue of a concluded contract for insurance intermediation as per the requirements of the Insurance Code;
- Insurance brokers in accordance with the requirements of the Insurance Code
- Re-insurers and co-insurers;
- Healthcare establishments;
- Other KBC Group entities

**4.3.3** Suppliers outside the European economic area (EEA) - it is possible that some of the above mentioned recipients are situated outside the European economic area (third countries), under the condition, that an adequate level of protection of personal data is ensured, as regulated in the local and European legislature and the provided personal data is protected enough in the respective third country. If necessary an approval from the Commission for Personal Data Protection is needed. Personal data can be transferred to recipients in countries outside EEA, which are not threatened as countries, with an adequate level of personal data protection, under the condition, that an agreement for personal data processing is concluded and standard contractual clauses are envisioned (as approved from the European Commission). Additionally a detailed Impact Assessment of the transfer on the data subjects, shall be conducted. The entity will undertake all the necessary data protection measures, if the processing requires the transfer of data in and outside the European economic area.

#### **4.4. Personal data storage period**

The personal data is being stored in accordance with the determined statutory periods, envisaged in legislative acts – the Insurance Code, the Accountancy Act, the Measures Against Money Laundering Act and others. The storage periods for all documents are listed in the Policy on Organizing the Company’s Archiving Activity, based on the statutory obligations for archiving.

The basic storage periods are the following:

- Insurance contracts and documents, pertaining to their conclusion – maximum storage period of 12 years after the contract’s termination.
- Insurance claims and documents, pertaining to their processing – maximum storage period of 12 years after settlement of the insurance claim.
- Proposals for conclusion of insurance contracts with insurance applicants – maximum period of 1 year, following the offer preparation.

### **5. Processing of personal data by DZI – Life Insurance JSC**

#### **5.1. Categories of personal data**

DZI processes various categories of personal data, pertaining to your physical, social, economic and other identity, including health-related data, for example: Data can be received from you in your capacity as data subject or from third parties by virtue of concluded contracts with the personal data controller (insurance intermediaries, healthcare establishments etc.), including such from publicly accessible sources (Commercial Register and others), in view of the determined purposes for the data processing. The various personal data categories are being processed depending on the determined purposes of data processing, for example:

- Basic data, which includes: full name, telephone number – mobile/fixed/home/business number, e-mail address, current and permanent residence (street, number, post code, city, state), information for the used products and services, offered by DZI. Most of all, we are using this data to offer you standart products and services, similar or connected to the ones, used from you. Additionally we are using the data to conduct client researches and to make our products, services and client experience better.
- Extended data, which includes: with the purpose of identification (identification data): full name, date of birth, citizenship, current and permanent residence, data from Personal ID and/or another identification document (passport, driving licence, residence permit, Unique identification number (UIN)/other identification number, according to the applicable legislation, IP address of the device with access to internet, from which there is an access to services, supplied from the entity; place of work; risk profile, source of income (when it’s applicable), family status; contact data: telephone number – mobile/fixed; e-mail address, current and permanent address, data of the contact person, connected to the client; with the purpose of scoring the insurance risk: data, connected to the client needs; age,; health status; insured property and others; with the purpose of providing consultation, products & services: identifiable data, contact details; health-related data; data for your needs, qualification, knowledge, professional experience, used products and services, property status, ability to

undertake risks (when it's applicable), feedback, comments, suggestion, previous complaints; with the purpose of fulfilling contractual obligations for insurance contracts and handling insurance claims: data, received from third parties (insurance intermediaries, employer, doctors, health clinics, public institutions, clients, partners, counterparty and others), including and information from public registers, location and others; with the purpose of participating in competitions, lucky draws and others: identification data, contact data, data for received products/services (depending of the specific competition), photos – with the explicit consent (if it's needed for the competition); with the purpose of ensuring the security of process, client relationship management, product analysis and distribution strategy, client experience and satisfaction – telephone calls in connection to the main activity of the company, for proof of provided client instructions, complaints, training of personnel and improving quality products. With the purpose for physical security – video images from cameras for security; data, collected through the corporate website of the company, received from the digital portals/feedback forms, signals and questions, calculators with the purpose of providing products and services, improving the processes, analysis of products and their distribution strategy, client relationship management, improving the client satisfaction and experience: identification data, contact data, information for the used products/services, information for a client/person, who is not client of the company, additional information, based on the judgement of the data subject (the responsibility for the information, including whenever it's send to third party recipients, lies with the data subject, who provided this information); social media and third party websites (whenever you are accessing the official company page in social medias such as Facebook, Instagram, LinkedIn, information in regards to the person, who accessed the respective social network; data, connected to the usage of mobile applications of the company with the purpose of providing products and services, improving the process, client relationship management, improving the client experience and satisfaction: identification data, contact data, Push notifications (messages from the application, which pops up in the mobile device of the user, incl., whenever he is not logged in the application, with the purpose of reminding to finalize the product/service request, for information and others) and others notifications from the applications, for whom the client gave his consent (this consent can be withdrawn by deactivating the services); additional collection of information, for which the client is responsible; data, collected through the usage of "cookies", such as behavioral information, searches, stay and others (the volume of the information depends from the cookie preferences, set up from the client. The data is processed for the respective purposes, shown in the respective channel).

- Processing of special category of data (health-related data)

The processing of health-related data of the insurance customers is required for the conclusion and execution of insurance contracts (under the applicable legislation of the Bulgarian Insurance Code). Before the conclusion of an insurance contract and during the duration of the contract, the insurer has the right to receive detailed and correct information about the health condition of the person, whose life, health and bodily integrity are subject to the insurance. Whenever an insurance event has occurred, the insurer has the right to access the whole medical documentation in regards to the health condition of the person, whose life,

health and bodily integrity is insured. This information can be required from anyone (doctors, health clinics and institutions), who is keeping records for such information, including according to the Medical-Treatment Facilities Act, the Health Insurance Act, the Health Act and others. DZI process health-related personal data as a data controller on the grounds of and for the purposes of a contract performance and legal obligation

## **5.2. Purposes of personal data processing**

### ***5.2.1. The main purposes of personal data processing, based on the Controller's statutory obligations, involve:***

- Enhanced customer due diligence (identification, verification and acceptance) of users of insurance services, monitoring and control with the purpose of money laundering prevention (whenever it is applicable), embargo and anti-terroristic activities
- Preparation of reports to regulatory authorities;
- Exerting of control and prevention of insurance frauds and conflicts of interest;
- Data privacy and information systems' protection;
- Provision of personal data to government and controlling authorities, upon exercising of their statutory powers.
- Analysis of client needs and categorization of them with the purpose of adhering to the requirements of the Bulgarian Insurance Code to provide a suitable product, and to some type of products (for example the unit linked products) and information about professional knowledge and skills of the client in the field of investment;
- Analysis of the product and the planned distribution strategy, including – to conduct client researches through some of the channels, incl. DZI offices, contact center, e-mail, SMS, telephone, online channels, with the purpose of identifying if the product is still suitable to the needs of the client in the selected targeted market and if the planned distribution strategy is still suitable.

With regard to the stated purposes the processing of personal data is being based on statutory obligations as per the following legislative acts - the Insurance Code, the Measures Against Money Laundering Act, the Measures Against Financing of Terrorism Act, the Tax Insurance Procedure Code, the Obligations and Contracts Act, the Accountancy Act, the Natural Persons Income Tax Act, etc.

### ***5.2.2. The main purposes of personal data processing, based on contractual grounds, involve:***

- Assessment of insurance-related risk;
- Preparation of an individual insurance proposal;
- Preparation of an insurance contract and fulfillment of the statutory obligations, in line with its conclusion;
- Processing of insurance claims in line with occurred insured events;

- Use of DZI products and services (applications, portals, lucky draws, competition and others) ., created with the purpose to ease up the access to the offered products and services and enhancing the client experience.  
With regard to the stated purposes the processing of personal data is being based on the concluded insurance contract, while observing the provisions of the Insurance Code and the other applicable legislature.

***5.2.3. The main purposes of personal data processing, based on the Controller's lawful interests, involve:***

- Testing of new and of changes in the company's existing software applications, demo platforms and internal portals of the entity with the purpose of:
  - Their atualization, creation of new and testing of changes in existing functionalities;
  - Testing of software applications in protected environment for validation purposes. In this case it is possible for the testing to be given to external vendor, with whom the company has a contract. In the contract the rights and obligations of the parties are explicitly stated, including the respective technical and organizational measures for data protection are planned, which are processed for the selected purpose;
  - Incident resolution;
  - Ensuring data protection;
  - Training of employees and others;
- Research and development of products/services and analysis of market trends with the aim to provide better products to our clients;
- Direct marketing of standard insurance products of DZI, which involves offering of products and services to existing clients of the company in view of ensuring better and of higher quality services to clients, similar or connected to the used from them products and services. For this purpose the company uses the basic data, as defined in item 5.1. of this document.
- Customer relationship management with the aim to offer suitable insurance products and services, while taking into account the individual preferences of every user, ensuring better and higher quality services to clients, which involves sending of messages over the phone, email, SMS, via letters etc., with regard to the products, used by the particular user, including through carrying out marketing surveys;
- Calculating and drafting report for stable bank-assurance and pension-insurance clients of UBB AD, "Pension Insurance Company UBB" EAD, DZI Life Insurance JSC and DZI General Insurance JSC – as part of a group strategy for providing an unique client experience. The companies, acting in their capacity of joint data controllers, are working together in order to analyse what part of their joint clients are preferring to use their bank and insurance products together. The purpose of this information is to direct efforts to the offering of complex services and some products to cover different client needs. In order to realise this purpose a minimum amount of data for used products is processed and the final result of the analysis does not suggest sending marketing messages and does not influence the client relationships. The company ensures and guarantees to the data subjects, whose information falls under the scope of the data processing with this purpose, the possibility to exercise their rights without any problems

- Internal reporting, management information and streamlining of the organization's processes, including data transfer in connection to activities, outsourced from the company;
- Legal disputes - ascertainment, exercising and protection of the company's rights in court during the resolving of legal disputes, pleas, or rulings;
- Creation of analytic business models, aimed at development of new products and services for clients and assessment of the offered products through using pseudonymized data, i.e. data, which cannot entail identification of a data subject without availability of additional information. The collected data of all of a big group of clients is grouped in a certain way with the purpose of building models/defining trends/algorithms/connections, without interfering with the interests of the individual client and without undertaking actions to it. For the creation of such models the company uses pseudonymized data i.e. data which cannot entail identification of a data subject without availability of additional information..
- Physical security – processing of personal data for video surveillance purpose at the company's offices.;
- Prevention and discovery of frauds – the company processes personal data of clients with the purpose of fraud prevention and against criminal activities. The measures for prevention and discovery of frauds are available in the context of our internal security rule, conducting control, ensuring reliable protection of information, kept on physical and electronic means, and in portals. Client management services – personal data of clients, kept in different data bases, could be possibly grouped in a certain way and be processed through different distribution channels of the company (direct sales, insurance agents, contact centers). The purpose of the grouping is to facilitate and make better the channels for accessing information and client servicing.

The processing of personal data for the stated purposes is needed for the protection of DZI's lawful interests in its capacity as personal data controller, which interests are linked to its activity as an insurance company, offering the best products and services to its clients in accordance with their needs. Each data subject has the right to object to the processing of his/her personal data for purposes, based on the controller's legitimate interests. During the processing of personal data for direct marketing and customer relationship management purposes, in your capacity as data subject you shall be entitled to object at any time to the processing of your personal data, as DZI shall discontinue the use of your data for those purposes. More information is available in Item 3 of the present document.

### **5.3. Personal data recipients**

The recipient categories outside the company, to which personal data is being disclosed, involve:

**5.3.1.** Personal data controllers, which are obliged to provide personal data by virtue of the Republic of Bulgaria's applicable legislation, are the following government authorities, institutions and organizations: Financial Supervision Commission, , Commission for Personal Data Protection, Financial Intelligence Directorate with the State Agency for National Security, National Revenue Agency, National Social Security Institute, Consumer Protection

Commission, bodies of the judiciary, Prosecutor's Office, Ministry of Interior, external auditors and others.

**5.3.2.** Personal data controllers and processors, which process personal data by virtue of a concluded contract with DZI, while applying appropriate technical and organizational measures, as per the requirements of the Regulation:

- Suppliers of products and services to the company, including suppliers of information and communication solutions, external attorneys-at-law and law offices, providers of consultancy services, marketing and market research agencies, etc.;
- Insurance agents by virtue of a concluded contract for insurance intermediation as per the requirements of the Insurance Code;
- Insurance brokers in accordance with the requirements of the Insurance Code
- Re-insurers and co-insurers;
- Healthcare establishments;
- Other KBC Group entities
- Suppliers outside the European economic area (EEA) - it is possible that some of the above mentioned recipients are situated outside the European economic area (third countries), under the condition, that an adequate level of protection of personal data is ensured, as regulated in the local and European legislature and the provided personal data is protected enough in the respective third country. If necessary an approval from the Commission for Personal Data Protection is needed. Personal data can be transferred to recipients in countries outside EEA, which are not threatened as countries, with an adequate level of personal data protection, under the condition, that an agreement for personal data processing is concluded and standard contractual clauses are envisioned (as approved from the European Commission). Additionally a detailed Impact Assessment of the transfer on the data subjects shall be conducted. The entity will undertake all the necessary data protection measures, if the processing requires the transfer of data in and outside the European economic area.

#### **5.4. Personal data storage period**

Personal data is being stored within the statutory periods, envisaged in legislative acts – the Insurance Code, the Accountancy Act, the Measures Against Money Laundering Act, the Obligations and Contracts Act and others. The storage periods for all documents are listed in the Policy on Organizing the Company's Archiving Activity, based on the statutory obligations for archiving. The basic storage periods are the following:

- Insurance contracts and documents, pertaining to their conclusion – maximum storage period of 12 years after the contract's termination.
- Insurance claims and documents, pertaining to their processing – maximum storage period of 12 years after settlement of the insurance claim.
- Proposals for conclusion of insurance contracts with insurance applicants – maximum period of 1 year, following the offer preparation.



## 6. Common purposes of personal data processing, based on given consent

DZI -Life Insurance JSC and DZI – General Insurance JSC (DZI) are joint personal data controllers, which determine common purposes and means for the processing of personal data, as well as their responsibilities for execution of the obligations, concerning the exercising of data subjects' rights. The common purposes for consent-based personal data processing involve:

### 6.1. Offering of personalized products and services to existing clients

Mandatory prior consent shall be required in the cases when the direct marketing involves profiling for the purpose of creating a client profile and sending of personalized offers. In those cases all natural persons shall be entitled to withdraw their consent at any time, easily and with no adverse consequences for them.

DZI shall obtain consent and ensure the right of its withdrawal through a sample form of a Statement of Consent/ Dissent, which includes the following purposes:

- **offering of personalized products and services to existing clients of DZI** by the companies DZI - Life Insurance JSC, DZI – General Insurance JSC, UBB AD, KBC Asset Management – Bulgaria branch, UBB Interlease AD, UBB – Insurance Broker EAD, UBB Factoring EOOD and “Pension Insurance Company UBB” EAD through *profiling*<sup>1</sup> and creating a personal client profile. In the particular case the companies shall determine a common purpose for the processing of personal data with another KBC Group entity in Bulgaria - UBB AD, KBC Asset Management – Bulgaria Branch, UBB Interlease AD, UBB – Insurance Broker, UBB Factoring EOOD and “Pension Insurance Company UBB” EAD- and shall process personal data of their existing clients for the stated purpose in their capacity as joint personal data controllers.
- **Direct marketing of DZI insurance products for potential clients of DZI** -Life Insurance JSC, DZI – General Insurance JSC

The above Statement comprises two parts – a part for granting of consent and a part for refusal to provide consent (dissent), which shall be provided to you simultaneously for fill-out by the staff at our offices. Should you wish to obtain additional information about the filling out of the Statement, your servicing official shall refer you to the *Information on the Protection of Personal Data* document („Information“) on DZI’s website – [www.dzi.bg](http://www.dzi.bg) and/or shall provide you with it on site at the office. If you wish to provide your consent, you should fill out your data in that part of the document, concerning the provision of consent. If you do not wish to provide your consent, then you should fill out the part for dissent. In all cases the official shall print out and provide you with both parts of the Statement. Every client shall have to personally fill out and sign the Statement of Consent /Dissent, as the official shall not be entitled to fill out the Statement on your behalf.

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<sup>1</sup> As per Art. 4, Item 4 (Definitions) of the Regulation, „PROFILING“ shall mean automated processing of personal data, which is expressed in the use of personal data for making an assessment and/or analysis of aspects, pertaining to the health, personal preferences, reliability, behaviour, location, professional obligations, economic status of the natural person, who is personal data subject. The profiling and processing of personal data for this purpose provides information about the needs and capacities of the particular client. It may have as a result your inclusion in the sale campaign list for a particular product. In order to have that specific analytic approach applied, we need your consent

For the purposes of offering personalized products and services for existing clients DZI shall process personal data of its clients jointly with UBB AD, KBC Asset Management – Bulgaria branch, UBB Interlease AD, UBB – Insurance broker EAD, UBB Factoring EOOD and “Pension Insurance Company UBB” EAD in their capacity as joint personal data controllers, based on a concluded agreement, pursuant to the Regulation. The companies shall use analytic models with the aim to create a client profile of yours, based on which to prepare and offer personalized insurance and banking products and services, tailored to your needs. The categories of personal data, which is being processed, are those stated in Item 4.1 and Item 5.1 hereof, which are being processed for direct marketing and customer relationship management purposes, as well as for conclusion of insurance contracts and settlement of insurance claims. The processing of personal data for the above purpose does not include special categories of data (data about the health status).

When profiling is being made for direct marketing purposes, DZI shall require in advance your prior explicit consent and shall not effect such processing in case your explicit consent has not been provided.

Not a single project, activity or process, relating to the activity of DZI, shall contain individual solutions, based solely on automated processing of personal data, including profiling. DZI guarantees that human intervention shall be available at any time in implementation of the processing activities and that it shall take into account the opinion of the data subject, while ensuring effective opportunity for exercising of his/her rights, including the right of refusal and the right to withdraw his/her consent at any time. Should you withdraw your consent to the above stated purposes, your data shall be obliterated within one business day after presenting your Consent Withdrawal Statement.

## **6.2. Receiving the e-newsletter ads of DZI**

You have the opportunity to register for receiving the e-newsletter ads of DZI through our website, webpages of prize games, special offers and promotional initiatives, realized on the Internet. Your consent poses legal grounds for the processing of personal data for the e-newsletter sending purposes.

The purpose of processing your data is the registration and receipt of an e-newsletter with information about prize games, special offers, promotional initiatives, discounts, prize raffles, new services, loyalty programmes. By marking the consent fields and submitting your request for registration you confirm your consent to the processing of your personal data for the stated purpose. After the registration you will receive a confirmation email from us. Upon lack of consent you will receive information about unsuccessful registration, as in this case we shall not be able to send you e-newsletters.

Upon a successful registration for the e-newsletter, you consent to DZI’s processing of your email address as mandatory information, to enable our sending you the newsletter ads by email. If upon the registration you also provide voluntarily information about given name, last name, location (town/village) and a telephone number, you consent to our using those data for inclusion of a personal address in your newsletter. With certain games and promotional initiatives, upon which it has been explicitly stated in their General Terms and upon availability of consent on your part, you may receive messages to the stated telephone number during your participation in the stated initiatives.

You may withdraw your consent to receiving the e-newsletter ads of DZI at any time with future effect, by sending an email to the following address:

[unsubscribe@dzi.bg](mailto:unsubscribe@dzi.bg).

Information about the opportunity to unsubscribe is contained in every sent newsletter. After you have unsubscribed, receipt of the e-newsletter shall be discontinued, as you may at any time re-register through the registration form on DZI's website - [www.dzi.bg](http://www.dzi.bg). Should you wish to request deletion of the provided by you optional personal data, you may exercise your right by sending an email to our Data Protection Officer at the following address: [dpo@dzi.bg](mailto:dpo@dzi.bg). Consequently, the provided by you optional data shall be deleted.

DZI processes the following categories of users' personal data for the stated purpose: Given name and last name, telephone number, email, town/village.

Access to the personal data of the e-newsletter users shall be granted only and solely to DZI employees from the business units, directly responsible for the administration of the activities for developing and servicing the e-newsletter.

Should you withdraw your consent to receiving the e-newsletter, your data shall be obliterated within one business day. Consequently, you shall no longer receive e-newsletter ads.

In view of abiding by the GDPR requirements, DZI may send you within reasonable deadline request to confirm the consent, granted by you.

