

BRIEF INFORMATION ON DATA PRIVACY

This information has been prepared in line with the entry into force of 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 dated 25.05.2018. This Regulation is applicable upon the processing of personal data of natural persons.

DZI - Life Insurance JSC with Company ID: 121518328 and DZI - General Insurance JSC with Company ID: 121718407 („DZI“) are registered as personal data controllers, which process your personal data in your capacity as user of insurance services, including if you are a person under 18-years old (Policyholder, Insuree, third party beneficiary, injured third party, etc.), representative/proxy of a counterparty-legal entity or another person.

The above-mentioned companies are joint personal data controllers, which determine common purposes and means for the processing of personal data, as they jointly fulfil their obligations to inform natural persons of the processing of data through a common *Information on the Protection of Personal Data* document, as well as ensure the exercising of their rights.

The joint objectives involve:

- testing of new and changes of existing software applications, demo platforms and internal portals of the above-mentioned companies – in light of their actualization, validation, incident resolution, data protection, employee trainings, etc.;
- research and development of products and services and analysis of market trends with the purpose of offering better products to the clients of the above mentioned companies;
- client relationship management with the aim to offer appropriate joint 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;
- physical security – processing of personal data for the purpose of video surveillance in the offices of the above mentioned companies; prevention and discovery of frauds; analysis of joint and similar products and planned distribution strategy, including conducting client researches via some of our channels (DZI offices, contact center, e-mail, SMS, phone, online channels, with the purpose of scoring at least if the products are suitable to the client's needs of the respective target market and if the planned distribution strategy is still appropriate);
- usage of products and services (applications, portals, participation in lucky draws, competitions, etc.), created with the purpose to ease up the access to the offered products and services and enhancing the customer experience;
- direct marketing of standard insurance products to present and potential clients, customer relationship management and others.

More information is available in Item 1 of the *Information on the Protection of Personal Data* document, available on www.dzi.bg.

Both entities define common purpose of processing personal data with UBB AD and “Pension Insurance Company UBB” EAD – calculating and drafting a report on the stable bank-insurance and pension insurance clients. The entities define joint purpose of processing of personal data with the entities within KBC Group in Bulgaria (UBB AD, KBC Asset management – Bulgaria Branch, UBB Interlease AD, UBB – Insurance broker EAD, KBC Leasing Bulgaria EOOD and “Pension Insurance Company UBB” EAD – offering personalized products and services by creating a client profile. More information is available in item 6 of the *Information on the Protection of Personal Data* document, available on www.dzi.bg.

1. Your rights

In your capacity as data subject, you have the following rights with regard to the processing of your personal data:

- **Right of access** to your personal data and provision of information about the purposes of processing, the personal data categories, recipients, to whom personal data is being disclosed, storage deadlines etc.
- **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 the following grounds: the personal data is no longer needed for the purposes, for which they have been collected /processed; upon withdrawal of your consent, in the cases when the data processing is based on such consent; when there are no other legal grounds for the processing; when the data has been unlawfully processed, etc.
- **Right to restrict the 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** – right to receive your personal data in a structured, widely used and machine-readable format, in the cases when these are being processed in an automated way on grounds of consent or contractual obligation, upon availability of technical capacity for their provisioning.
- **Right to object** to the processing of your personal data, in the cases when their processing is being made on grounds of the controller’s lawful interest. In case your objection concerns processing of personal data for direct marketing and customer relationship management purposes, we shall unconditionally discontinue their processing for such purposes.
- **Right not to be subject to a fully automated decision involving profiling** - as a data subject, you have the right not to be subject to a decision that is based solely on automated means, unless you have provided your explicit consent to do so or where the automated processing is necessary for entering into and performance of a contract to which you would be a party.

- **Right to complain before the Commission for Personal Data Protection (CPDP) or to the court** in line with the processing of your personal data. More information is available on the webpage of the Commission for Personal Data Protection: www.cpdp.bg where you could file a complaint.

Every natural person may exercise his/her rights through filing an application according to a sample format at any office of DZI or alternatively via e-mail to dpo@dzi.bg by using a valid qualified electronic signature. Templates of all the GDPR requests are available in our website (www.dzi.bg), section "Personal Data Protection". 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, through filing a Consent Withdrawal Statement at our offices. Detailed information as to how you may exercise your rights is available in the *Information on the Protection of Personal Data* document on DZI's website - www.dzi.bg

2. Categories of personal data

The company processes various categories of personal data, pertaining to your physical, social, economic and other identity, including health-related data. Personal data can be received from you as a personal data subject or from third parties in regards to contracts with the administrator or fulfilling statutory obligations (insurance intermediaries, medical centres, state institutions, etc.), including from public accessible sources (Business register and others). The entity can process various categories of data, depending from the purpose of the processing:

- **Basic data, which includes:** full name, telephone number – mobile/fixed/home/business number, e-mail address, current and permanent address (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 standard products and services, similar or related 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 have different purpose, depending from the purpose, from which they are processed. Detailed information is available in item 4.1 and 5.1 of the *Information on the Protection of Personal Data* document on DZI's website – www.dzi.bg
- **Processing of health-related data** of the users of insurance services is needed for the conclusion and execution of insurance contracts as per the Insurance Code.

3. Purposes of personal data processing

Purposes of personal data processing, based on statutory obligations:

- Enhanced customer due diligence (identification, verification, profiling and acceptance) of users of insurance services;
- Preparation of reports to regulatory authorities;
- Reporting to regulatory authorities as per the provisions of the Tax Insurance Procedure Code;
- Exerting of control and prevention of insurance frauds and conflicts of interest;

- Exercising control for the purposes of preventing money-laundering, embargo and terrorist activities;
- Data privacy and information systems' protection;
- Provision of personal data to government and controlling authorities, based on their powers;
- Need analysis and categorization of clients with the purpose of fulfilling the requirements of the Bulgarian Insurance Code for providing a suitable product, in regards to the clients requirements and needs;
- Analysis of the product and the planned distribution strategy (on the basis of Art. 291(3) of the Insurance Code).

Purposes of personal data processing, based on contractual grounds

- Insurance risk assessment and calculation of the insurance premium;
- Preparation of an individual insurance proposal;
- Preparation of an insurance contract and fulfilment of the statutory obligations, relating to its conclusion;
- Handling insurance claims, in regards to the insured event; Usage of products and services (applications, portals, competitions, participation in lucky draws, etc), created with the purpose of easing up the access to the offered products and enhancing the customer experience.

Purposes of personal data processing, based on the Controller's lawful interests:

- Testing of new and changes of existing software applications, demo platforms and internal portals of the entity, in light of their actualization, validation, incident resolution, data protection, training of employees and others;
- Research and development of products/services and analysis of market trends;
- Direct marketing of standard insurance products;
- Customer relationship management with the aim to offer insurance products and services;
- Calculating and drafting a report on the stable bank-insurance and pension-insurance clients;
- Legal disputes - ascertainment, exercising and protection of the company's rights during legal proceedings;
- Creation of analytic business models, aimed at development of new products and services for clients;
- Physical security – processing of personal data for video surveillance purposes;
- Prevention and discovery of frauds;
- Client relationship management with the purpose of providing a better service in all distribution channels of the entity (direct sales, insurance agent and contact centres);
- Participation in promotional campaigns, games and raffles organized by DZI independently or in partnership with third parties;

- Preventing the security and protection of customers' personal data by carrying out of a check (screening) for compromise, leakage /unlawful processing/ and illegal dissemination of information (dark and deep web searching);
- Create, maintain and improve robotic solutions.

Every personal data subject has the right to object the processing of his personal data on grounds of the controller's lawful interest.

Purposes of personal data processing, based on given consent:

- Offering of personalized products for existing clients through client profile creation;
- Receiving an advertisement e-newsletter, advertisement messages in your installed application and others.

Processing of health-related data of the users of insurance services is needed for the conclusion and execution of insurance contracts as per the Insurance Code.

4. Personal data recipients

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

4.1. Personal data controllers, for which there is an obligation by law for provision of personal data:
Financial

Supervision Commission, Commission for Personal Data Protection, Financial Intelligence Directorate with the State

Agency for National Security, National Revenue Agency, Consumer Protection Commission, bodies of the judiciary, Prosecutor's Office, Ministry of Interior, and others

4.2. Personal data controllers and processors, which process personal data by virtue of a concluded contract with DZI, while applying appropriate technical and organizational measures: suppliers of products and services to the company, including suppliers of information and communication solutions, external attorneys-at-law and law offices, trusted service centres, assisting companies, providers of consultancy services, marketing and market research agencies, external auditors; insurance agents and brokers in accordance with the requirements of the Insurance Code; re-insurers and co-insurers; healthcare establishments; other KBC Group entities, etc.

4.3. Recipients 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 personal 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. Personal data storage period.

Your personal data shall be stored in accordance with the statutory deadlines:

- 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.

6. How to reach us?

As regards issues, linked to personal data processing, you may contact our Data Protection Officer at the company's head office address or by emailing to: dpo@dzi.bg. **Detailed information on data privacy is available in the Information on the Protection of Personal Data document on our website, www.dzi.bg, as well as at any office of ours.**

