DZI – Life Insurance JSC
DZI – General Insurance JSC
Republic of Bulgaria
city of Sofia city, postal code 1463



### **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 (Policyholder, Insuree, third party beneficiary, injured third party, etc.), representative/proxy of a counterparty-legal entity or another person. The above companies are joint personal data controllers, which determine common purposes and means for the processing of personal data, as they jointly fulfill 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: direct marketing of standard insurance products to present and potential clients, customer relationship management, offering of tailor-made products and services through client profile creation. More information is available in Item 1 and Item 6 of the *Information on the Protection of Personal Data* document, available on <a href="https://www.dzi.bg">www.dzi.bg</a>.

### 1. Your rights

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 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: <a href="www.cpdp.bg">www.cpdp.bg</a> 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. 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 - <a href="www.dzi.bg">www.dzi.bg</a>

# 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, for example:

- For the purpose of concluding an insurance contract and settlement of insurance-related claims: full name, Personal ID Number/Foreign National's ID Number, date of birth, address (domicile, mailing address), nationality, bank account number, telephone, email, ID document data, health-related data (upon certain insurance contracts), etc.
- For direct marketing and customer relationship management purposes: full name, mailing address, telephone, email etc.

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#### 3. Purposes of personal data processing

# Purposes of personal data processing, based on statutory obligations:

- Enhanced customer due diligence (identification, verification 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;
- Data privacy and information systems' protection;
- Provision of personal data to government and controlling authorities, based on their powers.

# 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 fulfillment of the statutory obligations, relating to its conclusion;
- Analysis of the needs of the users of insurance services;
- Processing of insurance claims in line with occurred insured events;
- Use of the company's products and services in line with concluded insurance contracts.

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

- Testing of changes in the company's software applications in view of their updating;
- 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;
- 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.

## Purposes of personal data processing, based on given consent:

- Offering of personalized products for existing clients through client profile creation;
- Direct marketing of DZI insurance products for potential clients.

**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.

### 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: <a href="mailto:dpo@dzi.bg">dpo@dzi.bg</a>. Detailed information on data privacy is available in the Information on the Protection of Personal Data document on our website, <a href="https://www.dzi.bg">www.dzi.bg</a>, as well as at any office of ours.