

#### **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, <a href="www.dzi.bg">www.dzi.bg</a>. More information in line with the application of the data privacy legislation is available on the website of the Commission for Personal Data Protection: <a href="www.cpdp.bg">www.cpdp.bg</a>.

## 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, UBB Asset Management, UBB Interlease AD, UBB Life Insurance EAD, UBB - Insurance Broker EAD and UBB Factoring EOOD. 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 direct marketing of standard insurance products of DZI to existing and potential clients and customer relationship management with the aim to offer suitable insurance products and services;
- The companies determine a common purpose for the processing of personal data with another KBC Group entity in Bulgaria UBB AD. This aims at offering personalized products and services to existing clients of DZI and UBB AD through profiling and creating a personal client profile. More information is available in Item 6 of the present 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: <a href="mailto:dpo@dzi.bg">dpo@dzi.bg</a>.

## 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 machine-readable 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: <a href="www.cpdp.bg">www.cpdp.bg</a>, 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 for direct marketing purposes of standard insurance products of DZI to potential clients through filing a Consent Withdrawal Statement on paper, according to a sample format, available at any office of DZI.
- You may withdraw your consent to receiving the e-newsletter ads of DZI at any time, by sending an email to the following address: <a href="mailto:unsubscribe@dzi.bg">unsubscribe@dzi.bg</a>.

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: <a href="mailto:dpo@dzi.bg">dpo@dzi.bg</a>.

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:

- Conclusion of 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, contact details (telephone number, email), ID document data, health status and civil status data (in certain cases), location of the insured property and others.
- For direct marketing and customer relationship management purposes: Full name, mailing address, contact details (telephone, email), etc.
- For the purposes of enhanced customer due diligence as per the Measures Against Financing of Terrorism Act: Full name, Personal ID Number/Foreign National's ID Number, date of birth, nationality, risk profile etc.
- Video images of data subjects in line with ensuring the physical security of our offices by means of a video surveillance system.
- Recordings of telephone conversations for the purpose of rendering services in line with administering the concluded insurance contracts.

## 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.

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 in line with concluded insurance contracts.

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 changes in the company's software applications in view of their updating, creation of new and testing of changes in existing functionalities, resolving of incidents, protection of data, 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;
- 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;
- Internal reporting, management information and streamlining of the organization's processes;
- 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;
- Physical security processing of personal data for video surveillance purposes at the company's offices.

The processing of personal data for the stated purposes is needed for the protection of the lawful interests of DZI in its capacity as personal data controller. 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.

Vitosha Blvd.

ДЗИ
Национален номер 0700 16 166
www.dzi.bg

#### 4.2.4 Processing of special categories of data (health-related data)

Processing of health-related data of the users of insurance services is needed for the conclusion and execution of certain insurance contracts, as per the provisions of the Insurance Code. Prior to conclusion of an insurance contract, as well as during its effectiveness period, the insurer shall be entitled to receive detailed and accurate information as to the health status of the person, whose life, health or bodily integrity are subject of insurance. Upon occurrence of an insured event the Insurer shall be entitled to access the entire medical documentation, pertaining to the health status of the person, whose life, health and bodily integrity has been insured, as the Insurer may demand such documentation from all persons/entities (general practitioners, healthcare establishments or institutions), storing such information, including such pursuant to the Medical Establishments Act, Health Insurance Act and the Health Act etc. DZI processes health-related personal data on grounds and for contract implementation purposes, as well as in fulfillment of statutory obligations in its controller capacity.

#### 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

### 4.4. 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:

- Conclusion of 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, contact details (telephone number, email), ID
  document data, health status and civil status data (in certain cases), hobby, employment
  activity, marital status, kinship relations, info about the financial situation etc.
- For direct marketing and customer relationship management purposes: Full name, mailing address, contact details (telephone, email), recording of telephone conversations, etc.
- For the purposes of enhanced customer due diligence as per the Measures Against Money Laundering Act, the Measures Against Financing of Terrorism Act and the Tax Insurance Procedure Code: Full name, Personal ID Number/Foreign National's ID Number, date of birth, place of birth, nationality, ID document data, Politically Exposed Person, risk profile, tax number, jurisdiction in his/her capacity as resident for taxation purposes (upon certain contracts) etc.
- Video images of data subjects in line with ensuring the physical security of our offices by means of a video surveillance system.
- Recordings of telephone conversations for the purpose of rendering services in line with administering concluded insurance contracts.

## 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;
- 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, upon exercising of their statutory powers.

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.

DZI - Life Insurance JSC DZI - General Insurance JSC Republic of Bulgaria

Sofia city, postal code 1463 89B, Vitosha Blvd.



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

- 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;
- 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 in line with concluded insurance contracts.

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.

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

- Testing of changes in the company's software applications in view of their updating, creation of new and testing of changes in existing functionalities, resolving of incidents, protection of data, 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 of higher quality services to clients, while catering for their needs;
  - 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;
- Internal reporting, management information and streamlining of the organization's processes;
- 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:
- Physical security processing of personal data for video surveillance purposes at the company's offices.

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.

#### 5.2.4. Processing of special categories of data (health-related data)



Processing of health-related data of the users of insurance services is needed for the conclusion and execution of certain insurance contracts, as per the provisions of the Insurance Code. Prior to conclusion of an insurance contract, as well as during its effectiveness period, the Insurer shall be entitled to receive detailed and accurate information as to the health status of the person, whose life, health or bodily integrity are subject of insurance. Upon occurrence of an insured event the Insurer shall be entitled to access the entire medical documentation, pertaining to the health status of the person, whose life, health and bodily integrity has been insured, as the Insurer may demand such documentation from all persons/entities, storing such information, including such, pursuant to the Medical Establishments Act, Health Insurance Act and the Health Act etc. DZI processes health-related personal data on contract implementation grounds, as well as in fulfillment of the controller's statutory obligations, only and solely for an insurance contract's conclusion and implementation purposes.

#### 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

### 5.4. <u>Personal data storage period</u>

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 and direct marketing to potential 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 and UBB AD through profiling¹ 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 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 – <a href="www.dzi.bg">www.dzi.bg</a> 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.

For the purposes of offering personalized products and services for existing clients DZI shall process personal data of its clients jointly with UBB AD 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

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<sup>&</sup>lt;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



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 enewsletter 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.

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. 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: <a href="mailto:dpo@dzi.bg">dpo@dzi.bg</a> 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.