

DZI – Life Insurance JSC

DZI – General Insurance JSC

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INFORMATION ON COUNTERPARTIES' 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 are registered personal data controllers, which process your personal data in your capacity as a representative/proxy/ authorized person of a counterparty, being either a legal entity or a natural person, by virtue of a concluded contract with the data controllers. As per the requirements of Art. 26 of the said Regulation the above companies 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 the natural persons' rights and ensuring awareness and transparency. Based on the agreement for joint personal data controllers, the companies jointly perform on their obligations to inform natural persons about the processing of their personal data by preparing a joint *Information on the Protection of Personal Data* document and applications for exercising of rights by natural persons.

1. Your rights

In your capacity as data subjects, 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, which the entities have explicitly asked for and you have provided with a declaration.
- **Right to rectification** – you may request rectification of your personal data, in case those are incorrect or incomplete. In such cases the entities inform all third parties to whom your personal data has been revealed, regarding the corrections and additions in your personal data.
- **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 or there is a legal basis for their deletion, etc.
- **Right to restrict the processing**, in one of the following cases:
 - o you object to the accuracy of the data that DZI processes - within a certain period, necessary for the validation of the accuracy;

- o in cases of unlawful processing in which you request for the data not to be deleted, but merely restricted in its usage;
- o at your request, in cases DZI no longer requires your personal data for processing, but you require it for the establishment, exercise or defence of legal claims;
- o you have objected against the processing in accordance with Art. 21, para. 1 GDPR regarding the data and expect the results of the check as to whether the legitimate interest of DZI has priority over your interests as a data subject.

- **Right of personal data portability** – you may 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 of an objection, concerning the processing of personal data for direct marketing and client relationship management – we will cease without any conditions the data processing for these purposes. On some occasions however, DZI has an undisputed legal basis for the continued data processing even after the receiving the objection (such as in cases of litigation, observation due to possibility of fraud, etc.) In those cases, DZI contacts you in order to clarify the reasoning behind the continued data processing.
- **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. In cases of automated decision-making, you have the right to express your opinion, to contest the decision, and to request the involvement of an employee of the companies to carry out a reassessment (i.e. human intervention). DZI will inform you in advance if it uses fully automated processing of personal data, providing clear information on the concepts underlying in the relevant decision-making software.
- **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.

2. Categories of personal data

The company shall process various categories of personal data, pertaining to your physical, economic, social and other identity. Personal data can be received from you as a personal data

subject or from third parties in regards to contracts with the data controller or whenever statutory obligations are fulfilled (from state institutions and others), including from public accessible sources (Commercial register and others). DZI can process various categories of data, depending on the purpose of the processing:

- For the purpose of concluding and executing a contract, as well as observing the applicable accounting and taxation related legislation: 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, etc.;
- For the purpose of concluding and executing an insurance intermediation contract, as well as observance of the applicable accounting and taxation-related legislation: 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, conviction-related data, education, qualification, labour activity, kinship relations, etc. ;
- Conclusion and administration of a contract with a supplier – personal data of a representative/ proxy/ authorized person (full name, Personal ID Number, telephone, email, etc.) ;
- Contact details (telephone; e-mail address; mailing address);
- Judicial data (information about criminal records, whenever required by law);
- Video images (through video surveillance for the purposes of video surveillance in the offices of the entity).

3. Purposes of personal data processing

Purposes of personal data processing, based on statutory obligations:

- Preparation of reports to regulatory authorities;
- Enhanced due diligence (Identification, verification, profiling and acceptance), conducting monitoring and control with the purpose of preventing money laundering (when it is required by law), embargo and anti-terrorism measures (again, when it is required by law);
- Abiding by accounting and taxation-related obligations;
- Fulfilment of the requirements for professional qualification, competence and reliability in accordance with the Insurance Code;
- Exerting of control and prevention of corruption practices 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:

- Ascertainment of representative powers upon contract conclusion;
- Contract conclusion and implementation.

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;
- Legal disputes - ascertainment, exercising and protection of the company's rights during legal proceedings;
- Physical security – processing of personal data for video surveillance purposes.

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

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, State Agency for National Security, National Revenue Agency, Consumer Protection Commission, bodies of the judiciary, Prosecutor's Office, Ministry of Interior, external auditors 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 for the purposes of the human resources management, including suppliers of information and communication solutions, external attorneys-at-law and law offices, providers of consultancy services, who are providing training and research services; external auditors; companies, offering additional benefits and others; re-insurers and co-insurers ; other entities within KBC Group.

4.3. 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 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

Personal data of natural persons shall be stored up to the fulfilment of the processing purposes, but not later than the period, envisioned in the Policy for organization of the clerical and archive activities. The maximum storage period is 12 years, after the termination of contractual relationship.

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.