

BRIEF 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

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 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** – 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.
- **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.

Exercising of your rights

Every natural person may exercise his/her rights through filing an application. 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.

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 will inform you of each extension of the period within one month of the application's receipt.

You may ask in writing questions of various nature, pertaining to the processing of your personal data, both on site at your servicing office, as well as electronically at 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.

2. Categories of personal data

The company shall process various categories of personal data, pertaining to your physical, economic and other identity, depending on the subject of the concluded contract:

- 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.)

3. Purposes of personal data processing

Purposes of personal data processing, based on statutory obligations:

- Preparation of reports to regulatory authorities;
- Abiding by accounting and taxation-related obligations;
- Fulfillment 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.

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, including suppliers of information and communication solutions, external attorneys-at-law and law offices, providers of consultancy services, etc.;
- Re-insurers and co-insurers;
- Other KBC Group entities

5. Personal data storage period

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

- Contracts and documents, pertaining to their conclusion – maximum storage period of 12 years after the contract's termination. Notwithstanding the above period, documents, for which the Bulgarian legislation requires a longer storage period, will be archived over the respective period.

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.