

INFORMATION ON THE PROCESSING OF PERSONAL DATA OF FORMER EMPLOYEES/INTERNS

This information has been prepared in connection with the entry into force on 25 May 2018 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 (GDPR, the Regulation). The Regulation applies to the processing of personal data of natural persons. “DZI – Life Insurance” EAD, with UIC: 121518328, and “DZI – General Insurance” EAD, with UIC: 121718407 (“DZI”), are registered data controllers. The companies are joint controllers of personal data who determine common purposes and means for the processing of personal data, jointly fulfilling their obligations to inform individuals about data processing through a joint “Privacy Notice” and to ensure the exercise of their rights.

1. Data subjects

This information is intended to inform you about how DZI processes your personal data in your capacity as:

- An employee whose employment relationship has been terminated (former employee, pensioner);
- An intern whose internship has ended.

2. Categories of personal data

In its capacity as the controller of your personal data, DZI processes the following categories of personal data:

- Identification data;
- Contractual and financial information;
- User profiles (e.g. personal number - J-number, email, username (account) etc.);
- Contact details;
- Social identity (e.g. education, qualifications, etc.);
- Health status – for the remainder of the statutory retention period for such information following the termination of the relationship with DZI.

3. Grounds for processing personal data

DZI processes your personal data where one of the following grounds applies:

- Where processing is necessary to fulfil a contractual obligation or is required by a specific law, decree or regulation;
- Where you have given your explicit consent, insofar as the nature of your relationship with DZI and the applicable legislation permit this;
- Due to a legitimate interest on the part of DZI or on your part as a data subject.

4. Purposes of personal data processing

As the controller of your personal data, DZI processes your personal data after the termination of our legal relationship with you for the purposes of complying with a number of legal obligations under labour, social security and tax legislation.

5. Retention period for personal data

Your personal data will not be retained for longer than is necessary. DZI will retain your personal data as follows:

- ✓ Pay slips, employment contracts and supplementary agreements thereto, appointment orders, transfer orders, orders for unpaid leave exceeding 30 working days in a calendar year, orders terminating the employment relationship, unclaimed employment record books, diaries and copies of certificates – for a period of 50 (fifty) years following the termination of your employment relationship with DZI. This period is in line with your interest in obtaining information relating to your employment relationship with DZI;
- ✓ Internal documents relating to employment legislation or legislation governing banking activities, as well as those relating to employment or arising from DZI’s internal rules; orders, instructions, consent to participate in training, performance appraisal forms, documents relating to the conduct of training and health and safety briefings, etc. – for a period of 5 years following the termination of your employment relationship with DZI;
- ✓ Documentation certifying an accident at work or occupational disease – for a period of at least 5 years;
- ✓ Contracts arising from legal relationships other than employment (civil, consultancy, etc.) – 5 years;
- ✓ Sick notes – for a period of 3 years, starting from 1 January of the year following the year in which they were issued.

A. Rights of data subjects.

As a data subject whose personal data is processed by DZI, you have certain rights which you may exercise by submitting a request to exercise your rights in accordance with the requirements of the Personal Data Protection Act in one of the following ways:

- by email torecruitment@ubb.bg – the request must be signed with an electronic signature in accordance with the Electronic Document and Electronic Certification Services Act;
- at the following address: Sofia, 89B Vitosha Boulevard, DZI, Head Office, “Human Resources Management”, or
- at any DZI office.

DZI guarantees you equal access and the opportunity to exercise the following rights:

A. Right of access – Upon your request as a Data Subject, DZI is obliged to provide you with information regarding the categories of personal data relating to you that it processes, as well as the purposes and timeframes for which they are processed, the recipients or categories of recipients to whom your personal data is disclosed, and the sources from which the data was obtained, except where it has been collected directly from you.

B. Right to rectification, restriction of processing and/or erasure (deletion) – At your request, DZI is obliged to rectify, erase or restrict the processing of your personal data in cases where the processing is unlawful. DZI shall notify any third party to whom your personal data has been disclosed of any rectifications and erasures made by it, as well as of any instances where the processing of your personal data has been suspended.

C. Right to data portability – As a data subject, you have the right to request to receive the personal data relating to you that you have provided to DZI in a commonly used, structured and machine-readable format, and you have the right to transmit/ transfer this data to another controller without DZI creating any obstacles, where the basis for the processing of your personal data is consent or a contract, and the processing of your personal data is carried out by automated means.

D. Right to object – As a data subject, you have the right to object to the processing of your personal data where such processing is based on DZI’s legitimate interests. DZI will consider your objection as soon as possible from the date of submission and provide you with its response in writing. Following consideration of the objection, DZI will, in principle, cease processing your personal data and notify all interested parties to whom your personal data has been disclosed of the objection received and the measures taken in this regard. In some cases, however, DZI has an indisputable legal basis to continue processing your personal data even after receiving your objection (for example, in cases of legal proceedings, monitoring in cases of suspected fraud, etc.). In such cases, DZI will contact you to explain the reasons why it will continue to process your personal data.

D. Right to withdraw your consent to the processing of your personal data, in the event that DZI processes such data on the basis of your consent, which DZI has expressly requested from you and which you have expressly provided in a specific declaration. You may withdraw your consent by means of the same declaration.

E. Right to lodge a complaint with the Commission for Personal Data Protection (CPDP) – As a data subject, you have the right to lodge a complaint with the Commission for Personal Data Protection (CPDP) against DZI’s actions in relation to the processing of your personal data.

G. Right not to be subject to a fully automated decision, including profiling – as a data subject, you have the right not to be subject to a decision based solely on automated means, unless you have given your explicit consent to this or in cases where automated processing is necessary for the conclusion and performance of a contract to which you are a party. Furthermore, where automated decision-making is involved, you have the right to express your opinion, to challenge the decision, and to request the involvement of a DZI employee 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 regarding the concepts embedded in the relevant decision-making software.

When exercising your rights, please be as specific as possible so that your query can be answered accurately and correctly.