

# Privacy notice

Hereby, „BULSTRAD VIENNA INSURANCE GROUP“ EAD (“Bulstrad” or “we”) provides information regarding your personal data which may be processed by the Company. Bulstrad processes your data in relation to the conclusion and execution of insurance contracts, administration of claims, inquiries from you, complaints, requests, and other legitimate purposes.

## WHAT KIND OF PERSONAL DATA IS PROCESSED BY US?

Personal data commonly processed by the Company include:

- Name: given, middle and last name;
- Personal Identification Number (PIN); Personal Foreigner’s Number, date of birth;
- Contact data: email, address and telephone number, etc.;
- Address: permanent or current;
- Banking information: number of bank account; tax related, financial and other information;
- Information related to the subject and manner of conclusion of the insurance contract and/or the subject and manner of filing of insurance claims: work experience, occupation, property owned, geolocation, IP address, etc.;
- Client number, code or other identifier created by Bulstrad for identification purposes;
- Health data: information about your health status (diagnosis, medical history, other medical documents);
- Data provided by you, e.g. in requests, complaints and other inquiries from you;
- Records of phone calls made to and from our telephone networks;
- Video records from the security cameras in the company’s buildings.

## WHAT ARE THE GROUNDS ON WHICH WE PROCESS YOUR PERSONAL DATA?

The processing of personal data is necessary for:

- For fulfillment of rights and obligations under insurance contracts, incl. administration of filed claims;
- For fulfillment of legal obligations, e.g. provision of information to the regulatory authorities (Financial Supervision Commission, Commission for Personal Data Protection, Consumer Protection Commission, etc.), to courts or investigative bodies, state institutions, organizations, individuals and legal entities. Our legal obligations are specified under different bodies of legislation;
- Based on a legitimate interest, e.g. in relation to video surveillance, for improving the quality of services offered, analysis of the insurance portfolio, prevention of insurance fraud interest, etc.;
- Bulstrad may process your health data in order to prepare proposals for conclusion of insurance contracts, in accordance with the effective legislation and the Insurance Code;
- Bulstrad may process your health data provided as evidence under insurance claims for the purpose of establishing, assertion or defense of legal claims.

## FOR WHAT PURPOSES DO WE USE YOUR PERSONAL DATA?

Personal data provided by you will be used for the following purposes:

- Preparation of analysis of individual needs of insurance products;
- Preparation of individual insurance proposals;
- Administration of insurance relations;
- Payment of insurance premium;
- Handling of claims in relation to occurrence of insurance events and payment of insurance indemnity for the settlement of claims;
- Reinsurance of risks;
- Handling of and responses to requests, complaints and other inquiries to Bulstrad;
- Improvement of the service quality and increasing the level of services offered;
- Protection of Bulstrad’s legitimate interests;
- Insurance fraud prevention;
- Risk analysis and assessment;
- Compliance with legal provisions, including prevention of conflict of interest and corruption practices;
- Statistical and analytical purposes of the Company;
- Prevention and control of misconduct, as well as protection of the company’s property and adjoining areas;
- Other purposes.

## PROFILING

In the preparation of your offer for a specific insurance, it is possible that your personal data may be subject to profiling through information processing systems. Depending on the type of the specific insurance, Bulstrad may use information systems to calculate the probability of occurrence of insurance events. Such information systems process the data according to criteria developed by expert actuaries.

## WITH WHOM CAN WE SHARE YOUR PERSONAL DATA?

Bulstrad respects and protects the confidentiality of your personal data. Bulstrad may disclose your personal data only on the basis of a valid reason and in compliance with the imperative regulatory provisions, as follows:

- In the utilization of services related to the purposes above, and in relation to the provision of technical and operational support of its information systems, it is possible that Bulstrad may disclose personal data to service providers (consultants, experts, appraisers, lawyers, etc.)

- In discharging its obligations under certain insurances, it is possible that Bulstrad may disclose personal data to subcontractors which provide services on our behalf on and outside the territory of the Republic of Bulgaria;
- In the fulfillment of its legal rights and/or obligations, Bulstrad may disclose personal data to state, supervisory, controlling, municipal, judicial and investigative bodies, external auditors, parties which has caused a damage or their insurer, other liable persons, private enforcement agents, postal service agents, etc.;
- In accordance with the applicable Bulgarian and EU legislation, Bulstrad may disclose data to other companies within Vienna Insurance Group;
- In the fulfillment of its legal obligation to guarantee coverage for its insurance portfolio, Bulstrad may disclose data to reinsurers, reinsurance brokers and their representatives;
- Bulstrad works with an extended network of insurance intermediaries, in order to bring its services close to you. For this purpose personal data may be shared with insurance intermediaries.

## HOW LONG DO WE STORE YOUR PERSONAL DATA?

Bulstrad stores the respective documents as follows:

- Insurance contracts and documents forming an integral part of the contract (proposal for conclusion of insurance contract, policy, annexes, etc.) – for a maximum period of 10 years, depending on the type of insurance;
- Documents related to insurance claims – for a maximum period of 10 years, depending on the type of insurance;
- Requests, complaints or other inquiries – 5 years;
- Non-accepted proposals for conclusion of insurance contract (offers) – 5 years;
- Records of phone calls from or to our telephone networks – 1 year;
- Records proving one’s acquaintance, acceptance, consent and declared circumstances, in relation to an insurance contract conclusion through an online platform – for a maximum period of 10 years, depending on the type of insurance;
- Records from the video surveillance systems installed in the Company’s offices – for a maximum period of 60 days.

You may contact Bulstrad for more details on the storage period of all documents processed by us.

## YOUR RIGHTS RELATED TO YOUR PERSONAL DATA

In accordance with the regulations, you have the following rights regarding your personal data processed by Bulstrad:

1. To access your personal data and receive a copy of them;
2. In case of incompleteness or inaccuracy of the data, your personal data can be rectified;
3. To request the erasure of your personal data, in case the preconditions for this are met. Such cases are: if the purpose of the data collection has been fulfilled; if you have withdrawn your consent, where the processing of data is based on consent and there is no other legal reason for the processing; in case your data are processed unlawfully, etc.;
4. In the cases stipulated in the law, to request restriction of the processing of your personal data;
5. In the cases when your data are processed on the basis of legitimate interests (listed above in this notice), you have the right to object against the processing of your personal data on such basis;
6. To exercise your right to data portability and to request to receive your data in a structured, commonly used and machine-readable format;
7. To withdraw the consent given by you, when the processing of your personal data is based on consent.

You can find detailed information on the conditions and procedure for exercising your rights in Bulstrad’s Rules for Exercising the Rights of Data Subjects, on our website ([www.bulstrad.bg](http://www.bulstrad.bg)), as well as in each of our offices in the country.

You also have the right to lodge a complaint before the Commission for Personal Data Protection, if the appropriate preconditions for this are met.

## CONTACT INFORMATION

You can contact us at the following address: Bulgaria, Sofia, 5 Positano Sq., email: [public@bulstrad.bg](mailto:public@bulstrad.bg). Our Data Protection Officer can be contacted at tel. 02/9856624, and email: [dpo-bulstrad@bulstrad.bg](mailto:dpo-bulstrad@bulstrad.bg)

Further information on the way we process your personal data and your rights in this regard can be found on the Company’s website: [www.bulstrad.bg](http://www.bulstrad.bg).

Date: .....

Given, middle and last name and signature of the client:

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