

These Rules (“the Rules”) determine the terms and procedures under which natural persons whose personal data are processed by ZEAD BULSTRAD VIENNA INSURANCE GROUP (“BULSTRAD”, “we”) may exercise their rights according to the personal data protection law.

PART 1: GENERAL PRINCIPLES

- 1.1. BULSTRAD processes and protects the personal data collected during their activities fairly, lawfully and in accordance with the purposes for which the data has been collected.
- 1.2. The employees who process personal data for the purposes of insurance products sales, insurance contracts, fulfillment of the obligations under the insurance contract and settlement of claims under insurance contracts as part of their employment duties, observe the following principles during the processing of personal data:
- i) Personal data shall be processed lawfully and fairly.
 - ii) Personal data shall be collected for specified, explicit and legitimate purposes and not processed in a manner that is incompatible with those purposes.
 - iii) Personal data collected and processed for the purposes of human resources management shall be adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed.
 - iv) Personal data shall be accurate and, where necessary, kept up to date.
 - v) Personal data shall be erased or rectified when they are found to be inaccurate or disproportionate to the purposes for which they are processed.
 - vi) Personal data shall be kept in a form which permits identification of the individuals for no longer than is necessary for the purposes for which the data are processed.
- 1.3. The employees who process personal data shall initially and periodically receive training on data privacy and be acquainted with the applicable legislation.

PART 2: DEFINITIONS

The definitions below have the following meanings:

“**Personal data**” means any information relating to an identified or identifiable natural person who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, identification number, location data, online identifier, or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person;

„**Applicable law**” means the legislation of the European Union and the Republic of Bulgaria, which is relevant to the protection of personal data;

“**Profiling**” means any form of automated processing of personal data consisting of the use of personal data to evaluate certain personal aspects relating to a natural person, in particular to analyze or predict aspects concerning that natural person’s performance at work, economic situation, health, personal preferences, interests, reliability, behaviour, location or movements;

“**Data subject**” means a natural person who can be identified, directly or indirectly, in particular by reference to an identifier such as name, identification number, location data, online identifier, or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person;

“Regulation (EU) 2016/679” means Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (General Data Protection Regulation), promulgated in the Official Journal of the European Union on 4 May 2016.

PART 3: DATA SUBJECTS' RIGHTS

Data subjects have the following rights regarding their personal data:

- i) Right of access;
- ii) Right to rectification;
- iii) Right to data portability;
- iv) Right to erasure;
- v) Right to be forgotten;
- vi) Right to restriction of processing;
- vii) Right to object to the processing of personal data;
- viii) Right of the data subject not to be subject to a decision based solely on automated processing, including profiling.

RIGHT OF ACCESS

- 2.1. Upon request, BULSTRAD shall provide to the data subject the following information:
- i) confirmation whether BULSTRAD processes the individual's personal data;
 - ii) copy of the personal data processed by BULSTRAD, and
 - iii) explanation about the processed data.
- 2.2. The explanation under Article 2.1.(iii) shall include the following information about the personal data processed by BULSTRAD:
- i) the purposes of processing;
 - ii) the categories of personal data concerned;
 - iii) the recipients or categories of recipients to whom the personal data have been or will be disclosed, in particular recipients in third countries or international organizations;
 - iv) where possible, the envisaged period for which the personal data will be stored, or, if not possible, the criteria used to determine that period;
 - v) the existence of the right to request rectification or erasure of personal data or restriction of processing of personal data concerning the data subject, or the right to object to such processing;
 - vi) the right to lodge a complaint with a supervisory authority;
 - vii) where the personal data are not collected from the data subject, any available information as to their source;
 - viii) the existence of automated decision-making, including profiling and information on the logic involved, as well as the significance and envisaged consequences of such processing for the data subject;
 - ix) where personal data are transferred to a third country or to an international organization, the data subject shall have the right to be informed of the appropriate safeguards relating to the transfer.
- 2.3. The explanation about the processed data shall include the information provided by BULSTRAD to the data subjects by means of a privacy notice.

- 3.1. Upon request by the data subject, BULSTRAD may provide a copy of the personal data processed.
- 3.2. When providing a copy of personal data, BULSTRAD cannot disclose the following categories of data:
- i) personal data of third parties unless they have given their explicit consent for this;
 - ii) data that are trade secret, intellectual property or confidential information;
 - iii) other information protected by the applicable law.
- 3.3. The provision of access to data subjects cannot affect adversely the rights and freedoms of third parties and cannot result in a breach of statutory obligation by BULSTRAD.
- 4.1. Where the requests for access are manifestly unfounded or excessive, especially because of their high frequency, BULSTRAD may charge a reasonable fee based on the administrative costs of providing the information or may refuse to respond to the request for access.
- 4.2. BULSTRAD shall decide for each case whether a request is manifestly unfounded or excessive.
- 4.3. Where BULSTRAD refuses to grant access to personal data, BULSTRAD shall explain the reason for its refusal and inform the data subject of his/her right to lodge a complaint with the CPDP.

RIGHT TO RECTIFICATION

- 5.1. Data subjects may request that their personal data processed by BULSTRAD be rectified if the data are inaccurate or incomplete.
- 5.2. When a request for rectification is honored, BULSTRAD shall notify the other recipients to which the data has been disclosed (e.g. state authorities, service providers), so that they can reflect the amendments as well.

RIGHT TO ERASURE ("RIGHT TO BE FORGOTTEN")

- 6.1. Upon request, BULSTRAD is obliged to delete the personal data if any of the following grounds exists:
- i) the data are no longer necessary for the purposes for which they were collected or otherwise processed;
 - ii) the data subject withdraws the consent on which the processing is based and where there is no other legal ground for the processing;
 - iii) the data subject objects to the processing, and there are no overriding legitimate grounds for the processing;
 - iv) the data subject objects to the processing of personal data for direct marketing;
 - v) the personal data have been unlawfully processed;
 - vi) the personal data must be erased in order to comply with a legal obligation of BULSTRAD;
 - vii) the personal data have been collected for offering of information society services to children within the meaning of Article 8 (1) of Regulation (EC) 2016/679.
- 6.2. BULSTRAD is not obliged to delete the personal data to the extent the processing is necessary:
- i) for exercising the right of freedom of expression and information;
 - ii) to comply with a legal obligation of BULSTRAD;
 - iii) for reasons of public interest in the area of public health in accordance with points (h) and (i) of Article 9(2) as well as Article 9(3) of Regulation (EC) 2016/679;
 - iv) for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes in accordance with

Article 89 (1) of Regulation (EC) 2016/679, in so far as the right referred to in paragraph 1 is likely to render impossible or seriously impair the achievement of the objectives of that processing; or

- v) for the establishment of, exercise of or defense against legal claims.

RIGHT TO RESTRICTION OF PROCESSING

- 7.1. The data subject has the right to obtain restriction of processing where one of the following applies:
- i) the accuracy of the personal data is contested by the data subject, for a period enabling the controller to verify the accuracy of the personal data;
 - ii) the processing is unlawful and the data subject opposes the erasure of the personal data and requests the restriction of their use instead;
 - iii) the controller no longer needs the personal data for the purposes of the processing but the individual requires the data to establish, exercise or defend a legal claim;
 - iv) the data subject has objected to processing based on the legitimate interest of BULSTRAD and verification whether the legitimate grounds of the controller override those of the data subject is being carried out.
- 7.2. BULSTRAD may process personal data with restricted processing only for the following purposes:
- i) for storage of the data
 - ii) with the consent of the data subject;
 - iii) for the establishment, exercise or defense of legal claims;
 - iv) for protection of the rights of another natural person; or
 - v) due to important reasons of public interest.
- 7.3. When the data subject has requested restriction of processing and one of the grounds under Article 7.1. above applies, BULSTRAD shall inform the data subject before revoking the restriction of processing.

RIGHT TO DATA PORTABILITY

- 8.1. The data subject has the right to receive the personal data relating to him/her and which s/he has provided to BULSTRAD in a structured, commonly used and machine-readable format.
- 8.2. Upon request, the data subject has the right to prefer that his/her data is transmitted directly from one controller to another, if technically feasible.
- 8.3. The data subject may exercise the right of portability in the following cases:
- i) the processing is based on the individual's explicit consent;
 - ii) the processing is necessary to fulfill a contract;
 - iii) the processing is carried out by automated means.
- 8.4. The right of portability cannot affect adversely the rights and freedoms of others.

RIGHT TO OBJECT

- 9.1. The data subject has the right to object to the processing of his/her personal data by BULSTRAD if the data is processed on one of the following grounds:
- i) processing is necessary for tasks in the public interest or exercise of authority vested in the controller;
 - ii) processing is needed for purposes relating to the legitimate interests of BULSTRAD or a third party;

- iii) the processing of data includes profiling.
- 9.2. The controller shall terminate the processing of personal data unless it can demonstrate compelling legitimate grounds for the processing that override the interests, rights and freedoms of the data subject, or for the establishment, exercise or defense of legal claims.

RIGHT TO OBJECT TO PROCESSING OF PERSONAL DATA FOR DIRECT MARKETING

- 10.1. Where personal data are processed for direct marketing purposes, the data subject shall have the right to object at any time to processing of personal data concerning him or her for such marketing, which includes profiling to the extent that it is related to such direct marketing.
- 10.2. Where the data subject objects to processing for direct marketing purposes, the processing of personal data for such purposes shall be terminated.

RIGHT TO HUMAN INTERVENTION IN AUTOMATED DECISION MAKING

- 11.1. In cases where BULSTRAD makes automated individual decisions including or excluding profiling having legal consequences for, or significantly affecting the individuals in a similar manner, these individuals may request a revision of the decision with human intervention and they may express their point of view.
- 11.2. BULSTRAD shall provide the individuals-subject to automated decision making essential information about the logic involved, as well as the significance and the envisaged consequences of such processing for the data subject.

PART 4: PROCEDURES FOR EXERCISING THE RIGHTS OF DATA SUBJECTS

- 12.1. The data subjects may exercise the rights under these Rules by submitting a request for the exercise of the applicable right.
- 12.2. Requests to exercise the rights of the data subjects may be applied in the following manner:
- i) By an e-mail to the following e-mail address:
public@bulstrad.bg.
 - ii) At an office of BULSTRAD
 - iii) Via regular mail to the address of the Head Office of BULSTRAD:
5 Positano Sq., Sofia.
- 12.3. The request for the exercise of personal data rights should contain the following information:
- i) Identification of the person – name and PIN/policy number/ client number
 - ii) Contact information – address, telephone, e-mail
 - iii) Request – description of the request.
- 13.1. BULSTRAD shall provide information about the actions taken in relation to the request for exercise of rights of the data subjects within one month from the receipt of the request.
- 13.2. If necessary, that period may be extended for further 2 months, taking into account the complexity and the number of the requests by the data subject. BULSTRAD shall inform the individual within one month of the receipt of the request and explain why the extension is necessary.
- 13.3. BULSTRAD is not obliged to respond if it is not in a position to identify the data subject.
- 13.4. BULSTRAD may request additional information required to confirm the identity of the data subject where there are reasonable concerns about the identity of the natural person making the request.
- 13.5. Where the data subject makes the request by electronic means, the information shall be provided by electronic means, unless otherwise requested by the data subject.