

BULSTRAD LIFE VIENNA INSURANCE GROUP JSC (Bulstrad Life) is hereby informing you about the processing of your personal data with regard to the conclusion, performance of obligations and settlement of claims under insurance contracts, as well as for the purposes of processing your request, complaint, application or other inquiry to us or for other legitimate purposes.

**Which of your personal data are we processing?**

The personal data which is typically processed by the Company is as follows:

- Names: first name, father's name and surname;
- Personal No (Personal No of a Foreigner), birth date;
- Contact details: email, mailing address, phone, etc.;
- Address: permanent or current;
- Banking information: servicing bank, bank account number and SWIFT code;
- Information relevant to the subject of the insurance contract or to filing a claim: profession, position, place of work, citizenship, financial information, gender, age, geolocation, etc.;
- Tax and financial information;
- Records of phone calls made by and to the Bulstrad Life Customer Service Centre;
- Video image from the video surveillance systems in the Company's buildings;
- Customer number, code or other identifier created by Bulstrad Life for identification purposes;
- Data provided at your request, complaint, application or other inquiry;
- Health data: information about your health and data related to your physical or mental health, as well as medical documents provided for the purpose of taking out insurance and filing insurance claims.

**On what grounds do we process your personal data?**

- Bulstrad Life shall process the personal data provided by you in order to undertake steps to conclude and/or perform obligations under an insurance contract, including also to administer legal claims;
- To perform a legal obligation and/or grounds provided for in a regulatory act - providing information to state and regulatory authorities (the Financial Supervision Commission, National Revenue Agency, Commission for Personal Data Protection, Commission for Consumer Protection), municipal, judicial and investigative authorities, including external auditors;
- On the grounds of a legitimate interest of the Company - to improve the quality of the service provided, to prevent insurance fraud, in the performance of video surveillance, for portfolio analysis and video surveillance;
- Bulstrad Life shall process your medical data for the purposes of preparing an offer and entering into an insurance contract and settling claims on insurance contracts on the grounds of the effective legislation and the Insurance Code;
- Bulstrad Life may process the health data you provided for the purposes of marketing communication, including for the purposes of direct marketing, based on your explicit consent.

**For what purposes will we process your personal data?**

Personal data provided by you shall be used, including but not limited to:

- analysis of the needs of users of insurance services;
- preparing an individual insurance offer;
- administering an insurance relationship;
- administering payments made for insurance premiums;
- processing claims related to the occurrence of an insurance event and the payment of insurance compensation;
- reinsurance;
- processing and responding to your request, complaint, application or other request to Bulstrad Life;
- improving the quality of the service and the level of the services offered;
- protection of the legitimate interest of Bulstrad Life;
- prevention of insurance frauds;
- risk assessment and analysis;
- performance of regulatory requirements, including avoiding conflicts of interests, corruption practices and obligations under the Measures Against Money Laundering Act;
- marketing communication and the purposes of direct marketing;
- for statistical and analytical purposes of the Company;
- for prevention and control of violations, as well as for protection of the Company's property.

**Profiling\***

Your personal data may become the subject of profiling through information processing systems during the preparation of your individual insurance offer. Depending on the specifics of the particular type of insurance, Bulstrad Life may use information systems to calculate the probability of occurrence of an insurance event. Information systems work based on the input of criteria developed by expert actuaries.

\*Profiling is any form of automated processing of personal data consisting of the use of personal data for the assessment of particular aspects related to the natural person with regard to their profession, economic position, health, personal preferences, place of residence, etc.

**With whom do we share your personal data?**

Bulstrad Life respects and protects the privacy of your personal data. Bulstrad Life may disclose your personal data to the following persons in compliance with the regulatory requirements:

- when using services related to the listed purposes as well as for technical maintenance of internal information systems and/or operational support of our activity, it is possible that Bulstrad Life discloses personal data to service providers (consultants, assisting companies, customer service centre, trusted doctors, their counterparts, etc.). Such disclosure shall only be made on reasonable grounds and in compliance with the regulations of the regulatory framework;
- in the performance of its obligations under specific insurances, Bulstrad Life may disclose your data to subcontractors providing services on behalf of Bulstrad Life, both on the territory of the Republic of Bulgaria and abroad;
- in the performance of its legal obligations, Bulstrad Life may disclose personal data to state supervisory or control bodies, municipal, judicial and investigative bodies, including external auditors;
- in compliance with the applicable Bulgarian and European legislation, the Company may disclose personal data to other companies within the group of Vienna Insurance Group;
- in the performance of its obligation to provide coverage of its insurance portfolio, Bulstrad Life may disclose your personal data to reinsurers, reinsurance brokers or their representatives;
- Bulstrad Life works with a wide network of insurance intermediaries in order to provide services close to you. For this purpose, your personal data may be shared with insurance intermediaries. Such disclosure shall only be made on reasonable grounds and in compliance with the imperative regulations of the regulatory framework.

**How long do we store your personal data?**

Bulstrad Life stores and administers individual documents containing your personal data for the following time limits:

- insurance contracts and other documents thereto (application for insurance contract, General and Special Conditions, policies, annexes) - a maximum period of 10 years, depending on the type of insurance;
- documents regarding insurance claims - a maximum period of 10 years, with the term depending on the type of the insurance;
- requests, complaints, applications and other inquiries - a maximum storage period of 5 years;
- rejected applications for insurance contracts (offers) - 5 years;
- recording of telephone calls, executed from and to the Customer Service Center, as well as when calling from and at our telephone exchange unit - 1 year;
- records proving the acquaintance, acceptance, agreement and declared circumstances when concluding an insurance contract through an online platform - a maximum period of 10 years, depending on the type of insurance;
- records of video surveillance systems - 60 days.

You can find more detailed information regarding the storage periods for all documents processed by Bulstrad Life in the Rules for Storing and Archiving Documents on our website ([www.bulstradlife.bg](http://www.bulstradlife.bg)) or you can contact the Bulstrad Life administration and request a copy of the Rules.

**What are your rights with regard to your personal data?**

In compliance with the regulatory framework, you have the following rights with regard to your personal data processed by Bulstrad Life:

1. The right to access your personal data processed by Bulstrad Life and to receive a copy of the data.
2. In the event of incomplete or inaccurate data being processed by Bulstrad Life, you are entitled to have your data rectified.
3. The right to request the deletion of your data when there are conditions for such a deletion. Such cases are situations where the purpose for which the data was collected has been achieved; you have withdrawn your consent when the processing is consent-based and there are no other legal grounds for processing; your data is being processed unlawfully, etc.
4. The right to request limited processing of your personal data in the cases stipulated by law.
5. In cases where your data is processed based on a legitimate interest, you may object to the processing of your personal data on those grounds.
6. To exercise your right to data portability and to request that your data is provided in a structured, commonly used and machine-readable format.
7. To withdraw the consent you have provided when the processing of your personal data is based on consent.

You can find detailed information on the conditions and procedures for exercising your rights in the Rules on Exercising Data Subject Rights of Bulstrad Life on our website ([www.bulstradlife.bg](http://www.bulstradlife.bg)), as well as in any of our offices in the country.

You also have the right to file a complaint with the Commission of Personal Data Protection when the relevant grounds are present.

**How can you contact us?**

Please contact us at this address: Bulgaria, 1301 Sofia, 6 Sveta Sofia Str., email: [bullife@bulstradlife.bg](mailto:bullife@bulstradlife.bg); tel.: 02/401 4000.  
Contact details of our Data Protection Officer: [dpo@bulstradlife.bg](mailto:dpo@bulstradlife.bg); tel.: 02/460 41 87.  
You can find more information on the terms and conditions under which we process your personal data on our website [www.bulstradlife.bg](http://www.bulstradlife.bg).

This document is prepared and adopted in Bulgarian, and the current version is its translation into English. In case of any discrepancy between the English and Bulgarian versions, the Bulgarian text shall prevail.

Date: .....

...../full name/

Signature .....