

EUROINS INSURANCE JSC

PRIVACY NOTICE IN CONNECTION WITH THE PROVISION OF INSURANCE SERVICES

Euroins Insurance JSC hereby regulates the provision of information about your personal data, which may be processed in connection with the conclusion, performance of obligations and settlement of claims under an insurance contract.

What personal data do we process?

Personal data usually processed in connection with the conclusion and performance of obligations under an insurance contract include:

- Names: personal name, father's name, and family name.
- Personal Identification Number (PIN) / Personal Alien Subject Identification number.
- Contacts: e-mail, address, and telephone.
- Address: permanent or current.
- Bank information: bank account number.
- Information related to the insured risks – work record, professional experience, remuneration, property (such as data on motor vehicles, immobility) and others.
- Medical data: information about the health status of users of insurance services (diagnoses, epiprises, other medical documents for examinations, research, or other interventions).
- Phone calls recorded when calling to and from the company's telephone exchange.
- Video images from surveillance cameras located in the company's offices.

On what basis do we process your personal data?

- The processing of personal data is necessary for the conclusion and implementation of an insurance contract, including for establishing a contact with the user of insurance services - Art. 6, para. 1 (b) of 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 (GDPR).
- The Company processes personal data in fulfillment of legal obligations, such as providing information to regulatory authorities, courts or investigative bodies, state institutions, organizations, and others (legal obligations are provided in various regulations) - Art. 6, para. 1, letter c) of the GDPR.
- Based on a legitimate interest, the Company processes personal data during video surveillance, recording and storage of telephone calls from a national telephone number, collection of receivables, reinsurance, inspections to prevent insurance fraud and others - Art. 6, para. 1, letter f) of the GDPR.
- The company may process health data for the purposes of preparing a proposal for an insurance contract on legal grounds - Art. 9, para. 4 of the GDPR.
- The company may process health data (diagnosis, health status, medical documents) provided for the purposes of settling an insurance claim, for establishing, exercising, or protecting legal claims - Art. 9, para. 2, letter f) of the GDPR.
- The company may process your health data for the purposes of preventive or occupational medicine to provide health care (preventive examinations of the insured) - Art. 9, para. 2, letter h) of the GDPR.

Automated decision-making in the processing of personal data and profiling

The Company does not make decisions based solely on automated processing, including profiling. You will be informed if we change our practice. Profiling is automated processing of personal data for the purpose of assessing certain personal aspects related to a person, including for analyzing or forecasting his or her behavior, performance of his/her professional duties, economic condition, personal preferences, interests, reliability, behavior, location or movement.

For what purposes we use your data?

The personal data provided by you will be used for the purposes of administering the insurance relationship, including, but not limited to, for the purposes of:

- identification of individual needs for insurance products;
- preparation of an individual insurance offer;
- conclusion of an insurance contract and its administration;
- payment of the insurance premium;
- processing of claims in connection with the occurrence of an insurance event and payment of insurance compensation in case of liquidation of damage;
- reinsurance;
- handling of complaints and other inquiries;
- prevention of insurance fraud;
- risk assessment;
- compliance with legal requirements, including avoidance of conflicts of interest and corrupt practices;
- statistical and analytical purposes;
- security and control of infringements;
- regressive claims in the cases provided for by law.

Marketing

Euroins Insurance JSC processes your personal data to send you messages about your insurance / damage operations via phone calls, emails, texts, letters, and more. Messages concern only products for which you have a contract. These messages are not related to direct product marketing.

The Company may, on the basis of its legitimate interest, use the personal data of a customer without the need for his/her consent when offering him/her a compatible product with the one originally used, in order to improve the quality of service by offering another product according to necessity. Such a proposal does not require the express consent of the insured.

With whom can we share your personal data?

Subject to legal provisions, Euroins Insurance JSC may disclose your personal data to the following persons:

- **Service providers** (consultants, experts, evaluators, lawyers, etc.). When we use services related to the conclusion of the insurance contract and payment of insurance compensation, technical support of information systems and operational support of the company's activities, it is possible to disclose personal data. Such disclosure of data is carried out only if there is a good reason to do so.
- **In fulfillment of its obligations under certain insurances**, Euroins Insurance JSC may disclose personal data to subcontractors who provide services on behalf of the Company outside the territory of the Republic of Bulgaria – Art. 49, paragraph 1, letter b) of the GDPR. When transmitting data to persons

based in third countries, the transfer is necessary for the establishment, exercise, or defense of legal claims - Art. 49, para. 1, letter e) of the GDPR.

- **In fulfilling its obligations**, the Company transfers data on insurance policies and claims under the Motor Third Party Liability Insurance to the system of the Guarantee Fund, according to Chapter 53 of the Insurance Code and Ordinance № 54 of 30.12.2016 concerning the Guarantee Fund registers for the exchange and protection of information and for the issuance and reporting of compulsory insurance under Art. 461, items 1 and 2 of the Insurance Code. Further, the Company may transfer personal data to government agencies on legal grounds: the Finance Supervision Commission, the National Revenue Agency, the State National Security Agency, the Personal Data Protection Commission and other controllers such as external auditors, postal service operator, banks, bailiffs and others.

- **Reinsurers:** To provide coverage of its insurance portfolio, Euroins Insurance JSC may disclose personal data to reinsurers, reinsurance brokers and their representatives.

Insurance intermediaries: The Company operates with a wide network of insurance and reinsurance intermediaries – brokers, agents and intermediaries offering insurance products as an additional activity (Art. 294 of the Insurance Code). For this purpose, your personal data may be shared (usually directly by you) with intermediaries.

For how long your personal data is stored?

The company stores the individual documents as follows:

- Insurance contracts and documents that are deemed a part thereof (proposal for conclusion of an insurance contract, policy, annexes, etc.) – for a duration of ten (10) years, after expiration of the year in which they are submitted for archiving.
- Documents concerning an application for an insurance claim – a maximum period of ten (10) years after the end of the year in which they were submitted for archiving, depending on the type of insurance.
- Requests and complaints – stored for the period of storage of the insurance claim to which they relate.
- Unaccepted proposals for conclusion of an insurance contract (offers) – up to two (2) years after the end of the year of receipt of the data.
- Recordings of video surveillance systems installed in the offices of the Company – maximum period of two (2) months.
- Recordings of phone calls made upon call to and from the Company's telephone exchange – one (1) year.

The deadlines are determined in compliance with the regulatory requirements for the storage of documents and data and considering the legitimate interest of the Company in exercising and defending its interests in disputes and legal claims.

Your rights with respect to your personal data

Subject to applicable law, you have the following rights towards your personal data, processed by Euroins Insurance JSC:

- To access your personal data that the Company processes and to obtain a copy of them.
- In case of incompleteness or inaccuracy of the data that the Company processes, your personal data to be corrected.
- Request that your data be deleted when the prerequisites therefore are met. Such cases shall be if the purpose for which the data were collected has been achieved; you have withdrawn your consent when the processing is based on consent and there is no other legal basis for processing; your data are being processed unlawfully and more.

- In the cases defined by applicable law, require that the processing of your personal data be restricted.
- Exercise your right to data transfer and request that your data be provided in a structured, commonly used, and machine-readable format.
- Withdraw your consent when the processing of your personal data is based on consent.

Detailed information on the terms and conditions by which you can exercise your rights can be found in the Rules for providing information on the exercise of the rights of data subjects on our website (www.euroins.bg), as well as in any of our offices in the country.

In cases where your data is processed on the grounds of legitimate interest, you may object to the processing of your personal data on this basis.

You also have the right to lodge a complaint with the data protection supervisory authority by country of habitual residence, either by place of work or by place of alleged infringement. For Bulgaria, the Data Protection Supervisor is the Commission for Personal Data Protection.

How to contact us

You can contact us at: 43, Christopher Columbus Blvd., Sofia, Bulgaria, e-mail: office@euroins.bg. Contact of Euroins Insurance JSC Data Protection Officer: dpo@euroins.bg.