

## EUROINS INSURANCE JSC

### RULES FOR THE PROVISION OF INFORMATION IN THE EXERCISE OF THE RIGHTS OF DATA SUBJECTS

#### Chapter I. General provisions

1. The present Rules define the terms and conditions by which natural persons whose personal data are processed by Euroins Insurance JSC (the Company or the Controller) may exercise their rights under the legislation on personal data protection.
2. Euroins Insurance JSC shall be a data controller pursuant to Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016. on the protection of individuals with regard to the processing of personal data and on the free movement of such data and repealing Directive 95/46/EC (GDPR) and in that capacity processes and protects personal data collected in the performance of its activities, lawfully, in good faith and transparently.
3. The employees of the Company process personal data of individuals, including users of insurance services, as part of their employment duties.
4. The Company's staff-member who process personal data comply with the following principle while processing them:
  - 4.1. Personal data are processed lawfully and in good faith.
  - 4.2. Personal data are collected for specific, defined, and legitimate purposes and are not processed in a manner incompatible with those purposes.
  - 4.3. The personal data collected and processed are relevant, related to and not exceeding the purposes for which they are processed.
  - 4.4. The personal data shall be accurate and updated when necessary.
  - 4.5. Personal data shall be deleted or corrected where they are found to be inaccurate or disproportionate in relation to the purposes for which they are processed.
  - 4.6. Personal data shall be maintained in a form that allows identification of the natural persons concerned for a period not exceeding that necessary for the purposes for which such data are processed.
5. Employees who process personal data attend introductory and periodic privacy trainings and are familiar with the applicable legislation.

#### Chapter II. Rights of individuals - subject to personal data

##### 6. Right to information and access.

- 6.1. The controller provides the data subject with the information under Art. 13 and Art. 14 of the GDPR. The information is provided in the form of a Privacy Notice (except in the cases of Art. 13, para. 4 and Art. 14, para. 5 of the GDPR).
  - 6.1.1. The text of the Privacy Notice in connection with the provision of insurance services to clients of the Company is available on the official website of the controller [www.euroins.bg](http://www.euroins.bg). The privacy notice can be obtained on paper at the Company's offices, as well as by electronic means by request to the Administrator at e-mail [office@euroins.bg](mailto:office@euroins.bg) or to the Data Protection Officer at e-mail [dpo@euroins.bg](mailto:dpo@euroins.bg).
- 6.2. The data subject is entitled to receive from the Company the following information:
  - 6.2.1. confirmation of whether or not the Company processes the personal data of the person;
  - 6.2.2. upon explicit request a copy of the personal data of the person, which is processed;
  - 6.2.3. explanation on the data processed.

6.3. The explanation under 6.2.3 shall include the following information:

6.3.1. the purposes of the processing;

6.3.2. the co-responding categories of personal data;

6.3.3. the recipients or categories of recipients to whom the personal data are or will be disclosed, in particular recipients in third countries or international organizations;

6.3.4. where possible, the envisaged period for which the personal data will be stored or, if that is not feasible, the criteria used for determining that period;

6.3.5. the existence of the right to request rectification or erasure of personal data or restriction of the processing of personal data relating to the data subject or to object to such processing;

6.3.6. the right to complain to a supervisory authority.

6.3.7. where personal data are not collected by the data subject, any available information on their source;

6.3.8. the availability of automated decision-making opportunity, including profiling, and information on the logic used, as well as the meaning and intended consequences of such processing for the data subject;

6.3.9. where personal data are transferred to a third country or to an international organization, the data subject (the natural person) shall have the right to be informed of the appropriate guarantees in relation to the transfer.

6.4. The provision of access to personal data subjects may not adversely affect the rights and freedoms of third parties or lead to a violation of the Company's legal obligation.

6.5. Where requests for access are manifestly unfounded or excessive, in particular because of their repeatability, the Company may impose a reasonable fee on the basis of the administrative costs of providing the information or refuse to act on the request for access.

6.6. The Company shall assess on a case-by-case basis whether a request is manifestly unfounded or excessive.

## **7. Right to rectification.**

7.1. Data subjects may request that their personal data processed by the Company be corrected in case the latter are inaccurate, incomplete, or obsolete. The subject shall have the right to supplement incomplete personal data, including by adding a declaration.

## **8. Right to erasure (right to be forgotten).**

8.1. Data subjects may request that their personal data processed by the Company be deleted and the controller is obliged to remove them if any of the following grounds are given:

8.1.1. The personal data are no longer necessary for the purposes for which they were collected and otherwise processed.

8.1.2. The data subject shall withdraw his / her consent on which the processing of the data is based and there is no other legal basis for the processing.

8.1.3. The data subject is objecting against the processing where necessary for the performance of a task in the public interest or in the exercise of official powers conferred on the Controller, or the processing is for the purposes of legitimate interests of the Controller or of a third party and there are no legitimate grounds for the processing.

8.1.4. The data subject objects to the processing of personal data for the purposes of direct marketing, which also includes profiling in so far as it relates to direct marketing.

8.1.5. Personal data have been processed unlawfully.

8.1.6. Personal data must be deleted in order to comply with a legal obligation arising from a legal act and is applied to the Company.

8.1.7. Personal data have been collected in connection with the provision of information society services to children within the meaning of Article 8(1) of GDPR.

8.2. The Company is not obliged to delete the personal data, if the processing is necessary for:

- 8.2.1. compliance with a legal obligation of the Company;
- 8.2.2. reasons of public interest in the field of public health in accordance with items (h) and (i) of Article 9(2) and Article 9(3) of the GDPR;
- 8.2.3. establishment, exercise, or defense of legal claims;
- 8.2.4. exercising the right to freedom of expression and the right to information;
- 8.2.5. other legal obligation.

## **9. Right to restriction of processing.**

9.1. The data subject shall have the right to request restriction of processing where one of the following conditions is met:

9.1.1. The accuracy of the personal data is disputed by the data subject for a period that allows the Controller to verify their accuracy.

9.1.2. The processing is unlawful, the data subject does not want the personal data to be deleted, but instead requests a restriction of their use.

9.1.3. The controller no longer needs the personal data for the purposes of the processing, but the natural person (data subject) requires them to establish, exercise or defend legal claims.

9.1.4. The data subject has objected to the processing on the grounds of the legitimate interest of the Company and a check is underway as to whether the legitimate grounds of the Controller take precedence over the interests of the data subject.

9.2. The Company may process personal data, the processing of which is limited, only under the following conditions:

9.2.1. storage of the data;

9.2.2. with the consent of the data subject;

9.2.3. for the establishment, exercise, or defense of legal claims;

9.2.4. protection of another natural person's rights;

9.2.5. important reasons of public interest.

9.3. Where a data subject has requested restriction of processing and there is one of the grounds under item 9.1, the Company shall inform it before the revocation of the restriction of processing.

## **10. Right to data transfer.**

10.1. The data subject has the right to receive the personal data concerning him / her and which s/he has provided to the Company in a structured, widely used, and machine-readable format.

10.2. Upon request, such data may be transferred to another controller designated by the data subject where technically feasible.

10.3. The data subject may exercise the right to portability in the following cases:

10.3.1. processing is based on the consent of the data subject or on a contractual obligation, and

10.3.2. processing is carried out in an automated manner.

10.4. The right to portability may not adversely affect the rights and freedoms of others.

## **11. Right to objection.**

11.1. The data subject has the right at any time and on grounds related to his / her particular situation to object to the processing of his / her personal data by the Company if the data are processed on one of the following grounds:

11.1.1. Processing is necessary for the performance of a task in the public interest or in the exercise of official powers conferred on the controller.

11.1.2. Processing is necessary for purposes related to the legitimate interests of the Company or of a third party.

11.1.3. Data processing involves profiling based on the preceding points.

11.2. The controller shall terminate the processing of the personal data unless it proves that there are compelling legal grounds for its continuation which take precedence over the interests, rights and freedoms of the data subject, or for the establishment, exercise or defense of legal claims.

## **12. Right to object to the processing of personal data for direct marketing purposes.**

12.1. Where personal data are processed for direct marketing purposes, the data subject shall have the right at any time to object to the processing of personal data for that purpose, including with regard to profiling related to direct marketing.

12.2. Where the data subject objects to processing for direct marketing purposes, the processing of personal data for those purposes shall cease.

## **13. Right to human intervention in automated decision-making.**

13.1. Provided that the Company makes automated individual decisions involving or excluding profiling that have legal consequences for natural persons or significantly affect them in a similar way, such persons have the right to:

13.1.1. request a review of the decision with human intervention;

13.1.2. express their point of view, or

13.1.3. challenge the decision.

13.2. The Company provides the individuals subject to automated decision-making with essential information about the logic used, as well as the meaning and intended consequences of such processing for the person.

## **14. Right to lodge a complaint with a supervisory authority. Court protection.**

14.1. Any data subject has the right to lodge a complaint with a supervisory authority in the Member State of his / her habitual residence, place of work or place of alleged infringement if s/he considers that the processing of personal data concerning him / her violates the provisions of the GDPR.

14.2. Any data subject shall have the right to refer the matter to the court in the Member State where the controller or processor has a place of establishment where it considers that its rights under the GDPR have been infringed as a result of data processing. For Euroins Insurance JSC, the competent Bulgarian court is the Sofia City Court. Alternatively, such proceedings may also be brought before the courts of another Member State in which the data subject is habitually resident.

## **Chapter III. Exercise of the rights of data subjects**

15. Data subjects may exercise their rights under these Rules by submitting a written request for the exercise of the right in person or through a legal representative (where applicable) or a proxy.

16. The authorization of a proxy shall be notarized explicitly. Requests are submitted as follows:

16.1. By e-mail [office@euroins.bg](mailto:office@euroins.bg), signed with an advanced electronic signature based on a qualified certificate for electronic signatures, or qualified electronic signature, according to the requirements of the Electronic Document and Electronic Certification Services Act.

16.2. On site in an office of Euroins Insurance JSC by the data subject. Provided that the request is submitted by an authorized representative, the original power of attorney shall be submitted for a check.

16.3. By mail to Euroins Insurance JSC Headquarters: 43, Christopher Columbus Blvd., Sofia, Bulgaria.

17. The request for the exercise of personal data rights should contain the following information:

17.1. Identification of the person – full name and additional identification data such as PIN, or Alien Subject Identification Number, or other similar identifier, or policy number, or customer number.

18.2. A precise and specific description of the request.

18.3. Preferred form for providing (sending) the information.

18.4. Signature, date of submission of the application and address for correspondence.

19. The Company shall provide information on the actions taken in connection with a request for the exercise of the rights of the entities within one month of receipt of the request.

20. If necessary, this period may be extended by a further two months, considering the complexity and number of requests. The Company shall inform the person of any such extension within one month of receipt of the request, giving the reasons for the delay.

21. The Company is not obliged to respond to a request if it is unable to identify the data subject unambiguously and accurately.

22. The Company may request the provision of additional information necessary to confirm the identity of the applicant and the data subject whose data it processes where there are reasonable concerns regarding the identity of the individual making the request.

23. Where the request is submitted by electronic means, the information shall be provided by electronic means, unless the data subject has requested otherwise.

### **Additional provisions**

§1. Definitions:

1. "**Personal data**" means any information relating to an identified natural person or natural person that can be identified directly or indirectly, in particular by an identifier such as name, identification number, location data, online identifier or by one or more signs, specific to the physical, physiological, genetic, psychological, mental, economic, cultural or social identity of that natural person;

2. "**Applicable legislation**" means legislation of the European Union and of the Republic of Bulgaria that is relevant to the protection of personal data;

3. "**Profiling**" means any form of automated processing of personal data consisting in the use of personal data to assess certain personal aspects relating to a natural person, in particular to analyze or predict aspects relating to the performance of that natural person's professional obligations, his economic situation, health, personal preferences, interests, reliability, behavior, location or movement;

4. The terms "**controller**", "**processor**", "**data subject**", "**processing**" and others have the meaning given to them in the GDPR.