



RULES OF PROVIDING INFORMATION ON HOW THE PERSONAL DATA SUBJECTS CAN EXERCISE THEIR RIGHTS

INFORMATION CARD

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Section I. General

1. These rules determine the conditions and procedure under which the individuals, whose personal data is processed by "IC Euroins" AD (the Company), may exercise their rights according to the legislation on personal data protection.
2. "IC Euroins" AD is a personal data administrator and in this capacity processes and protects the personal data collected during the execution of its activity, honestly, legitimately and appropriately.
3. The Company employees process personal data, as a part of their labour obligations, for the following purposes:
 - 3.1. distribution of insurance products;
 - 3.2. conclusion of insurance contracts;
 - 3.3. fulfilment of the obligations under the insurance contracts;
 - 3.4. settlement of claims under insurance contracts.
4. The Company employees who process personal data for the purposes set forth in point. 3, abide by the following principles during the processing:
 - 4.1. The personal data is processed lawfully and in good faith.
 - 4.2. The personal data is collected for specific, precisely defined and legitimate purposes, and is not processed in a way incompatible with such purposes.
 - 4.3. The personal data which is collected and processed during the human resources management, is consonant with, related to, and not exceeding the purposes for which it is processed.
 - 4.4. The personal data is accurate and, if the need arises, it is updated.
 - 4.5. The personal data is deleted or corrected, when it turns out that the data is imprecise or disproportionate to the purposes for which it is processed.
 - 4.6. The personal data is maintained in a form which allows identification of the respective individuals for a period not longer than required for the purposes, for which such data is processed.
5. The employees who process personal data undergo, in the beginning and periodically, training for confidentiality, and become familiar with the applicable law.

Section II. Rights of the individuals, personal data subjects

6. Right to access.

- 6.1. Whenever requested, the Company provides to the individuals, personal data subjects, the following information:
 - 6.1.1. Confirmation whether the Company processes the personal data of the particular person, or not.
 - 6.1.2. Copy of the personal data of the particular person, which data is processed by the Company.
 - 6.1.3. Clarification on the data processed.
- 6.2. The clarification under item 6.1.3 comprises the following information:
 - 6.2.1. The objectives of the data processing.
 - 6.2.2. The respective categories of personal data.
 - 6.2.3. The receivers or the categories of receivers, before whom the personal data has been or is going to be disclosed, in particular the receivers in third countries or in international organizations.
 - 6.2.4. Whenever possible, the scheduled period of time during which the personal data will be kept, and if that is impossible, the criteria used in determining such period.
 - 6.2.5. The existence of a right to require correction or deletion of personal data, or to limit the processing of personal data related to the data subject, or to oppose such processing.
 - 6.2.6. The right to file a complaint to a supervisory body.
 - 6.2.7. When the personal data is not collected by the data subject, any information available on its source.
 - 6.2.8. The existence of automated decision making, including profiling, and information on the logic used, as well as the meaning and the predicted consequences from such processing to the data subject.

6.2.9. When the personal data is transmitted to a third country or to an international organization, the data subject (an individual) has the right to be informed about the appropriate guarantees on the data transmission.

6.3. The clarification on the data processed (item 6.1.3) is submitted to the data subjects by means of a notice of confidentiality (addendum No. 1).

6.4. Upon request by the individual, a personal data subject, the Company may provide a copy of the personal data, which is in a process of treatment.

6.5. When a copy of personal data is handed over, the Company may not disclose the following categories of data:

6.5.1. Personal data of third persons, unless they have not expressed their explicit consent for that;

6.5.2. Data which is trade secret, intellectual property, or confidential information.

6.5.3. Other information which is protected under the applicable law.

6.6. Providing access to subjects of personal data may not affect negatively the rights and liberties of third persons, or lead to a violation of a regulatory requirement of the Company.

6.7. When the requests for access are evidently unfounded or excessive, in particular because of their repetitiveness, the Company may impose a reasonable charge based on the administrative expenses involved in providing the information, or refuse to undertake actions on the access request.

6.8. The Company assesses on a case-by-case basis whether a given request is obviously unfounded or excessive.

6.9. Upon a refusal to grant access to personal data, the Company justifies its refusal and informs the data subject of their right to file a complaint to the Commission for Protection of the Personal Data (CPPD).

7. Right of correction.

7.1. Data subjects may ask for their personal data, processed by the Company, to be corrected, in case that such data is imprecise or incomplete.

7.2. If the request for correction of personal data is satisfied, the Company informs the other receivers, to whom the data was disclosed (e.g. governmental bodies, service suppliers), so that they can reflect the changes.

8. Right to deletion (right “to be forgotten”).

8.1. If asked to do that, the Company has the obligation to delete personal data, if some of the following reasons exists:

8.1.1. The personal data is no longer necessary for the purposes for which it was collected or processed in another way.

8.1.2. The data subject withdraws his/her consent, on which the data processing is based, and there are no other legal grounds for the processing.

8.1.3. The data subject raises an objection to the processing and there are no legitimate grounds for the processing, which have precedence.

8.1.4. The data subject objects against the processing of personal data for the direct marketing purposes.

8.1.5. The personal data was processed unlawfully.

8.1.6. The personal data must be deleted with the purpose of respecting a legal obligation of the Company.

8.1.7. The personal data was collected in relation to the service offering to the information society of children, within the meaning of Art. 8, paragraph 1 of Regulation (EC) 2016/679.

8.2. The Company is not obliged to delete the personal data, as long as the processing is required:

8.2.1. to exercise the right to the freedom of expression and the right to information;

8.2.2. to abide by a legal obligation of the Company;

8.2.3. for reasons of public interest in the field of public health care, in compliance with Art. 9, para. 2, letters 3) & 4), as well as Art. 9, para.3 of Regulation (EC) 2016/679;

8.2.4. for the purposes of archiving in the public interest, for scientific or historical research, or for statistical purposes pursuant to Art. 89, para.1 of Regulation (EC) 2016/679, as long as there is a likelihood for the right to deletion to make impossible or to impede seriously the achievement of the objectives of such processing;

8.2.5. To establish, exercise or protect legal claims.

9. Right to limit the processing.

9.1. The data subject is entitled to require limitation of the processing, when some of the following items is applied:

9.1.1. The precision of the personal data is contested by the data subject for a period which enables the administrator to check the accuracy of the personal data.

9.1.2. The processing is unlawful, but the data subject does not want the personal data to be deleted, and requires instead limitation of its use.

9.1.3. The administrator needs no longer the personal data for the purposes of the processing, but the individual (data subject) requires it in order to establish, exercise or protect 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 verification is underway whether the legal grounds of the administrator prevail over the interests of the data subject.

9.2. The Company may process personal data, whose processing is limited only to the following purposes:

9.2.1. to store the data;

9.2.2. with the consent of the data subject;

9.2.3. to establish, exercise or protect legal claims;

9.2.4. to protect the rights of another individual;

9.2.5. due to important reasons of public interest.

9.3. When a data subject has asked for limitation of the processing and some of the reasons under item 9.1. above exists, the Company informs him/her before the processing limitation is revoked.

10. Right to portability of the data.

10.1. The data subject is entitled to receive the personal data that concern him/her and which the data subject has made available to the Company, in a structured, widely used and machine-readable format.

10.2. Upon request such data may be transferred to another administrator, indicated by the personal data subject, when that is technically feasible.

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

10.3.1. The processing is based on the consent of the personal data subject.

10.3.2. The processing is based on a contractual obligation.

10.3.3. The processing is carried out in an automated way.

10.4. The right to portability may have no adverse effect on the rights and liberties of other persons.

11. Right of objection.

11.1. The data subject is entitled to object to the processing of his/her personal data by the Company, if the data is processed on any of the following grounds:

11.1.1. The processing is required for the fulfilment of a task of public interest, or while exercising official powers, which have been granted to the administrator.

11.1.2. The processing is required for purposes related to the legitimate interests of the Company or of a third party.

11.1.3. The data processing includes profiling.

11.2. The administrator ceases the processing of the personal data, unless it proves that convincing legal grounds exist about its continuation, which prevail over the interests, rights and liberties of the data subject, or aim to establish, exercise or protect legal claims.

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

12.1. When personal data is processed for the purposes of direct marketing, the data subject is entitled to raise an objection at any time to the processing of personal data for such purpose, including as regards the profiling, related to direct marketing.

12.2. When the data subject objects to processing for the purposes of direct marketing, the processing of the personal data for such purpose is ceased.

13. Right to human intervention at automated decision making.

13.1. In the cases where the Company makes automated individual decisions, including or excluding profiling, which generate legal consequences for individuals, or have considerable impact on them in

a similar way, such persons may ask for revision of the decision, with human intervention, and also to express their point of view.

13.2. The Company provides to the individuals, object of automated decision making, substantial information about the logic used, as well as about the importance and the envisaged consequences of such processing for the individual.

Section III. Exercise of the rights of the personal data subject

14. The subjects of personal data may exercise their rights in compliance with these Rights, by filing a request to exercise the respective right.

15. A request to exercise the rights of the personal data subjects can be filed in the following manner:

15.1. By electronic means to the following e-mail address office@euroins.bg.

15.2. On the spot in an office of "IC Euroins" AD.

15.3. By post to the address of the head office of "IC Euroins" AD: 43, Hristofor Kolumb Blvd., Sofia, Bulgaria.

16. The request to exercise rights of personal data should comprise the following information:

16.1. Identification of the individual – name and personal ID No./policy number/client number.

16.2. Feedback contact – address, phone No., e-mail No.

16.3. Request – description of the request.

17. The Company provides information on the actions undertaken in connection with a request to exercise the rights of the subjects, within a month after receiving the request.

18. If necessary, such period of time can be extended by another two months, having in mind the complexity and number of the requests by a definite person. The Company informs the person of any such extension within a month after receipt of the request, also indicating the reasons for the delay.

19. The Company has no obligation to respond to a request, in case it is not able to identify the data subject.

20. The Company may ask for additional information to be supplied, needed to confirm the identity of the data subject, when there are well founded concerns with respect to the identity of the individual having filed the request.

21. When the request was filed by electronic means, the information is supplied if possible by electronic means, unless the data subject has asked for something else.

Additional provisions

§1. Definitions:

1. **"Personal data"** means any information related to the identification of an individual, or an individual who can be identified directly or indirectly, especially by an identifier, such as name, identification number, data on the location, online identifier, or by one or more aspects, specific for the physical, physiological, genetic, psychic, mental, economic, cultural or social identity of such individual;

2. **"Applicable law"** means the legislation of the European Union and of the Republic of Bulgaria, which has a relation to the personal data protection;

3. **"Profiling"** means any form of automated processing of personal data, consisting in the use of personal data in order to evaluate certain personal aspects related to an individual, and more specifically to analyze or predict aspects referring to the fulfilment of the professional obligations of such individual, to his/her economic condition, health, personal preferences, interests, reliability, behaviour, location or movement.

4. **"Data subject"** means an individual, who can be identified directly or indirectly, more specifically by an identifier, such as name, identification number, data on the location, online identifier, or by one or more aspects, specific for the physical, physiological, genetic, psychic, mental, economic, cultural or social identity of such individual.

5. **"Regulation (EC) 2016/679"** means the Regulation (EC) 2016/679 of the European Parliament and of the Council of 27 April 2016, concerning the protection of the individuals in relation to the personal data processing and the free movement of such data, and for the repeal of Directive

95/46/EC (the General Data Protection Regulation), published in the Official Gazette of the European Union on 4 May 2016.

§2. The following addenda are integral parts of these rules:

1. addendum No. 1 – Notice of confidentiality in connection with the conclusion, fulfilment of duties and settlement of claims under an insurance contract.

Transitional and final provisions

§3. These rules have been adopted by the Board of Directors of “IC Euroins” AD on 21.05.2018 and are taking effect on 25.05.2018.

Attachments