# **PRIVACY NOTICE**

# UPON HIRING, CONCLUSION OF A FIXED-TERM CONTRACT AND DURING PERFORMANCE OF AN EMPLOYMENT OR FIXED-TERM CONTRACT WITH BULSTRAD

Hereby, ZEAD BULSTRAD VIENNA INSURANCE GROUP (Bulstrad, we) provides information regarding your personal data which may be processed upon hiring, conclusion of a fixed-term contract and during the performance of an employment or fixed-term contract with Bulstrad.

#### KINDS OF PERSONAL DATA PROCESSED BY US

Bulstrad commonly processes the following personal data of employees and persons hired under fixed-term contracts:

- Name: given, middle and last name;
- Personal Identification Number (PIN), Personal number of foreigner, date of birth;
- Contact data: email, address, telephone number, etc.;
- Education: educational degree and/or professional qualifications;
- Professional experience: professional and work experience, skills;
- Banking information: number of bank account; tax, financial and other information;
- Information about the evaluation of work performed: appraisals, evaluations of assigned tasks, completed trainings;
- Other information necessary for handling obligations under employment or fixed-term contracts;
- Health data: information related to sick leave notes, Labour Expert Medical Commission or National Expert Medical Commission decisions, information provided by occupational health services.

#### **GROUNDS ON WHICH WE PROCESS YOUR PERSONAL DATA**

We need to process your data in relation to the conclusion and performance of an employment (fixed-term) contract to which you are a party. Bulstrad has the right to process employee health data in accordance with the labour law and legislation in the field of social security and protection.

# PURPOSES OF USING YOUR PERSONAL DATA

The personal data provided by you will be used for the following purposes:

- administration of employment (fixed-term contract) relations;
- payment of salary, supplementary remuneration and bonuses, as well as remuneration under fixed-term contract;
- reporting and control of work performed under fixed-term contract;
- provision of additional benefits which, depending on Bulstrad's policy, may include medical insurance, sports cards and other benefits;
- use of records from the buildings access control systems, to ensure security and compliance with the employee work hours;
- participation in advertising and marketing activities;
- ensuring health and safety at work;
- human resources management and improvement of the working conditions;
- processing of health data for the administration of annual leaves, labour accidents, provision of special working conditions for persons with disabilities;
- budget administration and planning at Bulstrad;
- processing of information for achieving compliance with legal regulations, including prevention of conflicts of interest and corrupt practices.

Please note that the records from the video surveillance system in the buildings where you perform your obligations under employment (fixed-term) contract are used for ensuring safety and security, the protection of the lives and health of employees and visitors in the buildings, crime prevention and investigation, as well as the protection of Bulstrad's property. You may contact Bulstrad to receive more details.

#### PARTIES WITH WHOM WE MAY SHARE YOUR PERSONAL DATA

Bulstrad respects and protects the confidentiality of your personal data. In accordance with the legal requirements, Bulstrad may disclose your personal data to the following entities:

- Service providers: in the utilization of services for human resources management, technical support for the internal information systems and operational support for our business, it is possible that Bulstrad may disclose personal data. Such disclosure of data is done only on the basis of legitimate grounds and under a written agreement that the data recipients will ensure adequate protection level.
- Providers of additional employee benefits: in order to arrange additional employee benefits for its employees, Bulstrad may disclose your personal data to providers of such services, including to ZEAD Bulstrad Life Vienna Insurance Group, for the purpose of the employee's insurance provided by Bulstrad.
- State and municipal authorities: in the fulfillment of its legal obligations, Bulstrad may be obliged to disclose personal data of employees and persons under fixed-term contracts, at the express request of such authorities.
- Other companies within the parent Group of Bulstrad: for specific needs, it is possible that Bulstrad may share your data with other companies within the Group of Bulstrad on the territory of the EU. Such disclosure is done only in compliance with the relevant Bulgarian and EU legislation.

# PERIOD OF STORING YOUR PERSONAL DATA WITH US

Bulstrad stores the individual documents it processes for the purpose of employment (fixed-term) relations, as follows:

- Sick leave notes for a period of 3 years, starting on 1 January on the year following the year of issuance;
- Reassignment orders, orders for use of unpaid annual leave of more than 30 working days, and orders to terminate an employment relationship – 50 years;
- Other documents related to employment relations 3 years after the termination of the employment contract, unless a longer period is stipulated under the relevant legislation;
- Documents related to fixed-term contracts 5 years after the termination of the fixed-term contract, unless a longer period is stipulated under the relevant legislation.

You may contact Bulstrad for more details about the storage periods of all documents processed by us for the purpose of employment or fixed-term contract relations.

# YOUR RIGHTS RELATED TO YOUR PERSONAL DATA

In accordance with the Bulgarian legislation, you have the following rights



regarding your personal data processed by Bulstrad:

- 1. To access your personal data and receive a copy of them;
- In case of incompleteness or inaccuracy of the data, your personal data can be rectified;
- 3. To request the erasure of your personal data, in case the preconditions for this are met. Such cases are: if the purpose of the data collection has been fulfilled; if you have withdrawn your consent, where the processing of data is based on consent and there is no other legal reason for the processing; in case your data are processed unlawfully, etc.;
- 4. In the cases stipulated by the law, to request restriction of the processing of your personal data;
- 5. In the cases stipulated by the law, you have the right to object to the processing of your personal data;
- To exercise your right to data portability and to request to receive your data in a structured, commonly used and machine-readable format;
- 7. To withdraw the consent given by you, when the processing of your personal data is based on consent.

You can find detailed information on the conditions and procedure for exercising your rights in Bulstrad's Rules for Exercising the Rights of

Data Subjects, on our website (www.bulstrad.bg), as well as in each of our offices in the country.

You also have the right to lodge a complaint before the Commission for Personal Data Protection, if the appropriate preconditions for this are met.

### **CONTACT INFORMATION**

You may contact us at the following addresses: Bulgaria, 1000 Sofia, 5 Positano Sq., email: public@bulstrad.bg.

You may contact our Personal Data Officer by phone at 02/9856624 or via email: dpo-bulstrad@bulstrad.bg.

Date .....

Full name and signature of the Employee / Party to the fixed-term contract: