

Privacy notice

Hereby, „BULSTRAD VIENNA INSURANCE GROUP“ EAD („Bulstrad“) and VIG SERVICES BULGARIA EOOD („VIG“) provide information regarding your personal data which may be processed in relation to the handling of claims under insurance contracts.

WHAT KIND OF PERSONAL DATA IS PROCESSED BY US?

In the handling of claims under insurance contracts and for the provision of effective access to the services of Bulstrad, the data commonly processed by VIG and Bulstrad are of the following personal data categories:

- Name: given, middle and last name;
- Personal Identification Number (PIN), Personal Foreigner's Number, date of birth;
- Contact data: email, address and telephone number, etc.;
- Address: permanent or current;
- Banking information: number of bank account; tax related, financial and other information;
- Information related to the subject and manner of conclusion of the insurance contract and/or the subject and manner of filing of insurance claims: work experience, occupation, property owned, geolocation, IP address, etc.;
- Client number, code or other identifier created for identification purposes;
- Health data: information about your health status (diagnosis, medical history, other medical documents);
- Data provided by you, e.g. in requests, complaints and other inquiries from you;
- Records of phone calls made to and from our telephone networks;
- Video records from the security cameras in the companies' buildings.

WHAT ARE THE GROUNDS ON WHICH WE PROCESS YOUR PERSONAL DATA?

The processing of personal data is necessary for:

- For fulfillment of rights and obligations under insurance contracts, incl. administration of filed claims;
- For fulfillment of legal obligations, e.g. provision of information to the regulatory authorities (Financial Supervision Commission, Commission for Personal Data Protection, Consumer Protection Commission, etc.), to courts or investigative bodies, state institutions, organizations, individuals and legal entities. Our legal obligations are specified under different bodies of legislation.
- Based on a legitimate interest, e.g. in relation to video surveillance, for improving the quality of services offered, analysis of the insurance portfolio, prevention of insurance fraud interest, etc.;
- We may process your health data provided as evidence under insurance claims, for the purpose of establishing, assertion or defense of legal claims.

FOR WHAT PURPOSES DO WE USE YOUR PERSONAL DATA?

Personal data provided by you will be used by VIG and by Bulstrad for the following purposes:

- Administration of insurance relations;
- Handling of claims in relation to occurrence of insurance events and payment of insurance indemnity for settlement of claims;
- Handling of and responses to requests, complaints and other inquiries;
- Improvement of the service quality and increasing the level of services offered;
- Protection of a legitimate interest;
- Insurance fraud prevention;
- Risk analysis and assessment;
- Compliance with legal provisions, including prevention of conflict of interest and corruption practices;
- Statistical and analytical purposes;
- Prevention and control of misconduct, as well as protection of the company's property and adjoining areas;
- Other purposes.

WITH WHOM CAN WE SHARE YOUR PERSONAL DATA?

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

- In the utilization of services related to the purposes above and in relation to the provision of technical and operational support of their information systems, it is possible that Bulstrad and VIG may disclose personal data to service providers (consultants, experts, appraisers, lawyers, etc.);
- In discharging their obligations under certain insurances, it is possible that Bulstrad and VIG may disclose personal data to subcontractors which provide services on our behalf on and outside the territory of the Republic of Bulgaria;
- In the fulfillment of their legal obligations, Bulstrad and VIG may disclose personal data to state, supervisory, controlling, municipal, judicial and investigative bodies, incl. to external auditors;
- In accordance with the applicable Bulgarian and EU legislation, Bulstrad and VIG may disclose data to other companies within Vienna Insurance Group. In the fulfillment of its legal rights and/or obligations Bulstrad may also disclose the personal data of parties which have caused a damage or their insurer, other liable persons, private enforcement agents, postal service agents, etc.;

- In the fulfillment of its legal obligation to guarantee coverage for its insurance portfolio, Bulstrad may disclose data to reinsurers, reinsurance brokers and their representatives;
- Bulstrad works with an extended network of insurance intermediaries, in order to bring its services close to you. For this purpose personal data may be shared with insurance intermediaries.

HOW LONG DO WE STORE YOUR PERSONAL DATA?

All received documents are sent by VIG to Bulstrad for storage and further processing. Bulstrad stores the individual documents administered by it in relation to the fulfillment of its obligations under insurance contracts and claims, in the following manner:

- The insurance contracts and documents that are an integral part thereof (proposal for conclusion of insurance contract, policy, annexes, etc.) – for a maximum period of 10 years, depending on the type of insurance;
- Documents related to insurance claims – for a maximum period of 10 years, depending of the type of insurance;
- Requests, complaints or other inquiries – 5 years;
- Records of phone calls from or to our telephone networks – 1 year;
- Records proving one's acquaintance, acceptance, consent and declared circumstances, in relation to an insurance contract conclusion through an online platform – for a maximum period of 10 years, depending on the type of insurance;
- Records from the video surveillance systems installed in the companies' offices – for a maximum period of 60 days.

You may contact Bulstrad for more detailed information on the storage period of all documents processed by us.

VIG shall store records from video surveillance systems installed in the offices of the company for a maximum period of 60 days, whereas records from phone calls to and from our business telephone systems will be stored for 1 year. For more details, please contact VIG.

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 and VIG:

1. To access your personal data and receive a copy of them;
2. 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 in the law, to request restriction of the processing of your personal data;
5. In the cases when your data are processed on the basis of legitimate interests (listed above in this notice), you have the right to object against the processing of your personal data on such basis;
6. 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 office of Bulstrad or VIG 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.

AUTOMATED PROCESSING OF PERSONAL DATA – AUTOMATED DECISION MAKING

We assure you that your personal data which may be processed in relation to the handling of claims under insurance contracts are not being processed through automated means for decision making and profiling.

CONTACT INFORMATION

You can contact us at the following addresses:

„BULSTRAD VIENNA INSURANCE GROUP“ EAD, Sofia, 5 Positano Sq., email: public@bulstrad.bg. You may contact the Personal Data Officer of Bulstrad at email: dpo-bulstrad@bulstrad.bg.

You may contact VIG's Personal Data Officer at email: dpo@vig-sb.bg.

Further information on the way we process your personal data and your rights in this regard can be found on the two companies' websites: www.bulstrad.bg and www.vig-sb.bg.

Date:

Given, middle and last name and signature of the client: