

NOTIFICATION FOR CONFIDENTIAL TREATMENT OF PERSONAL DATA (CONFIDENTIALITY DECLARATION)

Your personal data and their confidentiality are important both for you, individually and for us - THE INSURANCE BROKER PRO INS LTD., considering the trust that you demonstrate by passing them on to us.

Hereby we wish to inform you what personal data, how and for what purposes, on what legal basis and for how long THE INSURANCE BROKER PRO INS LTD. (Administrator, Broker) collects, processes, stores and shares, as well as about your rights with regard to the processing of your personal data.

As a natural person, according to Regulation (EU) 2016/679 (General Data Protection Regulation) and the Personal Data Protection Act, you are a "data subject", and THE INSURANCE BROKER PRO INS LTD. is a controller or a processor who processes your personal data.

ABOUT US

THE INSURANCE BROKER PRO INS LTD. (IB PRO INS and/or the BROKER) is a body corporate, registered in the Commercial Register with the Registry Agency under UID 175124408, headquartered at: 2, Iliya Beshkov Street, Sofia, brokers@proins.bg, phones of contact person: +3592899992051, +3592899999198.

PERSONAL DATA TO BE PROCESSED

THE INSURANCE BROKER PRO INS" Ltd. collects various personal data with a view to fulfilling the insurance mediation, assigned by you for the conclusion and execution of insurance contracts, which includes research and analysis of the insurance interest; collection of offers from insurance companies for conclusion of insurance; conclusion, administration and processing of insurance policy; assistance in winding-up of damages and payment of insurance benefits.

The volume and type of data depends on the insurance chosen by the client and are the minimum necessary for an offer and/or concluded/administered insurance contract.

THE INSURANCE BROKER PRO INS LTD., as a personal data controller is collecting routinely from you or the person representing you the following personal data, which are included in the insurance contract /policy/ you wish to conclude or are necessary for its implementation:

Depending on the insurance contract type, for the purposes of bidding, concluding, and executing insurance, the Broker usually collects and processes personal data.

DATA TO BE COLLECTED AND PROCESSED

- Personal information – names, PIN/FIN, date and place of birth, nationality, address(es) (incl. Country), identity document data, data for representatives by law;
- Your contacts - phone number, e-mail address;
- Other data:

Information on the type and content of the contractual relationship, as well as any other information relating to the contractual relationship, including:

- E-mail correspondence, letters, complaints, requests, claims, recommendations;
- Bank account details or other bank and/or disbursement information, in

connection with your payments to the Broker;

- Property data – motor vehicle, property, etc.;
- Any other information, provided voluntarily by you in the course of our relationship.

GROUNDINGS FOR COLLECTING PERSONAL DATA

We need your personal data to carry out our business as an insurance intermediary, including compilation of offers, conclusion, administration, execution of insurance contracts and settlement of claims under insurance contracts.

Processing shall be carried out according to the law in force.

THE INSURANCE BROKER PRO INS LTD. processes the above-mentioned personal data on one or more of the following grounds, but not **only**:

For conclusion and execution of a contract: The Administrator concludes with you a written contract for the award of insurance mediation and collects personal data with a view to the conclusion and execution of this contract, in accordance with the Insurance Code.

For all compulsory insurances (e.g. third-party liability, compulsory accident insurance of passengers in the public transport, etc.) a written award contract is not required.

Compliance with the law: The Administrator has statutory obligations /tax, accounting, fraud prevention, money laundering, financing of terrorism, etc./ and for their execution it is obliged to collect your personal data – under the Anti-Money Laundering Measures Act, the Insurance Code and more.

Legitimate interest: For the purposes of exercising and defending legal claims.

Consent: The consent must be explicit, free, informed and given by you in case of processing of your personal data, related to sending notices, regarding the expiration and renewal of insurance, the provision of additional services and products by the Controller. At any time, you may withdraw your consent and we will suspend the processing of your personal data in the future for such purposes.

PURPOSES FOR THE COLLECTION OF PERSONAL DATA

We process your personal data for one or more of the following **purposes**:

Identification of the customer, verification of identity, provision of services, requested on your behalf or for the purpose of considering the possibility of providing such a service and / or product, including determining your requirements and needs.

Providing insurance intermediary services for the conclusion of insurance - collection, analysis and submission of offers by insurers, conclusion of insurance contracts; administration of contracts, notification of the circumstances of the proposed and / or concluded insurance contracts, payment of installments, expiration of insurance terms, assistance in the winding-up of damages.

Compilation of reports and excerpts for insurance companies and the supervisory authority – the Financial Supervision Commission.

In order to comply with legal, regulatory, and other requirements, conduct its activities in accordance with current legislation and professional norms and rules, and respond to the requirements of local and foreign regulatory, state or judicial authorities.

- To improve our services, including those for statistical purposes, analysis, audits with the

aim to inform about insurance products and services.

- Making contact concerning your objection or complaint.
- Exercise and protection of legal pretensions of the Broker.

When we process your personal data for the purposes of our main insurance mediation activity, as well as to fulfill our regulatory obligations, such processing is mandatory for these purposes. Without this data, we would not be able to provide the relevant services. For example, if you do not provide us with your names, PIN and address, as well as information about the insurance interest, we will not be able to conclude an insurance policy. In other cases, we will inform you whether this provision is mandatory and what the consequences will be if you opt out.

DISCLOSURE AND SHARING OF PERSONAL DATA WITH OTHERS

We may share your personal information with the following persons and in strict compliance with the applicable law:

Public bodies - such as courts, prosecutors, national security agencies, regulatory bodies - committees and others in order to enable them to exercise their legal powers;

Insurance companies selected by you for the purpose of making an offer or concluding an insurance;

Accountants, auditors, lawyers;

External service suppliers – IT-providers and specialists; appraisers and experts; mail, incl. email, etc.;

The insurance agencies that you have selected to conclude your insurances process your personal data separately from THE INSURANCE BROKER PRO INS LTD. and for their own purposes, being personal data controllers.

TRANSFER OF DATA TO ANOTHER COUNTRY

The Broker will not transfer your data to another EU member state or third country without your consent. Data transfer, if this is a necessary condition for providing an intermediary service for the conclusion of an insurance contract (for example, when concluding an insurance contract with an insurer, whose legal address is located in another country and does not operate in Bulgaria through a branch or under the right of establishment), will be carried out in compliance with the statutory rules and with your consent.

DATA STORAGE

THE INSURANCE BROKER PRO INS LTD. stores your personal data for a period corresponding to the purposes for which it is collected, but not less than the term of the insurance contract you have entered into.

In compliance with a statutory obligation, THE INSURANCE BROKER PRO INS LTD. will store your data for a period longer than the one specified above.

For protection of a legitimate interest, actually for the implementation of legal or other claims before the expiration of the Statute of limitations for filing, THE INSURANCE BROKER PRO INS LTD. will store your data for at least 5 years after the expiration or termination of the contract concluded with you.

YOUR RIGHTS

1. Right to access your personal data and right to receive related information provided for by law, such as: for what purpose the data is processed, which personal data is processed, the receipt of personal data, the time-limit of processing personal data, whether there is an automated decision-making that is concerning you, including profiling, and, if so, information about the logic used, the meaning and intended consequences of such processing. Upon your request, we may provide you with a copy of the personal data processed for you, and upon repeated or subsequent request may charge a reasonable fee for providing it. **THE INSURANCE BROKER PRO INS LTD.** can provide you with that information in a widely used electronic format;

2. Right to request rectification of your personal data that is inaccurate or obsolete;

3. Right to ask the Broker to restrict the processing of your personal data when:

3.1. You consider that the personal data are not accurate, in which case the restriction is for a period that allows the data controller to verify the accuracy of the personal data;

3.2. You consider that the processing of your personal data is unlawful, but do not want them to be deleted, only their use to be restricted;

3.3. You believe that the Broker no longer needs your personal data for processing purposes, but this data is necessary to establish, implement or protect legal claims;

3.4. You objected to the processing while waiting for verification of whether the grounds of **THE INSURANCE BROKER PRO INS LTD.** take priority over your interests as a data subject;

4. Right to request the deletion of your personal data ("right to be forgotten") - the Broker must remove your personal from all systems and records, where they are stored, and notify all third parties/processors to whom it has provided the data, where there is no legal basis to continue processing them, or when you have withdrawn your consent and there is no other legal basis for processing them, or where your legitimate interest takes priority over the legal grounds of the Broker, or where their processing is in breach of the law, and where there is an obligation to delete the data, pursuant to the applicable law;

5. Right to object to **THE INSURANCE BROKER PRO INS LTD.** against the processing of your personal data at any time, specifying the reasons for this – legal grounds or use of the data for direct marketing purposes, including profiling;

6. The right to be notified of the risk of a breach of the security of your personal data, as **THE INSURANCE BROKER PRO INS LTD.** must notify you of the nature of the breach and what measures have been taken as a remedy, as well as whether it has notified the supervisory authority about the breach;

7. Right to withdraw your consent for processing your personal data in part or in full at any time, without prejudice to the lawfulness of the processing on the basis of your consent, prior to the withdrawal, about which you should notify **THE INSURANCE BROKER PRO INS LTD.** as follows: in writing at 2, Iliya Beshkov Street, Sofia or by e-mail: brokers@proins.bg.

8. The right to transfer data if the basis for processing it is your consent, agreement or steps taken at your request prior to the conclusion of the contract - the right to receive in a structured, widely used and machine-readable format the personal data that you have provided to us, if there is an automated data processing, or the right to wish to transfer it directly to another person, if technically feasible. The transfer of data does not lead to their deletion and **THE INSURANCE BROKER PRO INS LTD.** will continue to process them and provide you with the intermediary service if there are legitimate reasons for this.

9. Right to lodge a complaint if you believe that the processing of your personal data is unlawful or that your rights in relation to the protection of personal data have been violated – before

the competent supervisory authority – the Commission for Personal Data Protection, address: 2, Professor Tsvetan Lazarov Street, 1592 Sofia, (www.cdpd.bg), as well as the right to a judicial remedy.

PROFILING

When preparing an individual insurance offer, as well as an insurance contract, it is possible that your personal data may be subject to profiling through information processing systems. Depending on the specifics of the particular type of insurance, THE INSURANCE BROKER PRO INS LTD. might use information systems to calculate the probability of an insured event. Information systems operate based on set criteria developed by experts.

Occasionally, we may use your personal data in systems and mechanisms that allow us to do automated analyses, based on the information we have about our customers. In this way, we take informed business decisions, improve the quality of our services, test the stability and proper functioning of our systems. Our automated approach helps us ensure that we can provide you with a fast and efficient service that meets your expectations. These automated analyses may affect the products, services, or terms that we may offer you now or in the future.

This Declaration complies with the General Data Protection Regulation 2016/679 of the European Parliament and of the Council, in force since 25.05.2018. The Personal Data Protection Act is currently applicable in Bulgaria.

Last amended: 22.05.2018