The present Rules (“Rules”) determine the terms and the procedures under which the natural persons whose personal data are processed by SOLELY OWNED JOINT STOCK COMPANY (ZEAD) BULSTRAD LIFE VIENNA INSURANCE GROUP EAD (“Bulstrad Life”) may exercise their rights according to the personal data protection legislation.

Section I
General principles

Article 1. Bulstrad processes and protects the personal data collected during their activities fairly, lawfully and in accordance with the purposes for which the data has been collected.

Article 2. (1). The employees, who process personal data for the purposes of insurance products sales, conclusion of insurance contracts, fulfillment of the obligations under the insurance contract and liquidation of claims under insurance contracts as part of their employment duties, observe the following principles during the processing of personal data:
1. The personal data is processed lawfully and fairly.
2. The personal data is collected for specified, explicit and legitimate purposes and not processed in a manner that is incompatible with those purposes.
3. The personal data collected during the HR administration are relevant, related to and not exceeding the purposes for which they are processed.
4. The personal data is correct and, if necessary, updated.
5. The personal data are deleted or rectified when they are found to be inaccurate or disproportionate to the purposes for which they are being processed.
6. The personal data are maintained in a form allowing identification of the individuals for a period that is not longer than is necessary for the purposes for which the data are processed.
(2). The employees who process personal data are initially and periodically trained for confidentiality and are acquainted with the applicable legislation.

Section II
Definitions

Article 3. The following definitions have the following meanings in these Rules:
“Personal data” means any information relating to an identified or identifiable natural person who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person;
“Applicable law” means the legislation of the European Union and the Republic of Bulgaria, which is relevant to the protection of personal data;
“Profiling” means any form of automated processing of personal data consisting of the use of personal data to evaluate certain personal aspects relating to a natural person, in particular to analyze or predict aspects concerning that natural person’s performance at work, economic situation, health, personal preferences, interests, reliability, behaviour, location or movements.
“Data subject” means the natural person who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person;

Section III
Data subjects’ rights

Article 4. The data subjects have the following rights regarding their personal data:
1. Right of access;
2. Right to rectification;
3. Right to data portability;
4. Right to erasure (‘right to be forgotten’);
5. Right to request restriction of the processing.
6. Right to object to the processing of personal data;
7. Right of the data subject not to be subject to decisions based on a fully automatic processing, including profiling.

**Right of access**

**Article 5. (1).** Upon request, Bulstrad Life provides to the data subject the following information:
1. confirmation whether Bulstrad Life process the individual’s personal data;
2. copy of the personal data undergoing processing by Bulstrad Life;
3. explanation about the processed data.

(2). The explanation under 1(3) includes the following information about the personal data processed by Bulstrad Life:
1. the purposes of the processing;
2. the categories of personal data concerned;
3. the recipients or categories of recipient to whom the personal data have been or will be disclosed, in particular recipients in third countries or international organizations;
4. where possible, the envisaged period for which the personal data will be stored, or, if not possible, the criteria used to determine that period;
5. the existence of the right to request rectification or erasure of personal data or restriction of processing of personal data concerning the data subject or to object to such processing;
6. the right to complain with a supervisory authority;
7. where the personal data are not collected from the data subject, any available information as to their source;
8. the existence of automated decision-making, including profiling and information about the logic involved, as well as the significance and the envisaged consequences of such processing for the data subject;
9. where personal data are transferred to a third country or to an international organization, the data subject shall have the right to be informed of the appropriate safeguards relating to the transfer.

(3). The explanation about the processed data includes the information provided by Bulstrad Life to the data subjects by means of a privacy notice.

**Article 6. (1).** Upon request by the data subject, Bulstrad Life may provide a copy of the personal data that is being processed.
(2). When providing a copy of personal data, Bulstrad Life cannot disclose the following categories of data:
1. personal data of third parties unless they have given their explicit consent for this;
2. data that are business secret, intellectual property or confidential information;
3. other information protected by the applicable law.

(3). The provision of access to data subjects cannot affect adversely the rights and freedoms of third parties and cannot result in a breach of statutory obligation by Bulstrad Life.

**Article 7. (1).** Where the requests for access are manifestly unfounded or excessive, especially because of their repeatability, Bulstrad Life may charge a reasonable fee based on the administrative costs of providing the information or may refuse to respond to the request for access.
(2). Bulstrad Life decides for each case whether a request is manifestly unfounded or excessive.
(3). Where Bulstrad Life refuses to grant access to personal data, Bulstrad argues its refusal and informs the data subject of his right to lodge a complaint with the PDPC.

**Right to rectification**

**Article 8. (1).** Data subjects may request that their personal data processed by Bulstrad Life be rectified if the data are incorrect or incomplete.
(2). When a request for rectification is respected, Bulstrad Life notifies the other recipients to which the data has been disclosed (e.g. state authorities, service providers), so that they can reflect the amendments as well.

**Right to erasure (‘right to be forgotten’)**

**Article 9. (1).** Upon request, Bulstrad Life is obliged to delete the personal data if any of the following grounds exists:
1. the data are no longer necessary about the purposes for which they were collected or otherwise processed;
2. the data subject withdraws the consent on which the processing is based and where there is no other legal ground for the processing;
3. the data subject objects to the processing, and there are no overriding legitimate grounds for the processing;
4. the data subject objects to the processing of personal data for direct marketing;
5. the personal data have been unlawfully processed;
6. the personal data must be erased in order to comply with a legal obligation of Bulstrad Life;
7. the personal data have been collected for offering of services to children by the information society within the meaning of the Regulation.

(2). Bulstrad Life is not obliged to delete the personal data as far as the processing is necessary:
1. for exercising the right of freedom of expression and information;
2. to comply with a legal obligation of Bulstrad Life;
3. for reasons of public interest in the area of public health in accordance with letters (h) and (i) of Article 9(2) as well as Article 9(3) of Regulation (EU) 2016/679;
4. for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes in accordance with Article 89 (1) of Regulation (EU) 2016/679, in so far as the right referred to in paragraph 1 is likely to render impossible or seriously impair the achievement of the objectives of that processing;
5. for the establishment of, exercise of or defense against legal claims;

Right to restriction of processing

Article 10. (1). The data subject has the right to obtain restriction of processing where one of the following applies:
1. the accuracy of the personal data is contested by the data subject, for a period enabling the controller to verify the accuracy of the personal data;
2. the processing is unlawful and the data subject opposes the erasure of the personal data and requests the restriction of their use instead;
3. Bulstrad Life no longer needs the personal data for the purposes of the processing but the individual requires the data to establish, exercise or defend a legal claim;
4. the data subject has objected to processing based on the legitimate interest of Bulstrad Life and verification whether the legitimate grounds of the controller override those of the data subject is being carried out.

(2). Bulstrad Life may process personal data with restricted processing only for the following purposes.
1. for storage of the data
2. with the consent of the data subject;
3. for the establishment of, exercise of or defense against legal claims;
4. for protection of the rights of another natural person;
5. due to important reasons of public interest;

(3). When the data subject has requested restriction of processing and one of the grounds under Article 1 above, Bulstrad Life informs the data subject before the revoking of the limitation of the processing.

Right to data portability

Article 11. (1). The data subject has the right to receive the personal data relating to him and which he has provided to Bulstrad Life in a structured, commonly used and machine-readable format;

(2). Upon request, the data subject has the right to prefer that his data is transmitted directly from one controller to another, if technically feasible.

(3). The data subject may exercise the right of portability in the following cases:
1. the processing is based on the individual’s explicit consent;
2. the processing is necessary to fulfill a contract;
3. the processing is carried out by automated means.

(4). The right of portability cannot affect adversely the rights and freedoms of others.

Right to object

Article 12. (1). The data subject has the right to object to the processing of his personal data by Bulstrad Life if the data is processed on one of the following grounds:
1. processing is necessary for tasks in the public interest or exercise of authority vested in the controller;
2. processing is needed for purposes relating to the legitimate interests of Bulstrad Life or a third party;
3. the processing of data includes profiling.
(2). Bulstrad Life terminates the processing of personal data unless he can demonstrate compelling legitimate grounds for the processing that override the interests, rights and freedoms of the data subject, or for the establishment, exercise or defense of legal claims.

Right to object to processing of personal data for direct marketing

Article 13. (1). Where personal data are processed for direct marketing purposes, the data subject shall have the right to object at any time to processing of personal data concerning him or her for such marketing, which includes profiling to the extent that it is related to such direct marketing.
(2). Where the data subject objects to processing for direct marketing purposes, the processing of personal data for such purposes is terminated.

Right to human intervention in automated decision making

Article 14.(1). In cases where Bulstrad Life makes automated individual decisions including or excluding profiling having legal consequences for, or significantly affecting the individuals in a similar manner, these individuals may request a revision of the decision with human intervention and they may express their point of view.
(2). Bulstrad Life provides the individuals-subject to automated decision making essential information about the logic involved, as well as the significance and the envisaged consequences of such processing for the data subject.

Section IV
Procedures for exercising the rights of data subjects

Article 15.(1). The data subjects may exercise the rights under these Rules by submitting a request for the exercise of the applicable right (Attachments from 1 to 7 to these Rules).
(2). Requests to exercise the rights of the data subjects may be applied in the following manner:
1. By an e-mail to the following e-mail address::bullife@bulstradlife.bg
2. At an office of Bulstrad Life;
3. Via regular mail to the address of the Headquarters of Bulstrad Life: Bulgaria, Sofia 1301, 6, Sveta Sofia St.; Tel. +359 2 401 4000
(3). The request for the exercise of personal data rights should contain the following information:
1. Identification of the person - name and PIN/policy number/client number
2. Contact information for responding - address, telephone, e-mail
3. Request - description of the request

Article 16. (1). Bulstrad Life provides information about the actions taken in relation to the request for exercise of rights of the data subjects within one month from the receipt of the request.
(2). If necessary, that period may be extended by 2 further months, taking into account the complexity and the number of the requests by the data subject. Bulstrad Life informs the individual within one month of the receipt of the request and explains why the extension is necessary.
(3). Bulstrad Life is not obliged to respond if they are not in a position to identify the data subject.
(4). Bulstrad Life may request additional information required to confirm the identity of the data subject where there are reasonable concerns about the identity of the natural person making the request.
(5). Where the data subject makes the request by electronic means, the information is provided by electronic means, unless otherwise requested by the data subject.

Final provisions

These Internal Rules have been adopted by Protocol No. 231 of 12.04.2018 of the Managing Board of the company.