

Policy on Exercising the Rights of Personal Data Subjects

This policy (the "Policy") sets out the terms and conditions under which individuals whose personal data is processed by UNIQA AD and UNIQA Life AD (each referred to separately as "UNIQA" or the "Company") may exercise their rights under data protection legislation.

Part 1: General principles

1.1. UNIQA shall process and protect personal data collected in the course of its business fairly, lawfully, and in accordance with the purposes for which the data was collected.

1.2. Employees who process personal data for the purposes of distributing insurance products, entering into contracts for the provision of insurance services, and performing obligations under such agreements as part of their employment duties shall comply with the following principles when processing personal data:

- i) Personal data shall be processed lawfully and in good faith;
- ii) Personal data shall be collected for specified, well-defined, and lawful purposes and shall not be further processed in a manner incompatible with such purposes;
- iii) The personal data collected and processed upon human resources management is relevant, related to, and not excessive to the purposes for which it is processed;
- iv) Personal data is accurate and kept up to date where necessary;
- v) Personal data is erased or rectified where it is found to be inaccurate or disproportionate to the purposes for which it is processed;
- vi) Personal data shall be kept in a form that permits identification of the individuals concerned for no longer than is necessary for the purposes for which the data was collected.

1.3. Employees who process personal data shall receive initial and periodic data privacy training and familiarization with applicable legislation.

Part 2: Definitions

The below-listed definitions have the following meanings:

"Personal data" shall mean any information relating to an identified individual or an identifiable individual, whether directly or indirectly, in particular by reference to an identifier such as a name, identification number, location data, online identifier, or one or more factors specific to the physical, physiological, genetic, mental, psychological, economic, cultural or social identity of such an individual;

"Applicable Legislation" shall mean the legislation of the European Union and the Republic of Bulgaria that is relevant to the protection of personal data;

"Profiling" shall mean any form of automated processing of personal data that involves the use of personal data to evaluate certain personal aspects relating to an individual, in particular, to analyze or predict aspects relating to the performance of that individual's professional duties, economic situation, health, personal preferences, interests, reliability, behaviour, location, or movements;

"Data subject" shall mean an individual who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, identification number, location data, online identifier, or one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of such an individual;

"**Regulation (EC) 2016/679**" shall mean Regulation (EC) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of individuals with regard to the processing of personal data and the free movement of such data, and repealing Directive 95/46/EC (General Data Protection Regulation), as promulgated in the Official Journal of the European Union on 4 May 2016.

Part 3: Rights of data subjects

Data subjects have the following rights regarding their personal data:

- i) Right of access;
- ii) The right to rectification;
- iii) Right to data portability;
- iv) Right to erasure (Right “to be forgotten”);
- v) Right to request restriction of processing;
- vi) Right to object to the processing of personal data;
- vii) The right of the data subject not to be subject to a decision based solely on automated processing, whether or not that processing includes profiling.

3.1. *Right of access*

3.1.1. Upon request, UNIQA shall provide a data subject with the following information:

- i) information as to whether or not UNIQA processes the personal data of the data subject;
- ii) a copy of the personal data of the data subject that is processed by UNIQA; and
- iii) an explanation of the data processed.

3.1.2. The explanation under Art. 3.1.1 (iii) shall include the following information about the personal data processed by UNIQA:

- i) the purposes of the processing;
- ii) the pertaining categories of personal data concerned;
- iii) the recipients or categories of recipients to whom the personal data has been or will be disclosed, in particular recipients in third countries or international organizations;
- iv) where possible, the intended period for which the personal data will be kept, and if that is not possible, the criteria used to determine such a period;
- v) the existence of a right to request rectification or erasure of personal data or restriction of processing of personal data relating to the data subject or to object to such processing;
- vi) the right to lodge a complaint with a supervisory authority;
- vii) where the personal data is not collected from the data subject, any available information about its source;
- viii) the existence of automated decision-making, regardless of whether such processing also involves profiling, and information on the logic used and the significance and intended consequences of such processing for the data subject;
- ix) when personal data is transferred to a third country or an international organization, the data subject has the right to be informed of the appropriate safeguards about the transfer.

3.1.3. The explanation about the data processed shall contain the information that UNIQA provides to data subjects by means of privacy notices.

3.1.4. If requested by the data subject, UNIQA may provide a copy of the personal data being processed.

3.1.5. When providing a copy of personal data, UNIQA should not disclose the following categories of data:

- i) personal data of third parties, unless they have expressly consented thereto;
- ii) data that constitutes trade secrets, intellectual property, or confidential information;
- iii) other information protected under the applicable law.

3.1.6. The granting of access to data subjects may not adversely affect the rights and freedoms of third parties or result in a breach of a legal obligation by UNIQA.

3.1.7. Where access requests are clearly unfounded or excessive, mainly because of their repetitive nature, UNIQA may charge a reasonable fee based on the administrative costs of providing the information or refuse to respond to the access request.

3.1.8. UNIQA shall assess on a case-by-case basis whether a request is clearly unreasonable or excessive.

3.1.9. In the event of refusal to grant access to personal data, UNIQA shall state the reasons for its refusal and inform the data subject of his/her right to lodge a complaint with the Personal Data Protection Commission.

3.2. Right of rectification

3.2.1. Data subjects may request that their personal data processed by UNIQA be rectified in the event that it is inaccurate or incomplete.

3.2.2. If a request for rectification of personal data is granted, UNIQA shall notify the other recipients to whom the data has been disclosed (e.g., government authorities, service providers) so that they can react to the amendments.

3.3. Right to erasure (Right "to be forgotten")

3.3.1. Upon request, UNIQA must erase personal data if any of the following grounds apply:

- i) the personal data is no longer necessary for the purposes for which it was collected or otherwise processed;
- ii) the data subject withdraws his/her consent on which the processing is based, and there is no other legal basis for the processing;
- iii) the data subject objects to the processing, and there are no overriding legitimate grounds for the processing;
- iv) the data subject objects to the processing for direct marketing purposes;
- v) the personal data has been unlawfully processed;
- vi) the personal data must be erased to comply with a legal obligation of UNIQA;
- vii) the personal data has been collected in connection with the provision of information society services to children within the meaning of Art. 8, Par. 1 of Regulation (EC) 2016/679.

3.3.2. UNIQA is not obliged to erase personal data insofar as the processing is necessary:

- i) to exercise the right to freedom of expression and the right to information;
- ii) to comply with a legal obligation by UNIQA;
- iii) for reasons of public interest in the field of public healthcare in accordance with Article 9(2)(h) and (i) and Article 9(3) of Regulation (EC) 2016/679;
- iv) for the purposes of archiving in the public interest, scientific or historical research, or statistical purposes pursuant to Article 89(1) of Regulation (EC) 2016/679, in so far as the right to erasure is likely to render impossible or seriously impede the achievement of the purposes of such processing; or
- v) for the establishment, exercise, or defense of legal claims.

3.4. Right to restriction of processing

3.4.1. The data subject shall have the right to request the restriction of processing where one of the following applies:

- i) the accuracy of the personal data is contested by the data subject; the restriction of processing shall apply for a period allowing the controller to verify the accuracy of the personal data;
- ii) the processing is unlawful, but the data subject does not wish the personal data to be erased, but requests instead that its use be restricted;
- iii) UNIQA no longer needs the personal data for the purposes of the processing, but the data subject requires it for the establishment, exercise, or defense of legal claims;
- iv) the data subject has objected to the processing on the grounds of UNIQA's legitimate interest, and an investigation is ongoing to determine whether the controller's legitimate grounds override the data subject's interests.

3.4.2. UNIQA may process personal data whose processing is restricted only for the following purposes:

- i) to store the data;
- ii) upon the data subject's consent;
- iii) for the establishment, exercise, or defense of legal claims;
- iv) for the protection of the rights of another individual; or
- v) for important reasons of public interest.

3.4.3. Where a data subject has requested a restriction of processing and one of the grounds referred to in Art. 3.4.1 above applies, UNIQA shall inform the data subject before revoking the restriction of the processing.

3.5. The right to data portability

3.5.1. The data subject shall have the right to receive the personal data provided to UNIQA by him/her in a structured, commonly used, and machine-readable format.

3.5.2. Upon request, this data may be transferred to another controller designated by the data subject, where this is technically feasible.

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

- i) the processing is performed on the basis of the data subject's consent;
- ii) the processing is performed on the basis of a contractual obligation;
- iii) the processing is performed by automated means.

3.5.4. The right to portability may not adversely affect the rights and freedoms of others.

3.6. Right to object

3.6.1. The data subject shall have the right to object to the processing of personal data concerning him/her by UNIQA if the data is processed on one of the following grounds:

- i) the processing is necessary for the performance of a task performed in the public interest or in the exercise of official authority which is delegated to the controller;
- ii) the processing is necessary for purposes relating to the legitimate interests of UNIQA or a third party;
- iii) the processing involves profiling based on the previous two grounds.

3.6.2. UNIQA shall terminate the processing of personal data unless it establishes compelling legitimate grounds for its continuation, which override the interests, rights, and freedoms of the data subject or for the establishment, exercise, or defense of legal claims.

3.6.3. Where personal data is processed for direct marketing purposes, the data subject shall have the right to object at any time to processing the personal data for this purpose, including profiling related to direct marketing.

3.6.4. Where the data subject objects to processing for direct marketing purposes, the processing of personal data for those purposes shall be terminated.

3.7. Right to human intervention in automated decision-making

3.7.1. In cases where UNIQA makes automated individual decisions, regardless of whether these decisions are made by means of profiling, which give rise to legal consequences for individuals or affect them to a significant extent in a similar way, these individuals may request a review of the decision with human intervention as well as express their point of view.

3.7.2. UNIQA shall provide the individuals subject to automated decision-making with essential information about the logic used as well as about the meaning and intended consequences of this processing for the individual.

Part 4: Procedure for the exercise of data subjects' rights

4.1. Data subjects may exercise rights under this Policy by submitting a written request to exercise the pertaining right.

4.2. A request to exercise the rights of data subjects may be made in the following manner:

- i) Electronically on UNIQA's corporate website www.uniqa.bg or at dpo@uniqa.bg, subject to the Electronic Document and Electronic Certification Services Act and the Electronic Identification Act;
- ii) By submitting a written application on-site at UNIQA's head office at 1000 Sofia, 18 Todor Alexandrov Blvd., or at any other office of UNIQA.

4.3. The request for exercising rights related to personal data protection should contain the following information:

- i) Identification of the person – name, address, personal identification number, and verification of identity document;
- ii) The preferred form for providing the information – address, telephone, or email;
- iii) Request – description of the request;
- iv) A signature, date of submitting the request, and mailing address.

4.4. Where the request is made by an authorized person, the appropriate authorization shall also be attached.

4.5. UNIQA shall provide information on the activities undertaken concerning a request for exercising the data subjects' rights within one month of receipt of the request.

4.6. If necessary, this period may be extended by a further two months, taking into account the complexity and number of requests from a particular person. UNIQA shall inform the person of any such extension within one month of receipt of the request, including the reasons for the delay.

4.7. UNIQA shall not be obliged to respond to a request if it is unable to identify the data subject.

4.8. UNIQA may request the provision of additional information necessary to confirm the identity of the data subject where there are reasonable concerns about the identity of the individual making the request.

4.9. Where the request is made by electronic means, the information shall, where possible, be provided by electronic means unless the data subject has requested otherwise.

This Policy has been adopted by resolution of the Board of Directors of each of the Companies dated 2 May 2018 and updated by resolution of the Board of Directors of each of the Companies dated 11 March 2020.

For UNIQA AD:

For UNIQA Life AD:

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