

Privacy Policy Information on the processing of personal data

We refer to articles 13 and 14 of regulation 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, repealing Directive 95/46/EC (hereinafter referred to as "GDPR")

In relation to the processing of personal data of data subjects the processor hereby provides the relevant information pursuant to Articles 13 and 14 of GDPR.

Controller: Colonnade Insurance S.A., registered seat Rue Jean Piret 1, L-2350 Luxembourg, The Grand Duchy of Luxembourg, company ID No. B 61605, acting through **Colonnade Insurance S.A. – Bulgaria Branch**, with its registered office 51B Cherni vrah blvd., Entrance B, Floor 2, FairPlay Business Center, 1407 Sofia, Bulgaria, UIC: 204603407, VAT number: BG 204603407

Controller Contact Details:

Postal address:

Colonnade Insurance S.A., Rue Jean Piret 1, L-2350 Luxembourg, Luxembourg

or

Colonnade Insurance S.A. – Bulgaria Branch

51B Cherni vrah blvd., Entrance B, Floor 2, FairPlay Business Center, 1407 Sofia, Bulgaria
phone contact: 0700 14 251, email contact: info@colonnade.bg

Data Protection Officer Contact Details:

Postal address:

Colonnade Insurance S.A. – Bulgaria Branch

51B Cherni vrah blvd., Entrance B, Floor 2, FairPlay Business Center, 1407 Sofia, Bulgaria
phone contact: 0700 14 251, email contact: dpo@colonnade.bg

Purposes and legal bases of processing:

- I. The controller processes personal data of clients, potential clients, their representatives, persons who caused damages, beneficiaries and witnesses of loss events for the following purposes:
 - a) Identification of clients and their representatives and preservation of the possibility of future control of this identification for the purpose of the conclusion of insurance contracts and management of insurance; handling of claims or loss events; the protection and seeking of the rights of the controller; documenting the controller's activity; supervision of the controller and its activities; to fulfil the obligations and tasks of the controller under the Code of Insurance; the management of reinsurance contracts between the controller and the reinsurance undertaking, a reinsurance undertaking from another Member State or a foreign reinsurance undertaking; handling of claims from reinsurance contracts and for the purpose of checking indemnities from the insurance contracts for which the reinsurance undertaking, the subsidiary of the reinsurance undertaking from another Member State and the branch of the foreign reinsurance undertaking provides reinsurance – the controller processes personal data on the legal basis of Article 6 point 1. c) of GDPR - processing is necessary for compliance with a legal obligation of the controller under the Code of Insurance and on the legal basis of Article 6 point 1. b) of GDPR - processing is necessary for the performance of a contract.
 - b) Fulfilment of obligations in respect of international sanctions – on the legal basis of Article 6 point 1. c) of GDPR - processing is necessary for compliance with a legal obligation of the controller.
 - c) Provision of data to public authorities – on the legal basis of Article 6 point 1. (c) of GDPR - processing is necessary for compliance with a legal obligation of the controller.
 - d) Direct marketing – approaching a client with business information and offers - on the legal basis of Article 6 point 1. f) of GDPR (see Recital 47 GDPR) - processing is necessary for the legitimate interests pursued by the controller.
The legitimate interest of the controller is the realization of its right to conduct business activities and the resulting interest in approaching the client with business information and offers of other products with the intention of concluding an insurance contract.
 - e) Verification of the identification of a natural person and its occurrence on sanctions lists – on the legal basis of Article 6 point 1. f) of GDPR - processing is necessary for the purposes of the legitimate interests of the

controller.

The legitimate interest of the controller or its owners for the purpose of verifying of the identification of a natural person and its occurrence on sanction lists is the fulfilment of the obligations arising out of the laws governing the controller, its owners, or their statutory bodies.

- f) Direct marketing - approaching the data subject with offers of products and services, advertising materials and other information about innovations and activities of the controller - on the legal basis of Article 6 point 1. a) of GDPR - consent to the processing of personal data.
- g) Improvement of speed and quality of preparation of business offers and policy proposals, administrative and claims handling services using latest technologies and solutions including the ones with artificial intelligence - on the legal basis of Article 6 point 1. f) of GDPR - processing is necessary for the legitimate interests of the controller.

The legitimate interest of the controller is the realization of its right to conduct business activities in the most efficient way to be competitive and to provide the client with fast and high-quality services at attractive prices.

- II. The controller processes through processors also special category of personal data of clients and their representatives – biometric data contained in the biometric signature for the purpose of concluding a contractual relationship using biometric signature and subsequent management (storage) of the corresponding contractual documentation containing biometric signature – on the legal basis of Article 6 point 1. a) of GDPR - consent to the processing of personal data.

Categories of personal data concerned:

- 1. common personal data as referred to in Article 6 of GDPR (points I. a), b), c) and e));
- 2. specific category of personal data - health data (point I. a)) and biometric signature (point II.);
- 3. cookies¹ – all types and types (especially necessary, preferential, analytical, statistical, tracking, profiling, for targeted advertising – targeting, marketing, geolocation, plug-ins for social networks).

Categories of recipients of personal data: agents, financial advisers, financial intermediaries from another Member State in the insurance or reinsurance sector, experts, providers of assistance services, providers of health / medical services, physicians preparing opinions and expert opinions, reinsurers, companies providing out-of-court debt recovery services, companies providing postal and related services, companies providing services for the administration and storage of documents and data, their shredding and disposal, backup and data recovery, providers of IT services, companies processing cookies, persons providing services in claims handling area, persons operating registers of information on claims or damage incidents or lists of sanctions / sanctioned entities, enforcement agents / judicial officers, law enforcement authorities, judicial authorities, Financial Supervision Commission (FSC), other public authorities and bodies of supervision and/or supervisory authorities.

Transfer of personal data to third countries: The controller may transfer certain personal data between the European Union (“EU”) and non-EU countries, such transfers are subject to the rules as specified in the EU Standard Contractual Clauses (“SCC”) or are carried out on the basis of the European Commission's adequacy decision pursuant to Article 45 of GDPR or on the basis of the EU-U.S. Data Privacy Framework.

Retention period of personal data: personal data shall be processed for a maximum period of 10 years from the end of the purpose of processing; for individual cookies, these periods are listed on the website of the controller www.colonnade.bg/en/data-privacy-policy in section 11. Other information collected through the Colonnade Electronic Services.

Profiling: The controller may use automated decision-making processes based on data provided by the data subject and / or his / her representative (e.g. insured, claimant, legal representative, financial intermediary) and using customer profiling. Algorithms of the controller consider a variety of factors such as data subject demographics (e.g. age), current risk trends related to specific insurance coverages, claim history, cookies and others. These automated processes can be used in the following contexts:

- 1. assessment of insurance risk, which may affect the scope of the offered product, the amount of premium or the refusal to conclude an insurance contract;
- 2. addressing the data subject through direct marketing or another sales channel and offering her / him an insurance product or service;

¹ A cookie is a small amount of status data in the HTTP protocol that the WWW server sends to the web browser at the same time as the requested web page of the given website, if it uses cookies. If cookies are enabled in the browser, they are stored on the user's computer, usually as a short text file in a specified location.

3. payment of compensation in certain types of claims, with regards to their approval and amount of indemnity paid;
4. compliance with international sanctions that may affect the possibility of concluding an insurance contract or payments of claims.

The data subject and / or his / her representative has also the right to contact the controller and request justification for the automated decision, human intervention on the part of the controller, the right to express his / her point of view and the right to contest the decision.

Rights of the data subject:

1. The right of access to personal data relating to it;
2. The right to rectify the incorrect personal data relating to it;
3. The right of erasure of personal data relating to it;
4. The right to restrict the processing of personal data;
5. The right to object to the processing of personal data relating to it;
6. The right to the portability of personal data;
7. The right to revoke his / her consent to the processing of personal data at any time;
8. The right to lodge a complaint with the supervisory authority.

The data subject has the rights referred to above to the extent defined in Articles 15 to 21 and Article 77 of GDPR. The data subject may exercise her or his / her rights verbally, in writing or electronically, through the above-mentioned contact details. If the data subject requests the verbal provision of information, the information shall be provided upon proof of his / her identity.

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.

Failure to provide the necessary personal data by the data subject may result in non-conclusion of the insurance contract in question, non-payment of insurance claims.

Information on the source of personal data: personal data relating to the data subject have been obtained from the following sources: client, client representative, agent, financial advisor, financial intermediary from another Member State in the insurance or reinsurance sector, persons inputting personal data into portals of the controller, persons reporting a claim, reinsured, processor pursuant to Article 28 of GDPR, Commercial register, contractual partners of the controller authorized to provide personal data of data subjects for direct marketing purposes, judicial officers, law enforcement authorities, judicial authorities, Financial Supervision Commission (FSC), other public authorities and bodies of supervision and/or supervisory authorities.