

## **INFORMATION BY INSURANCE BROKER MV FINANCE EOOD REGARDING PERSONAL DATA PROCESSING**

Your privacy is important to us. We have taken all the necessary organizational and technical measures in order to process your personal data in a manner that is lawful, appropriate and transparent. In this privacy statement by Insurance Broker “MV Finance” EOOD, the Broker, we explain which of your personal details we will process, for what purposes and on what grounds, to whom we could provide them and how long will we store them.

We recommend that you read this information carefully, so that you know more about the manner of processing of your personal data as a client, potential client, related party to a client of ours, counterparty, contact person, representative of a legal entity, or any other interested party. Regardless of what are the purposes and the grounds on which we process your personal data, the Broker will treat your data with equal care. This document contains also information about your rights and the manners in which you can exercise them.

The Broker may update this privacy statement and its most recent version will be available at [www.mvfinance.bg](http://www.mvfinance.bg). The Broker will inform you of all material changes to its terms via its website or other communication channels.

You will also find more information about the Bulgarian privacy legislation on the website of the Bulgarian Commission for Personal Data Protection at [www.cdpd.bg](http://www.cdpd.bg)

### **1. About the company**

**Insurance Broker “MV Finance” EOOD (hereinafter referred to as the Broker), Company EIK 205990017, 147, Hajdushka Gora 147, fl. 1. #1, 1404 Sofia. For questions, related to the processing of personal data, please contact the Data Protection Officer at [office@mvfinance.bg](mailto:office@mvfinance.bg)**

“MV Finance” EOOD is registered as Personal Data Controller with the Personal Data Protection Commission. The Broker shall, in its capacity of a Personal Data Controller, conducts its activities in strict compliance with the requirements of the Personal Data Protection Act and Regulation (EU) 2016/679 of the European Parliament and of the Council on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, in order to ensure confidentiality and lawful collection and processing of clients’ personal data. **The Broker** distributes insurance products and provide related financial services.

**The Broker** is a controller with respect to the personal data of its clients but also a personal data processor. In this case, the Broker processes data of

insured persons, by following their instructions in carrying out this activity.

## 2. Definitions

**a. “Personal data”** means any information relating to an identified or identifiable natural person (‘data subject’); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, a personal identification number, location data, gender, address, telephone number, 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.

**b. "Processing of personal data”** any operation or set of operations which is performed on personal data whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

## 3. Rights of Data Subjects

If you are a person whose personal data is processed by The Broker under the General Personal Data Regulation, effective since 25.05.2018, you have the following rights that you can exercise by visiting the office of the Broker.

**a. Right to access** - Upon your request, as the data subject, the Broker shall provide information about the categories of the personal data relating to you, which are being collected and processed by the Broker, and information about the purposes of the processing, the recipients or categories of recipients to whom your data are disclosed and the sources of this data, except the cases when the data was collected directly from you.

**b. Right of rectification, blocking (restriction of processing) and/or erasure (deletion)** – Upon your request, the Broker shall correct, erase or cease the processing of your personal data in the cases when its processing would be unlawful. In such cases the Broker shall notify all third parties to whom your personal data has been disclosed regarding all rectifications and erasures that have been made or all cases of restriction of processing of your personal data.

**c. Right to data portability** – As a data subject, you have the right to request to receive the personal data concerning you, which you have provided to the Broker, in a structured and commonly used and machine-readable format and you have the right to transmit/transfer those data to another Controller without hindrance from the Broker as personal data controller, to whom the data was provided, where the processing is based on consent or on a contract or the processing of your personal data is carried out by automated means.

**d. Right to object** – As data subject, you have the right to object to the processing of your personal data when the processing of personal data is based on the Broker's legitimate interest. The Broker shall review your objection and shall provide its opinion in writing within 30 days unless this term needs to be extended,

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for which the Broker will notify you in due time. After reviewing the objection, the Broker will generally discontinue the processing of your personal data and will notify all interested parties to whom the personal data have been submitted of the objection received and of the measures taken in this regard. In some cases, however, the Broker has an indisputable legal basis to continue the processing of your personal data even after receiving your objection (for example, in cases of lawsuits, fraud surveillance, etc.). In such cases the Broker will contact you to clarify the reasons why it will continue to process your personal data. If your objection concerns the processing of personal data for direct marketing, the Broker will suspend unconditionally the processing of your for that purpose.

**f. Right to withdraw the consent** given for personal data processing for the purposes outlined in the Declaration of Consent. The withdrawal can be done via a consent withdrawal declaration form that is available at the Broker’s office.

**g. Right to lodge a complaint with the Commission for Personal Data Protection (CPDP)** – as the data subject, you have the right to lodge a complaint with the Commission for Personal Data Protection (CPDP) against the actions of the Broker in connection with the processing of your personal data.

In the cases when you are exercising your rights as a data subject, it would be necessary for you to make a detailed description of your request in the application submitted to the Broker. When exercising your rights, the Broker will need to verify your identity so as to avoid anyone else trying to impersonate you. For this purpose, the Broker may require an ID card or other identification document when providing you with the information you request.

You may ask in writing various questions about the processing of your personal data by the Broker, both in your service office and electronically at [office@mvfinance.bg](mailto:office@mvfinance.bg).

If you do not agree with the Broker's opinion regarding your inquiry or if you wish to receive more information, please visit the website of the Commission for Personal Data Protection at [www.cdpd.bg](http://www.cdpd.bg) where you could file a complaint.

In the cases when the Broker has received your personal data from third parties, e.g. the Commercial Registry or other public sources, and is processing them for its own purposes, you may file a complaint against the actions of these third parties directly to them.

The exercise of your rights can not be opposed to the provision of your personal data to the competent authorities for the prevention, investigation and detection of criminal offenses.

## **WHAT IS IMPORTANT TO KNOW WHEN YOU EXERCISE YOUR RIGHTS**

**How to claim our rights?** In order to exercise your rights under the Regulation, you may email us or send us a letter by mail to the address of the Broker or our Data Protection Officer. You may ask questions in writing, different by nature, regarding the processing of your personal data by the Broker, both in your on-site office and electronically at [office@mvfinance.bg](mailto:office@mvfinance.bg).

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Applications for the exercise of your rights are generally submitted in person or by a person specifically authorized by you. Where there are regulatory procedural rules regarding the exercise of your rights (in the Regulation, the Law on Personal Data Protection and other acts), they should also be respected.

**In what form will we answer you?** In the form in which you sent your inquiry to us - in writing or in electronic form. When you have submitted an electronic request, the information will, where possible, be provided in a widely used electronic form (word, pdf, excel), unless you have requested otherwise.

**How long will you get your answer?** Within **one month** of receiving your request, we will provide you with information about the actions we have taken on it. If necessary, this period may be extended by **two more months**, taking into account the complexity and number of requests. If such an extension is required, we will notify you within one month of submitting your request, explaining to you what the reasons for such an extension are.

**Doubts about your identity.** In cases where you exercise your rights as a data subject, it is necessary to prepare a detailed description of your claim in the application submitted to the Broker. When exercising your rights, it is necessary for the Insurance Broker "EM Finance" Ltd. to check your identity, so that it does not appear that someone else is trying to impersonate you. For this purpose, the Broker may ask you for an identity card or other identification document when providing you with the information you have requested. When we have reasonable concerns about the identity of the individual who submits the request to us, we may request the provision of additional information necessary to confirm the identity of the data subject. If we do not receive such information and are unable to identify the data subject, we may refuse to act on a request made to us to exercise any of the rights set out in this notice.

When a citizen makes requests to us that are manifestly unfounded or excessive, in particular because of their repetitive nature, we have the right either to: (a) impose a reasonable fee, taking into account the administrative costs of providing the information or communication or taking the requested action , or (b) refuse to act on the request.

#### **4. Types of processed personal data**

The Broker may process different types of personal data related to your physical, social or economic identity. Such data may be obtained from you as the data subject, from third parties, or may be generated by the Broker in connection with your customer service.

**4.1. Insurance Broker “MV Finance” Ltd. may process different types of data, depending on the purpose of the processing, such as:**

**A) Basic data**

*In order for us to be able to offer standard products and services similar or related to the ones used by you (so-called basic marketing – for more information refer to section 6.4.k of this document):*

- full name
- phone number – mobile/fixed
- email address
- permanent address (street, number, zip code, city, country)
- current address (street, number, zip code, city, country)
- information about the products you use

These data are the basic data that The Broker processes in order to identify you as your service broker. The Broker will only use your contact information to make an offer to buy standard insurance and finance products that match your expectations as it has an interest in making you offers as a Broker.

**B) Extended data:**

The Broker may process some or all of the "Extended Data" categories listed below in order to achieve the purposes described below, only if it has a good reason to do so.

*a) to identify you:*

- full name
- place/country of birth
- date of birth
- nationality (citizenship)
- driving category (driving license)
- permanent address (street, number, zip code, city, country)
- current address (street, number, zip code, city, country)
- a previous (old) address
- copy of an ID card
- client number
- national registration number/EGN
- VAT number
- employer
- your qualification, occupation and professional experience as well as income source
- risk profile
- your marital status

*b) to contact you:*

- phone number – mobile/fixed

- email address
- permanent address (street, number, zip code, city, country)
- current address (street, number, zip code, city, country)
- similar details of contact persons related to you.

*c) to provide you with the right advice and services:*

- Your products
- Your potential interest in Broker products and/or products of financial institutions, partners of the Broker.
- Your marital status, the members of your household required for some specific types of insurances, such as life insurance;
- Property and motor vehicle data for specific types of insurance, such as property or Casco insurance.
- Your qualifications, knowledge and professional experience, position / position for specific types of insurance, such as an accident at work
- Your health – as a data processor on behalf of the insurance and financial institutions, the Broker may process information in relation to insurances (for example, in order to execute life insurance). Strict procedures are in place for the processing of such information.
- Feedback, comments and suggestions, previous complaints. They can definitely help the Broker offer you better service in the future.
- Financial Information - incl. your bank account details when paying the premium by bank transfer
- Identification data in fulfillment of our obligations under the AMLL in life insurance- incl. ID card and photograph data (from a copy of the copy); date and place of birth, data on related persons holding senior government, citizenship, country of permanent residence; professional activity; the ultimate owners of a client – legal entity; origin of funds
- Other information required by law; is required for insurance and is required by the insurer or which you voluntarily provide to us.

#### **4.2. Public data and data acquired through third parties**

We collect certain personal information about you and as representatives of our clients - legal entities, at different stages of our business relationships: names; a position in the organization for which you work; telephone and email (contact); PIN (if required for certain documents). For example, we collect personal information directly from you when you provide it to us for the purpose of signing a contract with the company you represent, as well as from public sources, such as a commercial register for reference about your representative power. We may also receive your personal information from your employer or your colleagues, for example, when they have appointed you as a contact person for the purpose of executing a contract concluded with us or when you are listed in the list of insured persons by group insurance, taken out by an employer in favor to employees and their loved ones. We may obtain your information as an employee of our client lessee under a car lease contract in connection with claims against the insurer in the event of an insured event and damage to your leased company business vehicle.

The Broker sometimes processes public information such as:

- Information to be disclosed to a public database, such as if you are appointed as a company director or proxy, or if you are a company owner;
- The Broker may also receive your personal data from third parties:
  - from your family members or from your employers for specific insurance when they take out insurance as an insurer, and you are an insured person or an employee of our client and have driven a business vehicle when an insurance event occurs,
  - as well as from official public registers that are legally responsible for storing this information, such as the Commercial Register with the Registry Agency or
  - registers of financial institutions, partners of MV Finance EOOD, containing lists of risk clients that fall under the scope of the Law on Measures against Money Laundering and the Law on Measures against Financing Terrorism.

Such public data may be processed for the purposes listed by the Broker in this document in order to verify the accuracy of the information in the Broker's database.

## **5. Recipients of personal data**

Personal data is generally processed by the employees of the Broker. The processing of personal data may also be carried out by personal data processors with whom the Broker has signed a contract for this purpose and who perform activities forming part of the Broker's services. Where there is a legitimate reason, personal data may be provided to other administrators to use them for their legitimate purposes.

### **a. Personal Data Administrators to whom the Broker may provide personal data:**

- Guarantee funds and financial institutions and other bodies of the European Union which have audit and control functions.
  - Insurance companies, reinsurers, co-insurers involved in the servicing and / or performance of rights and obligations under your insurance contract, and / or related reinsurance or co-insurance contracts you have selected with our assistance in obtaining offers or in concluding insurance
- Assistance companies, external experts and experts involved in the servicing and / or performance of rights and obligations under your insurance contract, and / or related reinsurance or co-insurance contracts,
  - Courier Companies
  - State regulatory and other bodies: Financial Supervision Commission, CPDP (Commission for Personal Data Protection), CCP (Commission for Consumer Protection), National Revenue Agency, National Social Security Institute, National Health Insurance Fund, Specialized Administrative Directorate "Financial Intelligence", the State Agency for National Security, the Criminal Intelligence Service, Judicial bodies (courts, etc.), the Prosecutor's Office, Ministry of Interior etc.
  - Assignees with whom the Broker concludes contracts
  - Other companies, subcontractors and partners of the Broker, in their capacity as personal data controllers

In the event of changes to the list of personal data controllers to whom personal data are provided, the Broker will update this document.

**b. Personal data processors are:**

Individuals or legal entities, public authorities, agencies or any other body which processes personal data on behalf of the controller.

The insurance broker "MV Finance" Ltd. may assign certain data processing activities to other processors, suppliers of the Broker. Some of these data processing activities, commissioned by Insurance Broker "EM Finance" Ltd., could be related to the control and support functions such as:

- financial and accounting reporting
- marketing
- ICT management
- audit etc.

The Broker may directly or indirectly use other processors with whom it has signed a contract, such as:

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- persons assisting the administrator and assignees in relation to servicing and debt collection
- insurers, so as to conclude and service all types of insurance products: e.g. trade credit, personal and/or property insurance etc.
- persons to whom the administrator has assigned the processing of personal data for organizational reasons
- suppliers of products and services for the Broker
- companies, providing information and communication technologies in order to facilitate the work of the operation systems and services (Microsoft, etc.);
- hired lawyers and law firms which have signed contracts with the Broker
- hired accounting companies and/or auditors who have signed contracts with the Broker
- SMS providers
- market research agencies
- companies specializing in archiving digital information and access
- In all cases, we enter into written contracts with the merchants we work with, requiring them to take the necessary steps to ensure the protection of your personal information. We will only provide those of our contractors with the information they need to provide us with the agreed services, without allowing them to use your information for their own purposes. We will not share your personal information with third parties to send you unsolicited marketing communications unless you have given your consent. If you receive unsolicited commercial communications from the merchants we work with, please let us know at the address or email contact us listed at the end of this document
- Also, please note that our site may contain links to other such pages not owned and operated by us. We cannot control and are not responsible for personal data processing practices or the content of these other pages. We



strongly recommend that you review the privacy policies and information of any website that collects personal information. This Notice only applies to the personal information we collect about you.

### **c. Recipients outside the European Economic Area (EEA)**

We do not share your personal information with others abroad, i.e. outside EEA, including in a third country or international organizations.

## **6. Purposes of personal data processing**

Personal Data, collected by the Broker in its capacity of Personal Data Controller, may be processed for different **purposes** on different **lawful basis**, as follows:

### **6.1. Purposes, where personal data processing is based on legal obligations:**

**a. Client identification and authentication of personal data** pursuant to the Law on the Measures against Money Laundering and the Rules on the Implementation thereof.

**b. Risk assessment and control** to prevent money laundering, embargoes and anti-terrorist activities in life insurance - the reason for processing the data for this purpose are the obligations of the Broker to identify the clients in accordance with the Law on Measures against Money Laundering and the Regulations on its implementation, the Terrorism Financing Measures Act and its Implementing Regulations. The processing of your data is related to the measures and actions taken by the Broker to prevent, detect, investigate and report suspicious transactions to the Financial Intelligence Unit under the specified legal acts.

**c. Reporting to Government and Controlling Authorities** - Insurance broker "MV Finance" Ltd. can share your data with regulatory, state and judicial authorities, which by virtue of a regulatory act have the power to require the provision of information, including personal data, such as for example - courts, prosecutors, various regulatory bodies such as the Consumer Commission, the Commission on Personal Data Protection, the Financial Supervision Commission, the National Revenue Agency, the national security authorities and community order and more. In relation to requirements for financial institutions, incl. insurance companies under the Foreign Account Tax Compliance Act (FATCA) and changes to the Tax and Social Insurance Code of Procedure (CRS) related to the automatic exchange of financial information in the field of taxation (CRS) = Common Reporting Standard), your personal data collected, incl. for certain life insurance with a savings element, may be provided by the insurers, in the cases specified by law, for accounting and tax purposes in fulfillment of the reporting requirements, to the NRA and the competent authorities.

### **6.2.1 Purposes for which the processing of your personal data is performed on the basis of performance of a contract**

**a. Drawing up contracts at your request** - to enter into a contract with you (including verbally upon the conclusion of compulsory motor third party liability insurance or "Passenger accident in public transport"), as a customer using any insurance product, the Broker must have your specific personal data (e.g. name, date of birth, PIN, ID card number) as well as your contact details. It is possible that the Broker would require additional information, depending on the type of the services that are subject of the contract.

**6.2.2. Sending messages about used products and services** - Your broker processes your personal data in order to send messages about your used products and services through phone calls, emails, sms, letters and more. (such as a reminder of an expiring policy or maturity date). The messages concern only the products and services you already use, are not related to the achievement of specific marketing goals and do not contain an offer for new services.

- a. processing of damages under the insurance contract, including assistance to the insurers or the insured persons for making claims to the insurers for payment of insurance indemnities and other sums in case of insured events and damages**
- b. statistics, reports and reports related to the specific insurance contract, type of insurance and target market**
- c. settlement of recourse and litigation**
- d. Use of products / services - Insurance broker "MV Finance" Ltd. processes personal data of clients in its various channels in order to ensure the use of the Broker's purchased products and services**

**6.3. Purpose for which the processing of personal data is made on the basis of a customer's consent:**

**a. To exchange your personal data with other insurance companies and financial institutions, partner of the broker in Bulgaria and in EU and to receive your personal data from specialized data basis, in order to create a precise client profile and to offer you personalized insurance and financial products and services**

The processing of personal data for this purpose gives information about the needs and capabilities of the particular client. It may result in you being included in a product-specific sales campaign listing and sending promotional and promotional messages. To this end, your consent may be required.

In case you have given us your consent, the Broker will process all your extended data for the above- mentioned purpose. Detailed information on the extended personal data can be found on pages 4-5 of this document.

**6.4. Purposes for which the processing of personal data is based on safeguarding the legitimate interests of the controller:**

**a. Historical, statistical or scientific purposes** – the Broker has a legitimate interest in processing your personal data for the purposes of compiling statistical surveys and reports, conducting research and development, conducting historical reviews and forecasts for the development of economic, financial industry, etc. For these purposes aggregated data derived from the records of specific personal data of the clients are used.

**b. Sending product and service messages** – The Broker processes your personal data in order to send messages for the products and services used by you through calls, emails, sms, letters, etc. The messages pertain only to the products and services already used by you; they do not pursue marketing goals, nor do they contain new service offers.

**c. Litigations – Establishment, exercise and defense of Broker's rights** – the Broker will process its clients data in order to protect its rights in court/ litigation procedures, when settling claims with the help of hired solicitors/lawyers, etc. This pertains to situations where your personal data is processed in connection with the administration of information related to litigations, judicial warrants, petitions and court decisions.

**d. Testing software application changes, demo platforms and internal portals for training** – the Broker will use your personal data to create or update software applications to be used with the Broker’s operation systems, for:

- testing the software code changes of applications in different testing/acceptance environments (e.g. perfecting the distribution channels or ensuring safer protection of the collected personal data).
- incident resolving – replaying incidents
- demo platforms
- employee training

**e. Internal reporting, analysis and development of the offered products and services** – the Broker uses personal data of its clients in order to improve its market position by offering new or better services and innovative products and optimizing the internal processes.

**f. Risk evaluation as a measure for preventing and detecting fraud** – the Broker will process its clients’ personal data in order to protect itself against fraud or criminal actions on their part. The Broker has the right not to service clients with a high risk profile, who expose its image to a risk. Based on certain facts (e.g. a false ID card, certain client behavior) the Broker may assess the potential fraud risk. Certain indicators of the respective client profile, as well as any other information (like a stolen ID card etc.) could serve as a basis for this assessment to indicate potential fraud. The measures for preventing and uncovering fraud are taken in the context of compliance to the internal security rules, control, ensuring reliable information security, stored both physically and digitally, as well as incl. computer “cyber” crime.

**g. Direct marketing of standard Broker products and services:** Offering products and services provided by the Broker, as well as participation in surveys on products and services offered, through any of the channels, including bank offices, the contact center, email, SMS, phone, online channels. The Broker will offer you products and services and will only include you in surveys if you are a customer and, therefore, you can reasonably expect that it will process your personal data in order to offer you new and better products and services, similar or related to the ones you use. For these cases, the Bank will only use your Basic Data under 4.1. A herein above.

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The processing for these purposes is necessary for the protection of the legitimate interest of the Broker as

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personal data controller, given that these interests are related to the Broker's main function as a broker. The Broker has conducted tests to determine the balance between its legitimate interests in processing your personal data for each of the purposes described in Section 6.4., and your interests and fundamental rights and freedoms as data subjects, and it has concluded that its legitimate interests as data controller do not violate your interests, fundamental rights and freedoms.

**6.5. Purposes for which the processing of personal data** is carried out on the grounds of protection of the legitimate (legitimate) **interests of a third party** (your employer) - claiming insurance claims from your employer for compensation for damages, such as a company-owned car, in in which case we may process your personal data in your capacity as an employee, such as name, personal identification number, position, profession, management license / license data, etc.

## **7. Term of storage of personal data**

Documents and information containing Personal Data are stored by the Insurance Broker "MV Finance" EOOD in accordance with the Policy for storage and destruction of personal data and applicable legislation. All commercial contracts and related correspondence and documentation required for financial accounting and tax control are retained for a period of 12 years from the expiration or termination of the contract. Documents not required for financial and tax control shall be kept for a period of 5 years after the termination of business relations. We will not delete or anonymize your personal data if it is necessary for a pending legal or administrative proceeding or a proceeding to consider your complaint against us.

Anywhere in this Information by the Broker Regarding Personal Data Processing and in the declaration of consent by the client, the term MV Finance EOOD or “the Broker” shall mean the Insurance Broker “MV Finance” EOOD and its possible legal successors in the cases of transformation.

The privacy statement of Insurance Broker MV Finance EOOD is available at the following addresses: [www.mvfinance.bg](http://www.mvfinance.bg) or may be made available to you on request.

## **8. How to contact us**

You may submit a written application or request in connection with this document to the Broker at: 147, Hajdushka Gora Str., 147, fl. which you can address with questions about this document or to exercise your rights in this regard:

Milena Videnova, General Manager  
email: [office@mvfinance.bg](mailto:office@mvfinance.bg)