



## PERSONAL DATA PROTECTION SHORT INFORMATION

The present short information has been prepared with respect to the entering into force of Regulation 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, and repealing Directive 95/46/EC (General Data Protection Regulation). **UBB AD** /hereinafter referred to as UBB/the Bank/ UIC 000694959. Sofia, blvd "Vitosha" №89B as a Data Controller processes your personal data in your capacity of user of bank services or potential current, affiliate of our user, counterparty, contact person or representative of client representing a counterparty – a legal entity, or other interested party – data subject. UBB AD belongs to the KBC Group – a Belgian bank–insurance group. The following companies in Bulgaria also belong to the KBC Group: DZI – General Insurance EAD, DZI – Life Insurance EAD, KBC Asset Management – KLON, UBB Interlease EAD, KBC LEASING BULGARIA EOOD, UBB Insurance Broker OOD, UBB – Center Management EOOD, UBB Pension Insurance Company EAD, as well as KBC Group – Branch Bulgaria.



### 1. Your rights as Data Subject

In your capacity as a data subjects – natural person You have the following rights that you can exercise:

- **Right to access** to your personal data.
- **Right to rectification** – you have the right to request that your personal data be corrected, in case they are inaccurate or incomplete.
- **Right to erasure ("right to be forgotten")** – your personal data may be erased: when they are no more necessary for the purposes for which they have been collected/ otherwise processed; when you withdraw your consent and there is no other legal ground for the processing; your personal data have been unlawfully processed, etc.
- **Right to restriction of the processing** for a particular term, when the accuracy of the personal data is contested by you or you have objected to the legitimate interests of the Bank to process your personal data and you are awaiting the results of the verification whether the Bank's legitimate interest prevails over your interests as a Data Subject. Upon establishment that the data processing is unlawful, but you wish your data not to be erased, but instead usege to be restricted. Upon your request in case the Bank no longer needs the personal data for processing purposes, but you require it for the establishment, exercise or defense of legal claims.

- **Right to data portability** – you are granted to receive your personal data in a structured, commonly used and machine-readable format, when the processing of such data is carried out by automated means on the basis of your consent or on the basis of a contract, and when this is a technically possible.
- **Right to object** against the processing of your personal data when the processing is performed on the basis of the Bank's legitimate interest. In case that the objection refers to the processing of personal data for the purposes of direct marketing, including also the elaboration of models, based on which various products/services may be offered, the Bank will unconditionally stop processing them for this purpose.
- **Right not to be subject to a decision based solely on automated processing, including profiling.**
- **Right to withdraw your consent** for personal data processing for the purpose, appointed in the Consent declaration.
- **Right to lodge a complaint with the Commission on personal data protection (CPDP)** with regard to the processing of your personal data. You can find more information on the webpage of the Commission: [www.cdpd.bg](http://www.cdpd.bg), where you can lodge your complaint

You can exercise the rights above in person or through an explicitly authorized for this third party, by submitting an application at a bank branch of the controller or, in case you have a qualified electronic signature (QES), by electronic means to the email **addressed dpo@ubb.bg**. If you don't have a QES, but wish to exercise your rights electronically, please note that prior to sending a reply to your request, the Bank obligated you to make an additional check and establish contact with you to confirm your identity and to confirm, that no other person pretend to be you. In your search to exercise your rights, you must specify – indication of full name, identification number (PIN/PNF) and contact details along with a description of your request. You can add detailed information on how to exercise your rights in the "INFORMATION BY UNITED BULGARIAN BANK AD REGARDING PERSONAL DATA PROCESSING" on our website <http://www.ubb.bg>

We will provide a reply to every request of yours without unnecessary delay within a 30-day period of its receipt. If we are unable to fully handle your request within one calendar month (given its complexity, need of assistance by a third person or the number of requests), we may extend the above period and will explain to you the reasons for that.

In the cases when the Bank and companies from the Group act as joint personal data controllers, the Data Subjects could exercise their rights with the company, which customers they are, by submitting an inquiry to the following email addresses:

For UNITED BULGARIAN BANK AD (UBB), Company ID 000694959 – [dpo@ubb.bg](mailto:dpo@ubb.bg);  
 For DZI – LIFE INSURANCE AD, Company ID 121518328 and for DZI – GENERAL INSURANCE AD (DZI AD), Company ID 121718407 – [dpo@dzi.bg](mailto:dpo@dzi.bg);  
 For UBB PENSION INSURANCE COMPANY EAD (UBB PIC), Company ID 121708719 – [dpo@ubb-pensions.bg](mailto:dpo@ubb-pensions.bg);  
 For UBB INTERLEASE EAD, Company ID 831257890 – [interlease@interlease.bg](mailto:interlease@interlease.bg);  
 For UBB INSURANCE BROKER EOOD, Company ID 175073337 – [ubbib@ubb.bg](mailto:ubbib@ubb.bg).



## 2. Personal Data Categories

The Bank processes different categories personal data related to your physical, social, economic and other identity grouped as follows:

- **Basic data** – three names, phone number – mobile/fixed/home/business, e-mail address, permanent address (street, number, zip code, city, country), current address (street, number, zip code, city, country), information on the products you use.

- **Extended data** – identification data /including but not limited to three names, date of birth, nationality, place of work/, contact data /phone number, e-mail address, address/, geolocation, other data necessary for provision of suitable consultation and service, such as products, family status, financial status, credit indebtedness and social security status, education and skills, professional experience/.
- **Car registration number data** – in connection with the use of bank insurance products and services.
- Data about your account, names, telephone number and list of contacts from your telephone will be processed by the Bank only upon your explicit consent in line with the registration and use of the Transfer to Mobile Number (Blink P2P) service in the mobile banking app of UBB (UBB Mobile/KBC Mobile).
- **Data from public registers and data received from third parties, such as members of your family, credit intermediaries, Eurotrust, as well as other persons.**
- **Data in line with suspended fund transfers.**
- **Location .**
- Data received in phone calls, including recordings of telephone conversations, but only if you have explicitly consented to this.
- Data about your health, insofar as there is an explicit legal basis for this – when for the purposes of a specific product (e.g. a donation account, etc.) the collection of such information is necessary or in the capacity of the Bank as an insurance agent.
- **Video images from security camera .**
- **Transactions data/card number/movements and account balances.**
- **Data from our official website, UBB pages on social networks, electronic and mobile banking, including data obtained through the use of cookies ("cookies").**
- **Data in connection with your participation in games and raffles organized by UBB and/or its partners, and for declaring a received cash prize under the Personal Income Tax Act.**
- **Data collected through the Bank's corporate site, through social media and third-party websites or through cookies.**
- **Data related to the use of the UBB Mobile App – UBB Mobile and 'Push' notifications and Kate.**
- **Data on minors/under-age persons or persons subject to full / partial guardianship.**
- **Automated Individual solution – When you apply for certain credit products, including pre-approval for a mortgage loan, the Bank performs automated processing of your data (so-called credit scoring).**



### 3. Purposes for data processing

#### ❖ *Purposes, where personal data processing is based on a legal obligation:*

- Your identification as a client of the Bank and the truthfulness of your personal data.
- Profiling of the Bank's clients on the basis of risk assessment.
- Controlling data in order to prevent money laundering, embargo and anti-terrorism actions;
- Client profiling with the purpose to provide services, connected with financial instruments;
- Exercising control with the purpose of preventing the cases of non-compliance with the Financial Instrument Markets Act and Regulation No. 38 on the requirements to the investment mediators' activity.
- Exercising control with the purpose of preventing and disclosing market abuse;
- Exercising control in order to mitigate security incidents and operational risks in relation to the payment services provided by the Bank pursuant to the Payment Services and Payment Systems Act (PSPSA);
- Reporting to government and control bodies;
- Facilitating the administrative service and facilitating the process of applying for a loan at the Bank by issuing reports on the presence or absence of obligations electronically;

- Assessment of your creditworthiness.
  - ❖ *Purposes for which the processing of your personal data is performed on the basis of performance of a contract:*
    - Drawing up contracts at your request including mortgage contracts (legal or contractual mortgage);
    - Bank product/service simulation sale;
    - Product/service usage;
    - Enforcing rights under a loan agreement;
    - Sale of DZI insurance products and pension funds of UBB Pension Insurance company.
  - ❖ *Purpose for which the processing of personal data is made on the basis of a customer's consent:*
    - To exchange your personal data with other KBC companies in Bulgaria in their capacity as joint controllers and to receive your personal data from the database of the Central Credit Register (CCR) at the National Bank of Bulgaria and the National Social Security Institute (NSSI) in order to create a precise client profile and to offer you personalized banking, insurance, pension and investment products and services.
    - *For the conclusion of a bank loan insurance contract and approval of the insurance coverage with BAEZ EAD.*
  - ❖ *Purposes for which the processing of personal data is based on safeguarding the legal/legitimate interests of the controller:*
    - Building analytical models.
    - Historical, statistical or scientific purposes, including storage in archive;
    - Sending product and service messages;
    - Litigations – Establishment, exercise and defense of UBB's rights;
    - Testing of new and changes in existing software application, demo platforms and internal gateways for delivery of trainings;
    - Internal reporting, analysis and development of the offered products and services;
    - Risk evaluation as a measure for preventing and detecting fraud;
    - Client relationship management;
    - Data transfer with companies within KBC Group in relation to activities, outsourced by UBB to another entity within the Group (outsourcing activity);
    - Credit and insurance Risk profiling;
    - Direct marketing of standard products and services of UBB and surveys on the satisfaction from the used products and services of the Bank;
    - Calculation and preparation of a report on the stable bank-insurance customers of UBB AD and DZI AD, as well as of the stable customers;
    - Participation in promotional campaigns, games and raffles organized by the Bank independently or in partnership with third parties (e.g. Visa, MasterCard, etc.);
    - Integration between UBB AD and ex KBC Bank Bulgaria EAD;
    - Creation, testing, maintenance and improvement of robotic solutions.



#### 4. Recipients of personal data

The recipients to which personal data is revealed are categorized as follows:

- 4.1. **Personal data controllers to which UBB may provide personal data**, for which there exists a legal obligation for such provision of information: Bulgarian National Bank, CPDP, Commission for Consumer Protection (CCP), Financial Supervision Commission (FSC), Central credit register, National Revenue Agency, National Social Security Institute, National Health Insurance Fund, the State Agency for National Security, the European Commission, the European Court of Auditors, the European Anti-Fraud Office (OLAF), the European Public Prosecutor's Office, BSE, Ministry of Interior, Commission for Combating Corruption and Confiscation of Illegally Acquired Property (KPCONPI), Notaries, Couriers and postal operators, Guarantee funds and financial institutions, such as the European Investment Fund, Fund Manager of Financial Instruments in Bulgaria, the National Guarantee Fund, the European Bank for Reconstruction and Development, the European Investment Bank, the Bulgarian Development Bank, Mobile operators, Eurotrust Technologies AD and etc.
- 4.2. **Personal data processors** – Natural or legal persons, public authority, agency or another structure, which processes personal data in the name and for the purposes of the Bank.
- 4.3. **KBC Group and other entities from the KBC Group.**
- 4.4. **Recipients outside the European Economic Area (EEA)** – in strict observance and in accordance with the effective local and European legislation, The Bank shall initiate all necessary measures for the protection of your personal data, if their processing requires having them provided to a third party in or outside the European Economic Area. Your personal data may be provided to third countries outside the EEA that are not treated as countries with an adequate level of protection of personal data, provided that a detailed assessment of the impact of the transfer on the rights of the subjects of personal data has been carried out, respectively based on of the evaluation in the agreements concluded between the parties for the processing and transfer of personal data, Standard Contractual Clauses (SCC) approved by the European Commission or another instrument for data transfer are provided for.



## 5. Term of storage of personal data

The retention period of your data depends on the legal basis and purpose for its processing. Most often, this period is 10 (ten years) as of the end of the respective legal relationship with the Bank.

The retention period may be longer when it is necessary for us to exercise our rights in accordance with the requirements of the law. When there is no legally specified period, this period may be shorter.

Personal data of potential customers are processed by UBB for a period of two years, unless in the meantime they have become customers. Potential customers can always request that their data be deleted. In case the Bank has no purpose and legal ground for this processing.

## 6. How to get in touch with us?

For issues related to personal data processing, you may get in touch with our data protection officer at the management address of the Bank or at the following e-mail: [dpo@ubb.bg](mailto:dpo@ubb.bg).

You may find detailed information about the protection of your personal data in the document Information by UBB AD regarding Personal Data Processing on our website [www.ubb.bg](http://www.ubb.bg), as well as in every bank office from the UBB network.

