



POD Allianz Bulgaria AD

# Privacy Notice

We care about the protection of your personal data!

Version:	Valid from:	Classification:
3	17.06.2024	Public



As of 25 May 2018, the General Regulation on the protection of natural persons with regard to the processing of personal data and on the free movement of such data (General Data Protection Regulation, GDPR) became applicable in the European Union. Below you will find information on how we in the companies of Allianz Bulgaria Group comply with the requirements of the Regulation and protect your personal data. We kindly ask you to read this information carefully.

## **1. Who is a data controller?**

The data controller is a natural or legal person which, alone or jointly with others, determines the purposes and means of the processing of personal data. POD Allianz Bulgaria AD along with the other companies of Allianz Bulgaria Group are personal data controllers under the Personal Data Protection Act and the GDPR.

## **2. What personal data do we collect?**

We will collect and process the following types of personal data concerning you:

- Names;
- Date of birth;
- Personal Identification Number / Personal Number / Personal Number of a Foreigner;
- Address and country of permanent residence;
- Nationality;
- Gender;
- Identification document, incl. a copy thereof;
- Phone numbers;
- E-mail addresses;
- Addresses entered in your documents and/or for correspondence;
- Bank account details;
- Financial status details, incl. origin of funds;
- Professional occupation and other information.

When necessary, POD Allianz Bulgaria AD will collect and process the following types of "sensitive personal data" such as data from medical certificates, medical case histories, death certificates and other medical documents, genetic and biometric data, history of your insurance claims, etc. Where necessary, upon payment of funds from an individual insurance account, POD Allianz Bulgaria AD will collect and process the following types of "sensitive personal data" — data from the National Social Security Institute (NSSI) and an Expert Decision of the Medical-Labour Expert Commission (MLEC) or the National Expert Medical Commission (NEPC).

## 3. How will we collect and use your personal data?

POD Allianz Bulgaria AD will use the personal data provided by you or by other individuals for certain purposes and with your explicit consent, unless applicable laws and regulations give us the right to process your data on a legal basis and without consent obtained as follows:

Purpose	Basis for data processing	Is your explicit consent necessary?
For the conclusion, administration and performance of contracts for supplementary compulsory pension insurance.	Article 6(1)(b) of the Regulation, Article 6(1)(c) of the Regulation	No
For the conclusion, administration and performance of contracts for supplementary voluntary pension insurance.	Article 6(1)(b) of the Regulation	No
For marketing purposes: to inform you about products and services of the Company, other companies in the Allianz Bulgaria Group and business partners of the Company, which may be of interest to you.	Article 6(1)(a) of the Regulation	Yes
For automatic processing, including profiling in connection with market research, personalized marketing, and analysis of which products are suitable for you.	Article 6(1)(a) of the Regulation, Article 6(1)(b) of the Regulation	Yes, where it is necessary.
For detection and prevention of fraud attempts, economic sanctions compliance, etc.	Article 6(1)(f) of the Regulation	No
For compliance with legal obligations such as, but not limited to tax, accounting, anti-money laundering measures and others.	Article 6(1)(c) of the Regulation	No

For some of the purposes described above, we may obtain your personal data from third sources, such as state authorities and institutions, public databases like the commercial register, pension insurance intermediaries, business partners, other pension insurance companies, lawyers and legal advisers, etc.

For the purposes mentioned above, for which it is noted that your explicit consent is not required or for the purposes of concluding the contract, your personal data will be processed



on a legal basis and for the fulfilment of our obligations as a pension insurance company (e.g., tax, social security and accounting obligations, legal claims and proceedings, fraud prevention, etc.).

We need your personal data in order to be able to provide you with the products and services you want. In case you do not wish to provide and/or use your personal data, this may lead to an impossibility for us to fulfil the legal requirements when providing pension insurance services.

#### **4. Who will have access to your personal data?**

POD Allianz Bulgaria AD ensures that your personal data will be processed in a manner consistent with the purposes set out above. In this regard, your data may be provided to the following third parties acting as data controllers:

- Allianz SE, other companies from the Allianz Group, state and other public authorities, other pension insurance companies, pension insurance intermediaries, banks, etc.

For the stated purposes, your personal data may also be provided to the following persons who process data on behalf of POD Allianz Bulgaria AD, namely:

- Allianz SE, other companies from the Allianz Group, technical consultants, lawyers, as well as companies to which we assign the performance of specific activities (e.g., IT maintenance, record keeping, etc.)

Except in the above cases, we may provide your data to third parties, for example:

- In the event of the reorganization of the company such as merger, acquisition, as well as any other divestment of part of our business or assets, including in case of insolvency proceedings;
- In order to comply with legal obligations, including case of proceedings initiated by your signal or complaint.

#### **5. Where will your personal data be processed?**

Your personal data may be processed by the above persons both within and outside the European Economic Area (EEA), always in the presence of some contractual obligations for confidentiality and data protection in compliance with the applicable legislation. Your personal data will not be disclosed to persons without the right to authorized access.

When we transfer personal data for processing by another company from Allianz Group outside the EEA, this is done on the basis of the approved Allianz Binding Corporate Rules (Allianz BCRs), which provide an adequate level of protection of personal data, and which are legally binding for all companies of Allianz Group around the world. The Allianz Binding Corporate Rules can be found at the following link: [www.allianz.bg/gdpr](http://www.allianz.bg/gdpr). In case the Allianz BCRs are not applicable, we will undertake the necessary measures to ensure that the transfer of your personal data outside the EEA is at the same level of protection as when data is transferred in the EEA. More information on the protection measures we apply to such transfers (such as Standard Contractual Clauses) can be obtained by contacting us as set out in Section 10 below.

## 6. What are your rights in relation to your personal data?

In accordance with the legal framework in the field of data protection, you have the following rights:

- Right to access your personal data, including the right to information about the source of the data, the purposes and limits of the processing, data about controllers, processors and third parties to whom the data may be disclosed.
- Right to withdraw your consent at any time when the data is processed on the basis of your consent.
- Right to update and correct your data with us so that it is always accurate.
- Right to request the deletion of your personal data from our archives when they are no longer necessary for the purposes of processing outlined above, upon compliance with the requirements of the Social Insurance Code for data storage for a term no shorter than 50 years, counted as of the termination of the respective social security relationship.
- Right to object against the processing or restrict the processing of your personal data in certain circumstances, for example when you question its accuracy, for the time we need to verify and update the data.
- Right not to be an object of a decision based solely on automatic processing, including profiling.
- Right to receive your personal data for you or your new data controller in electronic format if technically possible, including your personal data being forwarded directly to your supplementary pension insurance fund.
- Right to lodge a complaint with POD Allianz Bulgaria AD, Allianz SE and/or the Bulgarian Commission for Personal Data Protection.

You can exercise the above rights by contacting us at the address below providing us with identification data (such as names, email address, identification of supplementary pension insurance contract) and the purpose of the request. You can also request access to your personal data by filling in an application for access to personal data, which you can find at: [www.allianz.bg/gdpr](http://www.allianz.bg/gdpr).

## **7. How can you object to the processing of your personal data?**

You have the right to object to the processing of your personal data in cases provided for by law or to request termination of the processing (including for direct marketing purposes) by submitting a written statement. Once you notify us of your request, we will discontinue the processing of your personal data unless we have another legal basis to continue processing it.

## **8. Video images from security cameras**

POD Allianz Bulgaria AD uses security and video surveillance cameras on the basis of Ordinance 8121z-444 of the Ministry of Interior and the Bulgarian National Bank for the organization and the control of the security of banks and financial institutions and the Private Security Activities Act, inside and outside its premises. POD Allianz Bulgaria AD complies fully with the statutory requirements for installation and use of video surveillance cameras. When there are video surveillance cameras installed in an office of POD Allianz Bulgaria AD, you are notified by means of a sticker located in a visible place. Video camera recordings inside and outside the offices (indicated by a sticker) are kept for a period of 30 (thirty) days. They may be stored for longer in case when:

- The records will be used as evidence of a criminal offence or an irregularity;
- The records will be used as evidence of damage or in order to identify a criminal, an intruder of the public order, a witness or a victim.

## **9. How long do we store your personal data?**

POD Allianz Bulgaria AD will not store your personal data longer than necessary to fulfil our legal and contractual obligations; we will store them only in relation to the purposes for which they have been collected.

Your personal data is stored with us for a period of 50 (fifty) years after the termination of the relationship under the supplementary compulsory/voluntary pension insurance contract concluded with you, unless we have a legal obligation to store the data for a longer period.

If you have submitted an application for participation or a change of participation in a supplementary compulsory pension insurance fund, which has not been accepted and therefore you have not become an insured person in the funds managed by POD Allianz Bulgaria AD, we store your data for a period of 2 years after the date of the application.

## **10. How can you contact us?**

POD Allianz Bulgaria AD  
16 Srebarna Str.  
1407, Sofia  
Data Protection Officer: Ivelina Koleva  
e-mail: [data.privacy@allianz.bg](mailto:data.privacy@allianz.bg)

## **11. When is this Notice updated?**

This Notice shall be reviewed periodically and whenever circumstances change. The current version can be found on our website: [www.allianz.bg/gdpr](http://www.allianz.bg/gdpr). If there are any important changes that may affect you, you will be notified. This Notice was updated last on 17.06.2024.