

Privacy Policy of ProCredit Bank (Bulgaria) EAD



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This document outlines the approach of ProCredit Bank (Bulgaria) EAD to the protection of personal data with a view to meeting the requirements set out in Regulation (EU) 2016/679 (General Data Protection Regulation), Articles 13 and 14. One of our main responsibilities as a Bank is to ensure the security of the information we have been entrusted with. The Privacy Policy provides answers to significant questions related to the processing of personal data at the Bank. This Policy applies to all our products and services.

Please, take the time to learn about the Privacy Policy.

1. Who we are

ProCredit Bank (Bulgaria) EAD is a credit institution – a Bank – that holds a Banking Licence granted by the Bulgarian National Bank. We provide products and services to both small and medium-sized businesses and individuals. ProCredit Bank (Bulgaria) EAD is a data controller with the following contact details:

Address: ProCredit Bank (Bulgaria) EAD 26 Todor Aleksandrov Blvd., 1303 Sofia

Tel.: + 359 700 1 70 70 or * 7000

Fax: +359 2 813 51 10

E-mail: contact@procreditbank.bg

ProCredit Bank (Bulgaria) EAD is part of ProCredit Group, which is managed by ProCredit Holding AG, the parent company based in Frankfurt, Germany. ProCredit Holding AG is the sole owner of the capital of ProCredit Bank (Bulgaria) EAD.

Members of the ProCredit Group include the following companies: ProCredit Holding; ProCredit Academy; Kipu (a software development company), ProCredit Bank (North Macedonia), ProCredit Bank (Albania), ProCredit Bank (Bosnia and Herzegovina), ProCredit Bank (Ecuador), ProCredit Bank (Georgia), ProCredit Bank (Germany), ProCredit Bank (Moldova), ProCredit Bank (Romania), ProCredit Bank (Serbia), ProCredit Bank (Ukraine), ProCredit Bank (Kosovo), and related parties of ProCredit Bank (Bulgaria) EAD;

For more information about ProCredit Bank (Bulgaria) EAD's activities, please visit the Bank's official website: www.procreditbank.bg.

Information about ProCredit Group's activities is available at <https://www.procredit-holding.com>.

2. Reasons why the Bank collects and processes your personal data

ProCredit Bank (Bulgaria) EAD collects, processes, and stores personal information for various reasons and on several legal grounds. We use the personal data you have provided to us to process your requests for products and services offered by the Bank, as well as to support their administration, ensure the best possible service, prevent unauthorised access to your accounts, and fulfil our legal and regulatory obligations. Under Regulation (EU) 2016/679 and the effective Bulgarian legislation, we have the right to use personal information if one or more of the following legal grounds apply:

- By virtue of law;
- By virtue of a contract concluded with you;

- When having a legitimate interest;
- When you provide your consent.

In case of a reason to use your information, which reason relates to our activities, we use “legitimate interest” as a basis. Referring to it in the process of handling the information you have given us, we strive to ensure a fair balance between the Bank’s legitimate interests and your rights.

Regulation (EU) 2016/679 regards certain categories of sensitive personal data as special, the use of which is possible only upon your explicit consent. These data include information on racial or ethnic origin, political orientation, sexual orientation, religious beliefs, trade union membership, health data, and criminal records.

ProCredit Bank (Bulgaria) EAD collects, processes, and stores your personal data on the following grounds:

2.1. To comply with legal obligations (Article 6(1)(c) of Regulation (EU) 2016/679):

We, as a financial institution, are required to process and store your personal data in compliance with certain legal requirements:

- To verify the personal data provided to us and to fulfil our obligations under the Credit Institutions Act, the Consumer Credit Act, the Consumer Credits Related to Immovable Property Act, the Measures Against Money Laundering Act, and the Measures against the Financing of Terrorism Act.
- To regularly provide data/information to the Bulgarian National Bank (BNB) in accordance with BNB Ordinance No. 22 and other relevant regulations, and to respond to inquiries from the Bulgarian National Bank.
- To respond to inquiries related to the Foreign Account Tax Compliance Act (FATCA) and to provide data as required by the Accounting Act, the Tax and Social Security Procedure Code, and other relevant regulatory frameworks in accordance with the establishment of a fair and lawful accounting process;
- To transfer data to the payer or payee via the receiving or sending bank in accordance with the Payment Services and Payment Systems Act;
- To report/provide reports/respond to inquiries made by regulatory authorities, law enforcement agencies, and/or other government authorities in connection with investigations or proceedings. Examples of such authorities include: the police, the Prosecutor’s Office, judicial authorities, the State Agency for National Security, the National Investigation Service, the Commission on Prevention and Counteraction of Corruption, etc.
- To provide information to private/public enforcement agents in accordance with and under the conditions set forth in the Obligations and Contracts Act and the Civil Procedure Code;
- To maintain video surveillance in the premises specified in ORDINANCE No. 81213-444 of 3 May 2016 on the organisation and control of security measures for banks and financial institutions, such as bank halls;
- To provide personal data to the ProCredit Group to the extent and in the manner permitted by law, so that the company managing the ProCredit Group may fulfil its legal obligations related to risk management, regulatory reporting, anti-money laundering, and fraud prevention at the group level.

2.2. When entering into and/or performing contractual relationships (Article 6(1)(b) of Regulation (EU) 2016/679):

Upon entering into and/or performing a contractual relationship with the Bank pursuant to the pre-contractual and/or contractual relationship, the Bank shall have the right:

- To collect your personal data when processing a request for services or products in order to assess the conditions under which the Bank may enter into a contract with you.
- To process and store your personal data for the purpose of providing and managing services arising under: a banking services agreement, including the servicing of payment/trust and/or other accounts or services; a loan agreement, a letter of credit agreement, a bank guarantee agreement, and/or other agreements.
- To assess changes in your creditworthiness and collect additional information from registers, such as: Central Credit Register, Commercial Register and Register of Non-Profit Legal Entities, BULSTAT Register, Register of Employment Relationships, Property Register, etc.
- To process payments made by you or to you.
- To contact you by mail, phone, text message, e-mail, social media, fax, through the Bank's online banking website, or by any other means that does not violate the law.
- To provide you with information about the products and services you use by sending you notifications, reports of errors or incompleteness, and responding to your requests, complaints, or inquiries.
- To sign electronically, contract with you using a qualified electronic signature in compliance with the Distance Marketing of Financial Services Act and the Electronic Document and Electronic Trust Services Act;
- As part of fulfilling our contractual relationship with you, in certain cases we share your data with service providers (experts in a given field and/or subcontractors and/or electronic identity administrators providing the Qualified Electronic Signature service) in order to better serve you. (For example, when providing collection services /electronically signing contracts).

Please note that failure to provide the required personal data may prevent the controller from providing the services you have requested by taking steps prior to entering into a contract.

2.3. To process personal data based on legitimate interests (Article 6(1)(f) of Regulation (EU) 2016/679):

When we process personal data on the basis of "legitimate interest," we conduct a prior assessment to balance our interests against the fundamental rights and freedoms of the data subjects. Processing is carried out only to the extent necessary for the specific purpose and provided that appropriate safeguards for the protection of personal data are in place.

The legitimate interests for which the Bank needs to process the personal data you have provided are basically:

- To determine the product that will meet your expectations as a prospective borrower and align with your ability to repay, the Bank may, on a lawful basis, collect additional information about



you and other related parties from publicly available records, such as: Central Credit Register, Commercial Register and Register of Non-Profit Legal Entities, BULSTAT Register, Property Register, Agriculture Fund Registry, etc.

- In order to provide you with high-quality and timely services, the Bank may share the information you provide with other organisations – cash management companies, lawyers, notaries, insurance companies, property valuation companies, or other providers of electronic or other services;
- To achieve certain internal administrative objectives of the Bank, we may disclose your personal data to archiving companies, debt collection agencies, electronic identity administrators providing the Qualified Electronic Signature service, and/or members of ProCredit Group;
- To record conversations with you conducted through our call centre in order to provide you with better service and/or to combat fraud;
- To contact you for marketing purposes if you are a current customer, to offer you new banking services and/or to inform you of the expanded scope of rights you have regarding the products you already use;
- To use and process personal data provided by you in exercising the institution's right to defence, including when it is necessary to take enforcement actions (e.g. debt collection);
- To maintain video surveillance not required by law, e.g. in 24/7 customer service areas or in bank premises for the purpose of preventing crimes or fraud;
- To ensure the security and continuity of business processes and operations;
- To ensure strict risk management;
- To provide personal data to the ProCredit Group to the extent and in the manner permitted by law so that companies within the ProCredit Group, when commissioned by the Bank, may fulfil their legal obligations related to risk management, regulatory reporting, and anti-money laundering and fraud prevention at the group level.

2.4. When you have given your consent (Article 6(1)(a) of Regulation (EU) 2016/679):

The Bank uses, processes, and stores your personal data with your explicit consent in the following cases:

- When we use your personal data for direct marketing purposes before you become our customer;
- To collect sensitive information – such as information about your health or other sensitive information you share with us when you apply for a product or service, or when you request a change to an existing product or service;

You can withdraw your consent at any time via our contact channels free of charge. In that case, the Bank will not use your data for the purposes described above. When you make an informed decision not to give your consent or to withdraw your consent, please be aware that the Bank may not be able to provide the product/service for which your consent was required.

3. The types of personal data we process

The Bank collects, records, structures, organises, processes, stores, and, if necessary, rectifies personally or through a representative of its, or through our alternative communication channels, such as internet banking or our website, various types of personal data from our customers (prospective and current) in the context of establishing/developing business relationships. The information we process, structure,

analyse, and store may vary depending on the products and services the customer uses. It falls into different categories, as listed below:

- **Identity and contact details**

Name, gender, date of birth, place of birth, copies of a Personal ID Card or other identification document, such as a driver's licence, passport (Personal Identification Number (PIN)/Personal Number of a Foreigner (PNF), type of document, document number, issuing authority, date of issue, expiration date), nationality, photo, address (country, region, zip code, town/city, address), contact details (personal e-mail address, home and/or mobile phone number, work phone number, work e-mail address), marital status and family details, professional experience, education, tax residency and tax information, authentication data (signature);

- **Financial details or circumstances**

Financial status and income details/documents, processing of requests and supporting documents, employment and employment details of related parties, credit history, creditworthiness assessment documents, data from public registers, financial needs, relationships with other banks or financial institutions, business documents of self-employed individuals, asset information, collateral data (property description, data from the property registry, property valuation, insurance, construction documentation, documents certifying ownership of movable/immovable property);

- **Information directly related to the products and services of the Bank**

Data related to the fulfilment of our contractual obligations, data contained in the provided documentation, bank account data, credit/debit card data, transaction data and history, data on proxies, and information on third parties involved in a transaction; details regarding the products used and requests for such products, including, if available, reasons for refusal of a product or service, and other data related to the use of the bank's products and services; internal customer identification number, internal product identification number, or collateral identification number;

- **Technical details and online identification**

Information: regarding electronic communication and the user's identity, such as a username and log-in credentials (e.g. online banking credentials); regarding the device's location, the device's unique identifier, and the IP address of the device used to access online banking services; details about the device and technology you use; a record of IT activity; the merchants with whom you make payments using your card; and information regarding the "cookies" used on our websites;

- **The information on another person you provide us with or the information another person provides on you**

If you provide us with information about another person (for example, data on a spouse or a business partner in connection with a joint loan application with that person) or if another person provides us with information about you, we may combine it with the personal information we already have and use it in the ways described in this Privacy Policy. We may note financial connections in the personal data of individuals who have economic or family ties.

Note: A natural person or legal entity may disclose information on others only when they have given their consent thereof, and in case this person can ensure that they confirm their consent to the Bank. That

person or entity is responsible for providing data in accordance with the Bank's Privacy Policy and the legislation relating to personal data protection.

- **Sensitive categories of personal data**

In case you have given your consent and/or there is a legal basis, we store and process the information you have provided that includes sensitive personal data, such as health information or court information. The storage of this data is maintained for the duration of the purposes of the product or service we provide to you.

The Bank collects personal data of children in compliance with legal requirements and only after obtaining the explicit consent of a parent or guardian.

- **Other types of personal data**

CCTV footage recorded in or around bank premises and 24/7 self-service areas; voice data from telephone recordings; complaints and information related to the exercise of the data subject's rights; records of correspondence and other communications with the Bank; data from investigations (e.g. sanctions and anti-money laundering checks, external intelligence documents);

- **Information regarding third parties**

The Bank stores information/data on transaction parties; guarantors; collateral owners; cardholders; persons empowered by law or by special power of attorney, or client representatives; persons applying for the Bank's products and services; former clients; persons subject to investigations by regulatory authorities; service providers or their employees; and video recordings of visitors to the Bank's premises within the timeframes established by law.

The Bank may process certain categories of personal data in a pseudonymised form. Pseudonymisation is a processing in which direct identifiers (such as name, personal identification number, or address) are replaced or removed, while the additional information necessary for re-identification is stored separately, subject to appropriate technical and organisational measures. Pseudonymised data remain personal data within the meaning of Regulation (EU) 2016/679 and are used only for limited purposes, such as group reporting, internal risk management, statistical analysis, and, where necessary, to minimise the risk associated with data transfers.

4. When and how we collect information on you

This section lists the places wherefrom we collect data considered to be part of your personal data. The Bank collects information from various sources regarding each of our products or services that you apply for, currently use, or have used in the past.

The Bank processes data that you provide or we collect in the course of our relationship with you:

- When you apply for the Bank's products and services;
- When you use the Bank's website and/or the online services it provides and/or visit the Bank's branches and 24/7 self-service areas;

- When providing us with information orally or in writing – in application forms, contracts, e-mails and letters, complaints, or through conversations with the Bank’s contact center or other communication channels;
- In financial analysis and monitoring;
- When you use our products or services, we collect information about how and where you access them, as well as your usage history;
- We use video surveillance to monitor offices and 24/7 self-service areas and to capture images.

The Bank may also collect, process, rate and store personal data it legally receives from legal entities, natural persons and other sources:

- Information that is publicly available – in the media, websites, social networks, business directories;
- Information from public registers – the Commercial Register and the Register of Non-Profit Legal Entities, the Central Credit Register, Real Estate Registry, Agriculture State Fund , National Social Security Institute, National Revenue Agency, Ministry of the Interior’s Internet portal – website for verifying the validity of ID cards, etc.;
- Information coming from socially or economically related persons, such as employers, business owners, relatives or others;
- Information provided by state authorities and law enforcement bodies;
- Data from debit/credit card issuers such as Visa and Mastercard or transaction networks;
- Information from insurers, recruitment agencies.

5. How long we keep your personal information

Personal information is stored for a period that depends both on its nature and the purposes it is handled for. Personal data is retained for the duration of the contractual relationship and for an additional period following its termination, as necessary to comply with legal obligations or to protect the Bank’s legitimate interests.

We will process your personal data for as long as we have a business relationship with you – whether as a natural person or in connection with our relationship with a legal entity that you are authorised to represent or of which you are the owner. After the termination of your relationship with the bank, personal information is retained in accordance with legal retention obligations based on the Measures Against Money Laundering Act, the Credit Institutions Act, the Payment Services and Payment Systems Act, Ordinances issued by the Bulgarian National Bank, the Commercial Act, the Accounting Act, the Tax and Social Security Procedure Code, etc.

For example, account information is retained for 6 years from the date the account is closed. If you hold or are associated with multiple accounts (including deposit accounts), the six-year period begins on the date the last account is closed.

Information about loan transactions will be retained for 5 years from the date of full repayment of the loan.

We adhere to a strict retention period for CCTV footage. In isolated cases, the recordings may be stored for a longer period, for example, during a fraud investigation or when they have led to the initiation of criminal proceedings.

If the reason for processing the information no longer applies, if the information is no longer needed, and if the legal retention periods have expired, the information is destroyed or anonymised, which means that all identification features are removed from the personal data.

If you would like to receive additional information regarding retention periods, please contact the Data Protection Officer using the contact information provided in this Privacy Policy.

6. Obligation to provide personal data

In the context of your business relationship with ProCredit Bank Bulgaria EAD, you are required to provide personal data necessary for establishing and maintaining the relevant business relationship, as well as data that the Bank is required to collect in accordance with national and European legislation. You may choose not to provide or share with us personal information. Please note that if you do not provide us with the necessary information, we will not be able to establish or continue our business relationship with you as a natural person or with you as an authorised representative or beneficiary of a legal entity.

Sometimes the additional information we request is not required by law or contract, but it is essential to us. We collect this information only with your express consent. Failure to provide this information may result in the service you are using or have requested not being provided and/or in the termination of your contractual relationship with us.

7. How we protect your personal data

We have implemented a number of measures to ensure the safety and security of information. We apply all technical and organisational measures required by the Personal Data Protection Act, best banking practices and bank-related legislation. The Bank has established the necessary information security frameworks, appointed a data protection officer and a Data Protection Committee, and employs information and IT security specialists.

We require our staff and third parties processing your data to comply with high data protection standards, including the obligation to keep the confidentiality of information, and to implement appropriate data processing and transfer measures. We have a privacy policy and a procedure for handling data breaches.

The Bank uses pseudonymisation as a technical and organisational security measure when appropriate and necessary to mitigate risks associated with data processing and transfer. The additional information required to link the data back to a specific individual is stored separately and is accessible only to a limited group of employees whose job functions require it. Pseudonymised data is used solely for purposes consistent with the Bank's legal and regulatory obligations.

8. How we use personal information for direct marketing

The Bank may use your data for direct marketing only if there is a valid legal basis.

When marketing communications are directed at existing customers and relate to similar banking products or services, the processing may be based on a legitimate interest; in any case, you have the right to object at any time. If you exercise your right to opt out of receiving marketing communications, please note that discontinuing the receipt of such communications will deprive you of the opportunity to receive up-to-date information regarding the expanded scope of rights you have in connection with the services you are already using.

In all other cases, including marketing to individuals who are not customers of the Bank, data is processed only after prior consent has been obtained.

The Bank may process your personal data or the personal data of natural persons linked to your business in order to provide you with information about products, services, and offers that may be of interest to you or your business. We can send marketing messages by mail, e-mail, phone, or text message.

The personal data we process for this purpose consist of information that you provide or have provided to us, as well as data that we collect and/or analyse when you use or have used our services. We may use your personal data to promote our products and services only if we have your explicit consent to do so or if you are a customer of the Bank within the scope of our legitimate interest.

You have the right to object at any time to the processing of your personal data for marketing purposes by contacting the Bank and requesting that the use of your personal data to that purpose be discontinued. If you request that we stop sending you marketing communications, the Bank will continue to use your contact details to provide you with important information related to our contractual obligations. We would also like to inform you that the processing of your personal data will be lawful if the Bank has processed such data based on your explicit consent prior to its withdrawal.

9. Automated decision-making

As part of the approval process for certain credit products (such as a consumer loan or a credit line with a pre-set limit), your personal data may be subject to automated processing and automated decision-making (so-called credit scoring). This type of decision-making is necessary for the conclusion of the contract. This means that specialised software owned by the Bank or provided under a contract with a Bank vendor will automatically process (without human intervention) data provided by you, available in the Bank's database (if you have already been our customer) and in official national registers, and will analyse it based on criteria predefined in the software's algorithm. This means that specialised software analyses certain categories of data, such as financial status, credit history, and data from official registries, to assess credit risk. As a result, your application will be scored with a certain number of points, based on which it may receive automatic approval or automatic rejection. Such a decision may have legal consequences for you, including a refusal to grant a loan. When automated decision-making is applied, you have the right to express your opinion on the decision, to challenge it, and to request the involvement of our expert in the decision-making process (i.e., human intervention).

In connection with our obligations to prevent money laundering, fraud, and the financing of terrorism, the Bank may use automated processing and profiling to review suspicious transactions or to identify payments that may be subject to international sanctions.

10. Cookies

ProCredit Bank (Bulgaria) EAD uses “cookies”.

A cookie is a small text file that our web server sends to the cookie folder on your computer. The main function of the cookie is to allow our web server to recognise partially your operating system and Internet Browser settings with a view to improving and optimising the performance of our website. Another important goal of the cookie is to provide feedback on the performance of our site and to gather statistics to help us choose and improve the services we offer.

Some cookies are important to the functionality of the site and are automatically activated when visited by users.

You can find detailed information about the types of cookies used by ProCredit Bank (Bulgaria) EAD when accessing the Bank’s website and/or its internet banking service, Prob@nking, at the following link: <https://www.procreditbank.bg/bg/politika-za-biskvitki-na-pro-kredit-bank-bylgarija-ead/>.

You can block or restrict the cookies set by any website, including by the Bank’s sites, through the settings of each browser and on any device you use to access the Internet.

Please be advised that some of our services, such as Internet Banking, will not function if your browser does not support cookies.

11. Whom we share your personal information with

Within ProCredit Bank (Bulgaria) EAD, your data is accessed by employees and departments within the Bank who need to process the information in order to perform their job duties. ProCredit Bank (Bulgaria) EAD may share your personal information with an external organisation to fulfil our contractual or regulatory obligations and to improve the quality of the services we offer. The Bank shares the information you provide only with a limited number of individuals and companies, and such sharing is carried out pursuant to contractual agreements entered into with the Bank, which ensure compliance with confidentiality and data protection requirements under the Personal Data Protection Act and Regulation (EU) 2016/679. We allow service providers to use your information only in accordance with our instructions after we have verified that they have appropriate measures in place to protect the information.

Sharing can occur in the following circumstances and/or with the following recipients, for example:

- **Public bodies** with whom we have a public or legal obligation to exchange information: Supervisory and other regulatory and public bodies. Examples include central and local government bodies, the Bulgarian National Bank, the National Revenue Agency, the Customs Agency, the Deposit Guarantee Fund, law enforcement agencies, and fraud prevention agencies; the Commission for Prevention and Counteraction of Corruption, the Commission for Personal Data Protection, etc.



- **Your authorised representatives:** anyone who gives instructions or manages your accounts, products, or services on your behalf (e.g. agents, attorneys, intermediaries, joint account holders, etc.) and anyone else with whom we are instructed to share information at your request;
- **Third parties with whom we must share your information in order to process payments:** for example, Visa, Mastercard, card issuers and banks that process cards, correspondent banks, card payment processing companies, your payees, SWIFT, SEPA, clearing or settlement systems;
- **other credit or financial institutions:** ProCredit Holding AG and Group Companies – the Bank may share your personal data in your capacity as a customer or supplier with companies within the ProCredit Group when such sharing is necessary for the purposes of the legitimate interests of the Bank or another company within the ProCredit Group, in connection with compliance with anti-money laundering legislation – in the development and use of models for detecting money laundering, in connection with the outsourcing of certain data processing activities to other processors within the Group, including the outsourcing of (part of) an activity in accordance with the requirements of applicable legislation. Some of these data processing activities outsourced by ProCredit Bank Bulgaria EAD are related to control, administrative, and support functions such as financial reporting, compliance, risk, marketing, ICT management, internal audit, and a project management team that develops models to improve services and products, etc.

ProCredit Bank (Bulgaria) EAD shares a limited amount of personal data with ProCredit Holding AG, Germany, when necessary to fulfil legal and regulatory obligations at the group level – including the preparation of consolidated reports for supervisory authorities and group risk management. In such cases, we provide only the minimum necessary data, and whenever possible, the information is processed in a pseudonymised or aggregated form. ProCredit Holding implements appropriate technical and organisational measures to protect data and does not use personal data for purposes incompatible with the original purpose of sharing.

- **Companies that provide services to fulfil our legitimate interests or contractual obligations:** credit and financial institutions that provide financing you have received, such as the European Investment Fund, the European Investment Bank, cash management companies, companies providing information and communication technologies to support or facilitate the operation of operating systems and services, and/or providing access to registers maintained by primary personal data controllers through the Regix inter-register exchange environment, SMS providers other than mobile operators, market research agencies, and companies that, on behalf of and for the account of the Bank, send commercial offers via technical means of communication – to the extent that there is a legal basis for such offers.
- Companies specialising in the archiving of digital information and access, law firms, notaries, firms that perform collateral valuation, insurers, auditors, accountants, marketing and advertising agencies, document storage, archiving and destruction companies, companies providing cloud storage or offering Platform as a Service (PaaS), Software as a Service (SaaS), and Decision as a Service (DaaS) in the cloud – e.g. Microsoft, Amazon, Google, companies assisting the Bank in identifying and analysing customer behaviour on our applications and website (Google Analytics), IT and telecommunications service providers, software developers, companies providing IT support, printing companies, debt collection

agencies, consultants, private/public enforcement agents, couriers, electronic identity administrators providing the Qualified Electronic Signature service, etc.

- To make inquiries and obtain information from government agencies, institutions, offices, and registries (e.g. the National Social Security Institute, the Central Credit Register, the General Directorate of Civil Registration and Administrative Services, and others) for the purpose of assessing your creditworthiness or for the purpose of obtaining other types of preliminary information necessary for entering into a contract at the request of the individual.
- When entering into agreements under which the Bank transfers (assigns) its receivables under loan agreements to third parties, in compliance with the requirements of the applicable national legislation.

Please note that all of the above recipients process your data solely for the purposes for which it was collected.

12. Transfer of data outside the European Economic Community and the European Union

ProCredit Bank (Bulgaria) EAD does not normally transfer your personal data to third countries or international organisations. Information about natural persons connected to your business may be transferred and stored in locations outside the European Economic Area (EEA), including countries that may have a lower level of personal data protection, when necessary for the conclusion and performance of a contract between you and the Bank, in compliance with the provisions of the General Data Protection Regulation. In this case, we make sure that the company whereto we transfer the data has an appropriate level of protection, and that the transfer is legal. Such a transfer is made, for example, when you wish to send money to a third country.

We may transfer, or allow the transfer of, information about you and the products and services you use from us to our service providers and members of the ProCredit Group outside the European Economic Area (EEA), but only if they agree to operate in accordance with our instructions to protect your information to the same standard that applies within the European Economic Area. When using cloud service providers or other recipients outside the European Economic Area, the Bank ensures that the transfer of personal data is carried out on the basis of appropriate legal grounds and safeguards, including standard contractual clauses and additional technical and organisational measures, where applicable.

You can find further information on the European Commission's website here: https://ec.europa.eu/info/law/law-topic/data-protection/data-transfers-outside-eu_en

13. Exercise of rights under Regulation 2016/679 by natural persons

We hereby inform you of the rights you have as data subjects, which you may exercise in accordance with the conditions set forth in Regulation (EU) 2016/679:

- **Right to access:** In accordance with Article 15 of Regulation (EU) 2016/679, you have the right to obtain from the controller information regarding your personal data processed by the controller;
- **Right to rectification:** In accordance with Article 16 of Regulation (EU) 2016/679, you have the right to request that incorrect, inaccurate, or incomplete personal data be corrected;

- **Right ‘to be forgotten’:** In accordance with Article 17 of Regulation (EU) 2016/679, you have the right to request that your personal data be erased when: There is no legal or contractual basis for processing them; When personal data is no longer necessary for the purposes for which it was collected or processed; Upon withdrawal of explicit consent, in cases where personal data is processed solely on the basis of the data subject’s explicit consent; In other cases provided for in Regulation (EU) 2016/679:
- **Right to restriction of processing:** In accordance with Article 18 of Regulation (EU) 2016/679, you have the right to request that processing be restricted;
- **Right to data portability:** In accordance with Article 20 of Regulation (EU) 2016/679, you have the right to receive the personal data you have provided to the controller in a machine-readable format;
- **Right to object:** In accordance with Article 21 of Regulation (EU) 2016/679, you have the right to object to the processing of your personal data in cases where the processing is based on legitimate interests, including profiling, or where data is processed for direct marketing purposes, including profiling;
- **Right to withdraw the consent you have provided:** You have the right to withdraw your freely given, specific, informed, and unambiguous consent to the processing of your personal data. If you withdraw your consent, please note that this does not affect the lawfulness of the data processing that took place before your consent was withdrawn;
- **You have the right to request that decisions based on automated processing** that affect you and are made on the basis of personal data **be made by a human being rather than by automated means.**

The persons can exercise their rights by contacting us through the contact details of the Bank:

Address: Head Office, 26 Todor Aleksandrov Blvd., 1303 Sofia
Tel.: + 359 700 1 70 70 or * 7000
Personal Data Protection Officer
dpo@procreditbank.bg

To request access to or correction of your personal data, or to make other requests related to your rights as a data subject, please submit a request at any of the Bank’s branches or use the internet banking system, which allows for personal identification of the applicant, or another electronic channel specified and acceptable to the Bank that allows for unambiguous identification of the data subject.

You also have the right to file a complaint to the Commission for Personal Data Protection:

Commission for Personal Data Protection

2 Tsvetan Lazarov Blvd.
1592 Sofia
tel.: +359 2 915 3523
fax: +359 2 915 3525
e-mail: kzld@cpdp.bg
website: <http://www.cdpd.bg/>

You may exercise your rights under Regulation (EU) 2016/679 by submitting a request or application to ProCredit Bank (Bulgaria) EAD in free-form text. In order for your request to be processed, it must contain the following mandatory details to enable the Bank to identify you:



- Full name;
- Personal Identification Number (PIN)/Personal Number of a Foreigner (PNF)/Date and place of birth (if you are not a Bulgarian citizen);
- Identification document number, date of issue, issuing authority, and expiration date;
- Permanent address;
- E-mail address, if you would like to receive a reply to your e-mail address;
- In what capacity would you like to exercise your rights under Regulation (EU) 2016/679 – for example: customer/former customer, borrower, mortgage debtor, joint debtor, guarantor, pledgor, employee/former employee, legal representative/authorised representative/beneficial owner of a company or the name of the company, BULSTAT/Unified Identification Code (UIC)/foreign registration number, other capacity;
 - Description of the request/application to the administrator;
 - Preferred method for receiving a response from the administrator: to the e-mail address or mailing address you provide, or at a Bank office of your choice.

Please note that if the information you provide is incomplete and/or incorrect, we may not be able to identify you and/or fulfil part or all of your request.