

INFORMATION ON THE PROCESSING OF PERSONAL DATA of UBB INTERLEASE

Dear potential and current clients,

For UBB INTERLEASE, ensuring the security of personal data provided by potential and current customers is of utmost importance. Therefore, UBB INTERLEASE takes all necessary legal, organizational, technological and informational measures to ensure lawful, appropriate and clear processing of personal data of all its potential and current customers.

This declaration aims to acquaint you with how UBB INTERLEASE takes care of your personal data, namely: what information we collect or provide to you, what are your legal rights as our potential or current customer, what consents you can give us, with whom and how we share your personal data, how long we store it, etc.

The information contained in this document is important to you and it is in your best interest to read it in detail and carefully.

UBB INTERLEASE may update this privacy statement and its most recent version will be available at www.interlease.bg. UBB INTERLEASE will inform you of all material changes to its terms via its website or other communication channels.

1. For UBB INTERLEASE:

UBB INTERLEASE EAD (hereinafter UBB INTERLEASE) is a legal commercial entity, entered in the Commercial Register at the Registry Agency with UIC 831257890, address: Sofia 1040, Mladost district, 135A Tsarigradsko shose Blvd. UBB INTERLEASE has registered branches only on the territory of the Republic of Bulgaria.

UBB INTERLEASE is a member of KBC group - a banking and insurance group of companies that through cooperation with each other create and offer banking, financial, investment and insurance products and services. The main target groups of KBC Group are individuals, small and medium enterprises, and corporate clients. KBC Group operates mainly in Belgium, the Czech Republic, Slovakia, Hungary, Bulgaria and Ireland.

UBB INTERLEASE, as a controller of personal data, operates in full compliance with the requirements of the Personal Data Protection Act and Regulation 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of individuals in relation to the processing of personal data and on the free movement of such data and repealing Directive 95/46 / EC (General Data Protection Regulation), thus ensuring the confidentiality and lawful processing of personal data of its potential and current customers.

For questions related to the processing of personal data, you can contact our data protection officer at: data_privacy@interlease.bg.

More information about the current regulations for personal data protection can be found on the official website of the Commission for Personal Data Protection of the Republic of Bulgaria: <https://www.cdpd.bg/>.

2. Definitions:

"Personal data" means any information relating to a natural person ("data subject") who is identified or can be identified, directly or indirectly, in particular by an identifier such as: name, personal identification number, location data, gender, address, telephone number, online identifier or one or more characteristics specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that individual.

"Processing of personal data" means any operation or set of operations carried out with personal data by automatic or other means such as collecting, recording, organizing, structuring, storing, adapting or modifying, retrieving, using, disclosing, transmitting, distributing or otherwise by which data becomes available, stacking or combining, restricting, deleting or destroying.

3. Rights of Data Subjects:

Individuals - potential and current customers, whose personal data UBB INTERLEASE processes, have the following rights, regulated by applicable local and European legislation:

- **Right of access** - At your request, UBB INTERLEASE provides you with information about the categories of personal data relating to you that are collected and processed by UBB INTERLEASE, as well as information about the purposes of processing, recipients or categories of recipients to whom the data are processed. provide, and the sources of this data, except in cases where the data has been collected directly from you.
- **Right to request correction, blocking of processing, restriction and / or deletion (deletion)** - At your request, UBB INTERLEASE corrects, deletes or blocks the processing of personal data, which is not in accordance with the requirements of the legislation. UBB

INTERLEASE notifies all third parties to whom your personal data has been lawfully provided, in all cases of correction, deletion or blocking of the processing of relevant personal data.

- **Right to data portability** - You have the right to receive personal data concerning you that you have provided to UBB INTERLEASE, in a widely distributed, structured and machine-readable format, and you have the right to request UBB INTERLEASE to forward / transfer this data to another administrator, without interference from UBB INTERLEASE, when the processing of personal data is based on consent or a contractual obligation or the processing of personal data is performed by automated means.
- **Right to object** - You have the right to object to the processing of your personal data when the processing of personal data is based on a legitimate interest of UBB INTERLEASE. UBB INTERLEASE will consider your objection as soon as possible and will inform you in writing of its opinion. After reviewing the objection, UBB INTERLEASE will in principle suspend the processing of your personal data and will inform all parties concerned to whom the data have been lawfully provided, of the objection received and of the measures taken on the basis thereof. However, in some cases, UBB INTERLEASE may have compelling legitimate reasons to continue processing, even after an objection has been received from you (for example, in the case of legal action, fraud investigation, etc.). In these cases, UBB INTERLEASE will contact you to clarify the reasons why UBB INTERLEASE continues to process your personal data.
- Right to withdraw the consent given for processing of your personal data for the purposes, in the Consent declaration. Withdrawal of consent may be made in writing through a sample document, which is available at the offices of UBB INTERLEASE.
- **Right to file a complaint to the Commission for Personal Data Protection (CPDP)** - You have the right to file a complaint to the Commission for Personal Data Protection (CPDP) against the actions of UBB INTERLEASE related to the processing of your personal data.

You can exercise any of these rights at any time by sending a written request to the address of the company: Sofia 1040, Mladost district, 135A Tsarigradsko Shosse Blvd. or electronically addressed to: data_privacy@interlease.bg.

4. Types of personal data processed by UBB INTERLEASE

UBB INTERLEASE processes various personal data related to establishing your identity and your social and financial status. Personal data may be obtained from you or collected from third parties. Your personal data may arise and be processed by UBB INTERLEASE in the process of providing the relevant financial service.

UBB INTERLEASE may collect and process the following personal data depending on the purpose of processing:

4.1. To identify the customer:

- Names
- Unique civil number / personal number of a foreigner
- Permanent address
- Number and date of identity document
- Customer number

4.2. To contact the client:

- Names
- Permanent address
- Current address
- Phone number
- Fax
- e-mail / e-mail /

4.3. To determine the social and financial status of the client:

- Data on previously used and current financial and products;
- Data on your indebtedness collected from the Central Credit Register (CCR) databases, as well as data on the amount of your insurance income, the insurer, and other information about your insurance status received from the National Social Security Institute (NSSI). The data is necessary for the Bank to assess your creditworthiness in order to offer you appropriate banking products and services.
- Data on financial condition and for Marital status
- Information on professional qualifications, place of work and professional experience
- History of inquiries, requests and complaints submitted by the client
- Customer number

4.4. Public data:

- Data on participation in companies and non-profit organizations, publicly available at the Registry Agency
- Information publicly announced by the client on Internet sites, social networks and blogs

4.5. Security cameras and videos

UBB INTERLEASE can perform surveillance by means of security cameras for video surveillance in the office premises of the company, and in all cases the presence of video surveillance is indicated by information boards. The videos from the office premises of UBB INTERLEASE are subject to short-term storage (not more than 30 days) and can be kept for a longer period in case of:

- Need to establish and investigate crimes and violations;
- The need to identify the offender or witness an offense that has caused damage to property or persons.

4.6. Data collected through the use of cookies

When using the website information about your stay, behavior, searches, etc. might be collected through the so-called "cookies". The amount of such information depends on the cookie settings you have chosen, and the data will be processed for the respective purposes for which you will be notified in the respective electronic channel. More information on the topic can be found in Information on the use of cookies on the UBB INTERLEASE website, available at www.interlease.bg.

5. For the persons to whom UBB INTERLEASE provides personal data

The personal data of our potential and current clients are processed mainly by the employees of UBB INTERLEASE .

The processing of personal data may also be performed by other persons processing personal data with whom UBB Interlease has concluded a contract for this purpose and who perform activities that are part of the services provided by the Company. If there are legal grounds, personal data may be provided to other administrators who may use them for their own lawful purposes.

5.1. Administrators of personal data to whom UBB INTERLEASE may provide personal:

- BNB (Bulgarian National Bank)
- CPDP (Commission for Personal Data Protection)
- CPC (Consumer Protection Commission)
- CCR (Central Credit Register)
- National Revenue Agency
- National Insurance Institute
- National Health Insurance Fund
- Operators of card and payment services and systems such as Borika AD, VISA, Mastercard, Bisera, Rings
- External auditors who have contracts with UBB INTERLEASE
- SAD "Financial Intelligence", State Agency "National Security", General Directorate "Fight against Organized Crime"
- Judicial bodies / court, prosecutor's office, investigation /
- Supreme Judicial Council / SJC /
- Financial Supervision Commission
- Ministry of Interior (MIA)
- Commission for Combating Corruption and Confiscation of Illegally Acquired Property (KPKONPI)
- Guarantee funds and financial institutions such as the European Investment Fund, the National Guarantee Fund, the European Bank for Reconstruction and Development, the European Investment Bank, the European Court of Auditors, the European Commission and other European Union bodies with audit and control functions. tools in Bulgaria. These institutions may access your data as a customer or a third party related to the credit relationship in order to monitor the implementation of obligations under agreements concluded between UBB INTERLEASE and the institution.
- Assignees with whom UBB INTERLEASE EAD enters into contracts
- Couriers and postal operators
- Mobile operators
- External lawyers, law firms that have concluded contracts for legal services and legal protection with UBB INTERLEASE, Private and Court enforcement agents
- Other companies of KBC Group, in their capacity of data controllers
- Bulgarian and foreign banks and other financial institutions
- Eurotrust Technologies AD as a provider of electronic certification services
- Other recipients of data whose activity is regulated In the event of a change in the list of persons processing personal data to whom UBB INTERLEASE provides personal data under the law, UBB INTERLEASE will update this document.

5.2. Processors of your personal data are:

Natural or legal persons, public authority, agency or other body that processes personal data on behalf of the controller.

As part of KBC Group, UBB INTERLEASE EAD may assign certain actions for the processing of data to other processors of the Group.

Some of these data processing actions assigned by UBB INTERLEASE are related to the control and support functions such as:

- financial reporting
- compliance
- risk
- marketing
- ICT management
- Internal audit
- A research team that develops models to improve services and products.

UBB INTERLEASE can directly or indirectly use other processors with which it has concluded a contract, such as:

- persons who have been assigned actions for the production, completion and delivery of information forms of the company;
- persons to whom the Administrator has assigned the processing of personal data for organizational reasons;
- suppliers of products and services for the company;

- companies providing information and communication technologies to facilitate the operation of operating systems and services;
- SMS providers other than mobile operators;
- Market research agencies / for organizing games and raffles • companies that, on behalf of the company on its behalf and on its behalf, make commercial offers through technical means of communication - insofar as there is a legal basis for such an offer; • companies specializing in archiving digital information and access
- Companies providing physical and information services in connection with the processing and maintenance of documentary physical and electronic archives;
- KBC Group companies within or outside the European Economic Area (EEA) to carry out outsourcing activities (in the case of outsourcing) in accordance with the requirements of applicable law;
- persons assisting the company in connection with the servicing and collection of receivables - legal entities providing services for serving invitations / letters and logistics services;
- Insurance companies - insurance companies and insurance brokers that insure leasing property provided under lease agreements to data subjects;
- Persons to whom UBB INTERLEASE has assigned the processing of personal data for organizational purposes - companies entrusted with activities for preparation of offers and conclusion of leasing contracts, servicing of clients of UBB INTERLEASE, etc.;
- Persons providing to UBB INTERLEASE services for registration and change of registration of motor vehicles, property of UBB INTERLEASE and provided for use to the personal data subjects;

5.3. Persons outside the European Economic Area (EEA)

It is possible that some of the recipients listed above are located outside the European Economic Area. UBB INTERLEASE may provide personal data to recipients from countries that are not part of the European Economic Area (third countries), provided that it is adequately provided. level of protection of personal data in accordance with local and European legislation,. Your personal data may be provided to non-EEA third parties who are not treated as countries with an adequate level of personal data protection, provided that the agreements concluded between the parties for the processing and transfer of personal data provide for standard contractual clauses approved by the European Commission and after a detailed assessment of the impact of the transfer on the rights of personal data subjects. UBB INTERLEASE will take all necessary measures to protect your personal data if their processing requires their provision to third parties inside or outside the European Economic Area.

6. The purposes for which UBB INTERLEASE processes personal data

UBB INTERLEASE collects and processes personal data of its potential and current clients for different purposes and on different **legal grounds**, as follows:

6.1. PURPOSES FOR WHICH THE PROCESSING OF PERSONAL DATA IS BASED ON OBLIGATIONS DUE TO LAW:

- Identification of the client's identity and authentication of his personal data - according to the Law on Measures against Money Laundering and the Regulations for application of this law.
- Client profiling based on risk assessment - Client profiling according to the Anti-Money Laundering Measures Act and the Regulations for implementation of this law (approval of the client and the transaction and monitoring according to the risk profile).
- Undertaking control in connection with the prevention of money laundering, embargoes and terrorism (Law on Measures against Terrorist Financing, Law on Measures against Money Laundering and the Regulations for the Implementation of this Law) - Statutory actions to prevent, detect, investigate and take further action actions, and the fulfillment of obligations to report suspicious transactions to financial intelligence agencies, and the obligation to introduce measures against money laundering, embargoes and terrorism.
- Regulatory reports - personal data are collected and processed for accounting and tax reasons in order to ensure compliance with the reporting requirements to the competent authorities, in accordance with legal obligations.

6.2. OBJECTIVES FOR WHICH THE PROCESSING OF PERSONAL DATA IS BASED ON THE PERFORMANCE OF A CONTRACT:

- Preparation of contracts at the request of individuals whose personal data are processed - in order to sign a contract with a client, UBB INTERLEASE must have certain personal data of the client (eg name, date of birth / PIN / ID number) , permanent address) and contact details of the client. UBB INTERLEASE may request additional information depending on the nature of the services that are the subject of the contract.
- Use of products / services - UBB INTERLEASE processes personal data of customers through various channels in order to ensure the use by customers of the relevant products / services (for example, processes payment transaction data in order to indicate that the obligation to pay a fee has been fulfilled. under a lease agreement).

6.3. OBJECTIVES FOR WHICH THE PROCESSING OF PERSONAL DATA IS BASED ON THE CLIENT'S CONSENT

- **Individual / personalized direct marketing and segmentation / profiling for commercial purposes** - Creating customer profiles in order to provide new, better banking, financial, insurance and investment services and products by companies of KBC Group in Bulgaria, taking into account individual needs and interests of the client.

The consent for processing personal data for the purposes under item 6.3. the above is freely provided by the data subject through a special form of consent to receive personalized proposals from the client.

6.4. OBJECTIVES FOR WHICH THE PROCESSING OF PERSONAL DATA IS BASED ON THE PROTECTION OF THE LEGAL INTERESTS OF THE ADMINISTRATOR:

- **Development of analytical models** - UBB INTERLEASE will build analytical models to support the development of customer services and evaluation of the services offered. Collected data and personal data are grouped together on a specific basis to identify models / trends / relationships / algorithms, without affecting the interests of individual customers and without taking action against them (eg preparing a credit rating for the customer).
- **Sending messages in connection with the use of products and services** - UBB INTERLEASE processes personal data to send messages about the products and services used by the customer through calls, e-mails, SMS, letters, etc. The messages concern only the products and services already used by the customer; they do not pursue marketing goals, nor do they contain offers for new services.
- **Judicial actions** - protection of the rights of UBB INTERLEASE - UBB INTERLEASE will process the data of its clients in order to protect its rights in court proceedings with the help of external lawyers. This applies to situations where personal data are processed in connection with the administration of information related to procedural actions, judicial guarantees, requests and court decisions.
- **Testing for changes in software applications, demonstrations of platforms and internal portals, training** - UBB INTERLEASE will use personal data when creating and / or updating software applications for its operating systems, as follows:
 - checking for changes in the program code of applications in different test / reception environments (eg improving distribution channels or ensuring more secure protection of collected personal data);
 - solving incidents - playing incidents;
 - platform demonstrations;
 - training of employees.
- **Internal reporting, analysis and development of the offered products and services** - UBB INTERLEASE uses the personal data of its clients in order to improve its market position by offering new and better services and innovative products and to optimize its internal processes.
- **Risk assessment for prevention and detection of fraud** - UBB INTERLEASE will process the personal data of its customers as protection against fraud or criminal acts on their part. UBB INTERLEASE has the right not to serve high-risk customers who may jeopardize the company's image. Based on certain facts (eg providing false documents and data, certain customer behavior) UBB INTERLEASE assesses the potential risk of fraud. The assessment can be made on the basis of certain indicators of the respective customer profile, as well as on the basis of any other information (such as stolen ID card or choice of country for electronic banking), which may lead to potential fraud. Measures to prevent and detect fraud are taken in the context of compliance with internal rules, existing controls, ensuring reliable security of information stored physically and digitally.
- **Customer Relationship Management** - UBB INTERLEASE will process the personal data of its customers in order to offer an individual approach based on the information provided and the customer profile created. The personal data of the clients, which are stored in different databases, can be grouped by certain features and can be processed through different channels of UBB INTERLEASE (direct channels, call centers, offices and branches). The purpose of this grouping is to facilitate and improve these channels of access to information.
- **Determining credit risk** - UBB INTERLEASE will process the personal data of its customers to determine credit profiles to reduce risk when offering its financial products and services to customers.
- **Verification of data on the subject in public registers** - UBB INTERLEASE will process the personal data of its customers to make inquiries about customer data in the Central Credit Register (CCR), credit registers and offices, National Health Insurance Fund (NHIF) and receiving of personal data from the indicated administrators in connection with the processing of the received applications for the use of leasing financing. The consent for the processing of personal data for the specific purpose is provided in the application for the use of leasing financing, in the leasing contract or in a separate declaration.
- **Integration between UBB Interlease EAD and KBC Leasing Bulgaria EOOD** is a process of legal transformation through the merger of the two companies, which covers unification and harmonization of the processes, systems, products, structure and rules of UBB Interlease and KBC Leasing Bulgaria. For the purposes of integration, the two companies can exchange information about their customers, counterparties, etc. with the aim of smooth, problem-free, fast and quality service of the relations with the customers/partners of the two companies, including unification of the approach and the offered products and services. The processing of customer/counterparty data in connection with the integration activities aims to prevent duplicate service and conflicting processes and products offered in the two companies. Carrying out this process in a way that is comfortable for customers and counterparties requires the exchange of data for the stated purpose, taking due care and complying with all general requirements for the protection of personal data. The legal transformation of the companies through a merger will lead to the disappearance of KBC Leasing Bulgaria EOOD as an independent company and the transfer of all data of its clients/partners to UBB Interlease EAD. UBB Interlease EAD, in its capacity as a universal legal successor of KBC Leasing Bulgaria EOOD, will bear full responsibility and care for this information as an independent administrator of personal data.

The processing for these purposes is necessary for the protection of the legitimate interests of UBB INTERLEASE as a controller of personal data, where these interests are related to the main function of UBB INTERLEASE as a financial institution. UBB INTERLEASE has put all the necessary marks to ensure the secure and lawful processing of personal data of its potential and current customers.

7. Duration of storage of personal data

UBB INTERLEASE stores and processes the personal data of its clients - subjects of personal data, for a specific purpose and to perform specific actions. By fulfilling the objectives for processing and performing all actions for which personal data are required, UBB INTERLEASE terminates the storage of data and takes all necessary actions to delete and / or destroy them.

UBB INTERLEASE stores the personal data of the data subjects in accordance with the mandatory legal retention periods, and if such are not specified - in accordance with its internal rules. The total duration of storage of personal data and documents of clients, transactions and transactions is up to 10 (ten) years after the termination of the relationship with the client. For example, UBB INTERLEASE will keep the client file, containing all existing documents for the client, for 10 (ten) years, starting from the year following the termination of the contractual relationship. After the expiration of the set deadlines, UBB INTERLEASE will destroy all documents containing personal data for the respective client and / or will irreversibly delete the personal data in these documents.

UBB INTERLEASE stores the personal data of its potential clients for a period of not less than 5 (five) years. Potential customers have the right at any time before the expiration of this period to submit a request to UBB INTERLEASE for deletion of personal data stored by the administrator.

The UBB INTERLEASE privacy statement is available to all potential and current customers at the following addresses: <http://www.interlease.bg> and <http://www.ubb.bg> or can be provided upon request.