

## INFORMATION FOR PERSONAL DATA PROCESSING OF FORMER EMPLOYEES/INTERNS IN UBB AD

UBB AD (hereinafter referred to as UBB/the Bank), is company, registered in the Trade Registry to the Registry Agency with ID 000694959, with headquarters at 89B, Vitosha Blvd., Sofia. In order to ensure maximum security and alignment with the law of the processes, related to the processing of your personal data, UBB has appointed a Data Protection Officer, who can be contacted for issues related to the processing of personal data at [dpo@ubb.bg](mailto:dpo@ubb.bg).

The protection of your personal data is important for the Bank. We have undertaken all necessary organizational and technological measures, to process your personal data in a manner that is lawful, appropriate and transparent. The following privacy statement on the processing of personal data clarifies for which purposes and on what grounds we will process your personal data.

We encourage you to read this information carefully in order to learn more details about how your personal data is processed. No matter for what purposes and on what grounds your personal data is processed, UBB will treat it with the same care. This document also contains information about your rights and how you can exercise them.

### 1. Personal Data Subjects

The purpose of this Privacy Statement is to inform you how UBB processes your personal data in your capacity of:

- Employee with terminated employment relationship (former employee, pensioner);
- Intern with terminated internship.

### 2. Categories of personal data that are processed:

In its capacity of a Personal Data Controller, UBB processes the following categories of personal data:

- Identification data
- Contractual and financial information
- User profiles (e.g. individual number (U-number, J-number), email, username (account), etc.)
- Contact details
- Social identity (e.g. education, qualifications, etc.)
- Health status - for the rest of the statutory storage period of such information after termination of the relations with the Bank.

### 3. Grounds for processing personal data

UBB processes your personal data in case of one of the following grounds:

- If the processing is necessary to fulfill a commitment or is required by a special law, decree or ruling.
- If you have given your explicit consent, insofar as the nature of your relationship with the Bank and the applicable legislation allow it.
- Due to a legitimate interest of the Bank or you as Personal Data Subject.

#### 4. Purposes of personal data processing

As a Personal Data Controller, UBB processes your personal data after termination of working relations with you for the purpose of complying with several legal obligations under labor, social security and tax legislation.

#### 5. Term of storage of personal data

Your personal data will not be stored for longer than necessary. UBB will store your personal data as follows:

- ✓ Payroll slips, employment contract and annexes thereto, orders for appointment, orders for reassignment, orders for unpaid leave over 30 working days in one calendar year, orders for termination of employment, not received employment record books, diaries and copies of certificates - for a period of 50 (fifty) years after the termination of your employment relationship with the Bank. This term is consistent with your interest in receiving information from UBB, relating to employment relations with the Bank.
- ✓ Internal documents related to labor legislation or legislation regulating banking activity, as well as related to labor activity or arising from internal rules of the Bank: orders, consent to participation in trainings, performance assessment forms, documents relating to conducting trainings and instructions on safety and health at work, etc. –for period of 5 years.
- ✓ Documentation certifying an accident at work or occupational disease – minimum 5 years.
- ✓ Contracts arising from legal relations other than labor relations (civil, consultancy, etc.) -5 years.
- ✓ Sick leaves – for a period of 3 years, starting from January 1<sup>st</sup> of the year following the year when they were issued.

#### 6. Rights of the Personal Data Subject

As a Personal Data Subject processed by UBB, you have certain rights, which can be exercised by applying for exercising a right under the requirements of the Personal Data Protection Act in one of the following ways:

- email to [recruitment@ubb.bg](mailto:recruitment@ubb.bg) - the application should be signed with an electronic signature according to the Electronic Document and Electronic Certification Services Act
- at 89B Vitosha Blvd., Sofia, UBB, Head Office, Human Resources Management Directorate or
- at any UBB bank branch.

UBB guarantees you equal access and opportunity to exercise the following rights:

**A. Right to access** - Upon your request, as a Personal Data Subject, the Bank shall provide information about the categories of personal data related to you, which are being collected and processed by the Bank, and information about the purposes and terms of the processing, the recipients or categories of recipients to whom your data is disclosed and the sources of this data, except the cases when the data was collected directly from you.

**B. Right to rectification, suspension of processing** (imposition of restrictions on processing and/or deletion) – upon your request, the Bank is obliged to correct, delete or suspend the processing of your personal data in cases where the processing is unlawful. The Bank notifies any third party to whom your

personal data has been disclosed, of all rectifications and deletions made to your personal data, as well as in cases of suspension of the processing of your personal data.

**C. Right to data portability** – In your capacity of Personal Data Subject, you have the right to request to receive the personal data concerning you, which you have provided to UBB, in a structured, commonly used and machine-readable format and you have the right to transmit/transfer that data to another Controller without hindrance from UBB, where the processing is based on consent or on a contract and the processing of your personal data is carried out by automated means.

**D. Right to object** – In your capacity of Personal Data Subject, you have the right to object to the processing of your personal data when the processing of personal data is based on the Bank's legitimate interest. The Bank shall review the objection as soon as possible and shall provide its opinion in writing. After reviewing the objection, the Bank will generally suspend the processing of your personal data and will notify all interested parties to whom the personal data have been disclosed for the objection received and of the measures taken in this regard. In some cases, however, the Bank has an indisputable legal basis to continue the processing of your personal data even after receiving the objection (for example, in cases of lawsuits, fraud suspicions, etc.). In such cases UBB will contact you to clarify the reasons why it will continue processing your personal data.

**E. Right to withdraw the consent** for the processing of your personal data, in case the Bank processes them based on your consent, which the Bank has explicitly requested, and you have provided explicitly in a separate declaration. You can withdraw by means of the same declaration.

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

**G. Right not to be subject to a fully automated decision involving profiling** - as a data subject, you have the right not to be subject to a decision based solely on automated means, unless you have provided your explicit consent to this or where the automated processing is necessary for entering into, and performance of, a contract to which you would be a party. In addition, where there is automated decision-making you have the right to express your views, to challenge the decision, and to request the involvement of a Bank employee to carry out a reassessment (i.e. human intervention). UBB will inform you in advance if it uses fully automated processing of personal data, providing clear information about the concepts underlying the relevant decision-making software.

When exercising your rights, please be as specific as possible so that your question is answered accurately and correctly.