

I. Information about the Company

Investbank JSC (Investbank/The Bank) having a seat and registered office in Sofia, 85 Bulgaria Blvd., UIC 831663282.

Should you have any additional questions related to personal data processing, please, contact our personal data protection officer at the following e-mail address: dpo@ibank.bg or at the phone number: 0700 12 555 for Vivacom subscribers at the price of a city call nationwide, or 17 555 for mobile operator subscribers at the price as per the tariff plan.

Investbank has been registered as collector of personal data with identification No. 33115/19.07.2017 at a register kept by the Commission for Personal Data Protection. Investbank, in its capacity as collector of personal data, performs its activities in strict compliance with the requirements of the Personal Data Protection Act and Regulation (EU) 2016/679 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, in order to ensure confidentiality and legal processing of the data of its customers.

Apart from its banking and investment activities, Investbank also performs, jointly with Insurance Company Bulgaria, distribution of insurance products to natural persons and legal entities in the country.

II. Main definitions

1. "personal data" means any information relating to an identified or identifiable **natural person ("data subject")**; an identifiable natural person is one, who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person;

2. "processing" means any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

3. "controller" means the natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of personal data; where the purposes and means of such processing are determined by Union or Member State law, the controller or the specific criteria for its nomination may be provided for by Union or Member State law.

4. "personal data protection officer" is a natural person or legal entity holding the necessary competence, which is authorized or appointed by the collector by virtue of the relevant written act regulating the rights and obligations relating to the provision of the minimum necessary technical and organizational measures for personal data protection during their processing.

III. Rights of data subjects

The natural persons, whose personal data are processed by Investbank, shall have the following rights, which they may exercise by submitting a request in writing or by e-mail (e-mail address: dpo@ibank.bg), addressed to the personal data protection officer at Investbank, by specifying their names and contact information in order to receive a written notification.

1. **Right of access** by the natural persons (data subjects). The data subject shall have the right to obtain from the Bank a confirmation as to whether or not personal data concerning her or him are being processed and processes personal data related to it and, where that is the case, access to the personal data and the following information: the purposes of processing; the categories of personal data concerned;

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the recipients or categories of recipients, to whom the personal data have been or will be disclosed; when possible, the envisaged period for which the personal data will be stored, or, if not possible, the criteria used to determine that period; the right to lodge a complaint with a supervisory authority; where the personal data are not collected by the data subject, any available information as to their source; the existence of automated decision-making, including profiling, and, at least in those cases, meaningful information about the logic involved, as well as the significance and the envisaged consequences of such processing for the data subject.

2. **Right to rectification** of personal data by the natural persons (data subjects). Every data subject shall have the right to obtain from the Bank, without undue delay, the rectification of inaccurate personal data concerning him/her. Taking into account the purposes of the processing, the data subject shall have the right to have incomplete personal data completed, including by means of providing a supplementary statement.

3. **Right of erasure** of the personal data ("**right to be forgotten**") is a legal option for the data subject to request that the Bank should erase personal data concerning him, and the Bank shall have the obligation to erase personal data without undue delay, **where one of the following grounds applies:**

- the personal data are no longer necessary in relation to the purposes for which they were collected or otherwise processed;
- the data subject withdraws consent on which the processing is based and where **there is no other legal ground for the processing;**
- the data subject objects to the processing and there are no overriding legitimate grounds for the processing;
- the personal data have been unlawfully processed;

4. **Right to restriction** of personal data processing. The data subject shall have the right to obtain from the Bank restriction of the volume of processed personal data where one of the following applies:

- the accuracy of the personal data is contested by the data subject. In this case the restriction of processing shall be for a period that enables the Bank to verify the accuracy of the personal data;
- the processing is unlawful yet the data subject opposes the erasure of the personal data, and requests the restriction of their use instead;
- the Bank no longer needs the personal data for the purposes of the processing, but they are required by the data subject for the establishment, exercise or defense of legal claims;
- the data subject has objected to processing pending the verification (balancing test) whether the legitimate grounds of the controller override those of the data subject;

5. **Right to object and automated individual decision-making.** The data subject shall have the right to object, at any time and on grounds relating to his or her particular situation, to processing of personal data concerning him, including profiling. The Bank shall no longer process the personal data unless it can demonstrate compelling legitimate grounds for the processing which override the interests, rights and freedoms of the data subject or for the establishment, exercise or defence of legal claims. The data subject shall have the right to become the object of a decision founded solely on automated processing, including profiling, which gives rise to new legal consequences for the data subject or affects it in a similar way to a significant extent.

6. **Right to withdraw consent**, granted for the processing of personal data for purposes described in the Declaration of Consent. The withdrawal may be effected by written application to the bank offices.

7. **Right to lodge complaint to the Commission for Personal Data Protection** - the data subject may lodge a complaint to the regulatory competent authority against acts of Investbank related to the processing of his/her personal data.

The request under it. 1-7 shall be filed in personally or by a person explicitly authorized by the customer by a notarized power of attorney. The request may be sent electronically, by virtue of the Electronic Document and Electronic Signature Act. Investbank shall deliver a decision regarding a customer request within a 30-day period from its submission. When there is objective need of a longer period - in view of collecting all requested data and this hampers the operation of the Bank significantly, this period may be extended to 60 days. By its decision Investbank grants or denies access and/or the information requested by the applicant, yet it shall always give grounds for its decision.

IV. Types of personal data processed by the Bank

Investbank may process personal data of the data subject relating to their physical identity, social identity or economic/financial identity. The data might be collected by the data subject, third persons or might be created in the process of bank service provision. When the Bank processes personal data for the purpose of providing products and services, for their repayment, for the execution of customer service orders, as well as for the purpose of compliance with legal obligations, this processing is mandatory for the implementation of those goals. If these data are not provided, the Bank will not be able to provide the information for the respective services and enter into an agreement for a product or service with a customer.

1. Investbank may process various data concerning your identification - names; gender; date of birth; nationality (citizenship); permanent residency; current address; other data from identity papers; customer number, Personal No; tax number; qualifications, occupation, previous professional experience.

2. The Bank may process your contact details - phone number; e-mail; address; mailing address; similar information for contact persons;

3. Data processing when providing the right advice and services:

- the financial services that you use (accounts, credit products, insurances, deposits and savings accounts, investments in financial instruments); transactions and account balance; potential interest in products of the Bank; history of financial information and advice provided during previous periods. The Bank may use these data to analyze more efficiently which payment, credit or insurance products is the most appropriate for you;
- family status, family members;
- general financial position for the purposes of providing the appropriate advice, if necessary for improving your status (total assets, property, etc.);
- health status relevant to offering insurance products related to loans;
- feedback, comments and suggestions, previous complaints. The information is necessary for improving the services of the Bank.

4. Investbank may process data from official public registers and data collected by third parties. The information shall be used for the purpose of checking the accuracy of the information stored at the Bank and aid the process of creditworthiness assessment and campaigns for direct marketing of bank products and services.

5. Investbank may record phone conversations with you for the purpose of improving services, ensure security of processes and as evidence for compliance with the instructions from servicing officers. The Bank stores the recorded telephone conversations as evidence for

a period of time necessary for the settlement of disputes relating to the service. Records of the telephone conversations include the communication with the call center as well as with the central management for ongoing customer service.

6. Investbank uses a surveillance security system in and around its financial centers, as well as on the premises where it performs its main activities. The installed system and its operation are in compliance with the requirements of the existing legislation regarding the use of security equipment. The surveillance cameras are marked by a clearly visible sticker. The recorded images may serve as evidence in regulating specific relations related to solving a crime and identifying a perpetrator, witness or victim.

V. Personal data recipients to whom your personal data have been or may be disclosed

Personal data are processed primarily by officers of Investbank. Further to the implementation of its main activities, the Bank may receive and transfer personal data from other collectors in order to meet a contractual obligation or ensure compliance with an obligation under a specific law. The Bank shall not provide the personal data of customers to third persons before making sure that all technical and organizational measures for protection of these data have been taken and aims to exercise strict control over the implementation of this goal. In this case, Investbank remains liable for the privacy and security of customer data.

1. List of personal data collectors to/from whom the Bank transfers/receives data:

The Bulgarian National Bank; National Revenue Agency; National Social Security Institute; Commission for Personal Data Protection; Financial Supervision Commission; Commission for Consumer Protection; National Statistical Institute; Financial Intelligence Agency, State Agency for National Security (SANS); court; prosecutor's office, investigation services; Ministry of the Interior, Central Depository, Bulgarian Stock Exchange, external auditors.

2. List of other data controllers, with whom Investbank is in contractual relations for implementing its activities:

- Advertising agencies preparing promotional terms for bank products and games and lotteries thereto;
- Debt collection agencies assisting the work of the Bank in collecting loan debt;
- Insurers offering bank products or offering other insurance products;
- Suppliers providing information and communication technologies for the development and support of bank systems;
- Lawyers and legal firms;
- Notaries;
- Central Credit Register - when assessing creditworthiness;
- Card payment operators - Borica AD and international card organizations - VISA, Mastercard for execution of card payments
- Payment system operators and correspondent banks - for executing bank transfers
- Providers of electronic certification services, when the document related to the provision of a product or service is signed by electronic signature;
- Security companies licensed to provide private security services related to processing video recordings from Investbank offices and/or ensure the access regime to the offices;
- Cash money transfer companies.

VI. Purposes of processing for which the personal data are intended, as well as the legal grounds for their processing

(1) For purposes where the personal data are processed based on the legal obligations of the Bank

1. In order to implement the measures against money laundering and financing of terrorism, pursuant to MMLA, MFTA and their implementing regulations:

- customer identification and verification of customer personal data;
- creating a customer account based on risk assessment;
- exercise control for prevention against money laundering and financing of terrorism by actions for detecting, investigating and reporting suspicious operations.

2. In order to meet the requirements of Markets in Financial Instruments Act, Law on Measures against Market Abuse with Financial Instruments and Ordinance No. 38 of FSC:

- creating a customer account for the provision of services related to financial instruments by way of a risk profile questionnaire
- exercising control for prevention, detecting, investigating cases as well as adopting future measures for ensuring compliance with the regulatory requirements and the existing legislation.
- exercising control in order to prevent and detect market abuse with financial instruments.

3. Reporting to public regulatory authorities - as part of the automatic exchange of financial information pursuant to FATCA Agreement and Common reporting standard (CRS), the Bank shall prepare monthly reports to NRA containing personal data of its customers who are natural persons. Data processing shall be executed in compliance with the Tax Insurance Procedure Code.

4. Obligations set forth in the Accountancy Act and the Tax Insurance Procedure Code and other applicable legal acts related to keeping proper and lawful accounting;

5. Provision of information to the Commission for Consumer Protection or third persons as set forth in the Law on Consumer Protection;

6. Provision of information to the Commission for Personal Data Protection in compliance with the obligations set forth in the legal framework regulating the protection of personal data - the Personal Data Protection Act, Regulation (EU) 2016/679 of 27 April 2016, etc.

(2) For the purpose of processing of personal data in compliance with contractual obligations

1. With regard to the preparation of agreements at the request of customers, whose data are being processed - for signing a bank service agreement, the Bank needs customer data (for identification and contact with the data subject); Depending on the nature of various services and bank products, the Bank might require additional data as well.

2. Testing bank products/services - for the purpose of signing the appropriate contract and provide a bank service which meets the needs of the customers, the Bank uses personal data provided by the customer. The Bank organizes a simulation of the sale of bank products/services in order to offer the most advantageous price and sale terms based on which the customer may compare the offer and choose the most suitable product.

3. Use of bank products/services - Investbank processes personal data of its customers in order to ensure better conditions throughout the life cycle of the existing bank products/services and the execution of transfers and payments.

4. Verification and a check of customer data at the Central Credit Register, credit bureaus, National Health Insurance Fund, National Social Security Institute, National Data Base Population with the Ministry of Regional Development and Public Works. The Bank receives personal data from the listed registers in order to make a mandatory search for its products and services by using the automated algorithms to determine credit rating by performing initial and/or

ongoing credit assessment of customer solvency upon purchase and use of bank or insurance products and services. For credit rating purposes Investbank shall use the data from the customer payment history. The algorithm aims to assess how likely it is for a customer to pay on time the due amounts for used products and services and how likely it is for a customer to be or become insolvent. In the case of low credit rating or lack of assessment, the Bank may suspend the signing of the agreement and request additional payment guarantees.

(3) For purposes where the processing of personal data is based on the consent by the customer.

1. Direct marketing of products and services organized by the Bank - organizing and conducting advertising campaigns for offering bank products and services through any official channel, including bank offices, call center, e-mail, SMS, phone and online channels.

2. Individual/customized approach to direct marketing and profiling for commercial purposes - creating a customer account for providing a new service or product intended to meet the specific needs and customers. In processing of personal data of customers the Bank may use partially automated algorithms and methods in order to improve continuously its products and services, in order to ensure more personalized approach to customers, to adjust the products and services so as to meet customer needs in the best possible way, or for calculation. This process is referred to as profiling.

The consent for personal data processing is regulated in the subject of a separate Declaration of Consent by the customers.

(4) For purposes where the Bank processes personal data based on the protection of the Bank's legitimate interests

1. Statistical purposes - Investbank has the legitimate interest to process customer personal data in order to describe the statistical summaries and reports due to be presented to BNB for the Register of Bank Accounts and Safe Deposit Boxes pursuant to Ordinance No. 12. To this end, the summarized data obtained from customer personal data are stored and may be used.

2. Identification, implementation or protection of the rights of the Bank - Investbank processes personal data in order to protect its rights before competent courts and authorities in the event of complaints and with the help of external lawyers and legal firms. This purpose is relevant where data are used in connection to complaints, requests and court decisions under legal proceedings.

3. Testing software programs and platforms, external portal and trainings - the Bank may use personal data when creating or updating software applications for the Bank's information systems, while at the same time applying the principles of data minimization and pseudonymization.

4. Internal reporting, analysis and development of offered products and services - Investbank uses customer data to improve its market positions, by offering new and better and innovative products, as well as to improve internal processes

5. Risk assessment for fraud prevention and detection - Investbank processes customer data for protection against frauds or criminal acts. The Bank is entitled to refuse to provide services to high-risk customers who can be harmful to its good reputation. On the basis of specific facts and internal procedures, the Bank assesses the potential risk of fraud.

6. Service management and customer relations - Investbank uses the customer personal data in order to offer a customized approach based on the collected information and created customer profile. Customer personal data can be grouped based on certain criteria through various distribution channels at the Bank aiming to improve information access to the channels and their capacities.

7. Credit and insurance risk profiling - the personal data of customers shall be used for risk assessment for credit and insurance offers aiming to reduce risk.

Processing personal data for the purposes stated is necessary in order to ensure the protection of legitimate interests of Investbank in the capacity of personal data collector, where the interests are related to the ordinary course of business. If necessary, Investbank may prepare tests to assess the priority of the Bank's legitimate interests over the interests, rights and freedoms of data subjects for every purpose under it. 1-7.

VII. Personal data retention periods

Under the applicable law the Bank shall terminate the processing of personal data for the purposes related to the contractual relations after the termination of the contract, but shall not erase the data prior to the expiry of a 5-year period of termination of the contract and until the final settlement of all financial obligations and the expiry of the statutory data retention obligations, such as the obligations under the Payment Services and Payment systems Act. If the information is stored and provided for the purposes of solving and investigating crimes and preventing money laundering and financing of terrorism, it is retained for a period of 5 years. Data retention periods with regard to obligations under the Accountancy Act for keeping and processing accounting data is 10 years; for expiry of the limitation periods set forth in the Obligations and Contract Act - 5 year; for obligations to provide information the court, competent public authorities and other grounds set forth in the existing legislation - 5 years. Customers shall keep in mind that Investbank will not erase or anonymize their personal data, if they are necessary for a pending legal case, administrative proceedings or for the consideration of claim proceedings involving the Bank.

VIII. Personal data protection

To ensure adequate protection of the credit institution data and its customers, the Bank applies all necessary organizational and technical measures set forth in the Personal Data Protection Act, as well as the best practices of international standards (ISO 27001, TOGAF®, OWASP, ITIL, etc.), banking practices, etc.

Investbank has established structures for fraud prevention and security breaches, it has appointed a Data Protection Officer, as well as a Commission for Data Protection, which support customer data security and protection processes. In order to ensure maximum security of processing, transfer and storage of customer data, the Bank uses additional protection mechanisms, such as encrypting, pseudonymisation, etc.

IX. Updates and changes in the Privacy Statement (personal data protection policy)

In order to make sure that the most up-to-date measures for protection are applied and in order to ensure compliance with the applicable legislation, the Bank shall update this Privacy Statement on a regular basis. If the introduced changes are substantial, it can publish a notification about the changes at the official website, mobile applications and the call center. Investbank invites its customers to be regularly informed about the ways the Bank ensures the protection of the personal data collected and processed by it.

This Privacy Statement (resp., personal data protection policy) has been last updated on 25.05.2018.