

INFORMATION ON THE PROCESSING OF PERSONAL DATA OF FORMER EMPLOYEES/ INTERNS OF UBB AD

UBB AD (referred to hereinafter as UBB / the Bank), is a company, registered in the Commercial Register with the Registry Agency under Company ID Number 000694959, having its seat in Sofia city and registered office at No 89B Vitosha Blvd. In view of guaranteeing maximum security and compliance with the law of the processes, related to the handling of your personal data, UBB has appointed an employee, responsible for the personal data privacy, whom you may contact on issues, pertaining to the processing of your personal data at dpo@ubb.bg.

Your data privacy is important to the Bank. We have initiated the needed organizational and technical measures, in order to process your personal data in a lawful, appropriate and transparent manner. The present information on the processing of personal data explains for what purposes and on what grounds we are going to process your personal data.

We recommend that you should read this information carefully, in order to become aware of more details as to the manner, in which your personal data is being processed. Regardless of the reasons and grounds for processing your personal data, UBB shall treat those with equal diligence. This document also contains information about your rights and the ways you could exercise those.

1. Personal data subjects

The aim of this UBB's Privacy information is to inform you about the manner, in which UBB processes your personal data in your capacity as:

- An employee having his/her employment relation terminated (former employee, pensioner);
- An intern having its internship terminated.

2. Categories of personal data

In its capacity as controller of your personal data UBB processes personal data of the following categories:

- Identification data;
- Contractual and financial information;
- User profiles (e.g. individual number (U-number, J-number), email, user name (account), etc.);
- Contact data;
- Social identity (e.g. education, qualification, etc.);
- Health status - for the remaining of the statutory term for storage of such information after termination of the relations with the Bank.

3. Grounds for processing of personal data

UBB processes your personal data upon presence of one of the following grounds:

- In case the data's processing is necessary in order to fulfill a commitment or it is required as per a special law, enactment or ordinance;
- If you have provided your explicit consent, insofar as the nature of your relations with the Bank and the applicable legislation allow it;
- Due to lawful interest on the part of the Bank or you as a data subject.

4. Purposes for personal data processing

UBB, in its capacity as a controller of your personal data, processes your personal data after the termination of the relations with you for the purposes of compliance with a number of statutory obligations under the labour, social security and tax legislation.

5. Personal data storage period

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

- ✓ Payroll sheets, employment agreement and annexes thereto, orders for recruitment, reappointment, used non-paid annual leave of over 30 business days in one calendar year, and orders for termination of the employment relation, as well as non-received employment record books, journals and originals of references - for a period of 50 (fifty) years from termination of your labour relations with the Bank. This period corresponds to your interest to obtain information from UBB, pertaining to the labour relations with the Bank.
- ✓ Internal documents related to the labour legislation or the statutory enactments, regulating the banking activity, as well as such related to the labour activity or originating from the Bank's internal rules; orders, instructions, approval of participation in trainings, performance appraisal forms, documents related to delivery of trainings and documents on occupational health and safety, etc. - for a period of 5 years.
- ✓ Documentation certifying an accident at work or an occupational disease - for a period of at least 5 years;
- ✓ Agreements, originating from relations other than the labour relations (civil, consultant, etc.) - 5 years;
- ✓ Sick notes - for a period of 3 years with effect from 1 January of the year, following the year of their issuance.

6. Rights of the personal data subjects.

As a Data subject, whose personal data is being processed by UBB, you possess certain rights that you are entitled to exercise by submitting an application for that as per the requirements of the Personal Data Protection Act, in one of the following manners:

- via email recruitment@ubb.bg – the application shall have to be signed with an electronic signature pursuant to the Electronic Document and Electronic Authentication Services Act;
- at the following address: Sofia city, 89B, Vitosha Blvd., UBB, Head Office, Human Resource Management Directorate or
- at any UBB branch.

UBB guarantees you equal access and possibility for exercising the following rights:

A. Right to access - Upon your request in your capacity as data subject, the Bank shall provide information about the categories of the personal data relating to you, which is being 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 of rectification, discontinuation of the processing (imposing of restrictions on the processing and/or obliteration (deletion) – Upon your request the Bank shall rectify, delete or discontinue the processing of your personal data in the cases when the processing is unlawful. The Bank shall inform any third party, to which your personal data has been disclosed, of all rectifications and deletions it has made, as well as the cases of discontinuation the processing of your personal data.

C. Right of personal data portability - In your capacity as personal data subject you are entitled to request to receive the relating to you personal data, which you have provided to UBB, in a routinely used, structured and machine-readable format and you are entitled to transmit/transfer that data to another Controller, without hindrance on the part of UBB, in case the grounds for processing of your

personal data represents a consent or an agreement, and the processing of your personal data is made in an automated manner.

D. Right to object - In your capacity as data subject you are entitled to file an objection to the processing of your personal data when such processing is based on the Bank's lawful interest. The Bank shall consider the objection within the shortest possible term from the date of its submission and shall provide you with its statement in writing. After considering the objection, the Bank shall, in principle, discontinue the processing of your personal data, as well as shall inform all interested parties, to which the personal data has been delivered, of the received objection and of the measures, initiated to this end. In some cases, however, the Bank could have indisputable legitimate grounds to continue processing the personal data, even after receiving your objection (for example in cases of litigation, suspected fraud monitoring, etc.). Within these assumptions UBB shall contact you, in order to clarify the reasons, due to which it is going to continue processing your personal data.

E. Right to withdraw your consent for processing of your personal data, in case the Bank is processing it on the grounds of your consent, which it has explicitly requested and you have explicitly provided in a special declaration. The withdrawal may be done by using the same declaration.

F. Right to complain before the Commission for Personal Data Protection (CPDP) – In your capacity as data subject you are entitled to file a complaint with the Commission for Personal Data Protection (CPDP) against actions performed by UBB in line with the processing of your personal data.

Upon exercising your rights, we kindly ask you to be as specific as possible, so that the answer to your question would be precise and correct.