

Information regarding the protection of personal data in lending

First Investment Bank AD („We“, „the Bank“) hereby provides you with information regarding the processing of your personal data when submitting a loan application, as well as at the conclusion and during the performance of a loan agreement with the Bank.

What kind of personal data do we process?

The personal data processed are: full names, national ID number, date of birth, citizenship, identity document number, e-mail, address and telephone, education, occupation, bank account number, data on the financial condition: income, real and movable property, loan and lease obligations, marital status, other data necessary to fulfill the loan agreement requirements.

The Bank also processes personal data necessary for the assessment of creditworthiness obtained from registers, government bodies and institutions such as the civil registration and administrative service, NSSI, the Property Register, the Register of matrimonial property relations, the Commercial Register, the Register of non-profit legal entities, the Special Pledges Register, and other institutions. The Bank also processes personal data of mortgagors/pledgors necessary for establishing a mortgage/pledge.

The Bank processes personal data of the representatives of legal entities applying for loans or entering into loan agreements, or in connection with the provision of collateral.

The Bank uses scoring models when evaluating client creditworthiness in the areas of consumer loans and credit cards. When making the assessment, data is taken into account of the financial standing of clients and their ability to repay credit obligations on a regular basis.

The bank processes your health data if you wish to take out a *Tranquility with FiHealth* insurance from FiHealth Insurance Company. The Bank provides you with a medical questionnaire in its capacity as an insurance agent. After you fill in the questionnaire, it is sent to the insurer and not stored in the credit file.

On what grounds do we process your personal data?

Processing of your data is necessary for the conclusion and execution of a loan agreement, respectively a collateral agreement to which you are a party.

We process your personal data in compliance with our legal obligations in connection with the Law on Measures against Money Laundering, the Law on Measures Against the Financing of Terrorism, the Tax and Social Insurance Procedure Code, the Law on Credit Institutions.

Pursuing its legitimate interests, the Bank may also process your personal data in connection with sharing information that would be of interest to you, as well as for direct marketing, provided that you have not objected to the use of your personal data for these purposes.

For what purposes do we use your personal data?

Your personal data is used for the purposes of granting and administering bank loans, and assessing the creditworthiness of the borrower.

The Bank processes personal information in accordance with legal requirements, including for the purposes of identification under the Law on Measures against Money Laundering; the

automatic exchange of financial information under the Tax and Social Insurance Procedure Code; for the purposes of banking supervision and credit risk management under the Law on Credit Institutions;

Can we use your personal data to share information that would be of interest to you?

We may use your personal data for the purpose of research, event invitations, greetings, postcards, marketing newsletters, offers, promotions or campaigns for participation in raffles or games organized by the Bank or its partners.

With whom can we share your personal data?

The Bank respects and protects the privacy of your personal data. Subject to legal requirements, we may disclose your personal data to institutions or persons under current legislation, including the Bulgarian National Bank, the NRA, the NSSI, the court, prosecution, investigation authorities, the Ministry of Interior, external auditors, the SANS, or others specified by law.

The Bank may disclose your personal data to insurance companies when taking out insurance, to third-party transferees when transferring claims under loan agreements or contracting the services of collection companies, to private and public enforcement agents, to external consultants and contact centers, subject to all confidentiality requirements.

For what period do we store your personal data?

The Bank stores your personal data for no longer than is absolutely necessary. In order to fulfill our contractual obligations, we retain such data throughout the duration of the client relationship.

The Bank may retain your personal data after termination of the loan agreement relationship in order to comply with the applicable legislation as well as for reporting, tax, accounting purposes, or for the defense of legal claims related to its legitimate interests. Once the legal grounds expire, the Bank shall cease processing your personal data.

What are your rights with respect to your personal data

Subject to Bulgarian legislation, you have the following rights with respect to your personal data processed by us:

1. right of access your personal data processed by the Bank;
2. right to rectification of your personal data processed by the Bank in case it is incomplete or inaccurate;
3. right to call for erasure of your personal data by us subject to the relevant conditions;
4. right to object to the processing of your personal data in the cases provided by law;
5. right to portability of your personal data, and of receiving such data in a structured, commonly used and machine-readable format (provided that the Bank has the relevant technical capability);
6. right to withdraw your consent for processing of your personal data at any time and free of any charges.

Detailed information on the terms and conditions under which you can exercise your rights can be found in the Procedure for the exercise of rights related to personal data of First Investment Bank AD, published on our website at: www.fibank.bg, as well as in any of our offices in the country.

You also have the right to file a complaint with the Personal Data Protection Commission when the relevant prerequisites exist.

How to contact us?

You may contact us at the following address:

First Investment Bank AD

37, Dragan Tsankov Blvd.

1797 Sofia

Phone: (02) 817 11 00; (02) 9 100 100

Contact details of our Data Protection Officer:

Andrey Filchev

81G Bulgaria Blvd.

1404 Sofia

E-mail: dpo@fibank.bg