

Information regarding the protection of personal data in investment services and activities

First Investment Bank AD („We“, „the Bank“) hereby provides you with information regarding the processing of your personal data in the provision of investment services and activities related to financial instruments (including transactions).

What kind of personal data do we process?

The personal data processed are as follows:

Name, EGN, PN, PNF or NRA assigned number, date of birth, ID document details, residence address, correspondence address, contact phone, e-mail, jurisdiction of residence for tax purposes, tax number, identifier for individuals in transaction reports, client number, client account number for keeping of financial instruments with the Central Depository, financial status, education, knowledge and experience in the field of investment services and activities, occupation, IBAN. The scope of the processed data may differ depending on the nature of the services used.

On what grounds do we process your personal data?

Processing of your data is necessary for the conclusion and execution of intermediation contracts for transactions in financial instruments, trust management/client portfolio management, provision of investment advice, safekeeping and administration of financial instruments, provision of depository registration services.

The Bank also collects and processes your data in compliance with its legal obligations under the Markets in Financial Instruments Act, the Public Offering of Securities Act, the Government Debt Act, the Special Pledges Act, the Law on Measures against Money Laundering, the Tax and Social Insurance Procedure Code, as well as to meet the requirements of the Rules of Procedure of the Central Depository AD.

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 providing investment services and activities related to financial instruments, such as accepting, transmitting and executing orders in relation to financial instruments, managing individual portfolios, providing investment advice, safekeeping and administration of financial instruments, registering transfers of financial instruments, performing registration services. The Bank also processes your personal data for the purpose of preventing money laundering and terrorist financing, automatic exchange of financial information and for other purposes expressly provided for by law.

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 Financial Supervision Commission, the Ministry of Finance the court, prosecution, investigation authorities, the Ministry of Interior, the SANS, or others specified by law.

In order to perform the services requested by you, the Bank may also provide your personal data to other parties such as the Central Depository AD, other local or foreign depository institutions, payment system operators and trading venues such as the BSE - Sofia AD, trading platform operators, other investment intermediaries and issuers of securities.

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.

Normally, the Bank retains your data for a period of 5 years, such period starting from the beginning of the calendar year following the year of termination of the relationship.

The Bank may also retain your personal data for a longer period of time in view of reporting, tax, accounting purposes, or for the defense of legal claims related to its legitimate interests. Upon expiration of the retention period and fulfillment of the purposes for which the personal data were collected, 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 and receiving a copy thereof;
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 if any of the following applies: the personal data are no longer necessary in relation to the purposes for which they were collected; you have withdrawn your consent, and there is no other legal ground for processing; your personal data have been unlawfully processed; and others.
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