

ANNOUNCEMENT BY TBI BANK EAD

REGARDING THE 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

INFORMATION ABOUT THE ADMINISTRATOR OF PERSONAL DATA

„TBI Bank EAD, with headquarters and address for correspondence: Sofia 1421, Lozenets district, 52-54 Dimitar Hadjikitsev Street, e-mail: office@tbibank.bg, website : www.tbibank.bg, registered in the Commercial Register at the Registry Agency at the Ministry of Justice with UIC 131134023, licensed as a Bank and respectively carrying out banking activity according to License № B 30 and Orders RD 22-1067 / 13.08.2003, № RD 22 - 1067 / 12.06.2007, RD 22 - 1560 / 20.07.2007, RD 22 - 2270 / 16.11.2009, RD 22 - 0451 / 28.02.2012 and RD 22 - 0451 / 22.10 .2012 of the BNB

You can contact TBI Bank EAD via the contact form at www.tbibank.bg or directly at email: info@tbibank.bg, as well as with our Privacy Officer directly on email: compliance@tbibank.bg

In some cases when providing consumer credits, TBI Bank EAD acts as a joint administrator of personal data together with:

"4Financing" Ltd., with address: Sofia 1700, 79, Nikola Gabrovski Str., Floor 2, UIC 202393458

These are the cases in which the Bank and 4Finance provide each other with credit mediation services in order to offer our clients the most appropriate credit product for consumer financing according to the information provided by the client and the assessment of its creditworthiness.

DESCRIPTION OF CATEGORIES OF DATA SUBJECTS AND CATEGORIES OF PERSONAL DATA COLLECTED AND PROCESSED BY THE ADMINISTRATOR OF PERSONAL DATA

We process personal data of our applicants and clients in connection with the provision of banking products and services.

The main categories of personal data of these individuals that we process are the following:

a) Identification data of the individual / authorized individual, which may include the following:

- ✓ Information about the name, surname and family name of the person, PIN, / citizenship, gender, permanent address / residence, nationality / mobile number, signature;
- ✓ information about the name and family names of the family members, gender, date and place of birth, nationality, signature;
- ✓ copy of identity document and number, date and issuer of the identity document;
- ✓ e-mail;
- ✓ IP of a personal computer;
- ✓ profession,
- ✓ marital status;
- ✓ economic and financial information;
- ✓ bank data;
- ✓ voice recordings and images of individuals;

b) Data and information related to a consumer credit, other similar product or insurance product, that include, but are not limited to: the type of product, the amount granted, the currency of the loan, the loan tenure, the granting date, the maturity date, payments cycle, paid amounts, outstanding amounts, late payments and maturity date of late payments, days of repayment delay account status, debtor status information, employer name and address;

c) Fraud data contains information related to: offenses or violations in the financial and banking industry, directly related to the loan granted by TBI Bank EAD, established by final or irrevocable court decisions, as the case may be, or by uncontested administrative acts in name of the issuer;

TBI Bank EAD does not process personal data revealing racial or ethnic origin, political opinions, religious confessions or philosophical beliefs, trade union membership and genetic data processing, sexual orientation of an individual except as provided in the applicable law legislation.

OBJECTIVES FOR WHICH THE BANK, AND WHEN APPLICABLE 4 FINANCE, COLLECT PERSONAL DATA

- ✓ To identify the customer and to perform the relevant preliminary and periodic checks, either electronically or manually, related to the requested consumer credit;
- ✓ To contract and implement a loan agreement with the Bank, or respectively 4Finance, as well as for the possible contracting and execution of other agreements with the Bank or, respectively, 4Finance, regarding the possible provision of other banking and / or financial services (including through concluding contracts for the provision of financial services from a distance);
- ✓ For opening, managing accounts and providing payment services - when the person has open accounts with the Bank; for internal reporting and forecasting purposes and needs of the Bank for the establishment and development of the risk management system in the Bank, including and for self-training of specialized risk assessment software owned by the Bank;
- ✓ For direct marketing as defined by the Personal Data Protection Act (LPPD), including for sending letters with advertising and promotional content through the available remote communication channels for which the customer has provided contact data, including such related to the offering of other financial or combined products provided by or with the Bank and/or 4Finance, where the data collected are relevant and do not exceed the purposes for which they are processed and are not subject to further processing, incompatible with these objectives.

TBI Bank EAD, or "4Finance" EOOD, can verify the authenticity and timeliness of the provided personal data by means of telephone conversations, consultations with credit and non-bank financial institutions, specialized organizations, credit bureaus, employers and registers and other sources, as well as it may request from such sources additional information about the clients, if it finds this necessary regarding the conclusion and / or execution of a consumer loan contract or other contract.

RECIPIENTS OR CATEGORIES OF RECIPIENTS TO WHICH THE CUSTOMER'S DATA PROVIDED MAY BE DISCLOSED TO

The personal data of our clients will not be disclosed to third parties, except when required by law. Their personal data will be processed only by authorized employees of the Bank or, respectively 4Finance and by individuals and / or legal persons with the status of "processors" within the meaning and under the conditions of Art. 28 of Regulation 2016/679 ("the Regulation"). The processing of personal data to which the data provided can be disclosed and assigned for processing are: 1) Software Service Providers regarding the maintenance of the Bank's or 4Finance's information systems; 2) companies to which the Bank and / or 4Finance may entrust the collection of claims on consumer or other loans; 3) courier companies and other service providers for the sending of advertising or other messages; 4) Other Group companies of the Bank and 4Finance that can carry out activities related to the assessment of the creditworthiness of individuals, the management and administration of loan agreements or other related services; 5) companies administering payments on loans, household bills and others - for the purpose of providing different options for repayment of loans; 6) providers of archiving and document storage services

THE RIGHT OF ACCESS, THE RIGHT OF ADJUSTMENT, THE RIGHT OF EXCLUSION, THE RIGHT OF LIMITATION AND THE RIGHT OF MOBILITY OF THE COLLECTED PERSONAL DATA

According to Art. 15 to Art. 22 of the Regulation, the individuals have the opportunity at any time to request from TBI Bank EAD and, where applicable, 4Finance EOOD:

- ✓ Information (access to) about the personal data related to them and processed by TBI Bank EAD and where applicable "4Finance" EOOD;

- ✓ Information about the purposes of processing their personal data;
- ✓ Information on the categories of data and the recipients or categories of recipients to which their personal data are disclosed;
- ✓ Receive a message in comprehensible form containing their personal data which is being processed, as well as any available information about their personal data and its source;
- ✓ Information about the logic of any automated processing of their personal data;
- ✓ To request that, under certain conditions, their personal data be deleted, corrected or blocked, the processing of which does not meet the requirements of the LPDP,
- ✓ To appeal to the Bank or the 4Finance against the processing of their personal data, provided there is a legal basis for this;
- ✓ To appeal against the processing of their personal data for direct marketing purposes;
- ✓ To be informed before their personal data is first disclosed to third parties or used on their behalf for the purpose of direct marketing, having the opportunity to object to such disclosure or use.

The right of access and the other rights listed above shall be implemented by a written application to the Bank or to "4 Finance" EOOD, signed by the client or by an explicitly authorized person with a notarized power of attorney, submitted via the contact form on www.tbibank.bg or directly to email: info@tbibank.bg, as well as in every branch of the Bank;

TIME LIMIT FOR THE STORAGE OF PERSONAL DATA

TBI Bank EAD, respectively 4 Finance, shall store, process and use the personal data provided by the client for a period established in accordance with the applicable legislation or the legitimate business needs of TBI Bank EAD, respectively 4 Finance, as well as until the completion of court or other disputes concerning the processing of personal data.

LEGAL PROVISIONS FOR THE PROCESSING OF PERSONAL DATA

The provision of personal data of individuals is voluntary, in view of the emergence and development of contractual relations between TBI Bank EAD or respectively 4Finance EOOD and the client.

The listed types of personal data are processed by TBI Bank EAD on one of the following grounds:

- ✓ the conclusion and implementation of a loan agreement or other contract for the provision of a product or service by TBI Bank EAD, respectively "4Finance" EOOD;
- ✓ A legitimate interest of TBI Bank EAD, respectively "4Finance" EOOD, to provide products and services to its clients;
- ✓ Customer's explicit consent to the processing of his or her personal data when necessary. The Customer may withdraw the consent at any time by sending a written application to the Bank's address at the beginning of this document or by email: info@tbibank.bg.
- ✓ implementation of legal obligations of TBI Bank EA;

AUTOMATIC PROCESSING OF PERSONAL DATA AND PROFILING

As part of the approval of individuals during the loan application process, automated data processing and automated decision making can be used. The automatic processing and decision making is done through a specialized software product (scoring software) of TBI Bank EAD, respectively "4Finance" Ltd., which processes the data provided by the data subject without any human intervention and analyzes them in terms of the criteria for assessing the person's creditworthiness set in the algorithm of the software. As a result of automatic data processing, the individual receives a number of points according to which his loan application can be automatically granted or automatically refused. In the case of a fully automated decision on an application (without the intervention of an employee of the Bank or "4Finance" EOOD), the person has the right to request a review of the decision by an employee and to express his / her point of view. In case the application receives a number of points between the minimum and the sufficient for approval, it will be examined by an

employee of the Bank or "4Finance" EOOD in order to reduce the automated processing and engage a human factor in deciding on the granting of a loan to the pindividual.

Each individual customer has the right to file a complaint with the Personal Data Protection Commission if his rights and interests in the protection of his or her personal data are violated by TBI Bank EAD or 4Finance EOOD.