

# **POLICY OF THE BULGARIAN NATIONAL BANK ON PERSONAL DATA PROCESSING**

The Bulgarian National Bank (BNB) is a **personal data controller** under Regulation (EU) 2016/679 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, and repealing Directive 95/46/EC (General Data Protection Regulation) and pursuant to the Law on Personal Data Protection (LPDP).

In processing personal data BNB conforms to the **principles set out in the General Data Protection Regulation**: lawfulness, fairness and transparency; purpose limitation; data minimisation; accuracy; storage limitation; integrity and confidentiality; and accountability.

## **PURPOSES OF PROCESSING**

The Bulgarian National Bank processes personal data to achieve the following goals, which also reflect the basis for their processing:

- Performance of the BNB's legal obligations and powers;
- Financial and accounting reporting;
- Performance of contracts;
- Identification of customers using BNB's services;
- Human resource management;
- Ensuring implementation of access control regime and protection of BNB property;
- Video surveillance;
- Exercising the rights pursuant to Regulation (EU) 2016/679 with respect to BNB in its capacity as a personal data controller;
- Processing of complaints, alerts and other requests.

## **DATA SUBJECTS' RIGHTS**

Persons, whose personal data are processed by BNB, have the following rights:

**Right of access** – at the request of the data subject, BNB provides information about the personal data it collects and processes; of the purposes for which they are processed; of the recipients or category of recipients, to which personal data are provided, if any; and the sources from which data are received, outside the cases where they are collected directly from the data subject.

**Right of rectification** – upon request of the data subject, BNB rectifies any incorrect personal data related thereto.

**Right of erasure (or “right to be forgotten“)** – upon request of the data subject, where there is no legal basis for their processing, BNB erases the data if any of the following grounds is present: 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; the data subject objects to the processing and there are no overriding legitimate grounds for the processing; the personal data have been unlawfully processed; the personal data have to be erased for compliance with a legal obligation.

***Right to restriction of processing*** – upon request of the data subject, BNB restricts processing of personal data in the cases explicitly provided for in the General Data Protection Regulation.

***Right to personal data portability*** – the data subject has the right to request and receive the personal data concerning him or her, which he or she has provided to the BNB, in a structured, commonly used and machine-readable format and has the right to transmit those data to another controller. This right is applicable where the basis for personal data processing is a consent or a contractual obligation and processing of personal data is carried out by automated means, i.e. there is a technical possibility for this to be done.

***Right to object*** – the data subject has the right to object at any time on grounds relating to his or her particular situation, provided there are no compelling legitimate grounds for the processing which override the interests, rights and freedoms of the data subject. BNB considers the objection and provides its opinion in writing within a 30-day term, unless this term has to be extended, for which the data subject will be duly notified.

***Right to withdraw his or her consent*** – in the cases where processing is done based on a consent, the data subject has the right to withdraw the consent, by filing a declaration as per standard form at the BNB head office at 1 Knyaz Alexander I Sq., Sofia 1000.

***Right of complaint*** – the data subject has the right to lodge a complaint to the supervisory authority – the Personal Data Protection Commission, at address: 2, Prof. Tsvetan Lazarov Blvd., Sofia 1592, e-mail: [kzld@cpdp.bg](mailto:kzld@cpdp.bg), in relation to processing of personal data related to him/her.

Exercising some of the above rights may not be a ground for refusal to provide personal data to the competent authorities for the purposes of prevention, investigation and detection of crimes.

Data subjects' rights are exercised thereby in compliance with the provisions and requirements of the General Data Protection Regulation.

## **TYPES OF PROCESSED PERSONAL DATA**

The Bulgarian National Bank processes personal data, which may be obtained directly from the data subject, or from a third party.

The Bulgarian National Bank may process various types of data, depending on the purpose of processing, such as:

- Data through which the data subject can be identified (full name, uniform personal identification number);
- Contact particulars, for establishing contact with the data subjects (e.g. phone number, e-mail address, mail address);
- personal data provided by data controllers in the cases provided for by law;
- Video surveillance records – video surveillance is conducted in and around the BNB buildings pursuant to the Private Protection Activity Law.

## **PERSONS PROCESSING PERSONAL DATA AT THE BNB**

Access to personal data is performed only by persons, whose official duties or a specifically assigned task require such access, observing the ‘Need to know’ principle, and after they are acquainted with the personal data protection regulatory framework.

## **PERSON PROCESSING PERSONAL DATA PROVIDED BY THE BNB**

**The Bulgarian National Bank has a legal obligation to provide data to personal data controllers.**

Personal data processors are natural or legal persons, public authorities, agencies or other bodies which process personal data on behalf of the controller.

## **BASIS FOR PROCESSING**

Personal data collected by the BNB as a personal data controller are processed on the following basis:

- data subject’s consent to one or more specific purposes;
- in relation to implementation of a contract the data subject is a party to, or for taking actions at the data subject’s request prior to entering into a contract;
- to meet a legal obligation;
- for the purposes of the legitimate interests of the data controller or a third party.

## **PERSONAL DATA RETENTION PERIOD**

Personal data processed at the BNB are kept for the periods provided for in a law or in internal rules and regulations.

## **TECHNICAL AND ORGANISATIONAL PROTECTION MEASURES**

The Bulgarian National Bank implements the necessary technical and organisational measures and protection measures in accordance with the regulatory requirements.

## **PERSONAL DATA PROTECTION OFFICER**

In relation to processing of personal data, a data subject may address BNB through the personal data protection officer – Mr Alexander Tonev, at e-mail address: [personaldata@bnbank.org](mailto:personaldata@bnbank.org), or in writing through the BNB records keeping office at mail address: 1, ‘Knyaz Alexander I’ Sq., Sofia.