Boleron

EUROPEAN INSURANCE KNOWLEDGE BASE

PRIVACY POLICY

office@boleron.com

1. INTRODUCTION

We are **Boleron Consulting EOOD** ("Boleron", "we", "us"), a Bulgarian insurance broker and the controller for the personal data described in this policy. Our Bulgarian Unique Identification Code (UIC/EIK) is **102764975** and our registered office is **24 Georgi Benkovski Street, Sofia, Bulgaria**. We hold insurance broker certificate **No. 721-ЗБ of 1 December 2020**, issued by Bulgaria's Financial Supervision Commission (FSC), and we are passported to all 27 EU Member States under the freedom to provide services. Boleron.eu is an information service only: it is a European insurance knowledge base, the prices and quotes shown on it are an informative tool, and insurance cannot be purchased through the website. Insurance purchases are available in Bulgaria through **Boleron.bg**.

This policy covers **https://boleron.eu/en/** and its other language versions, our market, insurer and insurance-offer information pages, the free public REST discovery API, the **/api/mcp/** public read-only MCP service, the **/api/quote/mcp/** quotation service, WebMCP tools where supported, and our insurer pilot and contact communications. It applies whenever these interactions involve personal data. Anonymous catalogue information is not personal data by itself.

Boleron.eu publishes European insurance knowledge covering motor third-party liability (MTPL), motor casco and travel insurance. **Boleron.bg** is our Bulgaria-focused insurance distribution site and has its own services and privacy materials. This policy does not replace any separate notice applying to transactions on boleron.bg.

Data protection officer: Karina Kavdanska; **DPO email:** dpo@boleron.eu. **General enquiries:** office@boleron.com. **Postal contact:** 24 Georgi Benkovski Street, Sofia, Bulgaria. For questions or requests concerning your personal data, please contact our DPO by email or write to us at our registered address.

2. DEFINITIONS

For the purposes of this policy, the following terms have these meanings under the General Data Protection Regulation (EU) 2016/679 ("GDPR") or in our service context:

- **Personal data** – information relating to an identified or identifiable natural person, including an online identifier where it can identify a person.
- **Data subject** – the person to whom personal data relates.
- **Processing** – any operation involving personal data, such as collection, recording, storage, consultation, use, disclosure, deletion or destruction.
- **Controller** – the organisation deciding why and how personal data is processed.
- **Processor** – a service provider processing personal data on a controller's instructions.
- **Recipient** – a person or organisation to whom personal data is disclosed, whether as controller or processor.
- **Consent** – freely given, specific, informed and unambiguous agreement given by an affirmative action; explicit consent may be necessary for certain sensitive data.
- **API user** – a person or organisation accessing our published data or quote functions programmatically through an application or service.
- **AI agent** – software acting at a user's direction that accesses our content or tools through an MCP, WebMCP, REST or comparable interface.

- **Quote request** – a non-binding tariff calculation requested through a published quote tool; the Quote MCP service currently supports travel insurance quotations only.

3. PURPOSE OF THIS POLICY

We aim to explain, in plain language, what we collect, the purposes and legal grounds for collecting it, how long we keep it, who may receive it, whether it may leave the European Economic Area (EEA), and how you can exercise your rights. This policy is intended for natural persons, including business contacts whose details identify them.

General market and insurer information is available publicly without an account. You can read our knowledge base without providing your name. Using a quotation tool, writing to us, or connecting an API client may involve additional personal data as described below.

4. PRINCIPLES OF PROCESSING

We apply the principles in Article 5 GDPR and are responsible for demonstrating compliance:

- **Lawfulness, fairness and transparency** – we process data on a valid legal basis and explain what we do.
- **Purpose limitation** – we collect data for specified, explicit and legitimate purposes and do not reuse it incompatibly.
- **Data minimisation** – we ask only for information reasonably needed for a particular purpose.
- **Accuracy** – we take reasonable steps to correct or remove inaccurate information.
- **Storage limitation** – we retain identifying information only for justified periods.
- **Integrity and confidentiality** – we use appropriate technical and organisational measures to guard against loss, unauthorised access and misuse.

5. LEGAL BASES FOR PROCESSING

Not every item returned by the public catalogue or a non-identifying travel quote is personal data. When data relates to an identifiable person (including through technical identifiers), we rely on a lawful basis for each operation. We do not treat an instruction from an AI agent as proof of a legal basis or authorisation.

- **Legitimate interests (Article 6(1)(f))** – to provide and protect our public website, REST discovery API, MCP services and enquiry channels, prevent technical misuse, respond to business enquiries and maintain a reliable service, where these interests are not overridden by your rights and freedoms. The discovery API is public, requires no account or key, uses CDN-cached responses, and may be subject to access limits where necessary to protect the service. You can ask our DPO for more information about how we balance these interests.
- **Steps before entering a contract / performance of a contract (Article 6(1)(b))** – only where you directly request a service or contractual step for which processing your personal data is necessary, for example business arrangements with an insurer taking part in the insurer pilot. Because insurance cannot be purchased through Boleron.eu, a non-binding travel tariff calculation is informative only and does not create a contract.

- **Legal obligation (Article 6(1)(c))** – where a specific duty under applicable insurance, accounting, financial-services, data-protection or other law requires processing or recordkeeping. We rely on this basis only for the records and duties to which it actually relates.
- **Consent (Article 6(1)(a))** – for optional, non-essential storage of or access to information on your device, optional analytics or direct marketing. You can withdraw consent at any time without affecting earlier lawful processing. Boleron.eu currently uses only analytics cookies, which are set only after consent, as described in the **Boleron EU Cookie Policy**.

Where a service requires personal information, we indicate mandatory and optional fields at the point of collection. Refusing information needed for a personalised service may make that service unavailable, but does not prevent access to public market information.

6. SPECIAL CATEGORIES OF PERSONAL DATA

Health data is special-category information under Article 9 GDPR. Our travel Quote MCP is designed so that travellers are described by age only, and callers are instructed not to send names, full dates of birth or health information. It provides a non-binding price calculation, not medical underwriting, and health data is not an intended input to this service. Boleron.eu does not offer any service that requires special-category data.

Please do not send diagnoses, medical records, biometric information or other special-category data through ordinary enquiries, emails or public API/MCP tools unless we have specifically asked for such information through an appropriate lawful channel. If unsolicited information of this kind reaches us, we do not use it for the quotation or any other purpose, limit access to it and delete it unless we are required to keep it.

7. CATEGORIES OF DATA SUBJECTS AND INFORMATION COLLECTED

The information involved depends on how you interact with us:

- **Website visitors** – reading public pages involves the connection data needed to deliver the page, such as your IP address, the requested page, date and time, and browser information (User-Agent). Boleron.eu is delivered through a content delivery network (CDN). If you consent, analytics cookies also collect information about how you use the website (see section 11).
- **People requesting a Quote MCP travel calculation** – the request contains the country, product type (currently travel), an optional insurer and package, and the answers required by the quote schema. Travellers are described by age, not by name, date of birth or health details. The result is a non-binding quotation that can include pricing, cover descriptions and referral or decline reasons.
- **People using an AI agent** – a third-party agent may transmit the same tool inputs as a direct caller, together with technical connection metadata. Please do not include names or health information in a Quote MCP request. We do not receive your full conversation with the agent or your account information with the agent provider.
- **Developers and REST/API/MCP users** – the REST discovery API, public MCP data services and Quote MCP are available without registration or an API key. We ask API clients to identify themselves through a descriptive User-Agent. Normal network delivery involves the IP address, time, route, User-Agent and error information.

- **Insurer pilot participants and business contacts** – our insurer enquiry form requests company name, registered country, contact person's name, job title and work email, and optionally a phone number and message. We use these details to identify the insurer, assign a contact and send onboarding updates. The insurer programme also involves insurer documents, product-owner review and feedback.
- **People emailing us or exercising rights** – sender address, name if supplied, email text, attachments and the correspondence necessary to respond. Please avoid including unrelated sensitive information.

Data may come from you directly, from a third-party agent that you choose to use, or from your organisation where it nominates you as a contact. A third-party AI service may independently process information under its own privacy notice.

8. PURPOSES OF PROCESSING AND RETENTION

We keep personal data only for as long as necessary for the purpose for which it was collected. The purposes, legal bases and retention criteria are as follows:

- **Web pages, REST discovery and read-only MCP** – to deliver requested public information and troubleshoot failures; *legal basis:* legitimate interests; *retention:* only as long as needed for delivery, troubleshooting and security purposes, after which technical logs are deleted or anonymised.
- **Security, abuse detection and incident handling** – to protect availability and investigate misuse or incidents; *legal basis:* legitimate interests, or a specific legal obligation where applicable; *retention:* until the relevant security issue has been resolved, or longer where needed as evidence for an incident or legal claim.
- **Non-binding travel quote requests** – to calculate tariff-based prices for the answers submitted through Quote MCP; *legal basis:* legitimate interests where request metadata identifies an individual; *retention:* no longer than needed to process the request and for the security and troubleshooting purposes above.
- **Insurer pilot and partnership contacts** – to respond to applications, identify the insurer's contact person, provide onboarding updates and coordinate product-document review; *legal basis:* legitimate interests, or steps before entering into or performance of a contract where applicable; *retention:* while the enquiry, pilot or partnership is active and afterwards for the applicable limitation period for possible claims.
- **General correspondence, rights requests and complaints** – to answer messages, handle privacy requests, demonstrate compliance and, if necessary, address disputes; *legal basis:* legitimate interests and/or a legal obligation; *retention:* while needed to complete the request and afterwards for as long as needed to demonstrate compliance or defend legal claims.
- **Analytics cookies** – to understand, in aggregate, how boleron.eu is used so that we can improve its content and structure; *legal basis:* consent; *retention:* the lifetime of each analytics cookie, as described in the **Boleron EU Cookie Policy**. You can withdraw your consent at any time through the cookie settings on boleron.eu.
- **Legally required records** – to meet a specific statutory duty; *legal basis:* legal obligation; *retention:* the period prescribed by the law applicable to that record, after which identifying information is erased or anonymised.

Where the same record is needed for several valid purposes, we restrict its use to those purposes and do not keep it indefinitely. Data held in backups is deleted when the backups expire in the normal backup cycle.

9. RECIPIENTS AND DISCLOSURE

Access to personal data is limited to authorised people and to recipients with a lawful purpose and suitable contractual arrangements. Depending on the service you use, recipients may include:

- **Hosting, CDN, security and communications providers** – technical providers that deliver our services may necessarily receive connection information or business correspondence. They act as our processors under written agreements that meet the requirements of Article 28 GDPR. You can request more information about these providers from our DPO.
- **Insurers and commercial partners** – the insurer-pilot process includes the review of product documents. Because insurance cannot be purchased through boleron.eu and the Quote MCP returns only a non-binding, informative tariff calculation, the personal data of website visitors or quote users is not passed to insurers to arrange a purchase. If this changes, we will update this policy before the new functionality is introduced.
- **Analytics provider** – Google, which provides the analytics cookies (Google Analytics) described in the **Boleron EU Cookie Policy**. The analytics are managed by Boleron and are used only after you have given your consent. Boleron.eu does not use advertising or marketing cookies.
- **Public authorities, regulators and professional advisers** – where lawful and necessary to comply with a legal duty, manage legal claims or obtain professional advice.

Market and insurer catalogue information published through public APIs is distinct from the personal information of people using those APIs. We do not treat publicly accessible insurance data as consent to disclose information about an identifiable user.

10. TRANSFERS OUTSIDE THE EEA

We aim to process personal data within the European Economic Area (EEA). Some of our service providers, including our analytics provider, may process personal data outside the EEA.

Where personal data is transferred outside the EEA, we ensure that the transfer is protected by an appropriate mechanism under Chapter V GDPR, such as an adequacy decision of the European Commission (including the EU–US Data Privacy Framework for certified recipients) or Standard Contractual Clauses, together with any necessary supplementary safeguards. You can request information about these safeguards by contacting our DPO at dpo@boleron.eu.

11. COOKIES AND SIMILAR TECHNOLOGIES

Boleron.eu currently uses only analytics cookies. They help us understand, in aggregate, how the website is used so that we can improve its content and structure. They are used for statistical purposes only and are not used to identify you.

Analytics cookies are set on your device only after you have given your consent through the cookie banner shown when you first visit boleron.eu. You are free to refuse them, and you can still use the whole website if you do. You can withdraw your consent at any time through the cookie settings on boleron.eu or by deleting the cookies in your browser.

Boleron.eu does not use advertising, marketing or cross-site tracking cookies, and the REST API and MCP servers do not set browser cookies. Full details, including cookie names and lifetimes, are set out in the **Boleron EU Cookie Policy**.

12. DATA PROCESSED THROUGH AI AGENTS AND MCP/WEBMCP

Our REST discovery API, public **/api/mcp/** server and market, insurer and offer WebMCP tools publish source-linked, read-only information and do not require user registration or an API key. The separate **/api/quote/mcp/** service currently provides travel quote calculations. It offers **get_quote_schema** and **submit_quote**, returning non-binding insurer-tariff prices and referral or decline reasons. No agent channel accepts payment or binds an insurance policy.

The Quote MCP instructs agents to describe travellers by age only, never by name, date of birth or health status. The request includes the country, travel product, optional insurer and package, and the answers required by get_quote_schema. Even when these answers are not directly identifying, request metadata such as an IP address can be personal data; we process it as described in sections 7 and 8. Quote requests are not passed to insurers.

A third-party agent or AI assistant may have its own account, conversation and personal-data practices. We do not control those providers, and we do not see your conversation with the agent beyond the tool request it sends us. If you act for someone else, use an agent with appropriate authority.

Catalogue comparisons and travel tariff calculations are informational and non-binding. Boleron.eu does not make decisions based solely on automated processing that produce legal or similarly significant effects within the meaning of Article 22 GDPR. If we introduce such decisions in the future, we will provide the information and safeguards required by GDPR before doing so.

13. RIGHTS OF DATA SUBJECTS

Subject to the GDPR conditions and any applicable exceptions, you have these rights:

- **Right to be informed** – to receive clear information about the controller and how your personal data is used.
- **Right of access** – to obtain confirmation of processing, a copy of your data and the information described in Article 15 GDPR.
- **Right to rectification** – to correct inaccurate or complete incomplete personal data.
- **Right to erasure** – to request deletion in circumstances covered by Article 17; a legal obligation or overriding legal claim may limit this right.
- **Right to restriction of processing** – to limit use in the situations set out in Article 18, including while accuracy is checked.
- **Right to data portability** – for data you provided and processed by automated means on the basis of consent or contract, to obtain it in a structured format or transmit it where technically feasible.
- **Right to object** – to processing based on legitimate interests, on grounds relating to your situation; we will stop unless overriding grounds or legal claims justify continuation. You may object at any time to direct marketing, if any.
- **Right to withdraw consent** – at any time when processing is based on consent, without affecting processing before withdrawal.
- **Rights regarding automated decision-making** – not to be subject to a decision based solely on automated processing that produces legal or similarly significant effects, except where the GDPR permits it and requires safeguards.

- **Right to complain and seek judicial remedy** – to contact a supervisory authority and, where appropriate, seek a remedy before a court.

14. HOW TO EXERCISE YOUR RIGHTS

To exercise a GDPR right, email our DPO at dpo@boleron.eu or write to **Boleron Consulting EOOD, 24 Georgi Benkovski Street, Sofia, Bulgaria**. Please state which right you wish to exercise and give enough information for us to locate the relevant records. We ask for additional identity evidence only when we have reasonable doubts about your identity; notarisation is not routinely required.

Under Article 12(3) GDPR, we respond **without undue delay and within one month** of receiving your request. Where necessary because of complexity or the number of requests, we may extend this by two further months, informing you of the extension and the reasons within the first month. If we do not take action on your request, we will explain why and inform you of your right to complain and seek a judicial remedy.

Requests are generally **free of charge**. If a request is manifestly unfounded or excessive, particularly because it is repetitive, we may charge a reasonable fee or refuse to act on it, as permitted by GDPR. An authorised representative may act for you subject to suitable proof of authority. Where a person has died, requests from heirs are handled to the extent permitted under applicable national law.

15. SUPERVISORY AUTHORITY

You may complain about personal-data processing to the Bulgarian **Commission for Personal Data Protection (CPDP)**. If you live or work in another EU Member State, or an infringement occurred there, you may complain to its supervisory authority. You may also seek judicial redress. You are not required to contact us first, although we welcome the opportunity to address a concern.

Contact the supervisory authority:

Commission for Personal Data Protection (CPDP)
2 Prof. Tsvetan Lazarov Blvd, Sofia 1592, Bulgaria
kzld@cpdp.bg
https://www.cpdp.bg

16. CHANGES TO THIS POLICY

We may update this policy as our services or legal obligations change. We will publish revisions on boleron.eu and, where required, provide additional notice or ask for your consent.