

POLICY OF BANCA TRANSILVANIA S.A.

**REGARDING THE PROCESSING AND PROTECTION OF PERSONAL DATA
WITHIN THE BANKING ACTIVITY**

(THE “POLICY” OR THE “PRIVACY POLICY”)

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About this Privacy Policy

Banca Transilvania S.A. (hereinafter referred to as “**BT**”, the “**Bank**” or “**we**”) constantly endeavours that the personal data of all the individuals it interacts with, processed in accordance with the applicable legal provisions and the highest security and confidentiality standards.

For a better guidance and support of our personal data processing and protection activity we have appointed a **data protection officer (DPO)**, who may be contacted by any data subject regarding to any aspects concerning the way in which BT processes such data, via a notice sent to:

- the Bank’s headquarters in Cluj-Napoca, str. Calea Dorobanților, no. 30-36, Cluj county, with the mention “to the attention of the data protection officer” or a message to
- the e-mail address dpo@btrl.ro.

Please find below our policy in this field of utmost importance to any individual, a policy that we undertake to review periodically for an ongoing improvement.

Through this Policy’s provisions we mean to comply with our obligation to inform all the categories of natural persons whose personal data we process in our banking activity (“data subjects”), we have the obligation to inform in accordance with the provisions of art. 13-14 of the EU Regulation no. 679/2016 or the General Data Protection Regulation (hereinafter referred to as “GDPR”).

Whenever we have the objective possibility to directly inform certain categories of data subjects about the processing of their data, we undertake to do so.

In some cases, however, the bank either has no objective possibility, or it would involve a disproportionate effort for us to fulfill this obligation directly. For all the above situations, we commit to inform the data subjects through this Privacy Policy.

If you are a regular customer of BT (“BT Customer” or “customer”) and you would only like to consult the section of this Policy regarding this category of data subjects’ personal data processing, you can access: the [**General Privacy Notice regarding the processing of personal data belonging to the BT Customers**](#), which is part of this Policy.

This Policy does not address to the employees of Banca Transilvania, as they shall be informed regarding to their personal data processed by BT as an employer through a distinct document.

We hereby present which categories of personal data we process in our banking activity, who the data subjects are, what are the purposes for which we process personal data, to whom we may disclose or transfer personal data, how long we keep them, in what way we ensure their security, and what rights the data subjects are entitled to exercise in connection with this processing.

If you are not familiar with the meaning of the different specialized terms used in the GDPR or the applicable banking law, we recommend you first to study the following section regarding:

A. Specialized terms used in this Policy

The terms defined in this section will have the following meaning when they are used in this Policy:

- a. **“Personal data”** means any information relating to an identified or identifiable natural person (‘data subject’); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person;
- b. **“Processing of personal data”** or **“data processing”** means any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction;
- c. **“GDPR”** means the Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on 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);
- d. **“BT Financial Group”**- means the Bank together with the entities controlled by it, such as [BT Microfinanțare IFN SA \(„BT Mic”\)](#), [BT Asset Management S.A.I. S.A., \(„BTAM”\)](#), [BT Leasing Transilvania IFN S.A. \(„BTL”\)](#), [BT Direct IFN S.A. \(„BTD”\)](#), [BT Capital Partners S.S.I.F. S.A.\(„BTCP”\)](#), Fundația Clubul Întreprinzătorului Român, Fundația Clujul are Suflet and other entities that may join this Group in the future;
- e. **“Controller”** means the legal person, who, alone or jointly with others, determines the purposes and means of the processing of personal data;
- f. **“Data subjects”** means any natural person whose personal data is processed;
- g. **“Recipient”** means a natural or legal person, public authority, agency or another body, to which the personal data are disclosed, whether a third party or not;
- h. **“Third party”** means a natural or legal person, public authority, agency or body other than the Data Subject, Controller, Processor and persons who, under the direct authority of the controller or processor, are authorised to process personal data;
- i. **“Supervisory authority”** means a public independent supervisory authority which is established by a Member State, responsible with the monitoring of GDPR application. In Romania the national supervisory authority for the personal data processing is “ANSPDCP”;
- j. **“Biometric data”** means personal data resulting from specific technical processing relating to the physical, physiological or behavioural characteristics of a natural person, which allow or confirm the unique identification of that natural person, such as facial images or dactyloscopic data;

- k. **“Data concerning health”** means personal data related to the physical or mental health of a natural person, including the provision of health care services, which reveal information about his or her health status;
- l. **“Signature Sample”** represents the handwritten signature of the Customer written on documents used in his relationship with the bank and/or the signature of the Customer captured by Electronic Device (SignaturePad), made available to the Bank as a signature specimen;
- m. **“Beneficial owner”** according to the provisions of art. 4 paragraph 1 of Law no. 129/2019 on the Prevention of Money Laundering and Terrorism Financing, and the subsequent amends brought to certain normative acts, is considered any natural person who ultimately owns or controls the client and/or the natural person on whose behalf is performed a transaction, an operation or an activity and includes at least the categories of natural persons mentioned in art. 4 paragraph 2 of this normative act;
- n. **“Politically Exposed Person”** according to the provisions of art. 3 paragraph 1 of Law no. 129/2019 on the Prevention of Money Laundering and Terrorism Financing, and the subsequent amends brought to certain normative acts, is considered any natural person who exercises or exercised important public position and includes at least the categories of natural persons mentioned in art. 3, paragraph 2 of the herein document.

B. Who is Banca Transilvania?

BANCA TRANSILVANIA S.A is a credit institution, Romanian legal entity, registered with the Trade Register under no. J12/4155/1993, tax identification number RO 5022670, with the following address: registered office in Cluj-Napoca, str. Calea Dorobanților, nr. 30-36, Cluj, phone no. *0801 01 0128 (BT) - Romtelecom network, 0264 30 8028 (BT) - any network, including international calls, *8028 (BT) - Vodafone, Orange network,, e-mail address: contact@bancatransilvania.ro, website: www.bancatransilvania.ro.

The Bank has over 500 units - branches, agencies, work points in Romania, as well as banking units operating in Italy.

Our official website is www.bancatransilvania.ro (hereinafter referred to as **“BT’s website”**).

The Bank also manages other internet pages, the updated list of which you can consult here: <https://www.bancatransilvania.ro/site-uri-bt.pdf>.

Banca Transilvania SA is the parent company of the BT Financial Group (hereinafter referred to as the “BT Group”), which also comprises the following subsidiaries of the Bank: [BT Microfinanțare IFN SA \(„BT Mic”\)](#), [BT Asset Management S.A.I. S.A., \(„BTAM”\)](#), [BT Leasing Transilvania IFN S.A. \(„BTL”\)](#), [BT Direct IFN S.A. \(„BTD”\)](#), [BT Capital Partners S.S.I.F. S.A.\(„BTCP”\)](#).

C. What are the categories of personal data that BT processes, who belong to and what are the purposes they are used for?

Within its banking activity, Banca Transilvania processes different categories of personal data, depending on the data subjects' relationship to BT. The purposes for which we process these data are also directly dependent to the way that different categories of data subjects relate with BT. Based on the bank- client relationship, we present distinctly below how BT processes personal data:

1. If you are a regular client of the bank - BT Customer- (e.g. account holder, legal representative/conventional representative of an account holder, mandated person, delegate, beneficial owner, etc.)

a. Who is a BT customer?

“BT customer” or **“Customer”** is any of the below mentioned categories of natural persons:

- resident or non-resident individuals, holders of at least one account opened with the bank (also referred to as **“BT individual account holder”**) or who complete the dedicated documents to acquire this quality;
- legal or conventional representatives of the BT individual/legal entities account holders, including BT customers that are authorized natural persons;
- individuals authorized to perform operations on the accounts of BT individual/legal entities account holders;
- the real beneficiaries of the Clients, natural or legal persons, BT individual account holders;
- individuals with rights to submit bank documents, to pick up account statements and/or to make cash deposits on behalf of BT individual/legal entities account holders (also known as "delegates"); any other individuals who are users of a product/service of the bank, who are neither account holders, nor legal representatives, authorized representatives, delegates or beneficial owners, such as, but not limited to: users of additional cards, users of internet services/mobile banking, users of mobile payment applications offered by the bank, individuals with account manager's securities records opened with the bank, BT meal tickets users);
- guarantors of any kind of the payment obligations assumed by the individuals/ legal entities account holders
- persons who request the bank to open a contractual relationship and/or contracting a specific product/service of the bank, even if this request is rejected;
- the legal or conventional successors of the aforementioned.

Full details, in printable form, concerning the processing by BT of customers' personal data can be found in the [*General Privacy Notice regarding the processing of personal data belonging to BT Customers.*](#)

b. Purposes for processing personal data belonging to BT customers

Upon case, if you are a BT customer, we shall process your personal data as follows:

- verifying the identity of individuals, in order to prevent money laundering and terrorism financing, as well as to confirm their quality as BT customers;

The identity verification is performed when establishing and during the performance period of a business relationship, when ordering any transaction or when they request certain information or when carrying out operations such as, but not being limited to: information about bank accounts, submission/transmission of any requests/notifications, handing out debit/credit cards, tokens, expressing options, contracting products/services of the bank, accessing some services of the bank already contracted, but also during the telephone calls initiated by the Customers or by the bank.

In the units of the bank, the identity is verified based on the valid identity documents, which must be presented in original, whereas for the online and the telephone calls initiated by the client or by the bank, the verification is performed by requesting to supply and by validation of the information already registered in the records of the bank in relation to that customer.

- applying the know your customer (KYC) rules in order to prevent money laundering and financing of terrorism, including risk-based verification. Applying the KYC rules involves both verification of identity and processing of personal data required by law, both at the moment of becoming a customer (data collection), for the entire time this quality is held (updating the data), as well as thereafter, for the period of time legally established after the moment of ending the quality of customer (data storage and processing for the purposes permitted by law);
 - For details on the processing of personal data for the purpose of **KYC**, please visit the following link:
<https://www.bancatransilvania.ro/Nota-de-informare-privind-prelucrarea-datelor-cu-caracter-personal-in-scop-KYC.pdf>
- assessing the solvency, reducing the credit risk, determining the degree of indebtedness of the Customers interested in personalized offers in relation to the bank's credit products or in contracting these types of products (credit risk analysis);
 - For details on the processing of personal data for the purpose of **analyzing a loan request submitted to Banca Transilvania S.A.**, please visit the following link:

<https://www.bancatransilvania.ro/Nota-de-informare-privind-prelucrarea-datelor-cu-caracter-personal-in-scop-analiza-cerere-credit-BT.pdf>

- the conclusion and performance of contracts between the bank and the Customers, related to products and services offered by BT in its own behalf (such as, but not limited to: debit/credit cards, deposits, credits, internet and mobile banking, SMS Alert);
 - For details regarding the processing of personal data **upon the execution and during the performance of a loan agreement (card or non-card) concluded with the Banca Transilvania S.A.** please visit the following link: <https://www.bancatransilvania.ro/Nota-de-informare-privind-prelucrarea-datelor-cu-caracter-personal-in-contextul-incheierii-executarii-unui-contract-de-credit-BT.pdf>
 - For details regarding the processing of personal data within the **BT Pay** mobile application, visit the following link: <https://www.bancatransilvania.ro/wallet-bt-pay/politica-de-confidentialitate-ro/>
 - For details regarding the processing of personal data within **the Self Service Livia from BT**, please access the following link: https://www.bancatransilvania.ro/files/self-service-livia-de-la-bt/nota_informare_prelucrare_date_caracter_personal_serviciu_livia_de_la_bt.pdf
 - For details regarding the processing of personal data within the **BT Visual Help** service, please access the following link: <https://www.bancatransilvania.ro/Nota-de-informare-privind-prelucrarea-datelor-cu-caracter-personal-in-cadrul-BT-VISUAL-HELP.pdf>
- the conclusion and performance of contracts related to occasional transactions, as well as, but not being limited to: deposits of cash amounts made by Customers at the counters or by using the devices from the bank units, if the amounts are deposited in the bank accounts on which the respective Customers do not have operating rights (they do not have the quality of account holder, authorized, delegated person on those accounts), money transfer services, foreign currency exchanges;
 - For details on the processing of personal data for the purpose of **depositing cash**, please visit the following link: <https://www.bancatransilvania.ro/Nota-de-informare-privind-prelucrarea-datelor-cu-caracter-personal-depunere-sume-in-numerar-clienti-ocazionali-BT.pdf>
- settlement of the banking transactions
- establishing the garnishments on BT bank accounts, recording the amounts garnished to the creditors and providing answers to the enforcement bodies and/or the competent authorities, according to the legal obligations of the bank;
- monitoring the security of persons, premises and/or assets of the bank or of the visitors of its units;
 - Details about the video surveillance data processing can be found here: <https://www.bancatransilvania.ro/supraveghere-video/>
 - Details about the processing of visitors data for access in some BT units can be found here: <http://www.bancatransilvania.ro/monitorizare.pdf>

- the preparation and submission of reports to the competent authorities, authorized to receive them in accordance with the legal provisions governing BT's activity (e.g. payment incident reports to the Office of Payment Incidents within the National Bank of Romania - NBR, declaring the transactions that exceed the amount established by the National Office for Prevention and Control of Money Laundering);
- conducting analyzes and the keeping of records for the Bank's economic, financial and/or administrative management;
- management within the internal departments of the services and products provided by the Bank;
- assessing and monitoring the financial-commercial behavior during the performance of the business relationship with the bank, in order to detect the unusual and suspicious transactions, according to the KYC legal obligations the bank is subject to, in order to prevent money laundering and financing of terrorism;
- debit collection and recovery of receivables registered by the customers;
- preventing the gaining or regaining of the "Customer" quality, by persons having an inappropriate behavior, which is likely to prevent the performance of a prudent banking activity, according to the legal obligations that the bank has;
- defending the bank's rights and interests in court, the resolution of disputes, investigations or any other petitions/ complaints/requests in which the bank is involved;
- performing risk controls on the bank's procedures and processes, as well as carrying out audit or investigation activities;
- taking measures/providing information or answers to the requests/claims/complaints of any nature addressed to the bank by any person or by legal authorities or institutions, including electronic communication and internet requests.
- proving the requests / agreements / options regarding certain aspects requested / discussed / agreed upon via the telephone calls initiated by the Customers or by the bank, by taking notes of the discussed issues and, as the case may be, the audio or video recordings of the telephone calls or the video calls;
- informing the Customers regarding the products/services contracted by them at BT, for the proper execution of the bank agreements (including, but without limiting to: bank account or debit/credit card statements, information regarding the working hours of the BT bank units, data regarding garnishments on BT bank accounts, notifications for unauthorized debits or overdue payments of installments, information about the approach of ending a particular product/service held, information about improvements or new facilities offered in relation to the product/service held);
- sending marketing messages, if the Customers have consented to receive such messages on the documents available in the bank's units, on its web page or within certain online services;
- collecting the opinions of the Customers regarding the quality of the services / products / employees of BT (assessment of the services' quality);
- the Customers' financial education;
- conducting internal analyses (statistics included) both with regard to products/services and the client profile and portfolio, for an ongoing improvement of the products/services, as well as market researches, market analysis, customer satisfaction analysis for the Bank's products/services/employees;
- archiving - both in physical and electronic format - of the documents, including backup copies;
- the performance of registration and secretary services regarding the correspondence addressed to the bank and/or sent by it, as well as for carrying out courier activities;
- ensuring the security of the IT systems used by BT and of the premises in which the bank operates its activity;
- preventing frauds;
- calculation of the fees to which certain categories of bank employees are entitled to.

c. Categories of personal data belonging to BT Customers, processed upon case

- identity details: name, surname, alias (if applicable), date and place of birth, national identification number (romanian “cod numeric personal” - CNP) or another unique similar identification element (another unique identification element is allocated by the bank to the Customers who are non-residents and this is represented by a code consisting of a sequence of figures referring to the year, month, day of birth and the number of the identity document), serial number of the national or international document/passport (ID document), as well as a copy the ID document, domicile and residence address;
- contact details - correspondence address (if applicable), telephone number, fax number, e-mail address;
- citizenship;
- information about the purpose and the nature of the business relationship;
- financial data (such as, without being limited to: transactions, including about the amount of expected transactions);
- fiscal data (country of fiscal residence);
- profession, job, name of employer or nature of the individual activity (if applicable),
- information about the important public position held - if applicable - and the political opinions (exclusively in the context of obtaining information related to the quality of the politically exposed persons- PEP);
- the quality, the social parts/shares and, as the case may be, the powers of attorney held within certain legal entities;
- information on the family status (including marital status, number of children, number of dependents),
- information on the economic and financial status (including data on income, data on banking transactions and their history, data on owned assets, as well as data on the payment behavior);
- the image (contained in the identity documents or caught by the video surveillance cameras installed in the bank's units, on the BT equipment, as well as in certain audio video recordings, as the case may be);
- the voice, within the calls and recordings of the audio or video calls (initiated by the customers or the bank);
- age, to verify the eligibility to contract certain products/services/offers of the bank (e.g. credit products, products dedicated to under-age individuals, etc.);
- Customer opinions, expressed through notices/complaints or during conversations, including telephone, regarding products/services/employees of the bank;
- signature (including within signature samples);
- biometric data (such as, but not limited to the situation of illiterate or visually impaired persons, to whom the fingerprint can be processed);
- identifiers, including identifiers allocated by Banca Transilvania or other financial-banking or non-banking institutions, necessary for the provision of services, such as, but not being limited to, the BT client code (CIF BT), IBAN codes attached to the bank accounts, the numbers of the credit card debit/credit, the card expiry date, the contract numbers, the codes and type of operating system of mobile phones or other devices used to access mobile banking/mobile payment applications, as well as the IP address of the

device used to access these services. The codes of the mobile phones, the type of the operating system and the IP addresses are processed exclusively to ensure the security measures for the transactions performed through these services, in order to prevent fraud;

- data regarding the health status, only if the processing of such data is necessary for the customers to prove the difficult situation in which they or the members of their families are, in order to provide facilities or in the context of providing/ performing the insurance products/services brokered by the bank.
- for credit products - the type of product, the granting term, the granting date, the maturity date, the granted amounts and credits, the amounts due, the status of the account, the date of closing the account, the currency of the credit, the frequency of payments, the amount paid, the monthly rate, the name and the address of the employer, the amounts owed, the outstanding amounts, the number of outstanding installments, the due date of the outstanding, the number of overdue days in the repayment of the loan. These data are processed both in the bank's own records, and - as the case may be - in the system of the Credit Bureau and / or other records / systems of this type;
- information regarding fraudulent / potentially fraudulent activity, consisting of data regarding accusations and convictions related to crimes such as fraud, money laundering and financing of terrorist acts;
- information related to crimes and offences committed in the financial-banking sector, in the direct relation with Banca Transilvania S.A., backed by final and irrevocable court decisions, as applicable, or by uncontested administrative deeds;
- information regarding the location of certain transactions (implicitly, in case of operations at the ATMs or POS belonging to the Banca Transilvania);
- data and information related to the products and services offered by the bank or its collaborators, which the data subjects use (such as, but not limited to, credit, deposit, insurance products);
- any other personal data belonging to the Customers, which are made known to the bank in various contexts by other Customers or by any other persons.

2. If you are an occasional BT client – “BT walk-in client” (e.g. external cash depositor, user of money transfer services, FX services, utility bill payer etc.)

a. Who is/in what situations we process your data as an BT walk-in client?

“**BT walk-in client**” is any of the below mentioned categories of natural persons, who initiate over the counter banking operations or banking operations through BT issue devices:

- cash deposits ordered by walk-in clients to third party accounts opened with BT, when the depositor is neither the account holder, nor has any operating rights on that specific BT account (you act as a BT walk-in client whenever you order such cash deposits even if you are a BT customer as well);

- FX exchange;
- Western Union (WU) money transfers;
- payment of utility bills;
- payment of different instalments of insurance premiums;
- cashing dividends or other types of cash amounts;
- cash withdrawals from BT equipment with cards issued by other banking institutions or payment.

For the privacy notice regarding personal data processing for the purpose of cash deposits, please visit the following link: <https://www.bancatransilvania.ro/Nota-de-informare-privind-prelucrarea-datelor-cu-caracter-personal-depunere-sume-in-numerar-clienti-ocazionali-BT.pdf>

If you are a BT walk-in client, we process your personal data whenever you make transactions of the type listed above, even if you are also a regular customer of the bank.

b. Purposes for processing personal data belonging to BT walk-in clients

When you act as BT walk-in client, your data are processed, by the case, for the following purposes:

- to verify your identity in order to prevent money laundering and terrorism financing;
For the occasional transactions initiated over the counter in BT units, for your identity to be verified you will have to present your original, valid ID document, and, in the case of banking operations you initiate through BT equipment your identity shall be verified via other information existing in the bank's evidence.
- applying the know your customer (KYC) rules in order to prevent money laundering and financing of terrorism, including risk-based verification;
- evaluating and monitoring the financial-commercial behaviour to detect unusual and suspicious transactions, according to the legal KYC obligations in order to prevent money laundering and terrorism financing;
- concluding and signing the agreements related to occasional transactions;
- settlement of transactions;
- the preparation and submission of reports to the competent authorities, authorized to receive them in accordance with the legal provisions governing BT's activity (such as, but not limited to payment incident reports to the Office of Payment Incidents within the National Bank of Romania- NBR, declaring the transactions that exceed the amount established by the National Office for Prevention and Control of Money Laundering);
- conducting analyses and the keeping of records for the bank's economic, financial and/or administrative management;
- management within the internal departments of the services and products provided by the bank;
- defending the bank's rights and interests, the resolution of disputes, investigations or any other petitions / complaints / requests in which the bank is involved;

- performance or risk control regarding the bank's processes and procedures, as well as the performance of audit activities or investigations
- monitoring the security of the customers, of the spaces and/or bank's assets or the units' visitor;
- taking measures/providing information or answers to the requests/claims/complaints of any nature addressed to the bank by any person or by legal authorities or institutions, including electronic communication and internet requests;
- performance of internal analysis (including statistics);
- archiving of documents both in physical and electronic format and security back-up;
- performing registration and secretary services for the correspondence addressed to the bank and/or sent to the bank, and for courier services;
- ensuring the IT systems security used by BT and of the spaces where the bank performs its activity;
- prevention of fraud.

c. Categories of personal data belonging to BT walk-in clients, processed upon case

The following categories of personal data belonging to **BT walk-in clients** may be processed, upon case:

- identity details - name, first name, series and number of national or international identity document/passport (ID document), personal identification number (romanian cod numeric personal- CNP)/NIN or another unique element of similar identification, like CUI for liberal professions (e.g. another unique element of identification allocated by the bank to their "non-residents" clients and it is represented by a code with a succession of digits regarding to the year, month, birth date and ID number, full or in a part), home address and - in some cases provided by law - including copy of ID document (usually for cash deposits, currency exchanges, money transfer services over a certain amount or suspicious transactions);
- details regarding the amount of the transaction and explanations on the nature of payment (what does the payment stand for);
- the transaction identifier;
- signature;
- contact details - phone number and/or e-mail address for cash depositors who are not BT customers and who wish to provide these contact data to be notified in case the transaction is cancelled);
- the image (from the identity document, if it is necessary to keep the copy of the ID document, or, as the case may be, caught by the video surveillance cameras);
- information regarding the location of certain transactions (by default, in case of banking operations initiated through BT equipment).

3. If you are an individual who is connected to a BT loan applicant - persons from the loan applicant's group (e.g. husband/wife/life partner of an BT loan applicant)

a. Who is an individual connected to a BT loan applicant?

There are individuals in connection to a BT loan applicant* (“**the applicant**” or “**the debtor**”) are part of the loan applicant's/debtor's group and they are any of the individuals indicated in the below table:

1	The husband/wife/life partner of the loan applicant together with the companies that he/she controls or manages
2	Other close members of the loan applicant's family, together with the legal entities that they control or manage, <u>to the extent that between the members or between the legal entities which are held or managed by these the following relationship exist: direct or indirect control/dominant influence/economic dependency</u>
3	The legal entities where the loan applicant exercises direct or indirect control through any of the following: <ul style="list-style-type: none"> • Owns a minimum of 50% of the holdings shares/social parts; and/or • Has the power to get the majority of votes within the GMS and/or • Has the power to appoint/revoke the majority of the supervisory and/or management body
4	The legal entities where the loan applicant is a director
5	The legal entities where the loan applicant is the General Manager, respectively a director of foundations /associations/ public bodies
6	Parent companies/subsidiaries of the legal entities mentioned at points 3 and 4; Legal entities under the control of the legal entities mentioned at points 3 and 4.
7	Directors and persons exercising directly or indirectly the control in legal entities mentioned at points 3, 4 and 6, except for the ones previously mentioned
8	The natural and/or legal person who guarantees with his/her goods (including with the income of the co-debtor/guarantor) the loan requested by the loan applicant, if the execution of these guarantees would impair it in such a way as to jeopardize its payment capacity.

*The loan applicant is an individual or legal entity applying for a BT loan. Is also considered to be an loan applicant his/her, wife/husband/life partner/co-debtor/guarantor.

b. Purposes for processing personal data belonging to individuals who are connected to a BT loan applicant/debtor

If you are such a person, BT processes your data, upon case, for the following main purpose:

➤ solvency assessment, credit risk diminishment, determining the indebtedness degree of loan applicants interested in personalized offers related to BT loan products or the commitment of this type of products (credit risk analysis);

In the context of analysing a loan application of an individual or legal entity, Banca Transilvania S.A. also processes your personal data, if you belong to any of the categories of individuals indicated in the table above (which are part of the loan applicant's group), as the bank is subject to legal obligations that impose to it to establish and analyse its exposure to the groups of connected debtors, as part of the credit risk analysis.

Also, as a reporting person, the bank will report these exposures and the membership of the groups of connected debtors to the NBR's Credit Risk Register (if applicable).

These data are necessary to the bank for analysing the loan application, and the refusal of the loan applicant (or yours) to provide such data or to have such data processed may determine the bank's inability to analyse and/or approve the requested loan.

Your personal data are transmitted/disclosed, upon case, to the Credit Risk Register within the NBR, and, as the case may be, in compliance with the need-to-know principle, to entities from the BT Financial Group and/or to the service providers used by the bank for the process of analyzing the loan applications.

The data retention within the bank's records is equal to that of the existence of a group/groups of connected debtors.

Other related purposes to the main one indicated above, in which we process your data are, as the case may be, the following:

- identity verification, including for validate/invalidate your quality of BT customer;
- the preparation and submission of reports to the competent authorities, authorized to receive them in accordance with the legal provisions governing BT's activity (such as, but not limited to: The Credit Risk Register within the NBR);
- conducting analyses and the keeping of records for the Bank's economic, financial and/or administrative management;
- management within the internal departments of the services and products provided by the bank;

- defending in court the bank's rights and interests, the resolution of disputes, investigations or any other petitions/complaints/requests in which the bank is involved;
- performance or risk control regarding the bank's processes and procedures, as well as the performance of audit activities or investigations;
- taking measures/providing information or answers to the requests/claims/complaints of any nature addressed to the bank by any person or by legal authorities or institutions, including electronic communication and internet requests;
- performance of internal analysis (including statistics);
- archiving of documents both in physical and electronic format and security back-up;
- performing registration and secretary services for the correspondence addressed to the bank and/or sent by the bank, and also for courier services;
- ensuring the IT systems security used by BT and of the spaces where the bank performs its activity;
- prevention of fraud.

c. Categories of personal data belonging to an individual connected to a BT loan applicant/debtor, processed upon case

- identity detail - name, surname, personal identification number (romanian cod numeric personal CNP/NIN);
- the quality, the social parts/shares and, as the case may be, the powers of attorney held within legal entities part of the loan applicant's/debtor's group;
- as the case may be, other data in the bank's records or publicly available, that need to be processed by the bank for the fulfilment of the main purpose regarding the credit risk analysis.

4. If you are a signatory and/or a contact person acting on behalf of a BT contractual partner

a. Who is the signatory/contact person acting on behalf of a BT contractual partner?

- **The signatories** are usually, the legal representatives or other representatives of BT's contractual partner, designated to sign the agreements concluded between the bank and that certain contractual partner (regardless of whether the contractual partner is a BT legal entity account holder or just a service provider, collaborator, supplier of goods contracted by the bank);
- **The contact persons** are individuals appointed by the contractual partner to communicate with the bank for the proper contractual performance, even if their data are mentioned or not in the contract.

b. Purposes for processing personal data belonging to signatories/contact persons acting on behalf of BT contractual partners

If you are a signatory/contact person of any contractual partner of the bank, we process your personal data, as the case may be, for:

- the conclusion and proper contractual performance of the agreement concluded between BT and that certain contractual partner (usually this is your employer), as well as for other purposes, in close connection with the conclusion and proper performance of the agreement, respectively;
- the preparation and submission of reports to the competent authorities, authorized to receive them in accordance with the legal provisions governing BT's activity;
- conclusion of analyses and the keeping of records for the bank's economic, financial and/or administrative management;
- defending in justice the bank's rights and interests, the resolution of disputes, investigations or any other petitions / complaints / requests in which the bank is involved;
- performance of risk control regarding the bank's processes and procedures, as well as the performance of audit activities or investigations;
- taking measures/providing information or answers to the requests/claims/complaints of any nature addressed to the bank by any person or by legal authorities or institutions, including electronic communication and internet requests;
- performance of internal analysis (including statistics);
- archiving of documents both in physical and electronic format and security back-up;
- performing registration and secretary services for the correspondence addressed to the bank and/or sent by the bank, and for courier services;
- ensuring the IT systems security used by BT and of the spaces where the bank performs its activity;
- prevention of fraud.

c. Categories of personal data belonging to signatories/contact persons acting on behalf of BT contractual partners, processed upon case

We usually process the following categories of personal belonging to you, as the case may be:

For signatories:

- identity details- name, surname;
- position held within the BT contractual partner;
- signature.

For the contact persons:

- identity details - name and surname;
- contact details - telephone number (work number) and/or e-mail address (work e-mail address);
- position held within the BT contractual partner.

The privacy notice dedicated to signatories and contact persons acting on behalf of BT's contractual partners can be found here: <https://www.bancatransilvania.ro/Nota-de-informare-privind-prelucrarea-datelor-cu-caracter-personal-semnatari-persoane-de-contact-pentru-partener-contractual-BT.pdf>.

5. If you are a BT shareholder and/or a BT obligor or a person whose data we process in relationship to our shareholders/obligors

a. Who is a BT shareholder and/or a BT obligor or a person whose data we process in relationship with our shareholder/obligor?

- **BT Shareholder** - you are a BT shareholder if you own shares issued by Banca Transilvania S.A., as a natural person or as a legal entity;
- **BT Obligor** - you are a BT obligor if you own bonds issued by Banca Transilvania S.A. as a natural person or as a legal entity;
- **Individuals whose data we process, as a rule, in relation to those of BT shareholders/obligors** - legal or conventional representatives of BT shareholders/obligors, persons holding jointly shares/bonds, successors of BT shareholders/obligors.

b. Purposes for processing personal data belonging to BT shareholders/BT obligors or to other persons in relation with the BT shareholders/obligors

If you are a BT shareholder and/or a BT obligor or a person whose data we process in relationship to the BT shareholders/obligors, we shall use your data, upon case, as follows:

- to verify your identity in order to confirm or not your quality of shareholder/obligor of the bank, another quality in relationship with the BT shareholders/obligors;
- fulfilling the specific legal obligations and activities that derive from the BT's issuer quality (e.g. organization of GMS, shareholder services, specific communications for investors);
- establishing the garnishments on BT shares/bonds, recording the garnished amounts owed to the creditors and providing answers in relation to latter to the enforcement bodies and/or the competent authorities, according to the legal obligations of the bank;
- the preparation and submission of reports to the competent authorities, authorized to receive them in accordance with the legal provisions governing BT's activity;
- conclusion of analyses and the keeping of records for the Bank's economic, financial and/or administrative management;
- management within the internal departments of the services and products provided by the Bank;

- defending in justice the bank's rights and interests, the resolution of disputes, investigations or any other petitions/complaints/requests in which the bank is involved;
- performance or risk control regarding the bank's processes and procedures, as well as the performance of audit activities or investigations;
- taking measures/providing information or answers to the requests/claims/complaints of any nature addressed to the bank by any person or by legal authorities or institutions, including electronic communication and internet requests;
- proving evidence for the requests/agreements/options regarding certain aspects requested/discussed/agreed, including the telephone calls initiated by you or by the bank, by recording the discussed issues and, as the case may be, the audio recording of the telephone calls, or, audio video recording;
- performance of internal analysis (including statistics);
- archiving of documents both in physical and electronic format and security back-up;
- performing registration and secretary services for the correspondence addressed to the bank and/or sent to the bank, and for courier services;
- ensuring the IT systems security used by BT and of the spaces where the bank performs its activity;
- prevention of fraud.

c. Categories of personal data belonging to BT shareholders/obligors/other persons in connection with the latter, processed upon case

If you act as a BT shareholder and/or obligor, or another related person, we usually process, the following personal data categories:

- identity details – name and surname, personal identification number (romanian cod numeric personal- CNP/ NIN), the series and number of the national or international identity document/passport (ID document), the postal address and, as the case may be, the copy of the ID document (for the identification of the shareholders in order to issue shareholder certificates or records for the shares they hold with BT);
- citizenship;
- fiscal data (country of fiscal residence);
- information about the economic and financial situation, regarding the assets held - number of BT shares and/or bonds, including the history of the ownership of these assets;
- the quality, the social parts/shares and, as the case may be, the powers of attorney held within legal entities;
- signature (on the bank's applications);
- telephone number, e-mail address, correspondence address, depending on the communication channel selected in the requests addressed to the bank.

6. If you are a visitor of the BT units and/or user/visitor of the BT equipment?

a. Who is a visitor of the BT units and/or user/visitor of BT equipment?

- Is an **Visitor of BT unit**- any individual visiting the bank's units (including its administrative buildings) is a visitor of the BT units, regardless if they perform banking operations or not.
- Is an **User/visitor of BT equipment**- any individual using or standing in front of a BT equipment (ATMs, BT Express, BT Express Plus, etc.), regardless if these equipments are placed inside the BT units or in other locations, regardless if the user/visitor is a BT customer, BT walk-in client or any other third party, regardless any banking operations are initiated or if the banking operations initiated through the BT equipment are finalized or not.

b. Purposes for processing personal data belonging to visitors of BT units and/or users/ visitors of BT equipment

The bank processes your data, as appropriate, for:

- monitoring of persons security, spaces and/or bank's assets or the units' visitor;
 - Details about the video surveillance data processing can be found here: <https://www.bancatransilvania.ro/supraveghere-video/>.
 - Details regarding visitors' data processing for the granted access in BT units, can be found here: <http://www.bancatransilvania.ro/monitorizare.pdf>
- transactions initiated through the BT equipment;

as well as for other related purposes related to the main purposes indicated above, respectively:

- verification of identity, as appropriate, if necessary for your identification at the request of the competent authorities or where the bank has a legitimate interest;
- performance or risk control regarding the bank's processes and procedures, as well as the performance of audit activities or investigations;
- performance of internal analysis (including statistics);
- archiving of documents both in physical and electronic format and security back-up;
- ensuring the IT systems security used by BT and of the spaces where the bank performs its activity;
- prevention of fraud.

Regarding the video surveillance, as well as the processing of the data for granting access into certain BT units, the data subjects are informed, including by specific icons and/or specific privacy notices displayed at the entrance into the bank units and respectively on BT equipment.

c. Categories of personal data belonging to visitors of BT units and/or to users/visitors of BT equipments, processed upon case

If you visit the bank's units (including its administrative buildings) and/or use/visit the BT equipment, the bank will process, as appropriate:

- your image, as it is captured by the video surveillance cameras installed;
- any data required to perform the banking operations initiated through BT equipment or other related purposes (e.g. time spent in units/at BT equipment).

Also, in order to give you access into certain BT units, the security personnel will need to identify you with your original, valid ID document and will insert in special hardcopy registers, the following data concerning you:

- identity details - name, surname, the series and number of the national or international identity document/passport (ID document).

7. If you are a visitor of BT websites/social media pages

a. Who is a visitor of the BT websites/social media pages?

It is a visitor of the BT websites/social media pages any individual who accesses any of the [BT portfolio's websites](#)/social media pages has this quality;

b. Purposes for processing personal data belonging to visitors of BT websites/social media pages

Through cookies or other similar technologies, the bank processes your data whenever you visit a BT websites for the purposes described in the cookie policies of each of our websites, as well as within the banners and cookies setting centers.

For the website <http://www.bancatransilvania.ro/>, the Cookies policy found at the following link: <https://www.bancatransilvania.ro/politica-de-utilizare-a-cookie-urilor/>

If, within the BT websites, you enter your data in the form of notifications/requests/complaints, applications for products/services/campaigns of the bank, subscription to newsletters in various fields, we process the data filled in such forms, as the case may be, for:

- taking measures/providing information or answers to the requests/claims/complaints of any nature addressed to the bank by any person or by legal authorities or institutions, including electronic communication and internet requests;
- proving evidence for the requests/agreements/options regarding certain aspects requested/discussed/agreed, including the telephone calls initiated by you or by the bank, by recording the discussed issues and, as the case may be, the audio recording of the telephone calls, or, audio video recording;collecting your opinion in regard to the quality of the services/products/employees of BT (assessment of the services' quality);
- performance of internal analysis (including statistics);
- performance or risk control regarding the bank's processes and procedures, as well as the performance of audit activities or investigations;
- archiving of documents both in physical and electronic format and security back-up;
- performing registration and secretary services for the correspondence addressed to the bank and/or sent by the bank, and for courier services;
- ensuring the IT systems security used by BT and of the spaces where the bank performs its activity
- prevention of fraud.

Please take into consideration that subscription or unsubscription of any e-mail address entered by you in forms/fields of type/with the name "newsletter", available on the BT websites to receive informations from various areas of interest is managed by the online forms (subscribing) and from unsubscribing links from the content of the messages received following the subscription (unsubscribe).

We also inform you that subscription/unsubscription to/from "newsletter" for which you choose to opt for BT websites do not influence the options regarding the processing of your data for the marketing purpose, completed on the bank forms available in the units or on the BT website (the online form found at the following link:<https://www.bancatransilvania.ro/gdpr/> is available only to BT clients for expressing marketing options in the context of the contractual relationship carried out by them with the bank.

c. Categories of processed personal data for the visitors of BT websites/social media pages

- If you are a visitor of **BT website** the bank will collect the following categories of personal data: data processed through cookies;
- IP Address;
- data about the equipment used to access the website.

Also, in the documents available on websites the bank collects, as appropriate:

- identity details - name, surname, and, in some cases, only with the consent of the data subjects, the national identification number (CNP);
- contact details-e-mail address and/or telephone number.

If you visit any of **BT's social media pages** and insert comments, images, opinions and/or value statements to our posts, we will usually process:

- your user name on the respective social media platform;
- the opinions you insert;
- images you insert.

In some cases we might ask you to provide – usually when you participate in different contests/campaigns or when you insert comments through which you complain about BT's banking activity or you ask about any aspects in regard to our activity - other information to help us identify you and/or the situation you bring to our attention and that permit us to send to you an answer to your request. Generally, we might ask you to provide further information regarding:

- details on the situation that you bring to our attention;
- identity details – usually name, surname;
- identifiers: upon case, BT client ID (CIF BT), IBAN;
- contact details: upon case, e-mail address and/or telephone number.

When you provide such personal data through the social media platform, we will process them for the above mentioned purposes in this section. For the security of your personal data, please do not insert such data in public posts on our social media platforms.

Please bear in mind that whenever you insert images of yourself or belonging to other individuals or when you “tag” other individuals in the bank's social media pages, you give your consent to the processing of your data by BT and, respectively you guarantee to us that you have obtained the similar consent of the individuals they belong to.

Last but not least, we inform you that any personal data that you insert in BT's social media pages will also be processed by the providers of the social media platform and thus they will also fall under the provisions of the privacy policy of that respective platform. BT has no control over the way the providers of these platforms process your personal data for their own purposes and we hold no liability for such processing.

8. If you are a person who has the potential to become a BT customer ("BT prospect")

a. Who is a BT prospect?

You may be a “**BT prospect**” if you have requested, in the bank units, through the BT websites or through some contractual partners of BT, information on BT products/services, you have started contracting them without completing this action or you have been registered in various campaigns organized by the bank.

b. Purposes for processing personal data belonging to BT prospects

If you are a BT prospect, we process your data, as the case may be, for the following purposes:

- verifying your identity, in order to confirm/infirm your quality of BT customer;
- taking measures/providing information or answers to the requests/claims/complaints of any nature addressed to the bank by any person or by legal authorities or institutions, including electronic communication and internet requests;
- proving evidence for the requests/agreements/options regarding certain aspects requested/discussed/agreed, including the telephone calls initiated by you or by the bank, by recording the discussed issues and, as the case may be, the audio recording of the telephone calls, or, audio video recording;
- collecting your opinion in regard to the quality of the services/products/employees of BT (assessment of the services' quality);
- performance of internal analysis (including statistics);
- performance or risk control regarding the bank's processes and procedures, as well as the performance of audit activities or investigations;
- archiving of documents both in physical and electronic format and security back-up;
- performing registration and secretary services for the correspondence addressed to the bank and/or sent by the bank, and for courier services;
- ensuring the security of the IT systems used by BT;
- prevention of fraud;
- calculation of the fees to which certain categories of bank employees are entitled.

c. Categories of personal data belonging to BT prospects, processed upon case

If you are a BT prospect, as the case may be, the bank usually processes the following personal data concerning you:

- identity details- name, surname, and, in some cases, only with the consent of the data subjects or if the bank justifies with a legitimate interest, the personal identification number (romanian cod numeric personal – CNP);
- contact details-e-mail address and/or telephone number.

9. If you are a candidate for positions available at BT or for internships organized by the bank

a. Who is a BT candidate?

You are a **candidate** for positions available at BT or for internships organized by BT if you have sent to the bank or if the bank has received your CV to be used for recruiting purposes - directly from you or through/from other natural or legal persons - or if you have brought to our

knowledge, in any other way, that you are interested in obtaining certain positions in BT/ participating in BT internships.

b. Purposes for processing personal data belonging to BT candidates

The bank processes your personal data, as appropriate, for:

- recruitment for the position/positions or, as the case may be, for the internship you wish to obtain/participate in within the bank, as well as for purposes closely related to this activity, such as:
- taking measures/providing information or answers to the requests/claims/complaints of any nature addressed to the bank by any person or by legal authorities or institutions, including electronic communication and internet requests;
- proving evidence for the requests/agreements/options regarding certain aspects requested/discussed/agreed, including the telephone calls initiated by you or by the bank, by recording the discussed issues and, as the case may be, the audio recording of the telephone calls, or, audio video recording;
- performance of internal analysis (including statistics);
- performance or risk control regarding the bank's processes and procedures, as well as the performance of audit activities or investigations
- archiving of documents both in physical and electronic format and security back-up;
- performing registration and secretary services for the correspondence addressed to the bank and/or sent by the bank, and for courier services;
- ensuring the security of the IT systems used by BT
- prevention of fraud.

If you apply for only one of the vacant positions/internships in BT, your personal data shall be processed by the bank only within the recruitment process for the respective position, and shall be erased upon the completion of that respective recruitment process.

If, instead, you choose to be contacted generally for vacancies/internships in BT, the bank will keep your data and use it for recruitment purposes for a period of 1 year, which may be extended with your consent.

References from previous employers or from professors may become relevant during the recruitment process. If the bank needs this kind of personal data, it will contact you to ask for your consent to obtain these references on your behalf. If you do not give your consent in this regard, you will need to obtain these references yourself if you want to continue the recruitment process.

c. Categories of personal data belonging to BT candidates

To those individuals interested in applying for positions available at BT or in attending the internships programs of the bank, the bank usually processes the following categories of personal data, as indicated in the CV submitted to/transmitted to the bank:

- identity details- name, surname;
- the age, to verify your eligibility to become an employee or, where applicable, to participate in certain internships of BT;
- contact details-e-mail address and/or telephone number;
- data on studies and professional experience;
- any other relevant data from the CV.

10. If you are a person who addresses to BT requests/notices/complaints on any channel ("BT petitioner")

a. Who is/when do we process your personal data as a BT petitioner?

You are such of person if you address to BT any request, on any channel, whether you are a BT customer, an BT walk-in client or you belong to any other category of individuals.

b. Purposes for processing personal data belonging to BT petitioners

Depending on the situation and the relationship you have with the bank, when submitting a request, the bank processes your personal data for the following purposes:

- verifying your identity, including in order to confirm/infirm your quality of BT customer;
- taking measures/providing information or answers to the requests/claims/complaints of any nature addressed to the bank by any person or by legal authorities or institutions, including electronic communication and internet requests;
- proving the requests/agreements/options regarding certain aspects requested/discussed/agreed upon via the telephone calls initiated by you or by the bank, by taking notes of the discussed issues and, as the case may be, the audio recordings of the telephone calls;
- collecting your opinion in regard to the quality of the services/products/employees of BT (assessment of the services' quality);
- performance or risk control regarding the bank's processes and procedures, as well as the performance of audit activities or investigations;
- performance of internal analysis (including statistics);
- archiving of documents both in physical and electronic format and security back-up;
- performing registration and secretary services for the correspondence addressed to the bank and/or sent by the bank, and for courier services;
- ensuring the security of the IT systems used by BT;
- prevention of fraud;
- calculation of the fees to which certain categories of bank employees are entitled.

c. Categories of personal data belonging to BT petitioners, processed upon case

In order to register, confirm the receipt, analyze, formulate and send answers to any requests/notifications/complaints you send to the bank, we process the following categories of personal data:

- identity details - name, surname and any other data from this category that BT petitioners make available to the bank or data that BT needs to process to verify the identify of the BT petitioner in order to prevent disclosure of confidential information (including personal data) to persons who are not allowed to receive them;
- contact details – correspondence address, e-mail address, phone number;
- voice, from the phone calls as well as from phone call recordings (initiated by petitioners or by the bank in connection with the petitions);
- depending on each case, any other information that the bank is aware of and which are necessary for analyzing the requests.

11. If you are a thirdparty individual whose data we process outside a direct relationship with BT (“BT third party”)

a. Who is/when do we process your personal data as a BT third party?

Usually, you belong to this category of data subjects if different categories of personal data concerning you are brought to the bank’s knowledge by the BT customers or by the walk-in BT clients in the context of their relationship with BT or by any other person. We process your data in this context as a third party, even if you have your own direct relationships with BT (e.g. a BT loan applicant provides us with the contract of purchase and sale of the building in which you are listed as seller. In this case, the data concerning you in this contract will be processed by the bank given your quality of thirdparty individual, even if you are in fact a BT customer and the bank processes your data for other purposes, specific to the contractual relationship you have established with the bank).

Thus, as an example, we will process your data as BT third party, if you belong any of the following categories of individuals:

a. members of a BT customer's or BT employee's family - it is possible that in certain situations the BT Clients may bring to our attention data related to members of their family, especially in the context of formulating and analyzing a credit application or during the performance of a credit agreement;

Also, BT employees may disclose to us personal data belonging to some of their family members, in different situations relating to their employment (e.g minor children of BT employees, other family members of BT employees);

b. non-customer payers: individuals who are clients of other institutions that provide payment services and who order transfers to the customers' accounts opened with BT (interbank

transfers ordered by clients of other payment institutions to BT account holders) - it is necessary to process the data of these data subjects to provide the payment services and to fulfill our legal obligations;

c. beneficiaries of non-customer payments: individuals who are customers of other payment service institutions, to the accounts of which BT customers order transfers (interbank transfers ordered by BT customers towards customers of other payment service institutions) - it is necessary to process the data of this category of individuals to provide the payment services and to fulfill our legal obligations;

d. individuals mentioned in the payment details/explanations from a payment order submitted/transmitted/received at BT - filling in the fields related to the explanations/details of a payment is mandatory, according to the legal provisions in the field of preventing money laundering and terrorism financing. According to the principle of data minimisation, the customers should insert personal data into these fields only when it is absolutely necessary and respectively only data that are strictly necessary;

e. authorized persons (other than the ones who are usually authorized to initiate transactions on the accounts of the BT individual/legal entities account holders) to initiate on behalf of a BT customer specific operations – banking or non-banking ones- through the channels offered by BT (e.g. telephone payment instructions);

f. individuals whose data are mentioned on various documents made available to the bank - if a BT customers or a BT walk-in clients or any other persons that BT interacts with submit/send to the bank different documents, in different situations (e.g. certificates or documents of any kind containing personal data of the signatories or, as the case may be, of other persons mentioned in the records) the bank will process these data, given the need to keep these records, even if it may not need to process them in another form;

g. persons in relation to whom BT receives information requests from various institutions and/or public authorities, from notaries, lawyers, bailiffs (judicial executors) etc.;

h. persons participating in various events or actions of social responsibility organized by the bank, whose data is necessary to be processed in order to ensure the logistics of the events;

i. any other category of individuals whose personal data are made available to us by any person with whom the bank interacts or whose data otherwise enter into the bank's possession.

b. Purposes for processing personal data belonging to BT third parties

The bank processes your data as a third parties according to the purpose it needs in our relationship with the person who provided it to the bank, as well as for the following related purposes:

- performance of the employment relationship with BT employees, where applicable;

- performance or risk control regarding the bank's processes and procedures, as well as the performance of audit activities or investigations;
- performance of internal analysis (including statistics);
- archiving of documents both in physical and electronic format and security back-up;
- performing registration and secretary services for the correspondence addressed to the bank and/or sent by the bank, and also for courier services;
- ensuring the security of the IT systems used by BT;
- prevention of fraud.

c. Categories of personal data belonging to BT third parties, processed upon case

The most common categories of personal data that we process if you are a BT third party, by way of example:

- identity details: - name, surname, personal identification number (romanian cod numeric personal- CNP);
- relationship between you and a BT customer or employee, upon case;
- position held within a legal entity;
- signature;
- any other data that is made available to us by any person we interact with in our activity.

12. If you are an individual who has expressed on the BT forms options regarding the processing of your personal data for marketing purposes (as the case may be, consent or refusal)

a. Who can be an individual who has expressed his/her options regarding the processing of personal data for marketing purposes (as the case may be, consent or refusal)

Currently we consider to be individuals who have given **their consent to BT to process their personal data for marketing purposes**, any of the following categories of data subjects:

- BT customers, BT walk-in clients or any third party who have given this consent on the dedicated BT form used in the BT units as of 12.03.2018 and on the BT website <http://www.bancatransilvania.ro/> (online form is only available to BT customers, to the following link: <https://www.bancatransilvania.ro/gdpr/>) starting with May 2018;
- BT customers, BT walk-in clients or any third party who have given this consent on the forms used in the bank's activity prior to 12.03.2018 and have not modified/withdrawn this consent meanwhile, neither following the notification sent by the bank in May 2018 on this possibility, nor on their own initiative.

Currently there are individuals who have **refused to have their personal data processed for marketing purposes** BT Customers, BT walk-in clients or any third party who have refused to have their data processed for this purpose from the start, as well as individuals who have withdrawn such consent that they had previously given.

b. Purposes for processing personal data belonging to individuals who have expressed their marketing options (as the case may be, consent or refusal)

If you have given us your consent to have your personal data processed for marketing purposes, we will process your data as follows:

- transmission of advertising messages, in accordance with the given consent (advertising purpose);
- verifying the identity of the persons, in order to confirm their quality as BT customers;
- proving the requests/agreements/options regarding the advertising options, by recording the discussed issues and, as the case may be, the audio recording of the telephone calls (initiated by you or by the bank);
- performance of internal analysis (including statistics);
- archiving-both in physical and electronic format-of the documents, realizing the backup;
- performing registration and secretarial services for the correspondence addressed to the bank and/or sent to the bank, and for courier services;
- ensuring the security of the IT systems used by BT;
- prevention of fraud.

If you have expressed your refusal regarding the processing of personal data for advertising purposes, we will process your data for all purposes above, except for the transmission of advertising messages.

* BT wants to inform the interested persons about the products/services/events offered/organized by the bank, the entities of the BT Financial Group or their partners, meaning that they process the personal data of these persons, if they have expressed their consent to receive such advertising messages by filling in the specific forms.

The document dedicated to expressing/collecting the marketing options currently used by BT, is accessible in any unit of the bank and on the website www.bancatransilvania.ro, or directly at the following link: <https://www.bancatransilvania.ro/gdpr/>.

The online document is only available to BT Customers and can be used by them, including for the modification of the previously expressed options, as well as for withdrawing the previously expressed marketing consent, as the case may be, to withdraw consent for receiving advertising messages.

c. The categories of personal data processed from the persons who have expressed to BT their consent on the processing of their data for advertising purposes, their recipients and the period of their processing

The data processed by BT for advertising purposes are usually:

- identification details: first name, last name;
- contact details: the telephone number and/or the e-mail address or correspondence address provided by the persons interested in receiving advertising messages or, as the case may be, those stated in the bank's records for the KYC purpose (the development of the contractual relationship) in case of BT Customers;
- for BT Customers: other informations that the Bank finds about customers, in the context in which they use the BT services/BT products (e.g. data about the transactions, age, location, income range, etc.), which the Bank will automatically analyze (profiling) to create an opinion about the products/services/events that would suit BT's customers (personalized advertising).

The personal data will be processed by the Bank for the transmission of advertising messages until the termination of the contractual relationship with the BT Clients or, as the case may be, until the withdrawal of the agreement to receive such messages (the last version for any other categories of non-BT clients).

In certain cases, in order to send ads via such channels, BT shall contract service providers that will process the personal data of the data subjects on behalf of and for BT, exclusively for the purpose of sending the established ads, strictly observing the instructions from BT and under the Bank's close supervision.

People willing to receive ads, may opt for ads from several categories, including without limitation: BT products and services, products and services of the BT subsidiaries, events organized by BT, products/services of BT's partners related to the products/services of BT or of BT's subsidiaries and events organized by BT's partners.

BT's subsidiaries the products/services and events of which are promoted within the ads sent to the persons willing to receive such messages are the following **entities within the Banca Transilvania Financial Group**: [BT Microfinanțare IFN SA \(„BT Mic”\)](#), [BT Asset Management S.A.I. S.A., \(„BTAM”\)](#), [BT Leasing Transilvania IFN S.A. \(„BTL”\)](#), [BT Direct IFN S.A. \(„BTD”\)](#), [BT Capital Partners S.S.I.F. S.A.\(„BTCP”\)](#), other entities that may join the Group in the future.

The list with the categories of current BT/BT's subsidiaries current partners, whose products/services and events are intended to be promoted within the advertising messages sent to those who have opted for this feature, is accessible at: <https://www.bancatransilvania.ro/parteneri>.

If one has consented to receiving ads about the products/services and events offered/organized by BT subsidiaries or partners, such entities shall process personal data with the purpose of sending such messages, under the Bank's close supervision and coordination, and, as the case may

be, together with it. For any other possible personal data processing activities carried out by BT partners/subsidiaries outside or connected to the sending of ads, such as, e.g. for the purpose of concluding certain agreements related to their promoted products/services, these partners are to act as controllers of the processed personal data.

The consent to receiving ads can be withdrawn or modified any time through several methods, separately indicated in the consent form regarding the processing of personal data for advertising purposes.

Withdrawal of consent operates only for the future and does not affect the legality of processing the data made before this withdrawal.

Please take into consideration that subscription or unsubscription of any e-mail address entered by you in forms/fields of type/with the name “newsletter”, available on the BT websites to receive informations from various areas of interest is managed by the online forms (subscribing) and from unsubscribing links from the content of the messages received following the subscription (unsubscribe).

We also inform you that subscription/unsubscription to/from “newsletter” for which you choose to opt for BT websites do not influence the options regarding the processing of your data for the marketing purpose, completed on the bank forms available in the units or on the BT website.

D. What are the sources from which BT processes the personal data?

As a rule, the personal data belonging to data subjects whose data the Bank processes are collected by the us directly from them, on various occasions and modalities, such as:

- upon the establishment and during the performance of the business relationship with BT;
- upon the execution and performance of certain agreements for the products/services provided by the Bank, on own behalf or for third-parties;
- by the filling-in of certain forms available on BT’s website, on other websites held by the Bank or other Group entities;
- by registering for/participating in different contests/campaigns organized by BT in its units, on BT’s website or the Bank’s social network pages;
- when inquiries/complaints are received at the Bank’s phone numbers, e-mail addresses, messages on the Banks social network pages or by letter in BT’s units;
- when apply to posts available in the Bank (online, by sending/submitting CVs in BT’s units or different e-mail addresses, career fairs or other events);
- when accessing websites/social media platforms of BT.

However, there are situations when the data are collected from other sources, such as:

- from other Customers, individuals or legal entities, account holders, in situations such as, but not limited to: authorizing other Customers on their accounts opened with the bank, contracting some products/services of the bank by one Customer on behalf of another Customer who authorized him/her on this regard, contracting by the employers who are legal entities Customers of BT of some products / services of the bank for/on behalf of their employees (e.g. meal vouchers, benefits for collecting the salary income in the accounts opened with BT, guarantee accounts management etc);
- from the payers - individuals or legal entities, whether or not they are BT Customers - if they transfer/deposit amounts in the accounts opened with BT of the Customers- account holders;
- from public authorities or institutions (e.g. courts, prosecutors, judicial executors, NBR, ANPC, ANSPDCP, etc.), notaries, lawyers in the context in which they send to the Bank notices or requests regarding the Clients;
- from/through Transfond, SWIFT, international payment organizations, etc.;
- from credit institutions with which Banca Transilvania S.A. merged (Volksbank Romania S.A. and Bancpost S.A.);
- from partner and correspondent banks, from banks or financial institutions participating in syndicated loans;
- from international payment organisations;
- from other entities of Banca Transilvania Financial Group etc.;
- from public sources, without being limited to: Trade Registry Office, Portal just, National Register of Mobile Advertising, Cadastre and Real Estate Office, Portal of the courts, entities entitled to manage databases with persons accused of financing terrorist acts and the politically exposed ones, Official Gazette, Social Monitor media, internet, etc.;
- from records such as the Credit Bureau, the Credit Risk Register, if there is a legal basis and a determined and legitimate purpose for consulting them;
- from private database providers- e.g. entities empowered to administer databases with persons which is accused for financing terrorist acts and the publicly exposed ones;
- from entities in the BT Financial Group, for their use for certain and legitimate purposes, in general for the smooth conduct of the joint economic activity carried out with other entities of the BT Group and for the fulfillment of the legal requirements related to the supervision on the consolidated basis of the BT Financial Group;
- from the contractual partners of the bank in various fields;
- from debt collection/debt recovery companies (e.g. the Bank can find out the new contact details of the Customers from companies that support the bank in the activity of recovering receivables, data that, the latter obtain based on their own interactions with the Customers or with close persons of them);
- from assessment companies;
- from insurance companies;
- from management companies of pension and investment funds;
- from Depozitarul Central S.A., for the data of the bank's shareholders;
- from any other individuals or legal entities who send us notices/requests containing Customers' data (e.g. persons notifying us that you no longer have the same contact details as those stated in the bank's records).

E. Which are the bases on which BT processes personal data and the consequences of the refusal to process them?

The bases on which BT processes personal data are, as appropriate:

- the need to process data for the performance of a requirement that is of public interest;
- the bank's legal obligation;
- conclusion/performance of the agreements concluded with the data subject;
- the legitimate interest of the bank and/or third parties;
- the data subject's consent.

Except for the cases in which the personal data are processed based on the data subjects' consent, and in some cases in which the basis of the processing is the legitimate interest, the refusal of the persons on processing their personal data by BT shall render the provision of the requested services or the resolution of the submitted requests impossible.

F. Whom are the personal data processed by Banca Transilvania disclosed/transferred to?

The personal data of the Bank's Customers and, as applicable, of other data subjects previously mentioned in this Policy, are disclosed by BT or, as applicable, transferred, in accordance with the applicable legal provisions of GDPR, based on the applicable legal bases, depending on the situation, and only under strict confidentiality and security conditions, to the recipient categories, including without limitation:

- other Customers who have the right and need to know them;
- entities within the BT Financial Group;
- assignees;
- contractual partners (service providers) used by the bank for the performance of its banking activity, as well as, but not limited to: service providers used by the Bank for: IT services (maintenance, software development), hard-copy or electronic archiving, courier services, audit, services related to card issuing and enrollment; market research, advertising, monitoring of traffic and behavior of the users of online tools, marketing services via social media, etc.;
- companies processing inter-bank payments and transmitting information on inter-bank transactions (eg: Transfond S.A., Society for Worldwide Interbank Financial Telecommunication-SWIFT);
- partners of the bank from various fields, whose products/services/events can be promoted to BT Customers based on their consent. The updated list with the bank's partners can be found at the following web address: <https://www.bancatransilvania.ro/parteneri>;
- international payment organisations (e.g. Visa, Mastercard);
- payments processors;
- financial-banking entities participating in the payment schemes/systems and inter-banking communications channels such as SWIFT, SEPA, ReGIS, financial-banking institutions to which we confirm or request confirmation of signatures and/or certain information that can be

found in the bank reference letters, bank guarantee letters, other addresses issued by the Bank's Customers in favor of their business partners, other entities (such as banks or financial institutions) for assignment operations or restructuring of debt portfolios and/or other rights of the Bank born on the basis of the legal relationships with the Customers;

- partner banks and correspondent banks, banks or financial institutions participating in syndicated loans;
- public authorities and institutions, such as, but not limited to: the National Bank of Romania (BNR), the National Agency for Fiscal Administration (ANAF) *, the Ministry of Justice, the Ministry of Internal Affairs, the National Office for the Prevention and Combating of Money Laundering (ONPCSB) **, the National Agency for Cadastre and Real Estate Advertising (ANCPI), the National Register of Mobile Advertising (RNPM), the Financial Supervisory Authority (ASF), including, as the case may be, their territorial units;
- guarantee companies (funds) for different lending/deposit products (e.g. FNGCIMM, FGDB, etc.);
- public notaries, lawyers, judicial executor;
- Central Credit Register***;
- The Credit Bureau and the participants to the Credit Bureau system***;
- insurance companies;
- assessment companies;
- companies collecting outstanding debts or receivables;
- entities to which the Bank has outsourced the provision of financial-banking services;
- banking institutions or government authorities, including authorities outside the European Economic Area - for SWIFT international transfers or as a result of the processing activities for the purpose of observing the FATCA and CRS legislation;
- providers of social media.

*In accordance with the provisions laid down in the Fiscal Code (Law No. 207/2015), in its capacity of credit institution, BT is legally bound to report to the central fiscal body - A.N.A.F. - the list of account holders - individuals, legal entities or any other entities without legal personality - that open or close accounts, as well as the identification details of the persons that are authorized to sign for the accounts held by them, the list of persons that rent safe deposit boxes, as well as the termination of the rental agreement. A.N.A.F. can transmit these data to the local fiscal bodies and to other central/local public authorities, under the provisions of the legislation.

**If the conditions for the transmission by BT of personal data to the National Office for Prevention and Control of Money Laundering are met, pursuant to Law No. 129/2019 on the prevention and sanctioning of money laundering and on setting up of certain measures for the prevention and combating terrorism financing, as republished and subsequently amended, such personal data are simultaneously sent, in the same format, to A.N.A.F., as well.

***The Bank is legally bound to report to Central Credit Register (CRC) the credit risk information related to each debtor that meets the reporting conditions (including the debtor's identification

details -individual or non-banking legal entity- and the RON and FCY operations through which the Bank is exposed to risk in relation to such debtor), and in relation to whom the Bank has an individual risk, respectively, as well as details regarding acknowledged card frauds.

****The Bank's legitimate interest is to record your personal data in the system of the Credit Bureau to which have access also the other Participants (mainly credit institutions and non-banking financial institutions), the personal data of debtors in case of payment defaults above 30 days, subject to the prior notification of the data subjects in this respect at least 15 days before the reporting date.

G. Transfers of personal data made by BT to third party countries and/or international organisations

Only if it's necessary for the fulfillment of the purposes of the agreements concluded with the BT Customers or occasional BT Customers, and only in specific situations or on the basis of adequate guarantees, the Bank shall transfer personal data abroad, as applicable, including to countries that do not provide an adequate level of protection of such data. The countries that do not ensure an adequate level of protection are countries outside the European Union/European Economic Area, except for the countries for which the European Commission has recognized an adequate level of protection, such as: Andorra, Argentina, Canada (only companies), Switzerland, the Faroe Islands, Guernsey, Israel, the Isle of Man, Jersey, New Zealand, Uruguay, Japan, USA - only within the protection granted by the Privacy Shield US-EU (unless a contrary decision is issued for any of these countries).

If BT Customers or occasional BT Customers order through the bank transactions in which the recipients of the payments are located in states that do not provide an adequate level of personal data's protection, the transfer of data to those states is realized based on the provisions of the General Data Protection Regulation regarding: the transfer that it is necessary for the performance of a contract between the bank and the Customer or for the application of certain pre-contractual measures, adopted upon the Customer's request or, as the case may be, the transfer that is necessary for the conclusion of a contract or for the performance of a contract concluded in the interest of the data subject.

If it is necessary to transfer personal data to third party countries or international organizations and in other circumstances, the bank will only do so with the guarantees legally provided for such transfers.

H. Automated decision-making processes, including the creation of profiles

In some circumstances, only with the fulfillment of the provisions of the GDPR, in the banking activity carried out by BT, the automated decision-making processes are used, including as a result of the creation of profiles. These are decisions taken by the bank, as the case may be, with

or without the intervention of a human factor, which can produce legal effects and/or affect the Customers in a similar way, to a significant extent.

Such situations, presented by way of example, are the following:

- for the application of the KYC measures in order to prevent and combat the money laundering and terrorist financing, verifications will be carried out in the databases, for the persons suspected of financing the acts of terrorism or, as the case may be, for the persons with a high risk of fraud; if the Customers are included in these records, the bank reserves the right to refuse to enter into a business relationship with them or to terminate the contractual relationship;
- to protect BT Customers and occasional BT Customers against fraud, as well as for the bank to properly fulfill its KYC obligations, it monitors the Customers transactions and, if it identifies, suspicious transactions (such as unusual payments as frequency, value, reported to the source of funds declared by the account holders Customers or the purpose and nature of the business relationship, transactions initiated from different cities located at short time intervals, which did not allow the travelling between those cities), consequently takes the measures to block the transactions, accounts' cards, taking these decisions exclusively on automatic bases;
- according to the legal provisions, the granting of the credit products is conditioned by the existence of a certain degree of indebtedness of the applicants. In order to determine the eligibility to contract a credit product related to the degree of indebtedness, this will be determined on the basis of automatic criteria, starting from the level of the income and expenses that the applicant Customer records;
- in order to objectively verify the fulfillment of the eligibility conditions for the pre-offer and, as the case may be, to analyze a credit application formulated by an applicant- individual or legal entity to BT, in most cases, a scoring application of the bank will be used, which will analyze the data from the credit application, the information resulting from the verifications carried out in the bank's own records and/or those of the Credit Bureau S.A. and will issue a score that determines the credit risk and the probability of paying the installments in time. The result of other verifications of the applicant's status, will be added to the issued score, which will be analyzed by the bank's employees, to determine if the eligibility conditions established by the internal regulations, are met. The final decision to approve or reject the credit application is based on the analysis performed by the Bank's employees (human intervention);
- if the BT Customers have expressed, on the dedicated form, the agreement that their personal data can be processed for advertising purposes for the transmission of personalized messages, they are based on a profile made on the basis of different criteria, such as, but without being limited to, data on transactions, age, location, income range, which the bank will automatically study, so as to make an opinion on the products/services/events that would suit the Customers. In some cases, this realized profile will only determine the promotion of a certain product / service to the persons fulfilling the conditions of the profile, and in other cases it will determine that only the persons who fulfill the criteria of the profile will be able to contract/benefit from certain promotional offers.

I. How long does BT process personal data?

Personal data processed by the Bank for KYC purpose in order to prevent the money laundering and combat the terrorist financing, including the data regarding the transactions made thru accounts opened at BT, will be kept by the bank, **at least 5 years since the termination of the business relationship with the Customer- individuals or legal entities- account holder**, according to the legal time period requested by the law and established on behalf of the bank.

Also, if the business relationship is not open, the data contained in the application will be stored at BT level for at least 5 years from the date of the bank's refusal to establish that respective contractual relationship.

The personal data filled out in the **loan application**, are stored in BT's records for a period of **3 years as of the signing of the loan application, if the application is rejected** and, for a period of **5 years as of the termination of the business relationship, if a loan agreement is concluded following the approval of the loan request.**

With regard to the **data processed within BT's activity in the system of the Credit Bureau**, such data are stored by this institution and disclosed to the Participants for a period of **4 years as of their updating date**, except for the data of **the loan applicants who have given up the loan request or the loan request of whom has been rejected, cases in which the data are stored and disclosed to the Participants for a period of 6 months.**

The personal data that BT is legally bound to report to the **Central Credit Register (CRC)** shall be kept in CRC's records for a period of **7 years as of the loan recording date.**

For the persona data processed based on the consent of the data subjects to receiving advertising messages, such data shall be processed until the termination of the business/contractual relationship with the Bank or, as applicable, until the revocation of the said consent.

As evidence of the fact that **notices/complaints/inquiries/measures** have been received and replied to, the received messages shall be kept within BT's records (both in hard-copy and electronically, **during the period of the business relationship for BT clients, and for the period necessary for the fulfillment of the purpose for which they have been processed (preparing the reply/providing the information), plus an additional period of 3 years - the legal prescription period - if the data do not belong to persons with whom the Bank has an established business relationship.**

The personal data processed from the **BT candidates** will be kept until the end of the recruitment process for that available position or, if the candidates have shown interest to be contacted for more suitable positions, the CV data and other documents that have been made available to BT for this purpose, will be kept for **a period of up to 1 year, unless during this time period their deletion from the Bank's records is required. This term can be extended with the consent of the candidate.**

The retention period for the **data obtained via the video surveillance system** is commensurate with the purpose for which the data are processed, i.e. it does not exceed **30 days**, the period after which the recordings are automatically erased, in the order of their recording. In case of a security incident (including a personal data breach), the retention period for the relevant recorded material can exceed the normal limits depending on the time necessary for the additional investigation of the security incident.

Any other personal data processed by BT for other indicated purposes shall be stored for the period necessary for the achievement of the purposes for which they have been collected, to which non-excessive terms may add up, as established in the applicable legal requirements, including without limitation, the legal provisions in the field of archiving.

J. Which are the rights that the data subjects may exercise with regard to the personal data processed by Banca Transilvania?

Any data subject whose data are processed by the bank, is guaranteed and can benefit from the rights provided by the GDPR, respectively:

a) **the right of access:** the data subjects can obtain from BT the confirmation that their personal data are processed, as well as information regarding the reasoning of the processing such as: purpose, categories of personal data processed, data recipients, period for which the data are kept, the existence of the right of rectification, deletion or restriction of the processing.

This right allows the data subjects to obtain for free one copy of the personal data processed, as well as, by paying a fee, any additional copies.

b) **the right to rectify the data:** the data subjects can request BT to modify the incorrect data concerning them or, as the case may be, to complete the data which are incomplete;

c) **the right to delete the data:** the data subjects may request the deletion of their personal data when:

- these are no longer necessary for the purposes for which the bank collected and processed them;
- the consent for the processing of the personal data has been withdrawn and BT can no longer process it on the basis of other grounds;
- the personal data are processed against the law;
- the personal data must be deleted in accordance with the relevant legislation;

d) **withdrawal of consent:** the data subjects may withdraw their consent at any time regarding the processing of personal data processed on the basis of given consent. Withdrawal of consent does not affect the legality of the processing carried out previously on this moment.

e) **the right of opposition:** the data subjects can, at any time, oppose to the processing for marketing purposes, as well as processing based on the legitimate interest of BT, for reasons related to their specific situation;

f) **the right to restriction of processing:** The data subjects may request the restriction regarding the processing of their personal data if:

- disputes the accuracy of the personal data, for a period that allows the bank to verify the accuracy of the data in question;

- the processing is illegal and the Data Subject opposes the deletion of the personal data, requesting instead the restriction of their use;
- the data are no longer necessary for the Bank to be processed, but the data subject ask the Bank to an action in court;
- if the data subject has opposed to the processing, for the period of time in which it is verified whether the legitimate rights of BT as controller prevail over the data subject's rights.

g) **right to portability:** the data subjects may request, according to the law, the bank to provide certain personal data in a structured form, used frequently and which can be read automatically. If the data subjects request, BT may transmit the respective data to another entity, if this is technically possible.

h) **the right to file a complaint with the National Supervisory Authority for the Processing of Personal Data:** the data subjects have the right to file a complaint at the National Supervisory Authority for the Processing of Personal Data if they consider that their rights have been violated: National Supervisory Authority for the Processing of Personal Data B-dul G-ral. Gheorghe Magheru 28-30, Sector 1, postal code 010336 București, România anspdcp@dataprotection.ro.

For the performance of the rights mentioned in points a) - g) above, or for any questions about the processing of personal data made by BT, the data subjects can use the contact details of the data protection officer designated by BT, by sending the request:

- **by mail, at the following address: Cluj-Napoca, str. Calea Dorobanților, no. 30-36, Cluj County, with the mention "in the attention of the data protection officer"**
- **at the following email address dpo@btrl.ro.**

K. How does BT protect the personal data it processes?

BT prepares an internal framework of standards and policies to ensure the security of the personal data. They are regularly updated in line with the legal regulations applicable to BT and the highest standards in the field.

Specifically, and in accordance with the law, the Bank adopts and applies adequate technical and organizational measures (policies and procedures, IT security etc.) in order to ensure the confidentiality and integrity of the personal data and of the way in which they are processed.

BT employees must keep the confidentiality of the personal data they process within their activity and may not disclose them, under any circumstances.

The Bank makes sure that its contractual partners that have access to personal data are contractually bound in accordance with the legal provisions and checks their compliance with the assumed obligations. The contractual partners who act as the bank's authorized person will

process the personal data on behalf of and for the bank, only in accordance with the instructions received from the bank and only in compliance with the security and confidentiality requirements within the limits imposed.

We warrant that BT does not sell the personal data it collects from the data subjects and does not transmit such data to entities, other than the ones that are entitled to know them, in line with the legally established principles and obligations.

This policy is regularly reviewed in order to make sure that the rights of the data subjects are guaranteed and to improve the ways in which personal data are processed and protected.