

## Information notice on the processing of personal data in the MoneyBack loyalty programme

1. MoneyBack is a loyalty programme organized and operated by Banca Comerciala Romana S.A. (hereinafter "**BCR**" or "**the Organizer**").

For the organization of this Loyalty Programme, BCR cooperates with a service provider for the provision of technical elements, Dateio s.r.o., a company registered under the applicable legislation in the Czech Republic, with registered office at Beníškové 1285/7, Košíře, postal code 150 00, Prague 5, Czech Republic, identification number 02216973, registered in the Register of Companies kept by the Prague Court, section C, entry number 216820 (hereinafter referred to as the "**Provider**").

Definitions of the terms included in this information can be found in the MoneyBack Programme Regulation, available at [www.bcr.ro/moneyback/Regulament](http://www.bcr.ro/moneyback/Regulament).

2. The Organizer and the Provider, as controllers, process the personal data of individual participants and representatives of legal entity participants (hereinafter referred to as "**data subjects**") for the purpose of running the MoneyBack Programme by providing personalised offers, including for registration in the Loyalty Programme, ensuring the operation of the online platform, the mobile application and for profiling based on transactional data, as provided for in the Programme Regulation, in compliance with the applicable legal provisions on the protection of personal data, including but not limited to the provisions of the General Data Protection Regulation no. 679/2016.

3. The types of personal data processed by BCR are: first name, last name, personal numerical code, e-mail address declared in the relationship with the Organizer, telephone number, bank account, customer ID - indirect customer identifier, Loyalty Programme registration status (active/inactive customer, date of registration/opening of account, geolocation data, Card information (such as, unique Card ID, debit/credit Card, masked Card number, Card active/inactive status, business/standard Card, Organizer branch data where the Card was opened), transaction data i.e. transaction channel (Automatic Teller Machine Withdrawal, POS or WEB), cash/card payment, payment amount, payment date and time, payment description, acceptor card information (e.g. name, country); merchant information (e.g. name, category).

The Provider processes the aforementioned data, except for the identification data of the data subjects (name, surname, personal number code).

The data processed is obtained directly from the data subjects (including data generated by them, such as transactional data) or they are generated by the Organizer or Provider on the basis of already existing data (e.g. information on inferred preferences).

Data subjects register in the Loyalty Programme to access personalised offers based on profiles generated by combining data processed by the Organizer and the Provider. The offers will only concern products promoted through the Loyalty Programme and will be made available only through the channels agreed by the Regulation. By enrolling in the Loyalty Programme, data subjects will not receive commercial communications related to other products of the Organizer.

For the generation of personalised offers, the preferences of the data subjects in terms of purchases made with the Card are evaluated, including by analysing transactional data for a period of one year prior to the time of registration in the Loyalty Programme. The following criteria will be taken into account for the selection of offers:

- previous purchases from similar Merchant Partners;
- The distance the data subject is from any of the shops involved (to the extent of using the mobile app and enabling geolocation); the relevant distance is determined based on the nature of the products or services offered by the Partner Merchants;

- The data subject's online shopping habits;
- Existence of previous purchases with the Card in Merchant Partner stores.

4. Data subjects' data will be processed either on the basis of the performance of contract, in the case of individual participants, by accepting the Regulation when enrolling in the Loyalty Programme, or on the basis of the legitimate interest of the Organizer to enroll legal entity participants in the Programme, in the case of representatives of legal entity participants. Also, to the extent that the data subject uses the mobile application, he/she has the option to activate the geolocation function in order to determine the nearest stores of the Merchant Partners enrolled in the Loyalty Programme. In this case, location data will also be processed based on the data subject's consent given by activating this functionality. Consent may be withdrawn at any time by deactivating this function, without affecting the processing carried out prior to the withdrawal of consent.

Personal data of data subjects are also processed for statistical purposes, based on the legitimate interest of the Organizer to evaluate the performance of the Programme, resulting in aggregated data, e.g. information on the number of customers registered in the Programme, the number of customers with active offers, the number of customers who have used the George web or mobile application in a given period.

Last but not least, the Organizer and the Provider will process the data of the data subjects also in order to fulfil the obligations imposed by the legislation on personal data protection (ensuring data security, confidentiality and updating), as well as those derived from the tax-accounting legislation.

The provision of data by the data subject is necessary to carry out the Loyalty Programme and the purposes related to this program, the refusal to provide them may result in the impossibility of achieving these objectives.

5. At the time of registration in the Loyalty Programme, data subjects are informed of the data processing carried out as described in this information notice, and they must tick the relevant box on acknowledgement of this before completing registration.

6. In order to fulfil the above-mentioned processing purposes, BCR may disclose some or all categories of personal data to the following categories of recipients: participants or legal representatives, the Provider or another entity of the Provider's group that contributes to the implementation of the Loyalty Programme, public institutions/authorities in Romania or abroad.

7. The Provider operates the IT application used to run the Loyalty Programme and in this respect processes the transaction data of the data subjects in order to prepare the dedicated Offers.

8. The personal data of the data subjects will be stored both during the time they are a participant or representative of a legal entity participant in the Loyalty Programme, and afterwards in order to fulfil the legal obligations of the Organizer, including tax and archiving obligations, and the legitimate interests pursued by the Organizer (resolving requests from former participants and proving certain facts and/or legal actions). After expiry of the storage periods, the Organizer may anonymise the data, thus depriving them of their personal nature, for statistical purposes.

9. In order to fulfil the above-mentioned purposes, BCR may transfer certain categories of personal data outside Romania, to countries within the EEA. For transfers outside the EEA, BCR will base the transfer of personal data on standard contractual clauses adopted at the level of the European Commission or other guarantees recognized by law.

10. Data subjects benefit from the following rights in the context of processing of personal data, within the limits provided for by law: (i) to be informed, (ii) to access their data, (iii) to rectification, (iv) to erasure of data, (v) to restriction of processing, (vi) the **right to object**, (vii) the right not to be subject to an automated individual decision-making process if it produces legal effects on the data subject or

similarly affects him or her to a significant extent; in the present situation, the law allows such decisions to be taken as they are necessary for the performance of the Regulation to which the participants adhere so that data subjects benefit from certain additional rights (right to challenge the automated decision, right to express their point of view; right to obtain verification by a human factor); (viii) to address the National Supervisory Authority for Personal Data Processing and/or the competent courts as they deem necessary. For more details on the processing activities carried out by BCR, as well as on the rights that data subjects enjoy in this context, they may send a request to [dpo@bcr.ro](mailto:dpo@bcr.ro), as well as to the nearest BCR branch. BCR's Privacy Policy can be consulted by visiting <https://www.bcr.ro/ro/persoane-fizice/informatii-utile/politica-privind-confidentialitatea>.