

Personal data processing policy

1. MoneyBack is a Loyalty Programme that is organized and implemented by Banca Comercială Română S.A., a credit institution incorporated as a Romanian legal entity, functioning as a joint-stock two-tier corporate entity, having its registered office in Bucharest, 159 Calea Plevnei, Business Garden Bucharest, building A, 6th floor, district 6, postal code 60013, registered with the Trade Register under No J40/90/1991, tax reference number (CIF) RO 361757, registered with the Register of Credit Institutions under No RB-PJR-40-008/1999, with a subscribed and fully paid-up share capital amounting to RON 1,625,341,625.4 and Listed with the Personal Data Controllers Register under No 3776 and 3772 (hereinafter referred to as ‘BCR’ or ‘**the Organizer**’).

In view of organizing this Loyalty Programme, BCR cooperates with a provider of services for ensuring the technical elements required for the operation of the Loyalty Programme, i.e. Dateio s.r.o., a company registered in accordance with the laws in force in the Czech Republic, having its registered office at Beniškové 1285/7, Košiče, postal code 150 00, Prague 5, the Czech Republic, company identification number 02216973, registered with the Commercial Registry maintained by the Municipal Court in Prague, section C, entry number 216820 (hereinafter referred to as ‘**the Provider**’).

The definitions of terms used in this policy are found in the Regulations of the MoneyBack Programme, available for consultation on the website www.bcr.ro/moneyback/Regulament.

2. The Organizer and the Provider, in their capacity of personal data controllers, process the personal data of the participants according to the provisions of these Regulations and in compliance with the legal provisions in force regarding the protection of personal data and ensuring the confidentiality thereof, including, but without limitation, to the provisions set forth in the General Data Protection Regulation No 679/2016 (hereinafter referred to as ‘**GDPR**’).

3. The Organizer processes the personal data of the participants for the purpose of the Loyalty Programme, whereby personalised offers are made available to the participants. BCR processes the following types of data: name, surname, personal identification number/identification code obtained by non-resident Clients by calling the Contact Centre of the Bank - used exclusively for the identification of Clients in the Bank systems as required for opening an account, e-mail address provided in the relationship with the Organizer, telephone number, bank account, Client ID - indirect identifier of the Clients, Loyalty Programme registration status (active/inactive Client, account registration/closing date), year of birth, gender (feminine/masculine), information on whether the salary is collected in a Bank account (yes/no), name/ID of the employer, Card information - Unique ID of the Card, debit/credit Card, number of marked Cards, Card status (active/inactive), business/standard Card, data on the Organizer’s branch where the Card was issued, Transaction Data i.e. the transaction channel (Automatic Teller Machine Withdrawal, POS or WEB), cash/card payment, value/amount of the payment, date/time of the payment, description of the payment, information on the card acceptor (for example, name, country); information on the merchant (for example, name, category).

The Provider processes the data referred to above, less the participant’s identification data (name, surname, personal identification number / identification code obtained by non-resident Clients by calling the Contact Centre of the Bank - used exclusively for the identification of Clients in the Bank systems as required for opening an account, bank account, email address, telephone number).

The data that is processed is obtained directly from the participants (including the data generated by the participants, such as the Transaction Data) or is generated by the Organizer / Provider from the already existing data (for example, data on the inferred preferences of the participants).

The participants enrol in the Loyalty Programme in order to receive and have access to offers that are personalised on the basis of the profiles created by means of combining the data processed by the Organizer and by the Provider. The Offers shall exclusively concern the products promoted under the Loyalty Programme and shall be made available to the participants solely through the channels approved in the Regulations. By enrolling in the Loyalty Programme, the participants will not receive commercial notices related to other products of the Organizer and/or of the companies that are part of the Organizer's Group, as the option on receiving this category of notices is managed through separate channels, where the data is processed on the basis of the consent given for this purpose by the data subjects.

Therefore, the data of the participants will be processed mainly in view of implementing the Loyalty Programme (enrolment in the Loyalty Programme, ensuring the operation of the online platform and of the mobile app, creation of profiles based on the Transaction Data for the purpose of submitting personalised offers - as presented hereunder), further to the execution of the contract (the Regulations to which the participant shall adhere upon enrolment in the Loyalty Programme).

Generating personalised offers requires an assessment of participants' preferences in terms of purchases paid by Card. For this purpose, an analysis is made of the personal data of the participants registered under the Loyalty Programme, including the Transaction Data corresponding to a specified period, namely 1 (one) year before the time of enrolling in the Loyalty Programme. The criteria to be considered for selecting the offers are:

- Previous purchases from merchants that are similar to the Partner Merchants;
- The distance between the Client and any of the stores involved in the Programme (where the mobile app is used and the geo-location function is activated); the relevant distance is established on the basis of the nature of the products or services offered by the Partner Merchants;
- The Client's habits in regard to online shopping;
- The existence of previous purchases paid by Card at the stores of the Partner Merchants;

Thus, the Organizer and the Provider process the personal data of the participants, including the Transaction Data, in view of the services to be provided under the Loyalty Programme (identification and analysis of participants' preferences in terms of purchases of goods and services provided by different specialised providers/merchants, where payment is made by Card), so as the participants would benefit from personalised Offers from the Partner Merchants enrolled in the Loyalty Programme. Furthermore, the personal data of the Clients enrolled in the Loyalty Programme is also processed for statistical purposes, on the basis of the legitimate interest of the Organizer, so as to produce aggregated data, for example information on the number of Clients enrolled in the Programme, the number of Clients with active offers, the number of Clients that used the web application/'George' mobile app during a certain timeframe.

Last but not least, the Organizer and the Provider will process the participants' data also for the purpose of fulfilling the obligations required under the legislation on protection of personal data (ensuring data security, confidentiality and updating), but also for fulfilling those obligations stemming from the tax & accounting laws.

The provision of the data by the Participants is necessary for implementing the Loyalty Programme and for achieving the goals related thereto, while a refusal in provision of data could lead to the impossibility of achieving those goals.

4. Upon enrolment in the Loyalty Programme, the Participants are informed on the data processing carried-out as described above in this section and are required to tick the acknowledgement box before completing the enrolment process. As well, to the extent the Participant uses the mobile app, he/she has the option to enable the geo-location function in view of finding the closest stores of the Partner Merchants enrolled in the Loyalty Programme. In this case, the processing will also include the location data, on the basis of the Participant's consent, which is deemed given by enabling this function. The consent can be withdrawn at any time by disabling this function, without affecting the processing operations carried-out before the withdrawal of the consent.

5. In view of fulfilling the processing goals referred to above, BCR may disclose some or all the categories of personal data to the following categories of recipients: the participants or the legal representatives thereof, the Provider (and another entity that is part of the Provider's Group and contributes to the implementation of the Loyalty Programme), public institutions / authorities in Romania or abroad.

6. The Provider uses the IT application used for the implementation of the Loyalty Programme and processes the participants' Transaction Data in view of preparing dedicated Offers. In a limited number of cases, such Transaction Data may enable the Provider to identify the participants.

7. The personal data of the participants in the Loyalty Programme will be stored both for the duration of their participation in the Loyalty Programme, and for a subsequent period of time, in view of fulfilling the legal obligations incumbent upon the Organizer, including the obligations on tax and archiving matters and on the legitimate interest of the Organizer (settlement of claims submitted by former participants and use of data as factual documentary evidence in the event of legal proceedings). Following the expiry of the data storage periods, the Organizer may proceed to data anonymization, so as to remove their personal nature, for statistical purposes.

8. In order to fulfil the goals referred to above, BCR may transfer some categories of personal data outside Romania, to UE/SEA states. For the transfer outside the UE/SEA, BCR will carry-out the transfer of personal data according to the standard contractual clauses adopted by the European Commission or according to other guarantees provided for by the law.

9. The participants in the Loyalty Programme have the following rights in the context of personal data processing, within the limits set by the legal provisions, as follows: (i) the right to be informed, (ii) the right of access to personal data, (iii) the right to have personal data rectified, (iv) the right to erasure of personal data (the right 'to be forgotten'), (v) the right to restriction of processing, (vi) the right to data portability, (vii) the right to object, (viii) the right to not be the subject of an automated individual decision-making, which produces legal effects onto the data subject or similarly significantly affects the data subject. In the present case, the law allows for such decision-making, because those decisions are necessary for enforcing the Regulations to which the participants adhered, therefore the participants have certain additional rights (the right to challenge the automated decision-making, the right to an opinion; the right to have a check performed by a human factor); (ix) the right to address the National Supervisory Authority For Personal Data Processing and/or the courts of competent jurisdiction, to the extent this is deemed necessary.

For further details on the processing activities performed by BCR, as well as on the rights conferred onto the Participants in this context, the participants can send a written, dated and signed application to BCR, at the address 159 Calea Plevnei, Business Garden Bucharest, building A, 6th floor, district 6, postal code 060013. Further details can also be found on the website <https://www.bcr.ro/ro/persoanefizice/informatii-utile/politica-privind-confidentialitatea>, or can be obtained by writing to the email address dpo@bcr.ro; alternatively, information can be requested from the nearest BCR branch. The Confidentiality Policy of BCR can be consulted on the website <https://www.bcr.ro/ro/persoanefizice/informatii-utile/politica-privind-confidentialitatea>.