

Privacy notice on personal data protection – for accounts opened remotely

Banca Comerciala Romana S.A. ("BCR") processes your personal data in accordance with the provisions of the General Data Protection Regulation no. 679/2016 ("GDPR"), as well as with the applicable legislation in the personal data protection field, in order to take the necessary steps for opening an account, to conclude a contract with BCR in this respect, as well as for granting the service provided through the internet and mobile banking platform, George. More information can be found by accessing the "BCR Privacy Policy" which completes the information available in this document and which is available at <https://www.bcr.ro/ro/persoane-fizice/informatii-utile/politica-privind-confidentialitatea> .

As you have been informed, the opening an Online Account involves certain specific personal data processing. For some of these processing activities we need your consent in order to proceed with the account opening process. Thus, we need your consent for the processing of biometric data in order to ensure that we identify you properly and for preventing an attempt to unauthorized access of your personal data. Also, in order to have an additional security measure, you have to contact a BCR operator by a recorded video call to ensure us the identity between your person and the personal data you have provided us. In addition, the video call guarantees the introduction of a human factor which ensures the proper conduct of the enrollment process for concluding the contract. Considering that the conclusion of the contract is performed remotely, these processes are implemented to protect personal data. The provision of these consents is necessary for the fulfillment of the formalities for opening the Account in safe conditions.

If you do not agree your personal data to be processed in these two situations (biometric data processing and video call recording) and you will not give your consent in this regard in the following screens, please go to any of our units to obtain a Package Banking services for payments.

Separately from these two consents, in order to complete enrollment process, we need some confirmations from you regarding the fact that you are not in a special relationship with BCR which could generate a conflict of interest, your waiver to the 15-day analysis (if you agree with this waiver) and your acceptance of the general or special provisions.

Also, checking the eligibility conditions presented above involves an automated process. If you do not meet these conditions, you could obtain a Package of Banking Services for payments only in the Banking Unit, the criteria being necessary to conclude the contract as they apply certain prudential rules and/or rules for the protection of minors.

Last but not least, if you consider it appropriate, you could give us your consent for marketing and profiling for in-depth analyzes in order to personalize the offers of products and services, including by using and combining trading data and/or consulting internal and external databases or online platforms (such as data from the Credit Bureau, ANAF (fiscal authority) and/or the Credit Risk Center, data on services and transactions, data related to your interactions with BCR and the history of your relationship or a company for which you were shareholder or director with BCR or with companies from the BCR/Erste group, etc.), in case

the consent is required by law in relation to possible legal effects or similar impact in a significant way, in order to send you messages regarding BCR products and services and respectively in order to offer you personalized services and products depending on your profile. The refusal to give us these two consents does not affect the possibility to access the BCR product through the application.

If the account opening process is interrupted at any time for various reasons, we will storage your contact details (first and last name, phone number, e-mail) for 30 days in order to contact you for granting assistance in using the application and for completing the process for conclusion of the contract.

BCR is assisted in the processing activity related to this application by contractual partners, as processors and controllers, case in which the personal data will be transferred and stored in countries within the European Union. BCR has taken all measures to ensure that they can be protected in the context of the transfer.

Authentication in the Internet, Mobile and Phone Banking Account and signing transactions

You can log in to your Internet, Mobile and Phone Banking account by activating eToken BCR and setting a PIN. In case your device allows, you can replace the PIN with a biometric option, for example: Face ID, fingerprint, pattern, etc. Please be informed that in this situation, your device will process the biometric data that allows you to authenticate in the account and sign transactions. BCR does not have access to these data and does not control this process. For more details, please consult the privacy policy of the manufacturer of the device you are using.

The personal data that we process

BCR processes personal data you have provided us, as well as data from other sources, as follows: biometric data; image; voice; age; political exposure data; electronic signature; data provided by the device used (device type, operating system, IP address, MAC address); IBAN; data on the options expressed for the processing of personal data performed by BCR only on the basis of consent, data on transactions (value, data on recipients, date of transaction, etc.), data on products that you held (current accounts, credit cards, loans, deposits, savings accounts), data related to suspicious transactions monitored by BCR, according to the analyzes performed by BCR, the score and the KYC, AML risk category.

Why do we process your personal data?

BCR processes your personal data for fulfilling the formalities regarding the concluding of the contract with BCR, opening the current account and ensuring the functionality of the internet banking service (contract execution), as well as for fulfilling the legal obligations to which BCR is subject to (know your customer requirements, preventing fraud and money laundering, combating terrorism, reporting to public and

surveillance authorities such as the NBR or ANAF, financial administrative management, internal audit, ensuring security and updating data, etc.).

We will also process your personal data to fulfill the legitimate interests of BCR (improving processes and policies, statistical analysis and creating profiles for marketing purposes and to understand your needs, simple marketing, development of IT services, development of mergers and acquisitions, maintaining a whistleblowing reporting line, monitoring suspicious transactions and contacting Customers to protect them from potential fraud).

We process personal data based on your consent for direct marketing and profiling activities. We will also take into account your options for customizing your account.

Consent for marketing and profiling activities may be withdrawn at any time without affecting the provision of the internet banking service. Consents for the processing of biometric data and data derived from video recording are given for a single action.

If you want to use Google maps (for example to find out where the nearest Banking Unit is), you have the option to integrate this service in the application if you give your consent to Google.

Your rights

In accordance with the GDPR, you benefit from the following rights: the right to be informed; the right of access; the right to rectification and deletion of data; the right to restrict processing; the right to data portability; the right to object; the right not to be subject to a decision based on automatic processing which produces legal effects or which affects you to a significant extent; the right to challenge the decision; the right to obtain human intervention; the right to express your point of view.

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In accordance with the GDPR and applicable law you benefit of the rights of access, rectification, restriction, deletion, opposition, portability and the right not to be subject to an automatic decision-making process that produces legal effects or that affects you similarly to a significant extent (as well as the right to challenge the decision, to express your point of view and to obtain human intervention), rights that you can exercise in any Banking Unit or by writing to dpo@bcr.ro. You also have the possibility to address ANSPDCP (B-dul G-ral. Gheorghe Magheru 28-30 Sector 1, postal code 010336, Bucharest, Romania).