

Personal Data Protection

Privacy notice on personal data protection

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 here.

Which categories of personal data do we process?

The opening an Online Account involves certain specific personal data processing. Thus, BCR processes the personal data you have provided us, as well as data from other sources, as follows: identification data; image; 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 regarding the products or the services obtained from BCR (current accounts, credit cards, loans, deposits, savings accounts), data generated by BCR in order to carry out the specific steps of the online contracting flow in an assisted manner, data related to suspicious transactions monitored by BCR, according to the analyzes performed by BCR, data obtained by consulting external sources, in accordance with the law in order to fulfill the specific obligations of knowing the customer, preventing fraud and money laundering, 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 (knowing the customer, 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.

Thus, 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 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 in 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.

Also, the consents for marketing and profiling activities may be withdrawn at any time without affecting the provision of the internet banking service.

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.

How to enter into a contract with us

Contracting the online account involves the fulfillment of some eligibility conditions, specific to this process. Checking of eligibility conditions in order to fulfill specific obligations to know the customer, to detect persons designated directly or indirectly on the lists of international sanctions, or involved in crimes that may affect the security and integrity of the financial system, and to ascertain political exposure and possible conflicts interests involves an automated process. This checking involves consulting public databases containing data of this nature, processing data directly from you, and checking transaction history. The consequences of these verifications may lead to the impossibility of contracting the online account, with the possibility of contracting a similar Payment Banking Package in any banking unit.

Also, 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.

If the account opening process is interrupted at any time for various reasons, we will store 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.

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. 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.

Recipients of personal data and the transfer of data

In order to fulfill the processing purposes, BCR may disclose certain categories of personal data to the following categories of recipients: data subject and/or its representatives, BCR representatives, BCR Group entities, judicial authorities or other public authorities, international organizations, service and goods providers, other contractual partners, controllers and/or processors of BCR. In order to fulfill the above-mentioned purposes, it is possible that BCR to transfer certain categories of personal data outside of Romania, in EU/EEA countries, as well as outside the EU/EEA to the United States of America. For transfers outside the EU/EEA, BCR will transfer the personal data on the basis of standard contractual clauses adopted at the level of the European Commission or other guarantees recognized by law. It is possible that in the course of its activities, the above-mentioned countries in which the data are transferred to be changed. In this case the list of transfer states mentioned above will be updated.

Duration of personal data processing

In order to achieve the mentioned processing purposes, BCR will process personal data during the performance of banking services, as well as subsequently in order to comply with applicable legal obligations, including, but not limited to, the provisions regarding the archiving obligation and the legitimate interests of BCR. It is possible that, following the fulfillment of the legal archiving deadlines, BCR to order the anonymization of the data, thus depriving them of personal character and to continue the processing of the anonymous data for statistical purposes.

For example, we mention some criteria and/or storage times regarding customer data, the general rule is that the personal data will be stored for a period of 10 years from the end of the financial year for the year in which the business relationship will end.

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 (a point of view regarding this decision or a contestation of it can be made by a written request to BCR at the e-mail address dpo@bcr.ro).

In order to exercise your rights in this context, you can contact us at any time using the following communication channels: (a) request addressed to the BCR data protection officer at dpo@bcr.ro; (b) request by Info BCR at *2227, a telephone number with usual fees that can be reached from national land line and mobile networks, or at contact.center@bcr.ro; (c) using the data protection request form on the BCR website, Privacy Policy section, using internet banking credentials; (d) by post, at our headquarters, or in the territorial units.

If you decide to exercise any of the rights you benefit in accordance with the policy, we inform you that we have an obligation to authenticate. Authentication is a procedure by which your identity is verified and confirmed by BCR by asking specific questions, to ensure that the information is not requested by or disclosed to unauthorized persons. Therefore, after you send us your request, depending on the channel through which you choose to contact us, you will be authenticated, as follows: (a) if you are in a territorial unit or contact us by phone, your authentication will be done on the spot, by the BCR representative; (b) if you contact us by e-mail or mail, you will be called by a BCR representative who will go through the authentication flow described above; (c) for requests addressed through the contact form on the website, section Privacy Policy, authentication is done only at and for connection to the internet banking application, by password, fingerprint, PIN code, etc., according to the settings chosen by you.