

Information notice regarding the processing of personal data within the Invoice Payments service

Valid as of 29 October 2021

Who processes the personal data within the Invoice Payments service?

Banca Transilvania S.A. (“BT”, the “bank”) provides the Invoice Payments service, under the terms and conditions laid down in the [Terms of Use related to this service](#). Before you decide to use this service, it is important to know how we process the collected personal data. This specific information notice shall provide you with the necessary information in this respect.

For the avoidance of any doubt, the processing of your personal data by Banca Transilvania, in your capacity as BT client, shall be governed by the provisions laid down in the [General Privacy Notice regarding the processing of personal data belonging to the BT Customers](#).

Processing purpose, processed data categories and recipients

a. for the activation of the Invoice Payments service

In order to use the Invoice Payments service you must be a BT Pay user identified as BT client. In order to make sure that you meet this condition, we check the phone number declared in the bank’s records, your date of birth and whether you hold at least one BT card enrolled in the application or not.

b. to link the providers in BT Pay

Once you select the providers the invoices of which you wish to pay via BT Pay, you can link the account of each provider to our application, by entering the login data required by such provider. The data categories required for the login are established by every provider in turn and are communicated to us via our partner, Timesafe SRL, (the provider of the Pago application). The providers and Timesafe process these data as controllers for purposes and through means that they have established individually, in accordance with their own personal data processing policies.

The Bank processes these data only in order to enable you to link such provider account to BT Pay, so as to be able to use the Invoice Payments service. The login data are usually the user name and the password(s) that you use for the login to the account created on the provider’s website. You can link several user accounts of the same provider in BT Pay.

You enter these data in BT Pay, we forward them to Timesafe along with an identifier that is assigned to you so that the bank and Timesafe can recognize your future connection attempts. In case of need, based on this identifier, BT and Timesafe will exchange the data necessary to resolve any notifications / complaints you may have regarding the use of the Invoice Payment service.

Timesafe then forwards the username and password you entered in BT Pay to each provider in question. If this data matches that of the provider, the connection in BT Pay of the account you created with that provider will be successful.

In order not to have to reconnect your account from each provider in case of reinstalling the BT Pay application, we will keep in our records the providers you have previously connected and we will automatically display them after reinstallation, as long as you still use the same credentials for connecting to their accounts.

c. to view the history of issued and paid invoices

Once the provider account is successfully connected, we shall process the amount on the invoices issued by such provider, the provider to which the payment is due, the client codes allocated by the provider, as well as other information, depending on the provider (e.g. phone numbers, addresses, client codes, contract numbers in relation to such provider, any other personal data, as they appear on the invoices). We carry out this processing in order to be able to display the payment amounts and the payment history related to the accounts of the providers as per the account with the provider.

The payment history period with a certain provider is established by such provider. BT can only see the payment history available upon your every login to the account with that provider from BT Pay.

d. to link the account from the Pago application

If you use the Pago application, you can import the providers already registered with Pago in BT Pay, without connecting each of them separately in BT Pay. For this, you must enter in BT Pay: the e-mail address of the Pago user account and a unique code displayed in the Pago application.

Once the data are imported from Pago, we shall process in BT Pay the same data under section c. that you have available in the provider accounts connected to Pago, and, as the case may be, further data as defined in the Pago account (e.g. consumer point type related to a certain provider, such as: parents' house, vacation house, domicile).

e. to scan the invoices

You can pay the invoice of certain providers by barcode scanning. In order to enable this functionality, BT Pay requires access to the camera. If you have previously agreed to the accessing of the camera by the application when you used other functionalities of the application (e.g. data update via BT Pay), the consent might not be requested again, as it is already granted. Please note that the access to the camera may be requested in a different manner depending on the operating system of the mobile phone you use or the version of this system. Depending on the same elements, the access to the camera granted in BT Pay may remain active or be deactivated when you no longer use the BT Pay functionality that requires such access. Please check the privacy settings of your phone in order to manage the access to the camera for the BT Pay application.

f. to pay invoices and, as applicable, to subscribe and pay the option Plus Bills or Unlimited Bills fee

We shall process the payment-related data: payer's full name, amount, currency, payment date, payment beneficiary (the provider to whom you make the payment), transaction reference, IBAN of the account from which the payment is made, number of the card attached to the account from which the payment is made, payment explanations (as imposed by the provider and manually entered or taken over through barcode scanning, e.g. client code assigned by the provider), number of paid invoices, IBAN of the account to which the option fee is charged.

g. to confirm the payment operations

We process the data related to the phone unlocking method you selected in order to ensure the proper security of the transactions in accordance with the legal provisions on payment services. The data related to the selected phone unlocking method (e.g. fingerprint, face recognition, model, PIN, password, etc.) are not known to the bank, as BT only knows the result of the check (accepted/rejected) by comparison of the data used for the authorization of every payment operation with the master data stored in your mobile phone.

h. for the transmission to suppliers of the status of payments related to invoices

In order for the utility providers to which you have made payments to be able to reconcile them in their systems, we transmit to them, through Timesafe SRL (Pago application provider), the necessary information for this purpose: amount, currency, payment date, payment beneficiary who make the payment), the transaction reference, explanations of the payment (as imposed by the supplier and entered by you or taken over by scanning the bar code eg customer code at the respective supplier, invoice code, etc.).

i. for sending notifications within the application in connection with this service

When a provider you have connected issues a new invoice, 3 days before the invoice due date of an invoice already issued or about the cards set when activating the Plus Invoices or Unlimited Invoices options, you will receive notifications in BT Pay. You can disable these notifications from the application settings menu. Please note that in this case you will not receive any other general notifications regarding BT Pay;

Grounds for the processing of personal data and processing denial consequences

The abovementioned processing operations are required in order for BT to be able to provide the Invoice Payments service or for BT's legitimate interest to provide the same experience and full image of the information with the one displayed on the account of a provider you have connected in BT Pay.

If you do not want BT to process these data, you shall not be able to use this service, but your right to use other functionalities of the BT Pay application or other BT services/products shall not be affected.

Source of data and categories of recipients of the personal data within the Invoice Payments service

We receive and share, by case, the data specified under sections b-d and h above with our partner, Timesafe SRL, the provider of the Pago application. They process the data as controller, in accordance with the provisions laid down in the Privacy Policy of Timesafe, available at: <https://pagoplateste.ro/privacy.htm>

When you pay the invoices from the BT account attached to the card selected in BT Pay, the transaction data are disclosed to the provider who is the beneficiary of the payment and, as the case may be, to the credit institution with whom the provider's account is opened.

Other categories of recipients of your data processed in your capacity of BT client are the ones laid down in the [General Privacy Notice regarding the processing of personal data belonging to the BT Customers](#).

Retention period for the personal data within the Invoice Payments service

The personal data mentioned under b-d above are processed by BT only as long as you use the Invoice Payments service and you have a provider account connected to BT Pay. The other data categories mentioned in this notice are processed, as applicable, for other functionalities of BT Pay (camera mentioned under e, payment confirmation via the phone unlocking method under g), while the payment-related data and the data required for the activation of the service are governed by the retention period laid down in the [General Privacy Notice regarding the processing of personal data belonging to the BT Customers](#), being closely related to your capacity as BT client.

Guaranteed rights

In your capacity of BT client, the rights laid down in the General Data Protection Regulation (GDPR), as detailed in the [General Privacy Notice regarding the processing of personal data belonging to the BT Customers](#), supplementing this specific information notice, are guaranteed to you. Please find the general notice on BT's website www.bancatransilvania.ro, both as part of [BT's Privacy Policy](#) and separately. You can also request it in hard copy, in any BT unit.