

## Privacy notice regarding the processing of personal data for the provision of Alias Pay BT service

### What is the SPL payment scheme and Alias Pay BT?

Banca Transilvania S.A. (“**BT**”, “**the bank**”) together with other Romanian banks (“**participating banks**”) have adhered to a payment scheme called “**SPL**” (Standardized Proxy Lookup), in order to offer to any of their customers who wish to benefit from this payment service the possibility to receive amounts in a bank account from any customer of a participating bank who provides the telephone number of the payment beneficiary. The phone number represents a proxy / alias of the bank account’s IBAN.

The SPL payment scheme is subject to special rules, which must be observed by the participating banks, rules that are [publicly available on the website of the Romanian Association of Banks](#).

At Banca Transilvania we have named this payment service **Alias Pay BT**, which we offer as mentioned in the [Alias Pay BT Terms](#), which we recommend you consult. The BT customer who chooses to activate this service through Banca Transilvania will be called “**Alias Pay BT user**”.

Before deciding if you want to become an Alias Pay BT user, if you are an individual, it is important that you know how your personal data would be processed in the context of using this service, as you would become the data subject of this processing.

For the avoidance of doubt, all information in this privacy notice refers to your data processed for the provision of the Alias Pay BT service. The processing of your data, as a BT Customer, carried out by Banca Transilvania, as an independent controller, is subject to the provisions of the [General Privacy Notice regarding the processing of personal data belonging to the BT Customers](#).

### The controllers of the personal data

The SPL payment scheme can only work if the participating banks exchange the information necessary to initiate payments based on the telephone number (proxy / alias).

The exchange of information will be done through a common database, which will be managed by the **Funds and Settlements Transfer Company (“Transfond”)**.

When it directly or indirectly identifies a natural person this information is personal data.

The participating banks and Transfond will process the data belonging to the data subjects as joint controllers, as this term is defined in the General Data Protection Regulation (“GDPR”) and have established through an agreement their responsibilities regarding the fulfillment of the obligations imposed by GDPR, especially those related to the confidentiality and security of personal data, as well as their role and relationship to these individuals. The list of banks participating in this scheme may be modified, as some may join or withdraw from the SPL scheme from time to time. The updated list of all participating banks can be found [here](#).

### The purpose of the processing, the categories of personal data and their recipients

The personal data are only processed by the joint controllers on Romanian territory, exclusively to facilitate the initiation of payments based on telephone number (alias / proxy) and only.

The categories of processed data are name and surname, telephone number (alias / proxy), IBAN of the bank account.

If you activate Alias Pay through Banca Transilvania, we are the controller who will collect this data and send it to Transfond, at which level your data will be stored.

Whenever a customer of a participating bank initiates a payment to you by entering the phone number on which you have activated Alias Pay BT, that participating bank will extract this data from the database managed by Transfond and will provide it to their customer who initiates the payment, so that they can be registered in the payment order. That bank and its customer who initiated the payment based on your phone number will have access to your data, regardless of whether that payment is completed or not.

### The legal ground of the processing and the consequences of your refusal to have your data processed

The processing operations presented in the above lines need to be performed by BT to provide you with the Alias Pay BT service, but they can only be performed based on your consent to have this data processed. You are not obliged to give your consent in order to receive amounts from clients of other banks in BT accounts. Any customer of any bank has the possibility to order transfers to your accounts opened with BT by entering the IBAN of these accounts. However, if you want this transfer to be initiated through your phone number instead of the IBAN, respectively if you want to use the Alias Pay service, you need to give your consent. You will have the right to withdraw your consent given for the processing of your personal data within the Alias Pay at any time. You can withdraw your consent by deleting the alias from the BT application in which you created it. As soon as you do this, the data attached to this alias will be deleted from the Transfond database. Withdrawal of consent for data processing operates only for the future, without affecting the legality of processing operations performed before its withdrawal.

### **The period for which the personal data will be stored if you use Alias Pay BT service**

Your personal data relating to the Alias Pay service contracted through BT will be stored in the Transfond database, and will thus be available to the other participating banks and to their customers initiating payments, as long as you use the Alias Pay BT service. The causes for which the provision of this service will be ceased are presented in detail in the Alias Pay BT Terms.

### **The rights that you are guaranteed**

In connection with the processing of your personal data within the Alias Pay service, you are guaranteed the exercise of the rights provided in the GDPR. You can address your rights request to any of the joint controllers, at the contact details of their data protection officers (DPOs) found in the Privacy Policies on each of their sites. Details can be found [here](#). As a rule, each controller will respond to requests of the data subjects related to the processing for which the respective controller is responsible, but, as needed, the joint controllers, through Transfond, will inform each other and provide the necessary information to respond to any request of a data subject.

The rights that you are guaranteed are the following: the right to be informed (we fulfill the obligation to inform you through this privacy notice), the right to access the personal data, the right to rectify the data (you can exercise this right by deleting from the BT application your alias containing incorrect, incomplete, outdated data and activating a new alias with the correct data), the right to erasure and the right to withdraw consent (you can exercise these rights at BT by deleting from the BT application the previously created alias), the right to restriction of processing, the right to data portability, the right to address a complaint to the The National Supervisory Authority For Personal Data Processing (ANSPDCP).

**Based on the information presented above, please tick the appropriate box in Banca Transilvania's application, if you wish to give your consent for the processing of your personal data within the Alias Pay BT service.**

**If you do not wish to express your consent, please do not tick the box. In this case, you will not be able to activate the Alias Pay BT service.**