

## **Information notice on the processing of personal data for identification in BT Pay**

The provisions of this privacy notice regarding the processing of personal data for identification purposes in BT Pay apply to the clients of Banca Transilvania S.A. in Romania.

For the clients of Banca Transilvania S.A. – Italy Branch (BT Italy), the version of this privacy notice found here applies, which contains information solely about the processing of personal data for identification in BT Pay related to the functionalities available to BT Italy clients."

Per i clienti di Banca Transilvania S.A. – La filiale Italia (BT Italia) si applica la presente informativa nella versione qui reperibile, che contiene informazioni solo sul trattamento dei dati personali per l'identificazione in BT Pay relativamente alle funzionalità disponibili per i clienti BT Italia.

### **Who is the data controller and what is the purpose of the processing?**

Banca Transilvania S.A. (the "Bank", "BT"), shall ensure that payments made online are secure. For this reason, there are identification rules implemented in BT Pay **in compliance with the legislation on payment services, whereby we check who you are, what you own and what you know, to make sure of your identity.**

**We check your identity for this purpose at several stages: when you register/re-register with BT Pay, when you set/reset/unlock your PIN (security code) in the app, and every time you access the app or authorize transactions in the app.**

**As part of this identification process, we process personal data as follows:**

### **What data do we use and what happens if you refuse the processing?**

#### **- For the registration in BT Pay**

To have your identity checked in BT Pay when you register in the app, you need to go through several steps:

1. you take a picture of your identity card ("ID card"), front and back (requires access to camera) - we get your ID details from your ID card using optical character recognition (a process that automatically extracts the letters and numbers from the photographed ID card) and compare them with those already in the bank's records to make sure they match.

2. you move in front of the camera (requires access to camera) - we use your moving image to make sure you are a real person. In addition, we automatically compare features of your face in the selfie with features of your face in the photographed ID card and, where applicable, in the ID card already stored in our records, to make sure they belong to one and the same person. The comparison would be made biometrically, based on criteria such as the colour, size and slant of the eyes, the position and distance between the main features of the face such as the eyes, eyebrows, lips and nose. Following the comparison, the IT solution will issue a confidence score, indicating the probability that the face in the two images belongs to the same person. The data used for and resulting from the comparison are **biometric data**, which uniquely identify you. They are special/sensitive data. We use such data only under the following conditions:

- if you are an **adult user** of BT Pay we process biometric data:

- for **identify you in BT Pay** only if you explicitly consent/agree to this by clicking on the "I consent to the processing of biometric data" button below.  
**If you do not wish to consent to the processing of biometric data, we can identify you in a BT unit, where your biometric data shall not be processed biometric data for registration in BT Pay.**
- for **the identification in BT Pay of a minor over 14 years of age for whom you are a parent/guardian/legal representative** (hereinafter "**parent**") and you want to use in BT Pay a card attached to his own account opened at the bank, only if you express explicit consent/agreement in this regard. You express this consent in the BT Pay Kiddo section **if you tick the box next to the "I agree to the processing of my child's biometric data" and then click the 'confirm' button.**

**If you want your minor to be able to use BT Pay for minors who have a BT account but do not want to express your consent to the processing of their biometric data, you and the minor must visit any BT unit, where the minor will be identified without the use of biometric data.**

- if you are a **minor** who wants to use BT Pay for minors who have a BT account, we may only use your biometric data for identification in BT Pay if your parent/guardian/legal representative (the "**parent**") explicitly consents/agrees to this (as detailed in the previous paragraph). **Even if a parent consents to our processing of your biometric data for identification in BT Pay, but you do not feel comfortable with us using your biometric data, do not initiate the registration process in BT Pay and ask your parent to accompany you to a BT unit where you can be identified without having your biometric data processed.**

### 3. you pronounce the figures displayed on the screen (requires access to the microphone) - we use your voice to make sure you are a real person

We do not rely on such automatic processing of your data exclusively, but we also perform checks on your data through our employees.

If you are an adult user, you will also be able to set your BT Pay PIN during the registration process.

- **For re-registering in BT Pay after setting a PIN in the app, for setting, resetting and unlocking the PIN and, as appropriate, for high-value transactions**

For the purpose of your identification, we use all or part of the following personal data, as applicable: the **phone number** declared to the bank, the **PIN** set for the application, the **image** from the selfie you will have to take (requires access to the camera) and the one from the ID card in the bank's records, which we will match biometrically, thus using the **biometric data of your face** (only if you consent to the processing of this type of data, through an explicit action that will be requested in a dedicated screen)

- **To access the application and authorize transactions in BT Pay (jointly referred to as "BT Pay authentication")**

To identify you for authentication in BT Pay, regardless of whether the identification for registration in BT Pay was made directly in the Application or in a BT unit, we process the

following categories of personal data, depending on the authentication method you use:

- if you do not have a PIN set in BT Pay, we process **your phone's unlock method** (whatever it is: fingerprint, face ID, PIN or phone unlock pattern). In this case, the Bank does not know the unlock method you use, but implicitly infers that it has been correctly entered if the transaction authorization is successfully completed.
- if you have a PIN set in the app, we identify you by the **PIN** and/or - if you activate the use of biometrics for authentication in BT Pay: your **biometrics (fingerprint, face ID - biometric facial features)** and the **biometric method set in your phone and for BT Pay, respectively.**

If you enable the biometric authentication in BT Pay, you should know that the Bank does not have access to your fingerprint or biometric facial features, but only uses the result of the comparison between the the applied/scanned fingerprint/face features and the fingerprint/face features stored in the device you are using to authenticate in the app. If the biometric authentication fails, you will have to use the PIN set in BT Pay for authentication purposes.

**By activating the biometric authentication in BT Pay you explicitly consent to the processing of biometric data related to your chosen biometric method to identify you for authentication in BT Pay.**

Please note that if you enable the biometric authentication in BT Pay and there are other people's fingerprints/face-IDs stored on the device you are using, any of them can successfully authenticate in BT Pay.

### **Data recipients and transfer of data to third countries**

For this identification service, BT uses the services of the provider Onfido and of its subcontractors, who process the data from your ID card, your image (from the selfie/video taken in BT Pay) and the biometric facial data used for identification in BT Pay, only on behalf of and under the instructions of the Bank.

Some of these service providers are located in third countries for which the European Commission has recognised that there is an adequate level of protection of personal data (UK), while others are located in third countries for which no such adequacy decision has been issued.

We have made sure that the transfer of data to the latter category of recipients is carried out under appropriate safeguards in accordance with the mechanisms in the GDPR provisions consisting of Standard Contractual Clauses approved by the European Commission which you can find here: <https://eur-lex.europa.eu/legal-content/RO/TXT/PDF/?uri=CELEX:32021D0915&from=EN>.

### **Special notice to US users of the App regarding the processing of personal data necessary for the identification**

US users of BT Pay, as defined in the Terms of Use of the App, should be aware that, under applicable US law for the processing of biometric data, including the Illinois Biometric Information Privacy Act (BIPA), their personal data of this type are processed by Onfido as detailed in Onfido's Facial Scan and Voice Recording Policy, available at the following link: <https://onfido.com/facial-scan-policy-and-release/>.

If you are a US user of BT Pay, by continuing the identification process in the App as described above, you confirm that you have read, understood and accept Onfido's Facial Scan and Voice Recording Policy and [Onfido Privacy Policy](#) and [Onfido Terms and Conditions](#).

The provisions of this specific information note shall be supplemented by those of [Information notice on the processing of personal data in the BT Pay mobile application](#) (in the case of adult users of BT Pay), respectively with those of the [Information Notice on the processing in BT PAY of personal data of users over the age of 14 who have a BT account](#)- (in the case of users age 14 who use the functionality for minors who have a BT account), as well as the [The General Information Notice on the processing and protection of personal data of BT Customers](#). The general information notice is an integral part of [BT's Privacy Policy](#), which can be found on [Banca Transilvania's website in the Privacy Hub section](#) or in BT units. In this notice you will find details about your rights in relation to the processing of your data, the way in which you can exercise them, the contact details of BT's DPO and the data retention period.