

Privacy notice regarding the processing of personal data for the purpose of identification in BT PAY

Who is the data operator and what is the purpose of the processing?

Banca Transilvania S.A. ("Banca", "BT") must ensure that online payments with BT cards are secure. Therefore, in BT Pay we apply identification rules as imposed by the applicable payment services legislation, through which we verify who you are, what you own and what you know, in order to ensure your identity. In this identification process we process personal data as we inform you in the following.

What data do we use and what happens if you refuse to process it?

To verify your identity in BT Pay you will need to go through the following steps:

1. take a picture of your ID card ("CI"), double-sided (requires access to the camera) - we collect your ID data from the CI through optical character recognition (a process that allows the automatic extraction of letters and numbers from the photographed CI) and we compare these data to those that are already in the bank's records, to make sure they match.

2. you must move in front of the camera and take a selfie (requires access to the camera) - we use your moving facial image to make sure you are a real person. In addition, we automatically compare features of your face within the selfie with facial features from your photographed CI and with the ones from the CI that we already have in our records to make sure they belong to the same person. This is a biometrical comparison, based on criteria such as: color, size and inclination of the eyes, position and distance between the main elements of the face such as eyes, eyebrows, lips and nose. Following the comparison, the IT solution that we use will issue a reliability score, indicating the probability that the face in the two images belongs to the same person. The data used for and resulted from the comparison are biometric data, which uniquely identify you. These are a special category data/sensitive data and that is why we can only use them if you express your explicit consent, by pressing the "I agree" button, which you can find below. If you do not want to express your consent, you will not be able to use BT Pay, but you will be able to use your BT cards for POS payments or for online payments (in this case, online payment confirmation will only be possible after setting a password).

3. say out loud the numbers that are displayed on the screen (requires microphone access) - we use your voice to make sure you're a real person

We don't rely only on these automatic processing of your data. We also perform verification of your data through our employees.

Recipients of data and transfer of data to third countries

For this identification service, BT uses the services of providers that will have access to the data in your ID. Some of these recipients are located in third countries for which the European Commission has acknowledged an adequate level of protection of personal data (UK), while others are located in third countries for which no such decision has been issued.

To the later category of recipients we have ensured that the data transfer is carried out with appropriate safeguards, in accordance with the mechanisms provided by the GDPR 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>.

The provisions of this specific privacy notice are supplemented by those of the [Privacy notice regarding the processing of personal data in BT Pay mobile application](#) and with those of the [General Privacy Notice regarding the processing of personal data belonging to the BT Customers](#), which is part of BT's [Privacy Policy](#), which you can find on <https://en.bancatransilvania.ro/> or upon request in any bank unit. Within the General Privacy Notice, you will find details about the rights you can exercise in relation to the processing of your personal data, the ways you can exercise, the contact information of BT's Data Protection Officer (BT DPO), as well as the period of retention of your personal data.