Privacy notice on the processing of personal data for the electronic signing of certain documents in the relationship with BT

Who is the controller of the personal data and who are the data subjects?

BANCA TRANSILVANIA S.A. (the "bank", "BT" or "we"), a credit institution and Romanian legal entity, whose identification and contact details are set out in Section III of the General Privacy Notice on the Processing and Protection of Personal Data Belonging to BT Customers (the "General Privacy Notice"), offers its customers the possibility to sign documents in their relationship with the bank using digital certificates issued by the trust service provider **Alfatrust Certification S.A.** ("Alfatrust"), in cooperation with BT.

If you are a natural person authorised to sign documents in the relationship with the bank on behalf of a customer (a legal entity or natural person), or a natural person who is an account holder, and you choose to sign the documentation using a digital certificate that Alfatrust will issue to you under its cooperation with BT, your personal data will be processed as described below. In this context, you are the data subject of this processing.

On what legal grounds do we process the data and what happens if you refuse such processing?

We process your personal data, as applicable, on the following legal grounds:

- BT's legal obligations (e.g. customer due diligence for the prevention of money laundering and terrorist financing, remote identification by video means)
- entering into/performance of the contract you conclude with BT (if you are the natural person customer who is the account holder)
- the legitimate interests pursued by BT and/or third parties (e.g. fraud prevention)
- your consent (e.g. for the processing of biometric data)

If you refuse the processing of biometric data or other types of personal data, we will not be able to identify you beyond any doubt. Consequently, Alfatrust will not be able to issue you a digital certificate through this online flow. In this case, you may sign the documentation using another digital certificate of your own or by hand (only if any other signatories to the document also choose this signing method).

For what purposes do we process your personal data, what data do we process, to whom do we disclose them and for how long do we retain them?

➢ for verifying your identity and your capacity as a signatory to a document in the relationship with BT

We use a process of **remote identification by video means** to make sure that you are who you say you are. During this process, we will take photographs of your face and identity document, **only if you agree.**

For identification purposes, we would process the following types of personal data, depending on the circumstances: (i) **data contained in your identity document** (including your passport, if you are not a Romanian resident citizen), which you will need to photograph in certain situations (this requires access to the camera). If you are a Romanian resident, we will compare this information with the information held by the General Directorate for Persons Records – D.G.E.P. (see here details about the processing of data provided by D.G.E.P.); (ii) the **moving image** of your face from the video selfie that we will ask you to take (requiring access to the camera); and (iii) your **facial biometric data**, obtained by biometrically comparing the selfie image with the image in the photographed identity document and/or, as applicable, with the image provided by D.G.E.P. We will process your biometric data

only if you give your explicit consent, which we will request before carrying out such processing. Biometric comparison is performed by analysing relevant facial characteristics through specific automated methods in order to confirm uniquely that the same person appears in the images. Following the biometric comparison, the IT solution indicates the probability that the faces in the two images belong to the same person. If you refuse the processing of your biometric data or if the result generated by the IT solution does not give us sufficient assurance as to your identity, the consequences described in the previous section will apply.

For remote identification, we use the services of Onfido and certain of its partners (sub-processors). They process the data contained in your photographed identity document, your image (from the selfie/video taken) and your facial biometric data solely on behalf of and under the instructions of the bank.

Onfido and its partners may be located in third countries, such as the United Kingdom (whose adequate level of data protection is recognised by the European Commission), or in other countries for which no such decision has been adopted. In the latter cases, we have ensured that the data transfer is carried out subject to appropriate safeguards under the GDPR, consisting of the Standard Contractual Clauses approved by the European Commission, available here: https://eur-lex.europa.eu/legal-content/RO/ALL/?uri=CELEX:32021D0914

➢**for the issuance and management of the Qualified Digital Certificate issued by Alfatrust Certification S.A. for signing documentation in the relationship with BT**

If your identification has been successfully completed, you must hold a qualified digital certificate in order to sign the documentation in your relationship with BT using a qualified electronic signature.

The issuance and use of the digital certificate for signing are free of charge for you. However, BT and Alfatrust must jointly process personal data relating to you, as joint controllers, as follows:

a. Controllers of personal data

Pursuant to Articles 13 and 14 of Regulation (EU) 2016/679 – the General Data Protection Regulation (the "GDPR"), Alfatrust Certification S.A. ("Alfatrust") and Banca Transilvania S.A. ("BT" or the "Bank"), whose identification and contact details are specified in the Terms and Conditions for the provision of certification services for qualified digital certificates, hereby inform you about the processing of your personal data as a User ("data subject"), which they carry out as joint controllers for the purpose stated under point b below.

b. Purpose and legal grounds for the processing of personal data

The purpose for which the joint controllers process the User's data is the issuance and management of the Qualified Digital Certificate (the "Certificate").

BT is the controller that identifies the User, collects from the User the personal data required for the issuance of the Qualified Digital Certificate and transmits such data to Alfatrust so that Alfatrust may issue the Certificate.

The data collected by BT from Users are data processed by the Bank in its own records in the context of the business relationship initiated between the User and the Bank when the data are transmitted to Alfatrust. During the validity period of the Certificate, personal data are processed by the joint controllers, as applicable, including where Users request the suspension or revocation of the Certificate using the methods detailed in the Terms and Conditions for the provision of services.

The legal grounds for the processing of personal data for the defined purpose are compliance with a legal obligation (Article 6(1)(c) GDPR), entering into/performance of the Contract (Article 6(1)(b) GDPR) and the legitimate interests pursued by the joint controllers (Article 6(1)(f) GDPR).

As regards the legal obligation, both BT, as the credit institution with which the User initiates a business relationship, and Alfatrust, as the accredited certification service provider from which the User seeks to obtain a Certificate, are subject to the applicable legislation on the prevention of money laundering and terrorist financing, under which they must collect certain personal data. Such data are also necessary for entering into/performance of the Contract under which the User is permitted to use the Certificate to sign documentation in the relationship with BT.

To support Users wishing to submit a request to suspend or revoke the Certificate, the joint controllers rely on a legitimate interest in enabling Users to submit such requests not only directly to Alfatrust, but also through BT. Handling these requests entails the exchange of Users' personal data between the two joint controllers.

Contact details, namely telephone number and home address, will be processed by either joint controller whenever it is necessary to contact the end user for the proper performance of the contractual relationship concerning the Qualified Digital Certificate.

c. Categories of personal data and categories of data subjects whose personal data are processed.

The personal data processed to fulfil the stated purpose are those which the law requires a credit institution and a certification service provider to collect for the prevention of money laundering and the combating of terrorist financing, namely: surname, first name, personal identification number (CNP), home/residence address, expiry date of the identity document, telephone number and a copy of the identity document. All such data, as collected by the Bank, will be made available to Alfatrust for the issuance and management of the Qualified Digital Certificate.

The processing of these personal data is necessary to generate the Qualified Digital Certificate. If the User refuses the processing of such data, the Qualified Digital Certificate cannot be issued.

The data subjects concerned by this processing are only Users, as defined in the Terms and Conditions of Use.

d. Recipients of personal data.

Apart from the joint controllers, between whom the personal data processed for the stated purpose will be exchanged, the data are disclosed, as applicable, to employees of the joint controllers who need to know them, IT and audit service providers, and authorities and institutions legally entitled to receive them.

e. Personal data processing period.

Information relating to a Qualified Digital Certificate (including personal data) is processed by Alfatrust for 10 years from the date on which the Certificate ceases to be valid, in accordance with the statutory retention periods.

At Banca Transilvania level, the remote electronic signature applied, on the basis of the Qualified Digital Certificate issued by Alfatrust, to documentation signed in the relationship with BT is retained throughout the period during which the User who is a customer maintains a business relationship with BT, plus the retention periods provided by the applicable banking legislation, namely at least 5 years after the business relationship with the credit institution ends.

f. Rights of data subjects in relation to the processing of their personal data for the stated purpose.

Every User, in their capacity as data subject, is guaranteed the exercise of the following rights in relation to the processing of their personal data with either joint controller: the right of access, the right to rectification, the right

to restriction of processing, the right to erasure of data, the right to object to processing and the right to data portability.

Users may exercise these rights or contact the data protection officers with any questions/requests concerning the processing of personal data as follows:

- Banca Transilvania S.A. – by sending an e-mail to dpo@btrl.ro or by submitting a request to BT's registered office, marked "for the attention of the Data Protection Officer (DPO)".
- Alfatrust Certification S.A. – by sending an e-mail to dataprotection@alfasign.ro or by submitting a request to Alfatrust's registered office, marked "for the attention of the Data Protection Officer (DPO)".

Users also have the right to lodge a complaint with the supervisory authority, the National Supervisory Authority for Personal Data Processing (ANSPDCP), whose registered office is at 28–30 General Gheorghe Magheru Boulevard, District 1, Bucharest.

➢for communicating with you

If the electronic signing of the document in relationship with BT is successfully completed, we will send the signed document to the e-mail address from which you initiated the signing flow. We obtained this contact detail, as well as your telephone number, from you (e.g. if you provided them to the bank when you became a customer) or, as applicable, from the customer who is the account holder and who authorised you to sign the documentation in the relationship with the bank.

Your rights, the DPO's contact details and information about the processing of personal data

Further information on how BT generally processes the personal data of BT customers, including information about your rights, how you may exercise them and the contact details of BT's Data Protection Officer (BT DPO), is available in the General Privacy Notice, which supplements this Privacy Notice. You can find it on www.bancatransilvania.ro, in the Privacy Hub section.