Privacy Notice Regarding the Processing of Personal Data within the RoPay Payment Scheme

Version applicable from 29.09.2025

What is the RoPay Payment Scheme?

Banca Transilvania S.A. ("BT", "the bank") and the Fund Transfer and Clearing Company – TRANSFOND S.A. ("TRANSFOND"), together with other participating banks in Romania ("**participating banks**"), process your personal data as a data subject, in accordance with the provisions of the General Data Protection Regulation (EU) 2016/679 ("GDPR"), for the purpose and through the means of processing defined in the RoPay Scheme Rulebook ("**RoPay**").

RoPay is provided by Banca Transilvania under the conditions set out in the BT RoPay Terms of Use. A BT customer using RoPay via Banca Transilvania is referred to as a "**RoPay user**".

If you are a natural person, it is important that you understand how your personal data is processed in the context of using this service, as you are a data subject in relation to this processing.

RoPay offers users two services:

- RoPay SPL Service – facilitates the initiation of payments/payment requests based on a proxy (alias – phone number) linked to an account (IBAN), registered in the RoPay SPL, which enables a consumer to initiate a payment or payment request.

- QR Code Payment Request Initiation Service – allows the payee to generate a QR code that the payer can scan to initiate a payment.

For clarity, all information in this specific privacy notice refers exclusively to the personal data processed for the provision of the RoPay service. The processing of BT customers' personal data by Banca Transilvania, as an independent data controller, is subject to the General Privacy Notice regarding the processing and protection of BT Customers personal data.

Joint Data Controllers

The RoPay payment initiation scheme operates only if participating banks exchange personal data necessary for payment initiation, in accordance with the RoPay Scheme Rulebook. This exchange is facilitated via a shared database managed by TRANSFOND.

Participating banks and TRANSFOND process personal data as joint controllers, as defined under Article 26 of the GDPR, and have entered into a joint controllership agreement that sets out their respective responsibilities for compliance with GDPR obligations, particularly those related to data confidentiality and security, as well as their roles and interactions with data subjects.

The list of participating banks may change over time due to new entries or withdrawals from the RoPay scheme. The up-to-date list of participating banks is available here.

Purpose of Processing

Personal data is jointly processed by the controllers solely for the purpose of providing services that facilitate the initiation of instant payments/payment requests, in accordance with the RoPay Scheme Rulebook, for customers of participating banks, in the use cases defined therein.

Categories of Personal Data Processed

The categories of personal data processed by the joint controllers in the context of RoPay include:

- Full name and phone number (proxy) of the RoPay user, either payer or payee, who is a natural person customer of a participating bank;
- IBAN of the account held by the RoPay user (payer or payee), used to send or receive payments/payment requests to/from customers of participating banks.

These data relate to the following categories of data subjects: BT customers with current accounts in RON opened at BT, who use BT's mobile banking service dedicated to individual customers. Data subjects may act as payers and/or payees in transactions via the RoPay service.

Legal Bases for Processing

The legal bases for processing personal data by participating banks under the RoPay scheme are:

- Performance of a contract to which the data subject is party (Article 6(1)(b) GDPR);
- Legitimate interest of the paying bank to execute the RoPay service and to present the RoPay user with a pre-filled payment order (Article 6(1)(f) GDPR).

The legal basis for TRANSFOND's processing of personal data is its legitimate interest in executing the RoPay service under the conditions set out in the RoPay Scheme Rulebook (Article 6(1)(f) GDPR).

Recipients of Personal Data

Personal data processed by the joint controllers may be disclosed, where applicable, to public institutions and authorities with supervisory and control responsibilities.

Data Retention Period

Your personal data related to the RoPay service provided via BT will be stored in TRANSFOND's database and will be accessible to other participating banks and their RoPay users for as long as you use the RoPay service. Personal data will no longer be used for the provision of RoPay if you request data erasure, object to the processing, or cease to be a customer of the bank.

Your Rights as a Data Subject

In connection with the processing of your personal data within the RoPay service, you are entitled to exercise the rights granted under the GDPR. You may exercise these rights with any of the joint controllers, using the contact details of their Data Protection Officers (DPOs) available in the privacy policies published on their respective websites.

BT's DPO contact details: dpo@btrl.ro, or by post at BT headquarters – Cluj-Napoca, Calea Dorobanților, no. 30-36, Cluj County.

Generally, each controller will respond to requests related to the processing for which it is responsible. However, if necessary, the joint controllers, via TRANSFOND, will inform each other and share the necessary information to respond to any data subject request.

Your guaranteed rights include: Right to be informed (fulfilled through this privacy notice);- Right of access; Right to rectification; Right to erasure; Right to restriction of processing; Right to data portability; Right to object; Right not to be subject to automated individual decision-making; Right to lodge a complaint with the National Supervisory Authority for Personal Data Processing (ANSPDCP).