

**Information on the processing and protection of personal data
in the context of the provision of the BT Go Internet and Mobile Banking service
("BT Go Privacy Policy")**

Version applicable from 23.05.2025

1. Who is the controller of personal data, the data subjects and what are the purposes of the processing

Banca Transilvania, S.A. a credit institution with registered office in Cluj-Napoca, Calea Dorobanților, 30-36, Cluj County, registered with the Trade Register under no. J1993004155124, CUI RO 5022670, contact telephone: 02648028 (hereinafter referred to as "**BT**") makes available to its legal entity customers the Internet and Mobile Banking service - BT Go (hereinafter referred to as "**BT Go**"). In this context, it processes personal data ("personal data") as an operator.

If you are a natural person using BT Go on behalf of a BT business customer(s) for whom you are a user of this service, you are a data subject and we inform you below how we will process your personal data for the purposes of identifying/authenticating you as a user (identity verification), for the security of this service for fraud prevention purposes, and for the use of BT Go features.

Also a data subject for processing is also the account holder customer who has contracted/uses BT Go, if he/she is a sole trader, sole proprietorship, individual form of self-employed professional (hereinafter "sole trader").

2. What personal data we process, on what legal grounds, what individually automated decisions we take and what happens if you refuse their processing

a. What data we collect to identify/ authenticate BT Go users

In order to be able to use BT Go as a user, we are legally required to verify your identity, i.e. to identify you as a user authorized to use this service. This identification is based on **your BT Go login ID ('user ID')** and/or **password**. We will also use (in the case of SMS OTP log-in) **the telephone number** declared to the bank.

When using the mobile version of BT Go, you can choose to use either the BT Go PIN you set yourself or **biometric data** (e.g. fingerprint, face-ID) for logging in. Biometric authentication is also available for the web version of BT Go. If you choose this option, BT does not have access to the biometric data, it is stored on the device you are using. BT only gets the information that the biometric authentication method has been validated by your phone.

b. What data we collect to ensure BT Go security

In order to be able to protect transactions ordered through BT Go and the information within this platform, we will collect and use **the DeviceID** of the device on which you have the BT Go mobile application installed, other **device security identifiers** (e.g. Instance ID/ Device Identifier), including the history of devices you have used BT Go on and the **tokens generated, the model, manufacturer of the phone and the type of operating system of the phone**, to verify

that at each login you are still using the same phone that you registered to use the BT Go application.

We also have a legitimate interest and, where applicable, a legal obligation, to collect and use the **IP address(es)** of the devices you connect to BT Go, including the geographic location from which you transact via BT Go. If you refuse to give us access to this data, you will not be able to use BT Go.

We also use a tool that scans **the list of applications on the device** you connect to BT Go with for malware, including applications such as those that allow remote/remote connectivity and/or if you use your device for calls while using BT Go. If such applications/ situations or other instances are identified that suggest a compromise of your user accounts in other applications offered by BT, we will block your access to your BT Go user account and/or block your use of BT Go on the potentially compromised device. This blocking is an individually automated decision that we make based on the legal obligations placed on us.

Last but not least, we are required by applicable payment services legislation to **monitor transactions** to prevent fraud. If we detect transactions that are suspected of fraud, we may take the decision to block their processing.

We process this data to protect the information in BT Go. If you refuse processing, you will not be able to use BT Go.

c. What data we process when you use BT Go

In order to fulfill our legal obligations to provide you with the BT Go service you have contracted for your company and, where appropriate, because we have a legitimate interest in preventing fraud and communicating with BT Go users to support them and to ask them to rate the quality of the BT Go service we use:

-> Account, card and transaction data

When you use the various BT Go functionalities, we will implicitly have access to information **relating to: bank accounts (of the legal entity and of the payees), balances, transactions ordered through the accounts of the legal entity or related to amounts received on the accounts of the legal entity, including information referred to in the payment explanations, data about the BT products of the legal entity (including loans held or that you wish to repay, deposits, investments held or that you are making and their history, cards issued/requested for designated card users and details about them).** Although this service is dedicated exclusively to legal entity customers of Banca Transilvania and information about legal entities is not considered personal data, information about customers who are individual professionals is subject to the personal data regime and the bank will treat it in compliance with the applicable legal provisions in this field.

We also process the **personal data of you and/or other persons, such as the payees individuals or individual professionals or other such persons mentioned in the explanations of payments (e.g. the name you want to insert for the default payee, address, IBAN) or that you define as default payees (name/ first and last name, IBAN).**

At the same time, in order to provide the Beneficiary Name Display Service (BNDS) for the purpose of fraud prevention in case of initiated interbank payments, if you are a legal entity customer of the type indicated above, whose information has the personal data regime, we inform you that they are processed according to the details in the *Information Note on the processing of personal data within the Beneficiary Name Display Service (BNDS)*, available on the bank's website, at the following link: <https://www.bancatransilvania.ro/nota-de-informare-sanb>.

Also for the prevention of fraud, for intra-bank payments initiated from BT Go, BT processes - as an independent controller - the same categories of personal data that are also used within SANB, but without the involvement of other participating banks or Transfond. The basis for the processing of personal data is BT's legitimate interest in preventing fraud in intra-bank payments (BT-BT). The truncated name of the entity, as registered with BT, will be displayed to other BT customers who initiate a payment from a BT application to the entity's account with the bank, regardless of whether the payment is completed or not.

If you **integrate from BT Go with the FGO billing platform** and allow the provider of this platform access to the transaction history of the accounts of the legal entity you connect to FGO, you undertake to comply with the applicable legal provisions in the field of processing and protection of personal data, including those of informing and, where applicable, obtaining the consent of the data subjects to whom the legal entity has transferred amounts or from whom it has received amounts in these transactions or whose personal data is contained in the transaction explanations, as such personal data will be disclosed to the FGO provider.

When accessing the **investment** functionality, certain users will be able to invest on behalf of the legal entity in funds managed by BT Asset Management SAI (BTAM) by signing the brokerage contract with BT, buy/sell fund units (FUs) in the chosen fund, set, modify or cancel a recurring investment, view transactions in process, transaction history and balance, generate portfolio statements and transaction confirmations, ex post cost details and certificates of investment accounts held. Banca Transilvania will process, as processor of the BTAM operator, as the case may be, the following information/personal data concerning you: name, surname, CNP, BTAM client_ID, investment account number, transaction history, balance held in the investment funds managed by BTAM, information on gain/loss and withholding tax.

-> **Contact date**

Because we have a legitimate interest in helping you use BT Go (support) and because we want to know what you think about this service (service quality assessment) we will use the contact details you have provided to the bank as a customer. You have the right to object to such contact. For details, please read the section on your rights regarding the processing of your personal data.

-> **Permissions required when using the application**

When you install the app, you will be prompted for permissions to access **your phone's status and identity**, as well as your device's **camera** to scan the QR code when you first log in to the BT Go app. Depending on the Android/ iOS version of your phone you can grant access as follows:

- Allow/ Deny access
- Allow/ Deny/ While using the app
- Allow/ Refuse/ Just this once

If you refuse to grant access to the camera when the QR code needs to be scanned, you will not be able to use the BT Go app. You can then withdraw this permission, in which case you will not be able to use the BT Go features that require the use of the camera, but you will be able to use other parts of BT Go.

Also, the first time you log into the app, you will be asked for permission to send notifications. If you refuse to grant access, you will still be able to use the app, but you will no longer receive notifications in the app.

Other permissions required for the use and operation of the app, as set by the operating system provider of the device you are using and for which explicit user consent is not required, are detailed in the 'permissions' section of the Play Store/ Apple Store for the BT Go app (e.g. permissions to notify you when you have no internet connection).

-> Notifications

Through the BT Go mobile banking app we will send you different types of notifications depending on the actions you take, such as but not limited to the following:

- To log in to the web version of BT Go
- For authorising payments made in the internet banking application (web version)

You will be able to separately enable/disable push or other notifications in the app. If you decline to receive notifications, you will still be able to use the app, but you will no longer receive push and/or in-app notifications, which may make it more difficult for you to use BT Go (e.g. you will need to navigate to different sections of BT GO to identify transactions that require action from you).

3. To whom we may disclose data as a result of your use of BT Go

For sole trader customers, data about their accounts and transactions in BT Go indirectly identify the natural person representing the sole trader and are thus personal data. We will disclose this data, as appropriate, to:

➤ other BT Customers who have a right and need to know

- a. BT Go users (all BT Go users are BT Customers) if you have granted BT Go user rights to other people on the individual professional's accounts with BT, we will disclose to those people - within BT Go - the banking data (accounts, transactions, account and transaction identifiers etc.) corresponding to the accounts you have granted user rights to.
- b. BT customers to whom you order payments from BT Go

When you make transactions through BT Go to other BT customers' accounts, the data related to these transactions (usually the name of the individual professional, amount, IBAN of the BT account, explanation of the payment) will be accessible to the beneficiaries to whom you made the payment.

➤ contractual partners (service providers) used in BT's business

- a. BT Go allows you to connect to services offered by the bank's contractual partners (e.g. billing services). If you use these features, the data required to activate/ connect/ operate these services is disclosed to these partners (these partners are also BT Customers).
- b. Your data processed in BT Go may be accessed, on a need-to-know basis and only on the basis of appropriate personal data protection safeguards, by the bank's contractual partners who support us in providing the BT Go service.

➤ financial-banking entities

- when you make transactions through BT Go to customers of other banks/payment institutions, the payment data (usually the name of the paying professional customer, the amount, the payment explanations) will be forwarded to the payee's bank for transaction processing.

- when you use the open banking functionality of BT Go for the legal entity accounts for which you are a user, we will disclose to the financial institutions for which you grant access, respectively for the accounts for which you grant access, as applicable: the account number, balance and transactions carried out through these BT accounts (with all their details - date, amount, currency, account number and name/name of the counterparty in the transaction etc).

The list of recipients is supplemented by the list set out in [**General Information Notice on the processing and protection of personal data belonging to BT Customers**](#), Section VIII.

4. How long we keep data processed in the context of providing the BT Go service

Your data, as a BT customer, as well as the data on the transactions carried out through the accounts (including through BT Go) are subject to the retention regime provided for by the applicable regulations, being at least 5 years from the end of your business relationship with the bank, unless longer legal terms are applicable, which can be up to 10 years from the end of the business relationship.

5. How we protect personal data in BT Go

Banca Transilvania takes all necessary technical and organizational measures to protect personal data within BT Go.

Notwithstanding these precautions, the Bank cannot guarantee that unauthorized persons will not gain access to your personal data through the terminals you use to access BT Go if they are unprotected or inadequately protected.

You are solely responsible for maintaining the confidentiality and keeping secure the terminal used to access BT Go (phone, computer, etc.) and in particular the login ID and/or passwords for logging in (password, fingerprint or other security method provided by the phone).

6. What rights BT Go users have

In accordance with the provisions of the General Data Protection Regulation ("GDPR"), as a data subject concerned by the processing of personal data in the context of the use of BT Go, you are guaranteed the following rights: the right to be informed (we fulfill our obligation to inform you by this notice), the right of access, the right of rectification, the right to erasure, the right to restriction of processing, the right to data portability, the right to object, the right to apply to the National Authority for the Supervision of Personal Data Processing (ANSPDCP) and to justice.

You can find these rights detailed also in [**General information notice on the processing and protection of BT Customers' personal data**](#), with which this specific information note is supplemented, and which you can find on the bancatransilvania.ro website in the [Privacy Hub](#) section.

You can exercise these rights at BT or you can contact the BT Data Protection Officer (DPO) by sending a request by post to the BT office indicated above - marked 'for the attention of the DPO' - or by email to dpo@btrl.ro.

You also have the right to contact the National Authority for the Supervision of Personal Data Processing (ANSPDCP) -(plangere@dataprotection.ro).

This BT Go Privacy Policy may be revised by BT from time to time. Users will find the most up to date version of the notice in the app and on the BT website in the [Privacy Hub - specific information notices](#).