

Information note on the processing of personal data within the BT Pay mobile application

Updated at 24.09.2024

General provisions

Banca Transilvania, S.A., credit institution incorporated in Romania, with registered office in Cluj-Napoca, Calea Dorobanților, nr. 30-36, Cluj County, registered with the Trade Register under no. J12/4155/1993, unique code RO 5022670, (hereinafter referred to as "BT"), hereby informs you how it will process, as controller, personal data within the mobile application - BT Pay (hereinafter referred to as "BT Pay" or "the application"). The cases in which, by way of exception, BT is not the controller of the personal data processed in BT Pay are separately set out in this information notice.

This information notice relates exclusively to the processing of personal data belonging to BT Pay users who are at least 18 years old ("**mature users**").

Minors over the age of 14 who have an account with BT and who wish to use the BT Pay functionalities available to this age group with their own card attached to that account, and the parents/guardians/legal representatives ("**parent**") of such minors should read the [Information Notice on the processing in BT Pay of personal data of users under the age of 14 who have a BT account](#), including the provisions on minors' personal data in the [Information Notice on the processing of personal data for identification purposes in BT Pay](#), for information on the processing of personal data of minors in this age group in BT Pay.

Minors aged 8 - 18 who wish to use/use the BT Pay functionalities available to this age group with their own card attached to a parent's account should read the [BT Pay Information Notice on the processing in BT Pay of personal data of minor users attached to a parent's account](#) for information on the processing of personal data of minors in this age group in BT Pay. If minors are under 14 years of age, we recommend that they read this information notice with their parent/ guardian/ legal representative ("**Parent**").

BT Pay is an application offered to BT customers, under the conditions set out in the [BT Pay Terms and Conditions of Use](#), which we recommend you to consult.

In BT Pay, users can use several distinct services/features. Some of these involve the processing of personal data for specific purposes and grounds of processing, details of which users can find in the specific information notices as follows:

- for the Alias Pay service, in [the Information Note on data processing within the Alias Pay service](#);
- for applying or increasing a credit card line in BT Pay, in the [Information Notice on the processing of personal data for online-only obtaining of a BT credit card](#);
- for applying for an overdraft in BT Pay, [in the Information Notice on the processing of personal data for obtaining an overdraft exclusively online](#);
- to apply for a personal loan in BT Pay, [in the Information Notice on the processing of personal data for a 100% online personal loan](#);

- for the Invoice Payments Service, [in the Information Note on the processing of personal data within the Invoice Payment Service](#);
- to update via BT Pay some of the personal data required by the bank for the application of the Know Your Customer measures, in the [Information Notice on the processing of personal data for the purpose of updating via BT Pay some information for Know Your Customer](#) purposes.

In addition, adult, resident individuals who do not yet have a current account with BT, may open a business relationship with Banca Transilvania from BT Pay. In this context, we process personal data as detailed in [Information notice on the processing of personal data for opening a business relationship with Banca Transilvania via BT Pay](#) which is distinctly displayed when the process of opening the business relationship via the application is initiated.

BT may revise this notice from time to time, but will not create less favorable conditions for users of the application in terms of processing and protection of personal data. We will notify you of such changes to the notice within BT Pay. The updated version of the notice and the date from which it applies will be available to users at any time. All users will be subject to the provisions of the current notice. If, at any time, you believe that the way BT processes and/or protects your personal data does not comply with the law and/or your requirements, you can notify us at dpo@btrl.ro and/or stop using BT Pay.

What types of personal data, if any, do we process within BT Pay?

For BT Pay security/ fraud prevention

In order to ensure the security of BT Pay, to prevent fraud, as required by law and in our legitimate interest, we process personal data such as:

- **the identity of the device used** (e.g. device ID, device model, type and version of the operating system of the device, including its history) and **whether it is secured** by password, fingerprint or other security method, as required by law. The Bank will only verify the existence of security, but will not have access to the password, fingerprint or other security methods used, which will remain stored in the memory of the user's device.
- the **IP address(es)** of the devices you connect to BT Pay with, including the geographic location from where you are making the transaction through the App.
- whether the device you are connecting to has **malware** on it , **including applications such as remote/remote connectivity**. Also, while using the app, if you are making transactions, we also check if the device is or has been recently used for calls, but we do not find out the details of the numbers/people you have been calling.

We process this data to protect your BT Pay information and to prevent fraud. If you refuse processing, you will not be able to use the App.

For the same purpose, we process data for PIN (security code) setting/ resetting/ unlocking, BT Pay authentication, as outlined in [Information notice on the processing of personal data for identification purposes in BT Pay](#) and, in the context of online payments, we process data related to the method of unlocking the device. The data related to your chosen phone unlocking method (e.g. fingerprint, facial identification, model, PIN, password, etc.) is not in the possession of the bank, but BT is only the result of verification (accepted/rejected) by comparison of the data used to authorize each payment transaction with the corresponding witness data stored in your phone.

Depending on the situation, the bank may take the following measures to prevent fraud through/with BT Pay: blocking the application until the uninstallation of third-party applications that may compromise the confidentiality of BT Pay information, blocking potentially fraudulent transactions, contacting customers by the bank, etc.

To register a new BT Pay customers with a current account with BT Pay

When you apply to open a business relationship with BT via BT Pay, we use a remote video identification service, which involves the processing of personal data in accordance with the applicable legislation (e.g. personal data from your identity card, contact data, as well as so-called biometric data related to facial recognition). In this process, we also collect other personal data for other purposes, as described in the [Information Notice on the processing of personal data for opening a business relationship with Banca Transilvania via BT Pay](#).

To register existing BT customers with BT Pay

If you have opened a business relationship with BT prior to the time you wish to use the App to register with BT Pay, we are required to apply a strict authentication procedure to you, as required by applicable payment services legislation. For this purpose, we process personal data as set out in the separate information notice which will be displayed to you in BT Pay, namely: [Information notice on the processing of personal data for the purpose of identification in BT Pay](#).

The registration process requires you to provide the card details requested and a chosen nickname that will correspond to your BT PAY account. We will also process the phone number declared to BT by the cardholder (hereafter referred to as the 'BT declared phone number') to complete the BT Pay card registration, to which we will send an SMS-OTP.

If you register in BT Pay cards issued in your name by other financial institutions in Romania (hereinafter "non-BT cards"), we will process personal data related to these cards: card number, expiration date, CVV code and the first and last name on the card, which will be displayed in the SMS messages automatically sent when initiating a transfer. You will only be able to finalize the registration of a non-BT card in the application after completing the card registration steps according to the 3D Secure standards applied by the card issuer. Banca Transilvania has no knowledge of the method or personal data used by the card-issuing financial institution to perform this verification.

After registering the non-BT card in BT Pay, the user has the possibility to access certain financial information by activating the Open Banking option for up to 90 days.

You can also enter in BT Pay your cards issued by BT Direct IFN SA ("**BT Direct** cards"), in which case we will process the following personal data from them: **card number, expiry date, CVV code and the first and last name on the card.**

You will be able to complete the registration of a BT Direct card in the application only after entering the SMS code received on the phone number registered in the records of the issuing institution.

When using BT Pay

We inform you below how we process personal data, separately for each functionality of the App:

I. Cards functionality.

1. Card payments at merchants

If you own a device with Android operating system and built-in NFC technology, with BT Pay you can pay at merchants with BT cards in the app. In this case, we will indirectly obtain data about you, such as **the verification required to complete the transaction (e.g. entering your phone unlock password), data about the transactions you have made, the card you used to make the transaction, the account data attached to the card, including the date, time and amount paid, the location where you paid and the data entered in the payment description.**

For payments at merchants with BT Pay installed on Android operating system devices, NFC (Near Field Communication) must be enabled. If this is not enabled, BT Pay will access this function to direct you to the NFC settings.

If BT Pay is installed on Android devices that do not have NFC available, BT Pay cannot be used for payments at merchants, but its other features are available.

If you wish to register your card with Google Pay, the processing of your personal data in the context of the use of Google Pay services is subject to the privacy policy of the provider of these services, which is Google.

To make it easier for you to enroll cards already registered with BT Pay into Google Pay, the app will check if you are using the Android operating system and, if so, if a card you have registered in the app is not enrolled in Google Pay, it will display a button to enable you to enroll it into Google Pay. If you opt in, the following **data related to your card will be processed, including being transmitted by Banca Transilvania to the Google Pay solution provider in a secure way: card number (PAN), card expiry date, first and last name on the card, BT customer code (BT CIF), Device ID, Wallet ID.**

If you are using an iOS device, you will need to enroll your card in Apple Pay in order to use it to pay merchants via NFC. Use of cards in Apple Pay is subject to the Apple Pay Terms and Conditions which can be found at the following link <https://www.bancatransilvania.ro/termeni-si-conditii-apple-pay.pdf>.

To make it easier for you to enroll cards already enrolled in BT Pay into Apple Pay, the app will check if you're using iOS and, if so, if a card you have enrolled in the app is not enrolled in Apple Pay, it will display a button next to it to enable faster enrollment into Apple Pay. If you choose this type of quick enrollment, the following **data related to your card will be processed, including being transmitted by Banca Transilvania to the Apple Pay solution provider in a secure way: card number (PAN), card expiry date, cardholder name, first 6 digits of the card number (BIN), card type (debit or credit).**

For "Pay With BT Pay" users who choose "BT Pay" as their payment method on the merchant's website, they will be able to authorize the transaction using the BT PAY app by choosing the card they wish to use to make the transaction and confirming the transaction.

2. Transfers by phone number or IBAN

With BT Pay, you can make transfers between a BT card and any other BT card in the app, or send or request money to/from people in your contacts list, as well as to/from any other BT Pay users, provided the transfer amount is accepted on a BT card or you can choose a primary/preferred card for cashing. To operate such transfers (hereafter referred to as "P2P transfers") to users of the application from your phonebook, **BT Pay will require access to your phone's contact list. If you choose not to grant this access, or if you do not have the phone number of the BT Pay user to whom you wish to initiate a P2P transfer in your phonebook, you will need to enter that number.**

If you choose a preferred card for the collection of P2P transfers, we will use **the data of the chosen card** for the collection and send you notification of the collection.

In order to facilitate P2P transfers via the phone number, BT Pay will display whether the BT Pay application is installed on the chosen phone number (whether it belongs to a person in your contact list or not) when initiating a P2P transfer. Thus, **if the phone number on which you have BT Pay installed is selected or entered by any BT Pay user in order to make a P2P transfer, that user will know that the BT Pay application is installed on that phone number.**

With BT Pay you'll also be able to initiate IBAN-based transfers from BT cards.

In the case of transfers, data related to the transaction (amount, explanations, date, etc.) will be processed, as well as the data of the recipient of the transfer - to whom you have sent a sum of money (name, surname, IBAN of the account to or from which the payment is made).

You can send proof of initiation of the transfer to an **email address** entered in a dedicated field, which we will keep to prove that we have sent proof of payment as requested.

For P2P transfers initiated from a non-BT card to a BT card, the authentication of the transactions will be performed according to the 3D Secure standards applied by the institution issuing the non-BT card.

3. BT ATM cash withdrawal by code

From BT Pay, you can generate a code for cards issued to individuals, which you can use to withdraw cash from ATMs. The code will be valid for a limited period of time and will be sent by the bank to the **phone number** selected from the BT Pay user's phonebook or entered manually by the user. To send the code, the bank needs to process **the recipient's phone number**.

4. Contactless cash withdrawal from BT ATMs

With BT Pay, the user can withdraw contactless cash from the ATM. This operation will only be possible by entering **the PIN code** of the respective card.

5. Setting transaction limits and/or blocking cards

From BT Pay, you can set transaction limits on BT cards registered in the app, block - temporarily or permanently - these cards and request the unblocking of temporarily blocked cards.

Access to these settings is allowed only after validation of the user's right to access them. In this regard, for each desired card, the use of these functionalities will be available (both for the card in digital and physical format) only after the SMS-OTP confirmation sent to the **phone number declared to BT**.

6. Displaying card details in the app

Through the BT Pay app, you will be able to view and copy your card details - card number and CVV code (the 3-digit code displayed on the back of the card) to make it easier to use your card for online payments.

In some cases, access to this functionality is allowed only after validation of the user's right to use it. To this end, an SMS-OTP will be sent for each desired card to **the phone number declared to BT**.

Entering the code received by SMS on this phone number will allow this information to be obtained for that card until it is deleted from the BT Pay application.

7. Authenticate/confirm online payments via BT Pay

Online payments (payments made on merchants' websites) initiated with BT cards registered in BT Pay and 3D secure will be able to be authenticated, respectively rejected, exclusively through the application.

The message to authenticate/reject such an online payment will be sent within the application in which the BT card is enrolled, on the "general" channel. Authentication/rejection of the online payment will be

possible from any of these devices. Failure to activate the notifications sent on the 'general' channel may make it impossible to receive the message required to authenticate/reject the online payment.

In the case of phones with Android operating system, with the user's permission, the payment confirmation screen can be displayed automatically, without the need to manually access the notification or the application, the user can confirm or cancel the payment by using the authentication method. This permission will be requested after the first confirmation of an online payment or can be set from the advanced settings of the phone - Applications section - BT Pay application.

The user will be shown the following information in the authentication/payment rejection message: **the card from which the transaction was initiated (the card image and the last 4 digits of the card as they appear in the application), the name of the merchant to whom the payment is to be made, the amount of the transaction, the maximum time required for authentication of the transaction and the status of the authentication of the transaction.**

On receipt of the message for the initiated online payment, BT Pay will save the transaction identifier in the handset so that the next time BT Pay is opened, the message can be displayed to authenticate/reject the transaction. The transaction identifier will remain stored on the handset until the online payment is authenticated or rejected, as appropriate.

8. Activating and using the Invoice Payment service

Within this service, personal data will be processed by BT as you are informed by a separate, specific information notice for this functionality, which can be accessed by following the link displayed in the 'general provisions' section of this information notice.

9. Enrolling in Open Banking

When accessing the Open Banking functionality for non-BT cards added to BT Pay, BT will have access to the following information which is, where applicable, personal data of the customer or other persons to/from whom the customer has transferred/received amounts through the accounts of the financial institutions from which they have integrated their accounts into BT Pay:

- **Balance of the selected non-BT card/ non-BT card account**
- **IBAN code of the selected card**
- **List of transaction history of the selected open payment accounts**, including the following details: transaction date, transaction amount, transaction detail (transaction details and transaction authorization code, person from whom amounts were debited to the respective account or, where applicable, the person to whom amounts were transferred to the respective account).

If this functionality is activated, BT Pay will have access to the following information which is, where applicable, personal data of the customer or other persons to/from whom he/she has transferred amounts through accounts with other financial institutions: **the card balance, the selected IBAN account related to the respective non-BT card and the transaction history of the selected payment accounts, including those made through the BT Pay application.**

10. Issuing/ reissuing a debit card

When accessing the debit card issue or reissue functionalities, BT will process, where applicable, the following information/ personal data of you: **data related to the card issued/issued, IBAN of the account to which it will be attached, card delivery address.**

11. Issuing a Virtual card

When accessing this functionality, you will have the possibility to request the issuance of a virtual debit card from the BT Pay application, BT will process, as appropriate, the following information/ personal data of yours: **data related to the issued card, IBAN of the account** to which it will be attached.

12. 'Move your money to BT' option

When you use this functionality we process personal data as follows: the **amounts** you transfer to the account to which the BT card is attached and **the frequency with which you transfer them, the data of the cards** involved in the recurring transfer and **the bank from which you transfer your amounts.**

II. Accounts functionality.

When accessing the Accounts functionality, Banca Transilvania will process, as appropriate, the following information/personal data about you: **IBANs related to the added accounts, cards attached to each account, transaction history, account currency, balance, recurring payments and predefined payees set in BT Pay or retrieved from BT24 and NeoBT.**

In the case of transfers, the **data related to the transaction** (amount, explanations, date, etc.) will be processed, as well as the data of the recipient of the transfer - to whom you have sent a sum of money (name, surname, IBAN of the account to which you wish to make the payment, phone number - if you initiate/make a transfer to an account via Alias Pay). In the case of foreign exchange exchanges and payments, **the currencies between** which you make the exchange and the exchange rate, respectively the currency in which you make the payment, will be processed additionally, as appropriate.

You can send proof of initiation of the transfer to an **email address** entered in a dedicated field, which we will keep to prove that we have sent proof of payment as requested.

In this section, when you access the statement functionality, BT will process the following information/personal data about you, as appropriate: **transaction data, account IBAN, account balance, transactions, rates on credit products and points available on credit card accounts held with BT.**

III. Savings functionality

1. Round Up

When accessing the Round Up functionality, BT will process, where applicable, the following information/personal data about you: **the amount of the round up service, the multiple of the amount selected, the data of the account for which you wish to activate the service and the data of the account to which the round up service amounts are transferred.**

2. BT Pay savings and deposit account

The Bank will process - as appropriate - the following information/personal data about you: **IBAN of the current account from which the deposit is made, the balance of the current account, the IBAN of the deposit account or - where applicable of the savings account set up, the amount of the deposit, the start and end date of the deposit,** the date chosen for recurring transfers, set for savings accounts.

IV. "Loans" functionality

When accessing the Loans functionality, the Bank will process information/personal data **of the type of credit products you have contracted from BT: IBAN of the credit account and current account from which the monthly installment is deducted, the balance of the non-card credit account, the amount of the credit contracted, the starting and termination date of**

the credit, the amount of the monthly installment, any arrears, credit-related insurances and their status.

V. "Investments" functionality

By accessing this functionality, you will be able to become an investor in the funds managed by BT Asset Management SAI (BTAM) by signing a brokerage contract with BT, buy/sell fund units (UF) in the fund of your choice, set, modify, or cancel a recurring investment, view transactions in progress, operation history and balance, generate portfolio sheets and transaction confirmations, details of ex post costs, and certificates of investment accounts held. Banca Transilvania will process the following information / personal data about you, as authorized by the BTAM operator, as the case may be: surname, first name, CNP, BTAM client_ID, investment account number, transaction history, balance held in BTAM-managed funds, profit/loss information, and withholding tax.

VI. Kiddo functionality

1. BT Pay Kiddo - for children over 14

If you access the BT Pay Kiddo section - the section for children aged 14 and over - **and** try to connect a child in this age group, we will need to check that you meet the conditions set out in the [BT Pay Kiddo Terms](#) for children with a BT account. To do this, based on your personal details consisting of **first name, surname, National ID, age**, we will check whether you are a proxy on the account of the minor for whom you provide us with the details in BT Pay (National ID and phone number) to grant them the right to access/use BT Pay for Minors. In addition, we will also by default process personal data consisting of the **relationship between you and that minor**.

The provisions in this paragraph relate only to the processing of your data as the minor's parent. The processing of the minor's personal data is carried out in accordance with the [Information Notice on the processing in BT Pay of personal data of users aged 14 and over who](#) have a BT account, including the provisions relating to the personal data of minors in the [Information Notice on the processing of personal data for identification purposes in BT Pay](#), which we ask you to read before completing the process of logging in with your minor in this age group through BT Pay Kiddo.

2. BT Pay Kiddo - for minors between 8 and 18 years of age attached to the parent's account

If you go to BT Pay Kiddo - the section for minors attached to a parent's account and try to connect a minor aged between 8 years of age and under 18 to use BT Pay with a child's own card attached to your account, we will need to check that you meet the conditions set out in the [BT Pay Kiddo Terms for minors attached to a parent's account](#).

For this purpose, we will process your personal data consisting of **your name, surname, CNP, age** and implicitly personal data consisting of the **relationship between you and the respective minor**.

The provisions in this paragraph relate only to the processing of your data as the minor's parent. The processing of the personal data of the 8 - 18 year old minor without a BT account is carried out in accordance with the [Information Notice on BT Pay processing of personal data of minor users](#) attached to the parent's account, which we ask you to read before completing the BT Pay Kiddo login process with the minor in this age group.

VII. Other BT Pay functionalities

1. To identify via BT Pay if you are on a call in a call center or BT unit

If you opt to be identified in BT Pay when you call into a BT call center or, in specific situations, a BT establishment, we will process information/personal data that you are a **BT customer who is a**

natural person using the App, the phone number on which you have BT Pay installed, the authentication method (App PIN, biometrics, phone unlock method), data on the version of the App installed.

2. To update your BT personal details via BT Pay

By accessing this functionality, you will have the possibility to update some of the personal data required by the bank for the application of know-your-customer measures in the BT Pay application. In connection with the processing of your personal data for this purpose, you will be provided with a separate information notice specific to this functionality, which can be accessed by following the link displayed in the 'general provisions' section of this information notice.

3. For the offering, issuing and management of RCA Insurance

Through the "RCA Insurance" section of BT Pay you can obtain offers of RCA Insurance from different Insurers or take out RCA Insurance Policies. In order to display insurance offers in the BT Pay app, more information is required, some of which is personal data. **Unlike the other functionalities available in BT Pay, please note that Banca Transilvania is only a processor for the personal data processed in this section. The processing of personal data in this section is subject to the provisions of *The Policy on the Processing of Personal Data by Timesafe SRL ("the Company") and Renomia - SRBA Insurance Broker SRL ("the Broker") of Personal Data within the "RCA Insurance" section of the BT Pay Application*, which is made available to you separately by the Data Controllers and which you can find in the menu of this section available in BT Pay.**

4. For the Recharge Card option

When you use this option, we usually process the following: the phone number for which you are recharging, the card details, the balance of the account from which you are recharging.

5. For the option "Rovignette"

To use this option, you will be able to purchase or renew your Romanian territory vignette from BT Pay. BT will process, as appropriate, the following information/personal data: information relating to the vehicle for which the vignette will be issued, the balance and the card used to pay the vignette.

6. For offering, issuing and managing Travel Insurance

Through the "Travel Insurance" section of BT Pay you can get Travel Insurance offers from Groupama Asigurări S.A. . In order to display the insurance offer in the BT Pay application and to conclude the insurance policy, several personal data are required. Unlike the other functionalities available in BT Pay, please note that for the personal data processed in this section, Banca Transilvania is only a data processor of the operator Groupama Asigurări S.A.. The processing of personal data in this section is subject to the provisions of Groupama's Personal Data Processing Information Notice (an integral part of Groupama S.A.'s Privacy Policy), which is made available to you separately in BT Pay from this operator when you request a travel insurance quote. You can also find this information notice in the Travel Insurance section menu in BT Pay.

7. For the provision of the Payee Name Display Service (SANB) in order to prevent fraud in case of interbank payments initiated from payment/ internet banking applications

Personal data is processed by BT together with other associated operators, as detailed in the [Information Notice on the processing of personal data within the Service Name Display Beneficiary \(SANB\)](#).

In order to prevent fraud in the case of intra-bank payments initiated from its own payment/internet banking applications, 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 and without the involvement of Transfond. The basis for the processing of your data is BT's legitimate interest in preventing fraud in intra-bank payments (BT-BT). Your first name (one or more, as appropriate) in full and the initial of your surname registered with BT will be displayed to other BT customers who initiate from a BT application a payment to your account. BT, whether the payment is completed or not.

8. For communication with BT Pay users

The application will send a series of **notifications** (e.g. for confirmation/ rejection of payments made with cards enrolled in the App; notifications dedicated to users of the Bill Payment service; for identification through BT Pay; for transfers, related to acceptance of transfers by the beneficiary/ payer, successful completion of the transaction, rejection of the transaction by the payer; for authentication/rejection of online payments initiated with BT cards enrolled in the App and in 3DSecure; general notifications, notifying the user of other relevant information related to the BT Pay App, other than those related to the above functionalities; notifications of particular interest, whereby the user is informed about important matters in relation to their contractual relationship with the bank, such as changes to the bank's General Terms and Conditions of Business, changes to fees, changes to the General Information Notice on the processing and protection of BT customers' personal data, notifications about the need to update data in the bank's records, notifications for identification via BT Pay, following a call to the BT call center or, where applicable, following certain types of requests/transactions in BT establishments notifications about offers, with the user being informed of new offers added to the list of offers in the App, as well as if they have unlocked an offer in the Offers - moving rewards section).

You can disable some or all of these notifications from the app's Settings menu. If you don't have notifications set to "on" you won't receive push notifications, you will find them in the Notifications section of the app.

In order to display personalized offers to you, BT Pay will request permission to access **device location** on which the app is installed to automatically display offers from Star partners (for Star credit card holders) as well as BT offers that are specific to a locality. You will be able to choose not to grant access to the location of the device, in which case you will be able to manually select the desired locality. The app will also allow users to view the partner locations of the published offer on the map, in which case you will need to enable the GPS functionality in the device settings.

By accessing the "offers" section of the app, you agree that BT will collect information about the offers accessed (saved, activated or to which you have applied), in order to present in the future other offers that may be of interest to you and to the application of preferential conditions for the offers activated or to which you have applied.

9. To display expenditure categories grouped by category of traders

You can use the app to view your BT card spending at merchants, grouped by spending category displayed according to the category of the merchants you are paying with your card. The grouping of charges does not involve analysis or evaluation of your payment behavior.

10. To analyze and improve BT Pay performance

In order to be able to compile statistics to measure the performance of BT Pay services with a view to improving the performance of the App, we have a legitimate interest to collect the following information about the devices on which the App is installed - phone identification (Device ID), phone type, operating system, operating system version, device name, device settings, access required to have an internet connection.

Retention period of data provided/collected in BT Pay

Except for the situations expressly mentioned in the presence of information notes, your data, as a BT customer, as well as the data regarding the transactions carried out through BT Pay will be kept for a period of 5 years from the termination of your business relationship with the bank, according to the applicable legal provisions, except for the data that must be kept for a period of 10 years, according to the legal provisions in the financial accounting and fiscal field.

Recipients of personal data processed within BT Pay

Data provided directly by users of the App or that the Bank may become aware of in the context of users' installation, registration, enrollment/use of the App, may be disclosed by Banca Transilvania to the service providers that assist us in providing the App and to Apple (Apple Pay solution), in case you have opted to enroll your card in BT Pay.

In accordance with the matters set out in this notice, certain information will be disclosed by default to other BT Pay users.

In addition, for certain competitions, certain data will need to be communicated to partner merchants in order to deliver your prizes.

The categories of recipients to whom personal data is disclosed in the context of registration or enrollment in/via BT Pay, as well as the separate services Alias Pay BT, Bill Payments, Overdraft, Credit Card and credit line increase exclusively online, 100% online personal needs credit are mentioned in the specific information notices for the processing of personal data within these services.

Links and third-party applications

The app contains **links to partner merchants' websites**.

The app also gives users the possibility to access:

- **third applications - physical activity monitoring** - by logging in with your account details from that application via BT Pay to unlock preferential offers in the BT Pay *Rewards on the Go* section.
- through the **Offers section**, **personalized links from partner merchants**, which third parties will be able to see that the person has accessed them from BT Pay, and therefore implicitly that they are a BT customer.

The Bank does not manage and does not control in any way the information that the owners of the merchant partner websites or third party application providers process in relation to users, and therefore cannot guarantee that it is processed and/or protected in accordance with the applicable legal provisions in the field of personal data processing and protection, such as, but not limited to, the General Data Protection Regulation ("GDPR"), Law 506/2004, Law 190/2018. Furthermore, the Bank cannot know and/or guarantee the timeliness or accuracy of the information that these websites/ applications hold about you.

Because the bank wants to encourage an active lifestyle, BT Pay has developed the *Rewards on the Move* section, through which users can unlock offers at preferential prices from partner merchants with which the bank collaborates, as well as offers from the Bank.

To this end, by accessing a physical activity monitoring application via BT Pay, the Bank will request **Permission to access certain information related to the user's activity in the third party application.** This data will be visible to the user who has accessed that app via BT Pay in the *Moving Rewards* section. Of these, the Bank will only use to enable the unlocking of offers **information related to the number of steps taken, the number of kilometers traveled and/or the number of active minutes ("physical activity data"), as defined in the third party physical activity monitoring application.** For the purposes of verifying the User's eligibility to benefit from the offer published in *Rewards on the Move* and for the accurate allocation of rewards, the Bank will store the User's Physical Activity Data strictly for the period necessary to fulfill these purposes. Offers may be unlocked based on one or more of this information, to which may be added, as appropriate, other parameters related to card, sticker, BT Pay app activity in a given period, all of which are specifically mentioned in each offer.

You are under no obligation to access and use the *Rewards on the Go* section of BT Pay. Not accessing this section in no way affects your ability to use BT Pay services. If you have given the BT Pay app access to the information in the movement tracking app you are using, you can revoke this access at any time from the third party app settings/phone settings, the permissions you have given the BT Pay app to take physical activity. In this case, you will no longer be eligible for the offers in this category until such time as access is granted again.

Each website and third party application accessed through the application has its own rules regarding the processing of personal data, so please consult the policy of each website/application to make sure it does not conflict with your interests.

Rights in relation to the processing of personal data in BT Pay

The processing of your personal data within BT Pay is subject to the provisions of the [General Information Notice on the processing and protection of personal data belonging to BT customers](#), an integral part of the [BT Privacy Policy](#), which you can find on the website www.bancatransilvania.ro, in the Privacy Hub section or on request at any BT Pay branch.

The General Information Notice includes the rights you can exercise in relation to the processing of your personal data, the ways in which you can exercise them, as well as the contact details of the Data Protection Officer (DPO) and how to contact him/her.