

## Privacy Notice regarding the processing of personal data in the BT Pay mobile app

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### **Personal Data Controller**

**Banca Transilvania S.A.**, headquartered in Cluj-Napoca, Calea Dorobanților no. 30–36, registered with the Trade Registry under no. J1993004155124, VAT no. RO5022670 (hereinafter referred to as “BT”), informs you about how it will process, as data controller, your personal data within the BT Pay mobile application (“the Application” or “BT Pay”).

Specific situations where BT is not the data controller are mentioned in this privacy notice. BT Pay is offered to BT customers in accordance with the [Terms and Conditions for using the BT Pay mobile application](#).

### **Data Subjects**

This privacy notice applies exclusively to the processing of personal data belonging to BT Pay users who are at least 18 years old (“adult users”).

### **Information for minor users**

#### **Minors aged 14+, with their own BT card and account:**

Minors aged at least 14 who have an account opened with BT and use BT Pay with their own card, as well as their parents/legal guardians (“parent”), are invited to consult:

- [The privacy notice regarding the processing of personal data in BT Pay for minor users aged 14+ with a BT account](#)
- [The privacy notice regarding the processing of personal data for identification purposes in BT Pay](#)

#### **Minors with a BT card linked to the parent’s account:**

Minors aged between 8 and 18 who use BT Pay with a personal card linked to a parent’s account are invited to consult:

- [The privacy notice regarding the processing of personal data in BT Pay for minor users linked to the parent’s account](#)

For minors **under 14 years old**, it is recommended that this notice be read together with the parent/legal guardian (“parent”).

### **Specific Privacy Notices**

BT Pay offers various products and services that may involve the processing of personal data for specific purposes and based on specific legal grounds. Full details are available in the following privacy notices:

- for **RoPay Alias** → [Privacy Notice regarding the processing of personal data within the RoPay Alias service](#)
- for **obtaining or increasing the credit limit of a credit card** → [Privacy Notice regarding the processing of personal data for the exclusive online issuance of a BT credit card](#)

- for **obtaining or increasing an overdraft facility** → [Privacy Notice regarding the processing of personal data for the exclusive online issuance of an overdraft](#)
- for **obtaining a personal loan** → [Privacy Notice regarding the processing of personal data for obtaining a 100% online BT personal loan](#)
- for **updating personal data via BT Pay** → [Privacy Notice regarding the processing of personal data for updating, through BT Pay, the data registered with BT](#)
- for the **Bill Payments Service** → [Privacy Notice regarding the processing of personal data within the Bill Payments service](#)
- for the **SANB Service – fraud prevention in interbank transactions** → [Privacy Notice regarding the processing of personal data within the Beneficiary Name Display Service \(SANB\)](#)

BT will periodically update this privacy notice without imposing less favorable conditions regarding data processing and protection. Any changes will be communicated within the BT Pay application, and the updated version will always be available for consultation in BT Pay and on the [BT website](#), in the [Privacy Hub](#).

BT Pay customers are always subject to the version of the privacy notice in force at the time of use.

If you have any questions or concerns regarding how BT processes personal data, you may contact us at [dpo@btrl.ro](mailto:dpo@btrl.ro).

## **Personal Data Processed in BT Pay, Purposes and Legal Bases of Processing**

### **1. Ensuring security in BT Pay / fraud prevention**

For the security of data in BT Pay and to prevent fraud, when you register or use BT Pay, we process, based on legal obligations and legitimate interest, the following types of data:

 **device data:** such as, but not limited to: device ID and name, model, type/version of operating system, the existence of a security method (e.g., password, fingerprint – BT does not have access to these methods, it only checks whether they exist), information regarding the recent use of the device for calls/conversations (without access to their content or to the phone numbers involved), including the presence of potentially dangerous applications (e.g., malware, remote-control apps) – we check the device to detect whether such applications are installed and, if so, which they are, without having information about or access to other applications installed/used on the device.

### **IP address and IP-based location**

 **data necessary for: setting/resetting/unblocking the PIN, app authentication, and transaction authorization**, as described in the [Privacy Notice regarding the processing of personal data for identification purposes in BT Pay](#).

Depending on fraud risks and based on the processing of this data, the bank may take measures, including automated ones, such as: blocking the application until unsafe third-party applications are removed or, as applicable, until you assume the risks related to using them on a device on which BT Pay is used; blocking suspicious transactions; contacting the user.

This data is essential for the security of the application. If you refuse its processing, as a rule, you will not be able to use BT Pay.

## **2. Registering new BT customers in BT Pay (current account holders)**

When initiating a business relationship via BT Pay, we use remote video identification, which involves processing identity document data, contact details, and biometric data (facial recognition), in accordance with applicable legislation.

Details are provided in the [Privacy Notice regarding the processing of personal data for opening a business relationship with Banca Transilvania via BT Pay.](#)

## **3. Registering Existing BT Customers in BT Pay**

If you already have a business relationship with BT and wish to register in BT Pay, you must undergo a strong customer authentication process, in accordance with applicable payment services legislation. For this purpose, we process personal data as detailed in the *Privacy Notice regarding the processing of personal data for identification purposes in BT Pay*, available in the “Specific Privacy Notices” section of this privacy notice.

For registration in BT Pay, based on the conclusion and execution of the contract related to the Application, we process the following personal data: **Username (nickname); Application identifier (wallet ID); Card data** (card number, expiration date, CVV/CVC code, and name on the card) for cards held with BT, BT Direct, or non-BT cards registered in BT Pay; **Phone number** declared with BT or BT Direct; For **non-BT cards**, confirmation of 3D Secure verification by the issuing institution (BT does not have access to the data used in this verification, nor does it know the method or personal data used by the card issuer)

## **4. Using BT Pay**

To execute the contract related to BT Pay to which you are a party, to fulfill the bank’s legal obligations, based on our legitimate interest and, where applicable, your consent, we process personal data as follows:

### **I. “Cards” Functionality**

#### **1. Payments with card at merchants**

With **Android devices** that have NFC enabled, you can make payments using BT cards registered in BT Pay. In this case, we process: **Device data** (operating system and version, NFC capability and status); **Authentication data** (e.g., phone unlock); **Transaction details** (amount, date, location); **Card and account data** used for the transaction

For enrolling cards in **Google Pay**, the application will display the option if you use Android and have BT cards not yet enrolled. In this case, BT securely transmits to Google: **Card data** (card number, expiration date, name); **BT customer code (CIF BT); Device ID and Wallet ID**

On **iOS devices**, NFC payments require card enrollment in **Apple Pay**, in accordance with [Apple’s terms](#). BT Pay will display the quick enrollment option and process: **Device data** (operating system and version); **Card data** (PAN, expiration date, name, BIN, and card type), which are securely transmitted to Apple;

To authorize **online payments with “Pay with BT Pay”**, we process: **Selected card data; Authorization method**

For **online payments via “Click to Pay,”** users must create a Click to Pay profile from the app. If the **email address and phone number** registered with the bank match those used at the merchant, the transaction can be authorized without manually entering card details. Details regarding the processing of

personal data can be found in the dedicated section of the Terms and Conditions for using the “Click to Pay” feature in BT Pay.

## **2. Transfers via phone number (P2P) or IBAN**

With BT Pay, you can: Send/request money to/from contacts or other BT Pay users via phone number (P2P); Make transfers based on IBAN; Transfer funds between your own cards registered in BT Pay

For P2P transfers, the app may access your phone’s contact list (**only with your consent**) to facilitate the transfer. If access is not granted, you will need to manually enter the recipient’s phone number.

During P2P initiation, the app will indicate **whether the entered phone number is associated with a BT Pay account**. Therefore, if your phone number with BT Pay installed is selected or entered by another BT Pay user for a P2P transfer, that user will learn that BT Pay is installed on that number.

To perform P2P transfers, we process: **Card data** (including the preferred card for receiving P2P transfers, if selected); **Transaction data** (amount, date, description, IBAN, name of payer/payee); **Phone numbers** (yours and the other BT Pay user’s);

For IBAN-based transfers, we process: **Your card and account data**; **Transaction data** (similar to P2P); **Beneficiary data** (name, surname, IBAN)

You may send proof of P2P or IBAN transfers to an **email address**.

For transfers between your own cards registered in BT Pay, we process: **Card data** involved in the transfer; **BT account data** linked to those cards; **Transaction data**

Within the “Cards” functionality, BT Pay also allows customers to perform other banking operations, such as: Cash withdrawals (via code or contactless); Setting transaction limits and blocking cards; Viewing card details; Authenticating online payments; Paying bills; Enrolling in Open Banking; Issuing cards (including for additional users); Transferring money to BT; Saving cards at merchants; Viewing credit limits and transaction breakdowns by merchant category (for credit cards). For each functionality, Banca Transilvania processes relevant personal data (e.g., card data, phone number, transactions). Further details on these processing activities are provided below.

## **3. Cash withdrawal from BT ATM using a code**

Through BT Pay, you can generate a **temporary code** for cash withdrawal from a BT ATM (available only for cards issued to **individual customers**). We process your **phone number** (selected from your contact list or manually entered) for sending the code, **card and account data**, and **transaction details**.

## **4. Contactless cash withdrawal from BT ATM**

Using BT Pay, the customer can withdraw cash **contactlessly** from a BT ATM. This operation is only possible by entering the **PIN code** associated with the respective card.

## **5. Setting transaction limits and/or blocking cards**

Through BT Pay, you can set **transaction limits** for BT cards registered in the application, **temporarily or permanently block** these cards, and request the **unblocking** of temporarily blocked cards. We process **information about the set limits, card status, and card data**, as well as the **phone number** declared with BT (these operations are permitted only based on an **OTP code** sent via SMS).

## **6. Displaying card details in the application**

Through the BT Pay application, you can view **card details** – **card number** and **CVV/CVC code** – to facilitate and enable **online payments**, as well as the **PIN code** set for the card. We process these data and, where applicable, the **phone number** declared with BT (when display is permitted only based on an **OTP code** sent via SMS).

## 7. Authentication/confirmation of online payments via BT Pay

**Online payments** (payments made on merchant websites) initiated with BT cards registered in BT Pay, including **3D Secure** transactions, can be **authenticated or rejected** exclusively through the application. We process **card data** and **transaction details** (including the **merchant name** and **transaction identifier**, which will be stored on the device you use from the moment the payment is initiated until it is authenticated or rejected, as applicable).

The **notification** regarding the authentication/rejection of such online payments will be sent via the **“general” channel** in the Application. If notifications on the “general” channel are not activated, you will not receive the authentication/rejection notification. On **Android phones**, with your consent, BT Pay may automatically display the **payment confirmation screen** without manually opening the app or the notification. Permission is requested after the first online payment or can be enabled from the phone settings, under the BT Pay app section.

## 8. Activation and use of the Bill Payments service

Personal data for the activation and use of this service are processed in accordance with the **specific privacy notice**, accessible in the “Specific Privacy Notices” section of this privacy notice.

## 9. Enrollment in Open Banking

To use the **Open Banking** functionality (available for **non-BT cards** added to BT Pay), BT processes the following information, which may constitute **personal data**: **IBAN**, **balance of the non-BT card/account**, and **transaction history/data** from non-BT accounts (**date, amount, transaction details, counterparty involved** in the transaction).

## 10. Issuance/reissuance of a card

Through BT Pay, you may request the **issuance/reissuance** of a card for yourself (including **virtual cards**) or for a person you designate as an **additional card user**. In this case, we process, as applicable, **personal data** of yourself and/or the additional card user: **data of the issued/reissued card**, **IBAN of the account** to which it will be linked, **card delivery address**, **national identification number (CNP)**, and **phone number** of the additional card user. If the additional card user is not yet identified in BT Pay at the time of designation, we will also process their personal data for **identification in BT Pay**, as provided in the *Privacy Notice regarding the processing of personal data for identification purposes in BT Pay*, accessible in the “Specific Privacy Notices” section of this privacy notice.

## 11. “Move your money to BT” option

When using this functionality, we process personal data as follows: **transaction data (amounts, transfer recurrence, bank from which the transfer is made)**, **card and account data**.

## 12. “Saved card at merchants” option

When using this option, we process: **name, surname, email address, card data, information about active subscriptions, details of recurring payments (amount, frequency, date),** and the **websites** where the card data were saved.

### 13. Credit info and expense categorization

For **credit cards**, you can view **information about your credit line/limit, minimum payment obligation and amount paid, any insurance linked to the credit line, transactions posted in installments, accumulated Star points,** activate/deactivate **monthly automatic payments** and their amount, and view **expense categorization** based on **merchant categories** where payments were made (this does not involve analysis or evaluation of payment behavior). We process these **personal data** to help you **manage your financial resources (financial education purpose).**

### II. [“Accounts” and “Savings” functionalities](#)

To view, use, and manage current accounts, **credit card accounts, savings accounts, deposits, and associated services** (such as Round Up, statements, transfers, or payments) in BT Pay, BT processes the following categories of personal data related to these accounts, as applicable: **IBANs, balances, currencies, cards linked to the accounts, transaction data (amount, description, date, exchange rate, recipient details – name, surname, account number, transaction history), recurring payments, predefined beneficiaries, amounts and settings related to the Round Up service, data regarding the creation and management of deposits and savings accounts (amounts, start/end dates, transfer frequency), information on interest and related taxes.** If proof of payment is sent via email, the **address entered by the user will also be processed.**

### III. [“Loans” functionality](#)

When accessing the **“Loans”** functionality, the Bank will **process personal data regarding the products you hold with BT** (the IBAN and balance of the loan account, of the current account from which the monthly installment is debited, or of the account you select to make an early repayment for a non-card loan; the loan contract number; the contracted loan amount; the loan start and end dates; the amount of the monthly installment; any outstanding payments; the repayment schedule; loan-related insurance policies and their status).

### IV. [“Investments” functionality](#)

The products in this BT Pay section are offered by the Bank’s subsidiaries (**entities that are part of the BT Financial Group**). In this case, Banca Transilvania processes your data as a **data processor**, while the subsidiary acts as the **data controller**. Your data from the Bank’s records, necessary for the conclusion/execution of the contract you enter into with the subsidiary, will be sent to the respective subsidiary, which will process them in accordance with its own **Privacy Policy**. Details are provided below:

To purchase and manage units in the funds administered by the Bank’s subsidiary – **BT Asset Management SAI (BTAM)** – through BT Pay, you can become an investor in the funds managed by BTAM by signing an **intermediation contract** with BT, and buy/sell and manage **fund units (UF)** in the fund of your choice. The **data controller BTAM** will process **personal data** such as: **name, surname, national identification number (CNP), BTAM client ID, investment account number, transaction history, balance held in BTAM-managed investment funds, information regarding gains/losses and withheld tax at source.** You will become a **BTAM customer**. Details about the processing of personal data by BTAM are available in the **BTAM Privacy Policy**, accessible on the website [www.btassetmanagement.ro](http://www.btassetmanagement.ro).

**To become a participant and view the amounts accumulated in the voluntary pension funds administered by the Bank's subsidiary – BT Pensii SAFPF S.A. (BT Pensii)** – by signing the accession agreement to a voluntary pension fund (Pillar III) administered by BT Pensii, you become a participant in that fund (a BT Pensii client). You will be able to set and manage your contribution to the fund, including expressing your preferences regarding BT Pensii's communication with you. Details on the processing of personal data carried out by the data controller BT Pensii can be found in the **BT Pensii Privacy Policy**, available on [www.btpensii.ro](http://www.btpensii.ro).

**To view the amounts accumulated in your privately managed pension administered by the Bank's subsidiary – BRD Pensii SAFPP S.A. (BRD Pensii)** – if your private pension (Pillar II) is with BRD Pensii, you can view the accumulated amount in BT Pay. Details on the processing of personal data carried out by the data controller BRD Pensii can be found on <https://www.brdpensii.ro/>

## V. **“Kiddo” functionality**

### 1. **BT Pay Kiddo – for minors aged 14+, with their own BT card and account**

If, as a **parent**, you initiate the connection of a minor through this section of BT Pay Kiddo, we will verify whether you meet the conditions set out in the **BT Pay Kiddo Terms**. For this purpose, we will process the following **personal data: name, surname, CNP, age, and your status as the minor's parent and authorized person on their account.**

### 2. **BT Pay Kiddo – for minors with their own BT card linked to the parent's account**

If, as a **parent**, you initiate the connection of a minor through this section of BT Pay Kiddo, we will verify whether you meet the conditions set out in the **BT Pay Kiddo Terms for minors linked to the parent's account**. For this purpose, we will process the following **personal data: name, surname, CNP, age, and implicitly the personal data reflecting the relationship between you and the respective minor.**

## VI. **Other BT Pay functionalities**

### 1. **Identification via BT Pay during calls or in BT branches**

If you choose identification via BT Pay during a call with a BT call center agent or in a BT branch, we will process your **personal data: your status as a BT customer and BT Pay user, phone number, authentication method (PIN, biometrics, phone unlock), and application version.**

### 2. **Beneficiary Name Display Service (SANB) for fraud prevention**

We have a **legal obligation** and a **legitimate interest** to prevent banking fraud. To protect you in the case of **interbank transactions** (payments to accounts held at other banks), BT, together with other **joint controllers**, processes your **personal data** in accordance with the details provided in the *Privacy Notice regarding the processing of personal data within the Beneficiary Name Display Service (SANB)*, available in the “Specific Privacy Notices” section of this privacy notice. In the case of **intra-bank transactions** (payments to BT accounts), BT processes the same categories of **personal data** independently, as used in SANB. The **legal basis** for processing your data is BT's **legitimate interest** in preventing fraud in intra-bank payments (BT-BT). Your **full first name(s)** and the **initial of your last name** registered with BT will be displayed to other BT customers who initiate a payment to your BT account from a BT application, regardless of whether the payment is completed or not.

### 3. **Updating personal data**

Through this functionality, you can update certain **personal data** held by the bank. Details regarding the processing of personal data are available in the specific privacy notice found in the “Specific Privacy Notices” section of this privacy notice.

#### 4. RCA Insurance

Through the “RCA Insurance” section in BT Pay, you can obtain offers or conclude RCA insurance policies. For displaying offers, **personal data** are processed by **Timesafe SRL** and **Renomia-SRBA**, in accordance with their respective **privacy policies**, available in the application. BT processes the data as a **data processor** on behalf of the controller.

#### 5. Travel Insurance

Through BT Pay, you can obtain travel insurance offers and conclude travel insurance policies from **Groupama Asigurări**. For this functionality, BT processes **personal data** as a **data processor** on behalf of Groupama. Details regarding the processing of personal data by Groupama are accessible directly in the application, in the “Travel Insurance” section.

#### 6. Home Insurance

Through BT Pay you can obtain an insurance offer and conclude a voluntary home insurance policy from Groupama Asigurări, as well as a PAD insurance policy. For this functionality, BT processes personal data as an authorized representative of Groupama. Details regarding the processing of personal data carried out by Groupama are available directly in the app, in the “**Home Insurance**” section.

#### 7. Mobile top-up

When using this option, we process: the **phone number** for which the top-up is made, **card data**, and the **account balance** from which the top-up is performed.

#### 8. Road tax vignette purchase

When purchasing or renewing a **rovinieta** (road tax vignette) for Romania via BT Pay, BT will process: **vehicle data**, **card used**, and **available balance**.

### [5. Communication with BT Pay users via the application](#)

#### a. Notifications

Through BT Pay, we send various types of **notifications**:

- **Notifications related to card payments:** confirmation/rejection of payments made with cards registered in the application, authentication/rejection of online payments initiated with BT cards enrolled in the application and in 3D Secure.
- **Notifications related to transfers:** acceptance/rejection of P2P transactions; confirmation of successful transaction completion.
- **Notifications related to partial early repayments of non-card loans:** information regarding the status of the partial early repayment request for the non-card loan.
- **Notifications for identification via BT Pay:** identification requests in the application (during a call with a BT call center agent or for identification via BT Pay in branches).

- **Notifications for the Bill Payments service:** messages dedicated to users of this service.
- **General interest notifications/messages:** relevant information about the BT Pay application, other than those related to the functionalities above.

- **Specific interest notifications/messages:** e.g., changes to the Bank's General Business Terms, fee changes, updates to privacy notices regarding personal data processing; notifications for updating data in the Bank's records.

- **Advertising messages,** if you have given your consent to BT to process your data for advertising purposes

- **Notifications about "Offers" in BT Pay:** information about new offers added to the application; notifications about unlocked offers in the "Offers – Active Rewards" section. By accessing the "Offers" section in the application, you give your **consent** for BT to collect information about: **offers accessed** (saved, activated, or applied for), for the purpose of presenting relevant future offers and applying preferential conditions related to the activated or accessed offers.

### **Active Rewards – BT Pay**

To encourage an active lifestyle, BT Pay includes in the "Offers" section a subsection called "**Active Rewards**", where users can unlock special offers from partners and the bank. Upon connecting a **physical activity tracking app**, BT Pay will request permission to access data such as: **step count, distance walked, active minutes**. These data are visible only to the user who connected them and are used exclusively for: **verifying eligibility for offers, allocating rewards**. The data are stored only for the duration necessary to fulfill these purposes.

Some offers may also include other parameters, such as **card or app activity**, clearly specified in each offer.

Accessing the "Active Rewards" section is **optional** and does not affect general use of BT Pay. If you have granted access to data from the tracking app, you can revoke it at any time from the settings of the respective app or your phone. Without access, you will not be eligible for offers in this category.

BT Pay will also request **access to your device's location**, to display offers available in your area (e.g., for automatic display of **Star partner offers** for Star credit card holders, showing partner locations on the map). You are not required to allow location access and may manually select your city. If you deny access, other BT Pay functionalities remain fully usable.

You can enable/disable notifications from the **Settings menu** of the application. If notifications are not enabled ("on"), they will not be received as **push notifications**, but will be available in the **Notifications** section of the application.

### **b. Assistance and support via BT Pay chatbot**

Through the BT Pay chatbot, you can chat in real time with a BT consultant. In this context, we process data such as: **name, BT customer code (CIF), customer type, card names, application version, phone operating system, and language selected in the chat**, for identification and support purposes.

## **6. For performance analysis and improvement of BT Pay**

To compile statistics that allow performance measurement of BT Pay and improve its functionality, we have a **legitimate interest** to collect the following information about the devices on which it is installed: **device identifier (Device ID), phone type, operating system, operating system version, device name, device settings, and access permissions required for internet connectivity.**

#### **Retention period of personal data processed in BT Pay**

Except for the situations expressly mentioned in this **privacy notice**, your data, as a **BT customer**, as well as data related to transactions carried out through BT Pay, will be retained for a period of **5 years** from the termination of your business relationship with the bank, in accordance with applicable legal provisions, except for data that must be retained for a period of **10 years**, in accordance with financial, accounting, and tax legislation.

#### **Recipients of personal data processed in BT Pay**

Data provided directly by users of the application or that the Bank may become aware of in the context of installing, registering, enrolling, or using the Application may be disclosed by Banca Transilvania to certain categories of recipients, as follows:

- other **BT customers** who have the right and need to know (all BT Pay users are BT customers)

- a. BT Pay users you have designated with operating rights on all your BT accounts, including in the application

If you have authorized representatives with full rights on all BT accounts and have granted them access in the app as well, they will be able to view in the app your personal data and the counterparties involved in transactions, as mentioned in Section II. “Accounts” and “Savings” functionalities of this information notice, except for the cards attached to the accounts. Authorized representatives can view this data, make transfers and currency exchanges, access statements and transaction history, share the IBAN, set up recurring payments, and manage savings and deposits.

- b. BT Pay users who have designated you with full operational rights on all their BT accounts.

If other BT clients, individuals who are account holders, have granted you full operational rights on all their BT accounts, they will see your first and last name in the app, as well as the fact that you are their authorized representative. When you perform transactions on these accounts, we will disclose to the account holders the details of the transactions carried out (information about you and about the counterparties involved in the transactions).

- c. Other BT customers who hold additional user cards linked to your accounts

If you have requested the issuance of additional cards on your account in the name of other card users, they may view your **account balance** in BT Pay.

- d. Other BT customers whose account includes a supplementary card issued in your name  
If you hold a supplementary card issued on another BT customer’s account, the account holder will be able to view in BT Pay **details of transactions** made with that card (amount, merchant, date, etc.).

- e. Other BT customers who are BT Pay users and who see, via the icon displayed next to your phone number/contact in their device’s address book, that you are a BT Pay user (and implicitly a BT customer)

- f. BT customers to whom you make payments via BT Pay

When you make transactions via BT Pay to accounts/phone numbers of other BT clients from accounts that belong to you, the data related to those transactions (typically, your name and surname, amount, account number, payment description) will be accessible to the beneficiaries of those payments.

#### • **Contractual partners of the bank**

a. Service providers who assist us in delivering the Application and related activities (e.g., SMS/email transmission providers; trusted service providers for signing documentation in the app using advanced electronic signature, etc.); identification service providers (for identification in BT Pay involving photographing the identity document and/or face – selfie/video selfie – BT uses the services of **Onfido** and its subcontractors, who process, solely on behalf of and under the instructions of the bank, data from the identity document, image – including from the video selfie taken in BT Pay – and biometric facial data, used for identification in BT Pay. Data processing may, in some cases, occur in third countries. The transfer of personal data to these countries is based either on adequacy decisions issued by the European Commission (e.g., for the United Kingdom), or on other appropriate safeguards, in accordance with GDPR mechanisms, consisting of Standard Contractual Clauses (SCCs) approved by the European Commission, which you can find here: <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:32021D0914>

b. Apple (Apple Pay solution), if you choose to enroll your card in this payment solution  
c. other entities within the BT Financial Group whose services/products are accessible through BT Pay (e.g., distribution of fund units through BTAM, voluntary pension funds administered by BT Pensii, or privately managed pension funds administered by BRD Pensii)

d. BT partners, whose services/products are accessible via BT Pay, including as described in the specific privacy notices (e.g., insurance companies)

The categories of recipients to whom personal data is disclosed in the context of the distinct services **RoPay, Bill Payments, Click to Pay Overdraft, Credit Card and online-only credit line increase, and 100% online personal loan** are mentioned in the specific information notices regarding personal data processing within these services.

The above list of recipients is supplemented by the one provided in the [General Privacy Notice regarding the processing and protection of personal data belonging to BT customers](#), section VIII.

#### **Links and third-party applications**

The application contains **links to websites** belonging to partner merchants. Additionally, the application allows users to access:

- **third-party applications** – for physical activity tracking – by logging in with the account credentials from the respective app via BT Pay, to unlock preferential offers in the **Active Rewards** section of BT Pay.
- through the **Offers** section, **personalized links** from partner merchants, where third parties may know that the person accessed the link via BT Pay, and thus implicitly that they are a BT customer.

 **Responsibility regarding the processing of personal data** – the bank does not control, manage, or take responsibility for the information processed by partner merchants' websites or by third-party applications accessed through BT Pay. Therefore, it cannot guarantee that such data are handled in accordance with data protection legislation (e.g., GDPR, Law 506/2004, Law 190/2018). The bank also cannot verify the accuracy or currency of the data these platforms/websites hold about you. Each site or

third-party app has its own rules regarding data processing. We recommend reviewing their privacy policies to ensure they align with your interests.

**✔ Rights related to the processing of personal data in BT Pay**

The processing of your personal data within BT Pay is subject, in addition to this privacy notice, to the provisions of the [\*General Privacy Notice regarding the processing and protection of personal data belonging to BT customers\*](#), which is an integral part of the [\*BT Privacy Policy\*](#), available on the website [www.bancatransilvania.ro](http://www.bancatransilvania.ro), in the Privacy Hub section, or upon request at any BT branch.

Within the aforementioned General Privacy Notice, you will also find the rights you may exercise in relation to the processing of your personal data, the methods by which you can exercise them, as well as the contact details of the Data Protection Officer (DPO) and how to reach them.