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

(Privacy Policy for BT Pay mobile app)

Updated version as of: 19.06.2026

🏦 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.

🗂️ 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.

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.

To view the amounts accumulated in your privately administered pension managed by the bank's subsidiary – BT Pensia Noastră SAFPP S.A. – if your private pension (Pillar II) is with BT Pensia Noastră, you can check the accumulated amount in BT Pay.Details regarding the processing of personal data carried out by the operator BT Pensia Noastră can be found on the website: https://btpensianoastra.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 **intrabank 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 intrabank 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. Managing authorized persons
If you have been granted/have access in BT Pay to the accounts of other BT clients (individuals, adults or minors) for whom you are designated with operating rights (authorized person), we process data regarding your status as an authorized person on those accounts, as well as data about the transactions and any actions you perform on those accounts. We will also process your data if those clients revoke your authorized status in BT Pay on their accounts.

If you grant access in BT Pay to other BT clients (adult individuals) designated with operating rights (authorized persons) on your accounts, we process data regarding your status as the account holder who has designated one or more authorized persons with access to BT Pay. Additionally, if the authorized persons perform transactions or any actions on your accounts, we process the necessary data (name, surname, accounts, transactions, balance, etc.).

5. Managing current account subscriptions
Through this functionality, you can activate and deactivate current account subscriptions and view details about the subscription you have active. For the execution of contracts related to each of the BT products and services included in these subscriptions, we process the necessary personal data as described in the General Information Notice regarding the processing and protection of BT customers' personal data. For the insurance products included in some subscriptions, the data controller for the conclusion and execution of the insurance policy is the Insurer.

6. RCA Insurance

Through the "RCA Insurance" section in BT Pay, you can obtain quotes or conclude RCA insurance policies. If you use this section in BT Pay, BT processes your data as a data controller for the following purposes: (i) facilitating the completion of the necessary contractual documentation, by pre-filling identification and contact details (e.g., phone number) as recorded in the bank's systems; (ii) paying RCA insurance policies, if you choose to purchase them based on the insurance offers obtained by BT Broker from the insurers it collaborates with; and (iii) reconciling payments related to insurance policies.

However, for the personal data required to obtain and display RCA insurance offers in BT Pay, as well as for concluding and executing RCA insurance policies, the data controllers are, as applicable, BT Broker and the insurers from whom you choose to purchase the insurance policy.

7. 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.

8. 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.

9. 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.

10. eSIM Purchase

When you use this option and purchase an eSIM data plan from our partner – Timesafe SRL (Pago), which provides this service within BT Pay, BT will process and disclose to Pago your data consisting of: **first name, last name, unique identifier (BT client code – BT CIF), and data regarding the transaction through which you purchased the eSIM** (payment transaction reference, payment status, and information regarding the payment method used for the eSIM purchase – bank card).

In the context of using the eSIM functionality within BT Pay, **Pago processes your data as an independent data controller, as described in the Timesafe SRL Privacy Policy for eSIM in BT Pay, which you can access in the eSIM section.**

11. 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, through the dedicated form (available in branches, on the BT website, in BT Pay Web, or during the process of establishing the business relationship with the bank for BT Pay for individuals, or through BT Go for legal entities).

• **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. Accessing the "Active Rewards" section is **optional** and does not affect general use of BT Pay.

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**. Some offers may also include other parameters, such as **card or app activity**, clearly specified in each offer. If this data falls within the category of health data, by granting access to such data from the monitoring application, you provide your explicit consent for its processing for the purposes mentioned in this paragraph. If you grant access to data from the monitoring application, you can revoke it at any time from the settings of that application or your phone. Withdrawal of access also represents withdrawal of consent. In the absence of access, you will not be eligible for offers in this category. The data are stored only for the duration necessary to fulfill these purposes. 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, Timesafe SRL for eSIM services, etc)

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 way partner merchants process your personal data on their websites or applications, even if you access these platforms from BT Pay. BT cannot guarantee that this data is handled in accordance with personal data protection laws (e.g., GDPR, Law 506/2004, Law 190/2018), and cannot verify the accuracy or timeliness of the data these platforms/websites hold about you. Each third-party site or application has its own rules regarding data processing. We recommend that you review 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, 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.

Salut. Te pot ajuta si colegii mei de pe grupurile (), (), ()

You may exercise the following rights regarding the processing of your data by the BT controller: a. the right of access; b. the right to rectification of data; c. the right to erasure ("right to be forgotten"); d. the right to withdraw consent; e. the right to object; f. the right to restriction of processing; g. the right to data portability; h. the right not to be subject to a decision based solely on automated processing of personal data, including profiling; i. the right to lodge a complaint with the National Supervisory Authority for Personal Data Processing (A.N.S.P.D.C.P.), using the authority's contact details available on the website www.dataprotection.ro.

To exercise your rights with BT as mentioned in points a–h above, please use the contact details of the Data Protection Officer designated by BT (BT DPO), by submitting your request through any of the following methods: 1. by email at dpo@btrl.ro; 2. by post, to the address in Cluj-Napoca, Calea Dorobanţilor Street, no. 30–36, Cluj County, with the mention "for the attention of the Data Protection Officer"; 3. by completing the online form available for Clients in the section "How to exercise your GDPR rights at BT", available on the Privacy Hub.