

**Privacy Notice regarding the processing of personal data for the purpose of issuing and managing the Qualified Digital Certificate issued to the User by Alfatrust Certification S.A. for the signing of documentation in relation with Banca Transilvania**

Effectiv as April 24, 2026

a. Personal data controllers

Pursuant to Articles 13 and 14 of Regulation (EU) 2016/679 – the General Data Protection Regulation (“GDPR”), Alfatrust Certification S.A. (“Alfatrust”) and Banca Transilvania S.A. (“BT” or the “Bank”), whose identification and contact details are indicated in the Terms and Conditions for the provision of certification services for qualified digital certificates, hereby inform you about the processing of the personal data of the User (“data subject”), which they carry out as joint controllers for the purpose referred to under point b. of this Privacy Notice.

b. Purpose and legal basis of the processing of personal data

The purpose for which the joint controllers process the User’s personal data is the issuance and management of the Qualified Digital Certificate (the “Certificate”).

BT is the controller that identifies the User, namely collects from the User the personal data necessary for the issuance of the Qualified Digital Certificate, and transmits such data to Alfatrust in order for the latter to issue the Certificate.

The data collected by BT from the Users are those processed by the Bank in its own records, in the context of the business relationship that is initiated or ongoing between the User and the Bank at the time the data are transmitted to Alfatrust.

During the validity period of the Certificate, the personal data are processed by the joint controllers, as applicable, including in situations where Users request the suspension or revocation of the Certificate, in accordance with the procedures detailed in the Terms and Conditions for the provision of services.

The legal bases for the processing of personal data for the defined purpose are the compliance with a legal obligation (Article 6(1)(c) GDPR), the conclusion and performance of a contract (Article 6(1)(b) GDPR), and the legitimate interests of the joint controllers (Article 6(1)(f) GDPR).

With regard to the legal obligation, both BT – in its capacity as a credit institution with which the User initiates or has an ongoing business relationship – and Alfatrust – in its capacity as an accredited certification service provider from which the User wishes to obtain a certificate – are

subject to the applicable legislation on the prevention of money laundering and terrorist financing, pursuant to which they are required to collect certain categories of personal data from customers. These data are also necessary for the conclusion and performance of the contract under which the User is allowed to use the Certificate for signing documentation in relation with the Bank.

In order to support Users who wish to submit a request for suspension or revocation of the Certificate, the joint controllers rely on a legitimate interest to offer such Users, who also have the status of customers of the Bank, the possibility to submit these requests not only directly to Alfatrust, but also through BT's Call Center. The handling of such requests entails the exchange of Users' personal data between the two joint controllers.

Contact data, namely telephone number and home address, will be processed by either of the joint controllers whenever it is necessary to contact the end User for the proper performance of the contractual relationship related to the Qualified Digital Certificate.

#### c. Categories of personal data and categories of data subjects

The personal data processed for the purpose indicated above are those required by law to be collected by a credit institution and by a certification service provider for the prevention of money laundering and terrorist financing, respectively, namely: name, surname, personal numerical code (CNP), home address or residence, validity date of the identity document, telephone number, and a copy of the identity document. All such data, as recorded in the Bank's records, will be made available to Alfatrust for the purpose of issuing and managing the Qualified Digital Certificate.

The processing of these personal data is necessary for the generation of the Qualified Digital Certificate. The User's refusal to allow the processing of these data results in the impossibility to issue the Qualified Digital Certificate.

The data subjects concerned by this processing are exclusively the Users, as defined in the Terms and Conditions of use.

#### d. Recipients of personal data

Except for the joint controllers between whom an exchange of personal data processed for the fulfillment of the processing purpose will take place, the data may be disclosed, as applicable, to employees of the joint controllers who need to know such data, IT service providers, audit service providers, as well as to authorities and institutions legally entitled to access them.

#### e. Personal data retention period

Information relating to a Qualified Digital Certificate, including personal data, is processed by Alfatrust for a period of 10 years from the date of expiry of its validity, in accordance with the legally established retention periods.

At the level of Banca Transilvania, the remote electronic signature applied based on the Qualified Digital Certificate issued by Alfatrust on documentation signed in relation with BT is retained for the entire duration of the business relationship between the User and BT, to which are added the

retention periods established under the applicable banking legislation, namely at least 5 years from the termination of the business relationship with the credit institution.

f. Rights of data subjects

Each User, in their capacity as a data subject, is guaranteed the exercise of the following rights in relation to the processing of their personal data, with either of the joint controllers: the right of access, the right to rectification, the right to restriction of processing, the right to erasure, the right to object to processing, and the right to data portability.

Users may exercise these rights or contact the data protection officers for any questions or requests regarding the processing of their personal data as follows:

- Banca Transilvania S.A. – by sending an email to [dpo@btrl.ro](mailto:dpo@btrl.ro) or by submitting a request at BT's headquarters, marked for the attention of the Data Protection Officer (DPO)
- Alfatrust Certification S.A. – by sending an email to [dataprotection@alfasign.ro](mailto:dataprotection@alfasign.ro) or by submitting a request at Alfatrust's headquarters, marked for the attention of the Data Protection Officer (DPO)

Users also have the right to lodge a complaint with the supervisory authority, namely the National Supervisory Authority for Personal Data Processing (ANSPDCP), headquartered in Bucharest, District 1, Bd. G-ral Gh. Magheru no. 28–30.