

## **Information regarding the processing of personal data provided on ATM operations**

GARANTI BANK SA, headquartered in Bucharest, Fabrica de Glucoza, no. 5, Novo Park 3, Business Center, Building F, 5th floor and 6, sector 2, with order number in the Trade Register J40 / 4429/2009, fiscal registration code 25394008, registered in the credit institutions register no. RBPJR-40-066 / 2009, hereinafter referred to as the "Bank", will process your personal data to be provided when performing ATM operations as described below.

**Personal data processed:** Name, surname, Personal Identification Number (PIN) / Fiscal Identification Number (NIF), Bank Card Number and Issuing Bank, Customer ID, Invoice Number, Product / Service Delivery Number, IBAN Code and place of birth, citizenship, home address, telephone number, serial number and ID number, image, information on inaccuracies found in the documents / statements submitted to the Bank, based on the forms, statements and documents submitted, drafted or completed.

We would like to specify that each transaction has its own specificity, so the data categories provided to the Bank for performing the operations on the bank machine will be different depending on: the standard customer requests of your operations, the requirements of our bank or the correspondent bank, the requirements of your utility provider, your supplier's products and services, etc. Thus, the Bank will not request, collect or use at the same time the entire set of personal data indicated above.

### **The purposes and bases of the processing. The recipients of personal data**

#### **(i) Your personal data will be processed to accommodate your requests as follows:**

- to perform your ordered operations, such as payment operations, cash deposit, transfers, currency exchange, etc. (the recipients of the data may be, depending on the orderly operation, the beneficiaries of the payment, cash deposit, correspondent banks, your utility suppliers, your suppliers of products and services) and to be able to contact you in the event of any inadvertent / in relation to them;
- transmission of data to Turkiye Garanti Bankasi A.S., a Turkish company, an indirect shareholder of the Bank, for the purpose of recording and processing transactions within the Bank's IT system, which is managed by this company. We specify that the provision of these services by the Turkish company was approved in advance by the National Bank of Romania.

#### **(ii) Personal data will be processed for the purpose of the Bank's fulfillment of legal obligations as follows :**

- the transmission of information on the operations carried out by the authorizing officer and their beneficiary to the authorities empowered by law to request and receive such information, e.g. the National Authority for Fiscal Administration (ANAF), the National Office for the Prevention and Control of Money Laundering (O.N.P.C.S.B.), courts of law, prosecutors, bailiffs, notaries, supervisory and control authorities in the banking field, etc.;

The processing of personal data for the purposes mentioned in points (i) and (ii) above is essential for carrying out the operations initiated by the data subject and for the Bank's fulfillment of legal obligations, so that, in the absence of data, the Bank will be able to handle your request and will not be able to process the transaction.

#### **(iii) Exercise by the Bank of a legitimate interest, as follows:**

- the transmission of personal data to entities belonging to the Garanti BBVA Group (all affiliated entities, as well as all direct and indirect shareholders of GARANTI BANK SA), formed at this time by: Garanti Holding B.V. and G Netherlands B.V. (Netherlands), Garanti Bilisim Teknolojisi ve Ticaret T.A.S., Turkiye Garanti Bankasi A.S. Banco Bilbao Vizcaya Argentaria SA (Spain), Ralfi IFN SA, Motoractive IFN SA, Motoractive Multiservices SRL (Romania) for the legitimate purpose of consolidating

- consolidated group supervision, for example, the analysis of the financial situation of the Group, identification of risks related to group activity, etc.).
- video surveillance of the ATM space in order to prevent fraud.

### **Transfer of personal data abroad**

As can be seen in the list of recipients indicated above, Garanti Bank SA transfers personal data to countries where an adequate level of personal data protection is ensured by a European Commission decision (except Turkey).

Transfers to Turkey are made on the basis of standard contract terms approved by the European Commission, clauses providing adequate safeguards for data protection.

The Bank may be contacted to obtain additional information on the guarantees offered for the protection of personal data in the case of any transfer of data abroad, upon a written request to do so.

### **The period of personal data storage**

The Bank will store the personal data for a maximum of 10 years from the date of the transaction, taking into account the provisions of the banking legislation on customer knowledge, money laundering prevention and terrorism financing, the provisions of the Accounting Law on keeping the supporting documents underlying the records in the financial accounts, the need to protect / preserve the Bank's rights in a possible dispute over the orderly operation.

For purposes of archiving in the public interest according to the National Archives Act and taking into account the Archival Nomenclature (approved by the National Archives) applicable at the Bank level, the data may be stored for periods that may exceed 10 years from the date of the transaction.

### **Rights of the person concerned**

The person concerned has the possibility to exercise in the cases and under the conditions stipulated by law the following rights regarding the personal data processed by the Bank:

- right to have access
- the right of opposition
- the right to data portability
- the right to withdraw the consent granted for the processing of the data
- the right to rectify the data
- the right to delete the data (the "right to be forgotten")

There may be situations where the Bank will not be able to respond to the data deletion request, namely:

- i. in cases where the Bank has a legal obligation to store personal data;
  - ii. in cases where data is stored for purposes of archiving in the public interest or for statistical purposes;
  - iii. in cases where the data are necessary for the establishment, exercise or defense of a right in court.
- the right to restrict data processing

The above-mentioned rights may be exercised by sending a request to GARANTI BANK SA, at its headquarters, to any of the branches of the Bank, as well as by electronic means, to e-mail [dpo@garantibbva.ro](mailto:dpo@garantibbva.ro), providing sufficient data to allow the applicant to identify the applicant by the Bank.

- the right to file a complaint with the supervisory authority for the processing of personal data - this right may be exercised if the data subject considers that the processing of his or her personal data violates the legal provisions in the field of data protection, without prejudice to any other administrative or judicial remedies; the complaint may be filed with the supervisory authority of the Member State of the European Union in which the person

concerned has his or her habitual residence or place of work or where the alleged breach has occurred. In Romania, the complaint will be filed with the National Authority for Personal Data Processing Supervision (A.N.S.P.D.C.P.), located in 28-30 G-ral Gheorghe Magheru Street, 1 st Sector, postal code 010336, Bucharest, in the form of an address written, at the headquarters of the institution, or electronically, at the e-mail address [anspdc@dataprotection.ro](mailto:anspdc@dataprotection.ro).