

## **Information about the data processing relating to suggestions and complaints addressed to GARANTI BANK SA**

GARANTI BANK SA, headquartered in Bucharest, no. 5 Fabrica de Glucoza, 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. RB-PJR-40-066 / 2009, hereinafter referred to as "the Bank", processes your personal data provided on the occasion of submitting suggestions / complaints, as follows:

**Personal data processed:** Name, surname, Personal Identification Number (PIN), address, telephone number, email address and any other data provided to the Bank under this suggestion and claim form or what might be disclosed by you during the process of analyzing and resolving this claim / complaint.

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

- (i) In order to register your suggestion / complaint and to take steps to resolve it, the Bank will process your personal data as follows:
  - o transmission of notifications / information in connection with solving the complaint / request.
  - o sending data to Turkiye Garanti Bankasi A.Ş. (and any of its legal successors), a Turkish company, an indirect shareholder of the Bank, which manages its IT system; o transmitting data to the contractual partners of the Bank (from Romania or abroad) in order to provide outsourced services, made for and on behalf of the Bank (eg transmission of notifications, archiving, customer service, etc.).
- (ii) **for the Bank's performance of legal obligations, such as:**
  - o establishment of identity in order to fulfill the legal obligations of the Bank in the field of customer knowledge;
  - o transmission of information to law enforcement authorities to request and receive such information, for example courts of law, prosecutor's offices, bailiffs, the National Office for the Prevention and Control of Money Laundering (O.N.P.C.S.B.), tax authorities, notaries, authorities with supervisory and control role in banking, etc.;
- (iii) **in order for the Bank to exercise a legitimate interest, as follows:**
  - o the transmission of personal data to the 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. (The Netherlands), Garanti Bilişim Teknolojisi v Ticaret TAS., Turkey  
Garanti Bankasi AS (Turkey), Banco Bilbao Vizcaya Argentaria SA (Spain), Ralfi IFN SA, Motoractive IFN SA, Motoractive Multiservices SRL (Romania) for the legitimate purpose of consolidating consolidated supervision at group level, for example, analyzing the financial situation of entities in the group, identifying the risks associated with the group's activity, etc.)
  - o the use of data by the Bank for statistical purposes, subject to their pseudonymization.

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

In fulfilling the above purposes, Garanti Bank SA will transfer personal data abroad only if an adequate level of personal data protection recognized by a European Commission decision such as the countries of the European Economic Area (EEA) is ensured in the recipient country).

In the absence of such a decision of the European Commission, the Bank may transfer personal data to a third country only if the person processing the data on behalf of the Bank provided adequate safeguards provided by law to protect personal data.

The Bank may be contacted to obtain additional information on the guarantees offered to protect the personal data in case of any transfer of data to foreigners through a written request to do so.

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

As long as you are a customer of the Bank, the Bank will store your personal data for the duration of our contractual relations and after the termination of these relationships for a period of maximum 10 years, taking into account that: the banking legislation on customer knowledge, the provisions of the Accounting Law on keeping the supporting documents underlying the records in financial accounting, the need to protect / preserve the Bank's rights in a possible litigation;

Unless you are a Bank customer, the Bank will store your personal data for a period of 3 years considering the need to protect / preserve the Bank's rights in a possible litigation.

For the purpose of archiving the data under the National Archives Act and taking into account the applicable National Bank Archival Nomenclature (approved by the National Archives) and data processing by the Bank for statistical purposes, the data may be stored for periods longer than those indicated above.

### **My rights**

You will be able to exercise, in the cases and under the conditions provided by law, the following rights regarding the personal data processed by the Bank:

- the right to have access
- the right of opposition
- the right to data portability
- 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, by 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 to the personal data processing supervisory authority. In Romania, the complaint will be filed with the National Supervisory Authority for Personal Data Processing (A.N.S.P.D.C.P.), headquartered in Gheorghe Magheru Blvd. 28-30, Sector 1, postal code 010336, Bucharest, in the form of a written address, at the headquarters of the institution, or electronically, at the e-mail address [anspdc@dataprotection.ro](mailto:anspdc@dataprotection.ro).