

## **Information about processing personal data while doing operations at the bank's counter**

**GARANTI BANK SA**, headquartered in Bucharest, no. 5, Fabrica de Glucoza, Novo Park 3, Business Center, Building F, 5th and 6th floor, 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 the personal data provided during the ordering of an operation at the Bank's counters, as follows:

**Personal data processed:** name, surname, personal identification number (PIN) / fiscal identification number (NIF), date and place of birth, nationality, home address, serial number and ID number, picture, information of inaccuracies found in documents / statements submitted to the Bank, based on the forms, statements and documents submitted, drafted or completed.

### **The purposes and bases of the processing.**

#### **Recipients of personal data**

- (i) Personal data will be processed to meet the person's request as follows:**
  - for orderly operations by the data subject, receipts, transfers, foreign exchange, etc. (the recipients of the data may be, depending on the orderly operation of the beneficiaries of the payment, exchange, correspondent banks);
  - 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:**
  - establishing the identity of the person concerned in accordance with the legal provisions in the field of customer knowledge, money laundering prevention and combating terrorism;
  - 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 (A.N.A.F.), 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.;
  - video surveillance of the Bank's premises, representing access areas, both from the outside and from the inside, working areas with the public, driving routes and access to the storage areas of the values.

The processing of personal data for the purposes referred to in (i) and (ii) above is essential for carrying out the operations initiated by the target person and for the Bank's fulfillment of legal obligations, so that, in the absence of data, the Bank will not be able to respond to the request of the person concerned 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 in Ticaret T.A.S., Turkiye Garanti Bankasi A.S. (For the legitimate purpose of consolidating consolidated group supervision, for example, the analysis of the financial situation of the Group), Banco Bilbao Vizcaya

Argentaria SA (Spain), Ralfi IFN SA, Motoractive IFN SA, Motoractive Multiservices SRL (Romania) of group entities, identification of risks related to group activity, etc.).

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

As can be seen in the list of recipients indicated above, Garanti Bank SA transfers personal data to recipient countries in which an adequate level of protection of personal data 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 case of any transfer of data to foreigners through 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 rights of the Bank in a possible dispute over the operation ordered by the data subject, the provisions of the legislation regarding the guarding of the objectives, the goods, the values and the protection of the persons.

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:

- the 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 lodge a complaint with the supervisory authority of 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 Supervisory Authority for Personal Data Processing (A.N.S.P.D.C.P.), headquartered in B-dul G-ral. Gheorghe Magheru 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 [anspdcp@dataprotection.ro](mailto:anspdcp@dataprotection.ro).