Information notice regarding data processing

Website Contact Request

GARANTI BANK SA, having its registered office in Bucharest, 5 Fabrica de Glucoza Road, Novo Park 3, Business Center, Building F, 5th and 6th Floors, District 2, registered with the Trade Register under no. J2009004429408, Fiscal Registration Code 25394008, registered in the Banking Register under no. RB-PJR-40-066/2009, and registered with the Financial Supervisory Authority (ASF) Register under no. PJR01INCR/400019/28.03.2019, hereinafter referred to as the "Bank", shall process my personal data provided in connection with this request, as follows:

The categories of personal data subject to processing may include, without limitation: first and last name, telephone number, email address, residential address, place and date of birth, national identification number (CNP), profession, employment details, and family status, as well as the data subject's economic, financial, and credit profile, including payment, savings, or borrowing habits and preferences. Processing shall further encompass voice recordings and any other information provided through the dedicated webform on the Bank's website, depending on the selected product option (such as term deposits, savings accounts, other savings or credit instruments, personal loans, or mortgages, credit card etc), or subsequently disclosed during telephone communications with the Bank's representative pursuant to an inquiry regarding the Bank's product offerings (savings products or deposit products etc)

The purposes and means of the processing. The recipients of personal data

(i)for the purpose of assessing the possibility of entering into a credit agreement to which I will be a party, or to take steps at my request prior to entering into this agreement, the Bank shall process personal data as follows:

- the transmission of notices/information regarding the processing of my request for the assessment of the feasibility of entering into a credit agreement;
- the transfer of data to Turkiye Garanti Bankasi A.S. (and any of its legal successors), a company incorporated in Turkey, which administers its IT system, for the purpose of recording and processing transactions within the Bank's IT system;
- the transfer of data to the Bank's contractual partners (located in Romania or abroad) for the purpose of providing outsourced services performed for and on behalf of the Bank (such as the transmission of notifications, archiving, customer relations services, etc.).

(ii) in order to assess the feasibility of entering into a deposit agreement/savings account agreement or any other savings product to which I will be a party, or to take steps at my request prior to entering into such agreement, regardless of my chosen application method (in branch, by telephone, via Garanti BBVA Online or Garanti BBVA Mobile, or by applying through the dedicated section of the website), the Bank shall process personal data as follows:

- the transmission of notices/information regarding the processing of my request for entering into a deposit agreement, regardless of my chosen application method for this product;
- the transfer of data to Turkiye Garanti Bankasi A.S. (and any of its legal successors), a company incorporated in Turkey, which administers its IT system, for the purpose of recording and processing transactions within the Bank's IT system;
- the transfer of data to the Bank's contractual partners (located in Romania or abroad) for the purpose of providing outsourced services performed for and on behalf of the Bank (such as the transmission of notifications, archiving, customer relations services, etc.);

(iii) for the purpose of the Bank's compliance with legal obligations, such as:

- establishing my identity for the purpose of compliance with the Bank's legal obligations in the field of know your customer, anti-money laundering, and countering the financing of terrorism;
- the disclosure of information to authorities authorized by law to request and receive such information, such as courts of law, prosecutor's offices, judicial enforcers, the National Office for the Prevention and Combating of Money Laundering (O.N.P.C.S.B.), tax authorities, public notaries, banking supervisory and control authorities, etc.;

(iv) for the purpose of the pursuit of a legitimate interest by the Bank, as follows:

- the transfer of personal data to the entities belonging to the group of which Garanti Bank is a part (including all affiliated entities, as well as all direct and indirect shareholders of GARANTI BANK SA): Raiffeisen Bank S.A., Motoractive IFN SA, Motoractive Multiservices SRL (Romania), as well as Raiffeisen Group entities, including, as the case may be, Raiffeisen Bank International AG, Raiffeisen Broker de Asigurare - Reasigurare S.R.L., Raiffeisen Leasing Financiar IFN S.A., SAI Raiffeisen Asset Management S.A, as well as other entities belonging to the group Raiffeisen Bank International AG Group, to the extent that their involvement is necessary for the purposes of consolidated supervision, governance and coordination, prudential, financial, and risk reporting, monitoring, control, auditing, or the implementation of the integration process,
- the processing of data by the Bank for statistical purposes, provided that such data is pseudonymized.

The processing of personal data in the context of the integration and the contemplated merger between Garanti Bank S.A. and Raiffeisen Bank S.A.

In the context of the acquisition of Garanti Bank S.A. by Raiffeisen Bank S.A., as well as the preparation and implementation of the integration process and the contemplated merger between the two credit institutions, personal data forming the subject matter of this Privacy Notice may be processed and disclosed to Raiffeisen Bank S.A., as well as to other persons legitimately involved in the implementation of the integration process, to the extent necessary for the preparation and implementation of the migration of data, products, services, systems, and processes, the testing and validation of migration activities, the ensuring of business continuity and continuity of contractual relationships, risk management, governance, reporting, information security, and compliance with applicable legal and regulatory obligations.

Depending on the specific processing activity and the manner in which the purposes and means of processing are determined, Garanti Bank S.A. and Raiffeisen Bank S.A. may act, as the case may be, as independent controllers, joint controllers, controller and processor, or data recipients. The applicable role shall be determined separately for each relevant processing activity.

The legal basis for the processing is determined based on the intended purpose and may consist, as the case may be, in the performance of a contract, compliance with a legal obligation, the legitimate interests pursued by the controller, or any other legal basis provided for by the applicable legislation.

The data shall be disclosed only to the extent strictly necessary to fulfill the intended purposes and in compliance with the applicable requirements regarding data protection, banking secrecy, and confidentiality.

Additional information regarding the processing of personal data in the context of the contemplated acquisition, integration, and merger between Garanti Bank S.A. and Raiffeisen Bank S.A. is available in the Privacy Notice on the processing of personal data in the context of the acquisition and integration of Garanti Bank S.A. by Raiffeisen Bank S.A., available at https://www.garantibbva.ro/prelucrarea-datelor-personale/.

Additional information regarding the processing activities performed by Raiffeisen Bank S.A., acting as a controller, including in connection with the data received from Garanti Bank S.A. in the context of the integration and merger, is available in the Personal Data Processing and Protection Policy of Raiffeisen Bank S.A., available at: https://www.raiffeisen.ro/despre-noi/politica-de-confidentialitate/.

The transfer or personal data abroad

In order to achieve the purposes set out above, Garanti Bank SA may transfer personal data abroad only if an adequate level of protection for personal data is ensured in the destination country, as recognized by an adequacy decision of the European Commission.

In the absence of such a decision by the European Commission, the Bank may transfer personal data to a third country only subject to appropriate safeguards provided for by law in order to protect personal data.

The Bank may be contacted by means of a written request to obtain additional information regarding the safeguards provided for the protection of personal data in the event of each transfer of data abroad.

For the purpose of carrying out the transfer to Turkey, the Bank provides appropriate safeguards within the meaning of Article 46(2)(c) of the GDPR, namely, it has entered into standard contractual clauses at European level with Turkiye Garanti Bankasi A.S., as approved by the European Commission through Decision 2010/87/EU or any other legal act replacing it.

The retention period of personal data

In the event that the Data Subject initiates and maintains a business relationship with the Bank (such as by entering into an agreement, using/accessing a banking product/service, or being designated as an authorized representative of a Client of the Bank), the Personal Data shall be retained for the duration of the contractual relationship/business relationship, as well as for a maximum period of 10 years, taking into account:

a) the provisions of the banking legislation on know your customer, anti-money laundering, and countering the financing of terrorism, according to which data shall be retained for a period of 5 years from the date of termination of the business relationship, with the possibility of extension for another 5 years if an extension of the period is required for the aforementioned purposes;

b) the provisions of the Accounting Law, according to which the supporting documents underlying the entries in the financial accounting records shall be retained for 10 years, starting from the closing date of the financial year during which they were drawn up;
c) the provisions of the Fiscal Procedure Code, which stipulate that a part of the data processed for the application of Know Your Customer measures must also be processed for reporting to the National Agency for Fiscal Administration (A.N.A.F.). The statutory retention period for such data is 10 years from the termination of the business relationship or from the date of the occasional transaction;
d) the necessity to defend/preserve the Bank's rights within a potential dispute arising from the contractual relationship/business relationship with the Bank;

In the event that the discussions/negotiations between the Data Subject and the Bank do not result in a transaction/the entering into an agreement/the use of or access to a banking product/service, the Personal Data processed up to that point shall be retained for a period of 5 years from the date of the account opening request/the request for the issuance of an additional card for an authorized user/the transaction, taking into account the provisions of the banking legislation on know your customer, anti-money laundering, and countering the financing of terrorism, and the necessity to defend/preserve the Bank's rights within a potential dispute.

We shall not retain your personal data for longer than is necessary and we shall process it only for the purposes for which it was obtained.

For the purpose of data archiving pursuant to the National Archives Law, taking into account the Archival Nomenclature (approved by the National Archives) applicable at the Bank's level, and for data processing by the Bank for statistical purposes, the data may be retained for longer periods than those indicated above.

Your rights, as a data subject

In your capacity as a data subject, you shall be entitled to exercise, in the cases and under the conditions provided for by law, the following rights with respect to the personal data processed by the Bank:

- **Right of access** - you shall be entitled to obtain from the Bank a confirmation as to whether or not your personal data is being processed, and information regarding the manner in which the data is processed;
- **Right to data portability** – you shall be entitled to request to receive, under certain conditions, the personal data provided to the Bank, in a machine-readable format, or you may request that the respective data be transmitted to another controller;
- **Right to object** - you have the right to object, at any time, to the processing of your personal data when such processing is based on the legitimate interests pursued by the Bank;
- **Right to rectification** - you may request the rectification of inaccurate data without undue delay;
- **Right to erasure ("the right to be forgotten")** - you may request that the Bank erase your personal data, including, without limitation, where the processing has been unlawful or where you have withdrawn your consent and no other legal ground for processing exists;

Circumstances may arise where the Bank is unable to fulfill a request for data erasure, specifically:

(i) in cases where the Bank is under a legal obligation to retain personal data;
(ii) in cases where the data are stored for archiving purposes in the public interest or for statistical purposes;
(iii) in cases where the data are necessary for the establishment, exercise or defense of legal claims.

- **Right to restriction of processing** – you may request the restriction of the processing of your data, particularly if you contest the accuracy thereof.

The aforementioned rights may be exercised by submitting a written request to GARANTI BANK S.A. at its registered office, at any branch of the Bank, or by electronic means to the email address dpo@garantibbva.ro, subject to providing sufficient information to enable the Bank to verify the identity of the applicant.

- **Right to lodge a complaint with the Data Protection Supervisory Authority**[1] – this right may be exercised if you consider that the processing of your personal data infringes data protection laws, without prejudice to any other administrative or judicial remedies.

By validating this form, I hereby declare that I have been informed of and agree to the processing of my personal data as described.

[1] **The National Supervisory Authority for Personal Data Processing, 28-30 G-ral. Gheorghe Magheru Blvd., Sector 1, post code 010336, Bucharest, Romania, e-mail: anspdcp@dataprotection.ro.**