In the context of registering and settling complaints, GARANTI BANK S.A., as a data controller, informs you about the processing of personal data ("Personal Data"), **the purposes of this processing and the rights offered by EU Regulation 679/2016 on the protection of individuals** with regard to the processing of personal data and on the free movement of such data ("GDPR"), **as follows:**

DATA CONTROLLER IDENTIFICATION/ CONTACT DATA ("Bank"): GARANTI BANK SA, with headquarters in Bucharest, Sos. Fabrica de Glucoza nr. 5, Novo Park 3, Business Centre, Building F, et.5 si 6, district 2, with order number in the Trade Registry no. J2009004429408, fiscal code 25394008, registered in the Credit Institutions Registry with no. RB-PJR01INCR/400019/28.03.2019.

The data subject may also contact the Data Protection Officer appointed by the Bank at the e-mail address: dpo@garantibbva.ro.

PERSONAL DATA PROCESSED ARE:

i) obtained directly from you when you file the complaint (for example: name, surname, address, telephone number, CNP, e-mail address, identification number in the Bank's system, as well as any other data that you will provide in the context of the complaint, verbally or in writing through the dedicated form or other support) or prior to filing the complaint, when, for example, you have signed a contract with the Bank or have filled in a form in your relationship with the Bank,

(ii) generated as a result of your relationship with the Bank or as a result of the Bank's analysis, such as: customer code, data related to the transactions or banking products/services contracted (e.g.: amount, date, payment reference, supporting documents, amounts due, outstanding amounts, etc.),

(iii) obtained indirectly from other sources, including from publicly available sources (e.g.: employer, Credit Bureau, Banking Risk Center, ANAF, public registers such as the National Trade Register Office, Insolvency Proceedings Bulletin,

public authorities and institutions, contractual partners, entities of the group of which the Bank is part, credit institutions, etc.), such as the following categories: degree of indebtedness, late payments, overdue amounts, data related to insurances, etc.,

and the Bank needs to process the Personal Data in order to resolve the complaint.

The Bank may also process the personal data of any authorized representatives/ legal representatives/ other categories of persons in relation to you, as a complainant, for the purposes mentioned below. Given that from a practical point of view, in certain situations, the Bank may not be able to directly inform these categories of persons, it is your responsibility to inform the persons concerned of the processing of their personal data and to obtain their consent to the processing of their personal data, to the extent necessary to fulfill the conditions provided by law.

THE PURPOSES OF THE PROCESSING OPERATIONS AND THEIR LEGAL BASES:

(i) the fulfillment of the Bank's legal obligations regarding the handling of complaints/complaints/requests received, in accordance with the applicable legal provisions, such as GDPR, applicable consumer protection legislation, on payment services, the JC 2018 35 Guide on handling complaints for the securities and banking sectors, implemented in Romania by the NBR Instructions of 20.01.2020 on the governance framework for retail products and complaints in the financial-banking sector, within which obligations are provided for such as:

a) obtaining and examining all relevant evidence and information regarding the complaint;

b) providing a response to the complainants without unnecessary delay;

c) reporting to the competent institutions (NBR) information on the administration and modalities of complaint resolution;

d) internal monitoring of the complaints handling process.

(ii) the fulfillment of the Bank's legal obligations in terms of *know-your-customer, reporting and risk assessment, keeping the documents evidencing the measures applied,* in accordance with the legal provisions in the field of know-your-customer, prevention of money laundering and combating terrorism;

(iii) complying with the Bank's legal obligations in terms of *reporting on request and/or periodically and providing information to the authorities authorized by law to request and receive such information,* e.g. courts of law, prosecutors, enforcement bodies, the National Office for the Prevention and Combating of Money Laundering (O. N.N.P.C.C.S.B.), ANAF and other financial-fiscal authorities, notaries public, authorities with a supervisory and control role in the financial-banking field (for example: National Bank of Romania, Financial Supervisory Authority) etc.

The processing of Personal Data for this purpose is essential in order to register the complaint, to take steps to resolve it and to respond to your complaint, respectively to fulfill the Bank's legal obligations, so that, in the absence of processing, the Bank cannot register and resolve the complaint, respectively cannot fulfill its legal obligations.

(iv) to pursue the legitimate interests of the Bank, as follows:

(a) handling of complaints/requests that fall outside the scope of legal obligations;

(b) constantly improving the products, services and the way of resolving disputes with the Bank's customers;

c) carrying out consolidated supervision at group level (e.g.: analyzing the financial situation of group entities, identifying risks related to the group's activities, etc.);

d) use of data by the Bank for statistical purposes, subject to pseudonymization.

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

In the context of the contemplated acquisition, integration, and merger between Garanti Bank S.A. and Raiffeisen Bank S.A., your personal data may be processed and disclosed among the parties involved—based on the performance of a contract, compliance with legal obligations, and/or legitimate interests—with these parties acting, as the case may be, as independent controllers, joint controllers, processors, or data recipients. Further information is available in the Information Notice regarding the acquisition and integration of Garanti Bank S.A. by Raiffeisen Bank S.A., accessible at https://www.garantibbva.ro/prelucrarea-datelor-personale/, and in the Privacy Policy of Raiffeisen Bank S.A., available at: https://www.raiffeisen.ro/despre-noi/politica-de-confidentialitate/.

THE RECIPIENTS OR CATEGORIES OF RECIPIENTS of the Personal Data may be, as the case may be: a) the entities that are part of the Group to which Garanti Bank SA belongs (all affiliated entities, as well as all direct and indirect shareholders of GARANTI BANK S.A.):Raiffeisen Bank S.A., Motoractive IFN S.A., Motoractive Multiservices S.R.L. (Romania) as well as entities within the Raiffeisen Group, including, as applicable, 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 that are part of the Raiffeisen Bank International AG Group, to the extent that their involvement is necessary for consolidated supervision, governance and coordination, prudential, financial and risk reporting, monitoring, control, audit or the implementation of the integration process, (b) Turkyie Garanti Bankasi A.S. (and any of its legal successors), a Turkish company, an indirect shareholder of the Bank, which manages the Bank's IT system; c) the Bank's service providers/ collaborators/ contractual/ business partners, in Romania or abroad (including those providing outsourced services, performed for and on behalf of the Bank), for activities such as: archiving, customer relationship services, mail and courier, insurance contracts/ policies, payment services, other financial-banking institutions, etc. ; d) competent authorities/institutions, such as public registers (e.g.: National Register of Real Estate Publicity, National Agency for Cadastre and Real Estate Publicity), courts, enforcement bodies, tax authorities, notaries public, banking supervisory and control authorities, etc.; e) legal/agency representatives of the data subject and persons indicated/ mandated by the data subject (e.g.: other financial/banking institutions, payment service providers, other).

For the data transfer to Turkey, to the IT services provider, the transfer is allowed since the Bank provides adequate safeguards within the meaning of Article 46 para. (2) lit. c) of the GDPR, i.e. it has concluded with Turkyie Garanti Bankasi A.S. standard clauses at European level, as approved by the European Commission by Decision 2010/87/EU or any other regulatory act replacing it.

In realizing the above purposes, the Bank may transfer Personal Data abroad, in compliance with the provisions of EU Regulation 2016/679, and further information on the guarantees offered can be obtained at the email address dpo@garantibbva.ro.

PERSONAL DATA STORAGE PERIOD/ CRITERIA USED TO DETERMINE THE PERSONAL DATA STORAGE PERIOD:

(i) to the extent that you are a customer of the Bank, Personal Data will be stored for the duration of the contractual relations, as well as for a maximum period of 10 years after their termination, taking into account: the provisions of banking legislation on know your customer, prevention of money laundering and terrorism financing, the Code of Fiscal Procedure, the provisions of the Accounting Law on the keeping of supporting documents underlying the financial accounting records, the need to defend/preserve the Bank's rights in the event of a possible litigation;

(ii) to the extent that you are not a client of the Bank, Personal Data will be stored for a maximum period of 3 years, taking into account the need to defend/preserve the Bank's rights in the event of a possible litigation;

(iii) for the purposes of data archiving under the National Archives Act and for processing Personal Data for statistical purposes, Personal Data may be stored for longer periods than those indicated above.

YOUR RIGHTS AS A DATA SUBJECTED PERSON, as provided for in Articles 15-22 of the GDPR, ARE AS FOLLOWS:

- **the right of access** - you have the right to obtain from the Bank a confirmation as to whether or not it is processing your Personal Data and, if so, to ensure access to certain information and to the Data concerned by providing a copy of the Personal Data subject to the processing;

- **the right to object** - you have the right to object at any time, on legitimate and legitimate grounds relating to your particular situation, to the Personal Data being subject to processing based on the legitimate interest of the Bank; the Bank shall no longer process your Personal Data, unless it demonstrates that it has legitimate and compelling reasons justifying the processing which override your interests, rights and freedoms or that the purpose of the processing is the establishment, exercise or defense of a right in a court of law;
- **the right to data portability** - you have the right to receive the Personal Data that you have provided to the Bank and to transmit them to another controller; this right can be exercised only when:

  (i) the processing of Personal Data is done on the basis of your consent to the processing or is based on the performance of a contract; and
  (ii) the processing is carried out by automated means;

- **the right to withdraw consent to the processing of Personal Data** - you may exercise this right at any time, free of charge, where the processing of Personal Data is based on consent; withdrawal of consent does not affect the lawfulness of processing carried out on the basis of consent prior to its withdrawal;
- **the right to rectification** - you have the right to request and obtain the rectification of inaccurate Personal Data and/or to obtain the completion of Personal Data that is incomplete, including by providing an additional statement;
- **the right to erasure ("right to be forgotten") -** you have the right to obtain erasure of Personal Data concerning you without undue delay, and the Bank is obliged to erase it without undue delay in the following cases:

  (i) the Personal Data is no longer necessary for the fulfilment of the purposes for which it was collected or processed;

  (ii) you withdraw your consent on the basis of which the processing is taking place and there is no other legal basis for the processing;

  (iii) you object to the processing and there are no legitimate prevailing grounds for the processing;

  (iv) you object to the processing of Personal Data for the purpose of direct marketing;

  (v) the Personal Data has been processed unlawfully;

  (vi) Personal Data must be erased in order to comply with a legal obligation of the Bank.

The Bank will not be able to comply with a request for erasure in the following situations, i.e. where processing is necessary:

(i) to comply with a legal obligation of the Bank;

ii) for archiving purposes in the public interest or for statistical purposes;

iii) for the establishment, exercise or defense of a legal claim.

- **right to restriction of processing** - you have the right to obtain restriction of processing in the following cases:

(i) in the event that you contest the accuracy of the Processed Data, and the restriction will operate for a period of time that will allow the Bank to verify the accuracy of the Data;

(ii) the processing is unlawful and you object to the erasure of the Personal Data, requesting instead the restriction of its use;

(iii) the Bank no longer needs the Personal Data for the purpose of the processing, but you require it for the establishment, exercise or defense of a legal claim;

(iv) you object to the processing of the Data, and the restriction operates/applies for the period of time during which it is ascertained whether the Bank's legitimate rights prevail over your rights.

The above-mentioned rights, including the *withdrawal of consent*, may be exercised by sending/submitting a request to GARANTI BANK S.A., at its head office (communicated at the beginning of this document), at any of the Bank's branches,

as well as by electronic means, at the e-mail address dpo@garantibbva.ro , providing sufficient data to allow the Bank to identify you.

- **- The right to lodge a complaint with a supervisory authority** if you consider that the processing of Personal Data violates the GDPR.

For more information on the processing of personal data, please visit https://www.garantibbva.ro/ro/compania-noastra/informatii-utile/prelucrarea-datelor-personale.html.

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Număr de ordine în Registrul Comerţului J2009004429408
Cod Unic de Înregistrare RO25394008
Înregistrată în Registrul Bancar cu nr. RB-PJR-40-066/2009
Înscrisă în Registrul ASF cu nr. PJR01INCR/400019/28.03.2019
Capital social subscris și vărsat 1.208.086.946 RON