

INFORMATION NOTE ON THE PROCESSING OF PERSONAL DATA¹ **[marketing, commercial communications, studies, analyses and surveys]**

B.R.D. - Groupe Société Générale S.A., headquartered in Bucharest, Blvd. Ion Mihalache, No. 1-7, Sector 1, registered with the Trade Register under number J/40/608/19.02.1991, Tax Identification Number 361579, registered with the Banks Register under number RB-PJR-40-007/1999 (hereinafter called „**The Bank**” or „**Us/ We**”), in the capacity of personal data operator, we would like to inform you about the way We process your personal data in the context of commercial communications, marketing, analyses and surveys activities, as well as about the rights that you have as a data subject, starting with May 25, 2018 (GDPR effective date).

I. FOR WHAT PURPOSE DO WE PROCESS THE DATA?

A. DIRECT MARKETING AND COMMERCIAL COMMUNICATIONS

We want to keep you updated with the latest news about the products and services of the Bank and/ or of other companies within BRD Group or of our partners, to invite you to participate in contests or advertising lotteries that We organize on our own or with our partners (co-organizers). Before contacting you, We may also consider our internal analyses and studies (for details, please see Section C below).

We can also send you commercial communications regarding our partners products/ services (such as market research agencies, insurance companies, pension funds, leasing companies, investment funds, etc.).

We are interested in your opinion about our products and services, about Us or other companies within the Group in general or about a particular subject relevant to our activity. We can periodically contact you to receive your feedback and suggestions on how to improve our products and services or how we can better meet your needs and expectations. You are not obliged to respond and if you do not respond, it will not affect in any way your relationship with Us.

We also carry out market studies; for this purpose, We can work with market research agencies, which will either conduct market studies for Us, or provide us with market research results and other information related to the subject of such studies. Usually, we receive information regarding the market studies from our partners in anonymised format (aggregated data).

We will only send you these communications if we have obtained your agreement.

B. PERSONALISED OFFERS

We want to offer you the most relevant products and services according to your profile and area of interest. Therefore, based on your agreement, We may analyze your data and information from the following sources:

- *Our internal database*, such as information from loan records/ other similar documents that we hold as a result of your previous loan requests/ other products and/ or banking services. For example, we are interested in knowing relevant information in order to evaluate your particular situation, such as age, occupation, income, previous transactions or your previous loan application score; and
- *External sources*, such as companies from BRD Group or our partners, the Trade Registry, the Credit Bureau, ANAF. We can also analyze the information you've made public on various webpages, including on social networks and forums.

We analyse and combine this information to provide you with the products and services that best fit your needs and particularities. We may also use the information to avoid sending you offers for products and services that, for various reasons (including our risk policy), are not of interest to you or you would not be able to access by reference to your particular situation.

¹ Implemented in accordance with the provisions of Regulation (UE) 2016/679 of the European Parliament and of the Council of April 27, 2016 on the protection of natural persons with regard to the processing of personal data and of the free movement of such data, and repealing Directive 95/46/CE („GDPR” - General Data Protection Regulation - regulation for protecting personal data), applicable starting with May 25, 2018.

C. ANALYSES AND OTHER INTERNAL STUDIES

We are preoccupied with the constant improvement of our products and services. Based on our legitimate interest, We use the data that we collect from you or other data that we generate/ deduct from the data received from you (such as: age, based on your CNP) for various statistics, analyses and internal studies.

Most internal analyses and internal studies are in anonymous format (aggregated data), providing Us with useful information for improving our products and services. Sometimes, We analyze your data to determine your specific customer profile, to better meet your needs and expectations. For example, We can include you in a campaign that offers a new product that We are addressing only to customers who have made card transactions with a certain frequency.

In the same time, We have a legitimate interest in analyzing your data so as not to disturb you with information that does not fit your profile. For example, We can exclude you from a particular campaign if you exceed the age that We target for a specific product (such as cards dedicated to students).

II. WHERE DO WE HAVE YOUR DATA FROM?

We process the personal data that you provide us directly or the personal data that we generate or deduct as a result of your interaction with Us.

However, We can obtain and process personal data regarding you for the purposes described herein also from other sources such as: market research agencies, statistical data suppliers/ reports or public sources.

III. TO WHOM DO WE DISCLOSE YOUR DATA?

On a case-by-case basis, We may disclose your personal data to:

- **To our business partners** (acting either as *operators*, or as *authorized persons* by Us) and which We contract for (i) providing services related to marketing activities (such as marketing agencies, e-mail marketing service providers, web development and maintenance service providers), (ii) organizing the lotteries/ contests that We offer you (such as prize-winning providers, travel agencies, notaries involved in monitoring advertising lotteries) and/ or (iii) organizing promotional lotteries as co-organizers (such as Mastercard, VISA, ISIC - payment services platforms providers or Western Union - funds transfer partners).
- **Market research agencies** conducting market studies for Us;
- **Public authorities**, if disclosure is required to comply with an obligation under applicable law.

If we organize contests/ promotional lotteries through social platforms to which you have signed up (such as Facebook), your personal data available on those platforms (e.g. those you provide as a user or those that We provide through the social platform to respond or contact you), will also be collected and processed by operators of those platforms according to their own personal data processing policy.

IV. TRANSFER YOUR DATA ABROAD

We transfer you personal data only to states belonging to the European Economic Area (EEA); We do not transfer your data to non-EEA countries.

V. FOR HOW LONG DO WE KEEP YOUR DATA?

We keep your personal data as long as necessary in order to meet the purposes for which it was collected, in compliance with the internal procedures regarding data retention, including the archiving rules applicable at the Bank's level.

For example, if you are our customer, We will keep your personal data, as a rule, throughout the contractual relationship with us, and, from the termination of the contractual relationship at least for the period required by the applicable legal provisions, including, but not limited to, the archiving provisions.

VI. WHAT ARE THE RIGHTS THAT YOU BENEFIT FROM?

According to the Law, you benefit from the following rights concerning the personal data processing that We perform:

a) Right of access to personal data: you may obtain from Us the confirmation that We process your personal data, as well as information regarding the specific nature of the processing, such as: the scope/ the purpose, the categories of personal data processed, the recipients of the data, the period for which

the data are kept, the existence of the right to rectification, erasure or restriction of the processing. This right allows you to obtain a copy of the processed personal data, as well as any extra copies for a fee.

b) Right to rectification: you may ask Us to modify your incorrect personal data or, if the case, to fill in the data that is incomplete.

c) Right to erasure: you may request the erasure of your personal data when: (i) the data are no longer necessary for the purposes for which We have collected and processed them; (ii) you have withdrawn your consent for processing your personal data and We can not process it for any other legal ground; (iii) the personal data are unlawfully processed, respectively (iv) the personal data have to be erased for compliance with the relevant legislation.

d) Consent withdrawal: you may, at any time, withdraw your consent regarding the processing of your personal data, data processed on a consent basis.

e) Right to object: you may object, at any time, to processing of personal data for marketing purposes, including profiling for the same purpose and you may also object to processing based on Bank's legitimate interest, for reasons related to your specific situation.

f) Right to restriction of processing: you may request to restrict the processing of your personal data if: (i) you dispute the accuracy of the personal data, for a period enabling Us to verify the accuracy of the personal data; (ii) the processing is unlawful and you oppose the erasure of the personal data and request the restriction of their use instead; (iii) the data is no longer needed for the purposes of processing, but you require them for exercise or defence of legal claims; respectively (iv) if you have objected to processing, for the period of time during which it is verified whether the legitimate rights of the Bank as an operator prevail over your rights as a data subject.

g) Right to data portability: to the extent that We process personal data by automated means, you may request, under the Law, to provide you with your personal data in a structured, commonly used and machine-readable format (e.g. CSV format). If you request this, We can send your personal data to another entity, if possible from a technical point of view.

h) Right to file a complaint with the Supervisory Authority: you have the right to file a complaint with the Supervisory Authority if you consider that your rights have been violated:

**National Supervisory Authority for
Personal Data Processing**

Bld. G-ral. Gheorghe Magheru 28-30 Sector
1, postal code 010336 Bucharest, Romania
anspdcpc@dataprotection.ro

FOR EXERCISING THE ABOVE-MENTIONED RIGHTS, ITEMS a) - g), YOU MAY CONTACT US USING THE CONTACT DATA REFERRED TO IN SECTION VII (CONTACT).

VII. CONTACT

If you have any questions about this information note or if you want to exercise your rights as a data subject, you may contact Us using the following contact details:

In the attention of: BRD Data Protection Officer (DPO)

Correspondence address:

**Blvd. Ion Mihalache, No. 1-7, Sector 1, BRD Tower,
postal code 011171, Bucharest, Romania**

E-mail: dataprotection@brd.ro

Telefon: 0213014381

AGREEMENT ON PROCESSING OF PERSONAL DATA **[marketing, commercial communications, studies, analyses and surveys]**

Name and surname

CNP/ PIN

I understand that the Bank processes my personal data, in accordance with the **Information Notice** included herein and respecting my choices expressed below.

In order to provide me with a customized and adapted to my needs offer, and in order to be able to provide me with the most suitable services, I agree that the Bank uses my personal data obtained from:

- the Credit Bureau database
- the Bank's internal database, as well as other public sources

I agree to receive commercial communications regarding BRD's products and services

I want to be contacted through the following channels:

- E-mail SMS Phone (human operator call and/ or automatic dial-up system)
- Internet/ Mobile banking Post (Letter)/ Courier

I agree that my options expressed above to be extended to the commercial offer of companies that are part of BRD Group and/ or to offers from third-party partners of the Bank (insurance companies, pension funds, leasing companies, investment funds, market research agencies, etc.)

BRD undertakes not to sell your personal data to third parties.

Shortly...

We analyze and combine information from internal sources (information from loan records/ other similar documents that We hold about you due to interaction with Us) and/ or from public sources (e.g. the Trade Register, Credit Bureau) in order to offer you products and services that best fit your needs and particularities.

If you do not opt for the above-mentioned processing or if you later withdraw your consent, We may not be able to send you certain offers for our products and services or, on the contrary, to send you offers that, for various reasons, you could not access.

Our communications consist in offers regarding the Bank's products & services and/ or companies in the BRD Group, invitations to participate in contests, advertising lotteries, studies and market analyses, surveys and other similar communications.

We also use your personal data to send you communications about products/ services offers of third party partners (e.g. insurance companies, pensions funds, leasing companies, investment funds). In this case, the commercial communications will be made by the Bank, without disclosing your data to these partners.

If you do not choose to receive such commercial communications or if you later withdraw your consent, We will no longer be able to send you our offers and/ or of our partners or, as the case may be, you will not be able to participate in our promotional lotteries, studies and surveys.

Date: _____

Signature: _____