

INFORMATION NOTE ON THE PROCESSING OF PERSONAL DATA¹
[marketing (including direct marketing and commercial communications), studies and analyses]

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: J1991000608402, Tax Identification Number 361579, registered with the Banks Register under number RB-PJR-40-007/1999, EUID: ROONRC.J1991000608402 (hereinafter called „**The Bank**” or „**Us/ We**”), acting as data controller, we would like to inform you on how We process your personal data in the context of marketing activities (such as direct marketing, commercial communications², including offers personalisation, studies and analyses for marketing activities), as well as on the rights that you have as a data subject.

I. FOR WHAT PURPOSES 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 Société Générale Group (such as insurance companies, pension funds, leasing companies, investment funds etc.) and/ or of our partners (such as insurance companies outside the Société Générale Group), 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, including direct marketing messages (related to products and services selling) regarding the aforementioned products and services.

We will only send you direct marketing and other commercial communications only upon your previous consent.

B. SURVEYS AND MARKET RESEARCH

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).

C. OFFERS/ PRODUCTS PERSONALISATION

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 seniority in relation with the bank, age, occupation, income, the quality of Politically Exposed Person, the quality in the shareholding structure of a legal entity, the products and services held and their degree of use on different channels (e.g. Internet and/ or mobile banking), the analysis of the typology and the value of the transactions you made within a certain time per product (e.g. cards) and/ or per type of merchant;
and/ or
- *External sources*, such as companies from BRD Group or our partners, international companies for card payments, the Trade Registry, the Credit Bureau.

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.

² For the purposes of the legislation on the processing of personal data and privacy protection in the electronic communications sector

Offer personalisation will not exclude your access to our products and services.

We analyse and combine the data and information mentioned above to provide you with the products and services that best fit your needs and particularities. We may also use the aforesaid 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 them, due to your particular situation.

The algorithms we apply for offer personalisation are based on information such as: seniority in relation with the bank, age, occupation, income (including as a result of a credit application previously submitted by you), your previous credit application score, the quality of politically exposed person, the quality in the shareholding structure of a legal entity, the products and services held and their degree of use on different channels (e.g. Internet and/ or mobile banking), the analysis of the typology of the transactions you made within a certain time per product and/ or per type of merchant. All this information is analysed for determining a statistical model, having as result a tailored product and services offer for you. This offer takes into account your transactional profile and behaviour (as evidenced by the aforementioned information) and will include personalised products and services based on your needs.

The algorithms used may vary over time, so for more information about the logic used in creating offers/products, you can contact us at the data mentioned in the "**CONTACT**" section.

Sometimes, in the process of personalizing offers/products, we use automated individual decisions. You benefit from adequate safeguards for the automated decisions we make. You have the right not to be subject to an automated decision if it produces legal effects on you or similarly affects you to a significant extent. Therefore, you have the right: (i) to express your point of view regarding that automated decision; (ii) to request a reassessment of the decision, on the basis of a human intervention and (iii) to contest the automated decision.

We may use personalized individual decisions to send you customized offers if we have obtained your **explicit consent** in this regard.

D. 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.

CLIENT PORTFOLIO SEGMENTATION

We use information such as age, occupation, income (including as a result of a credit application previously submitted by you), the quality of politically exposed person, the quality in the shareholding structure of a legal entity, the amounts held at the bank and/ or the outstanding of the loans granted by the Bank, in order to classify you into a specific generic profile, determined in accordance with the internal rules for customer portfolio classification.

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).

We will send you direct marketing messages and commercial communications related to the products designed for the client segment you are part of only if We have obtained your **explicit consent** in this respect.

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: external databases (such as Credit Bureau, Trade Register, international companies for card payments etc.)

III. TO WHOM WE DISCLOSE YOUR DATA?

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

- **To our business partners:** acting either as data controllers (such as BRD Asigurari de Viata S.A., BRD Asset Management SAI S.A) or as our data processors or as joint controllers together with Us) and which We contract for (i) providing services related to marketing activities (such as

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marketing agencies, e-mail marketing service providers, market research agencies which perform marketing studies for Us), (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 etc.).

- **Public authorities**, if disclosure is required to comply with an obligation under applicable law.

In case 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. WHAT ARE THE RIGHTS THAT YOU BENEFIT FROM?

You have the right to withdraw your consent at any time regarding the processing of personal data processed based on consent, without the withdrawal of consent affecting the lawfulness of the processing carried out before the withdrawal of consent. The withdrawal of consent can be made at any branch of the Bank's network, through the YOU BRD Internet and mobile banking service, the institutional website, by accessing the dedicated links provided in commercial communications received from the Bank (email, SMS) or according to the methods periodically communicated by the Bank. Information regarding **the other rights you have** as data subject, namely: the right of access to personal data, the right to rectification, the right to erase data, the right to object to processing, the right to restrict data, the right to data portability, the rights related to the automated decisions we make in the course of our activity, the right to file a complaint with the Supervisory Authority can be consulted in the framework document that governs the processing of your data in the context of the Bank – client relationship, available on the BRD website, accessible here: <https://www.brd.ro/en/processing-personal-data>. This framework document supplements this Notice. Also, within the aforementioned framework document, you can find information about how long we keep your data and about the transfer of your data abroad. For exercising the above-mentioned rights (except for the right to contact A.N.S.P.D.C.P.), you can contact us using the contact details mentioned in section V (CONTACT).

V. CONTACT

If you have any questions about this information note or if you want to exercise your rights as 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