



## INFORMATION REGARDING PERSONAL DATA PROCESSING

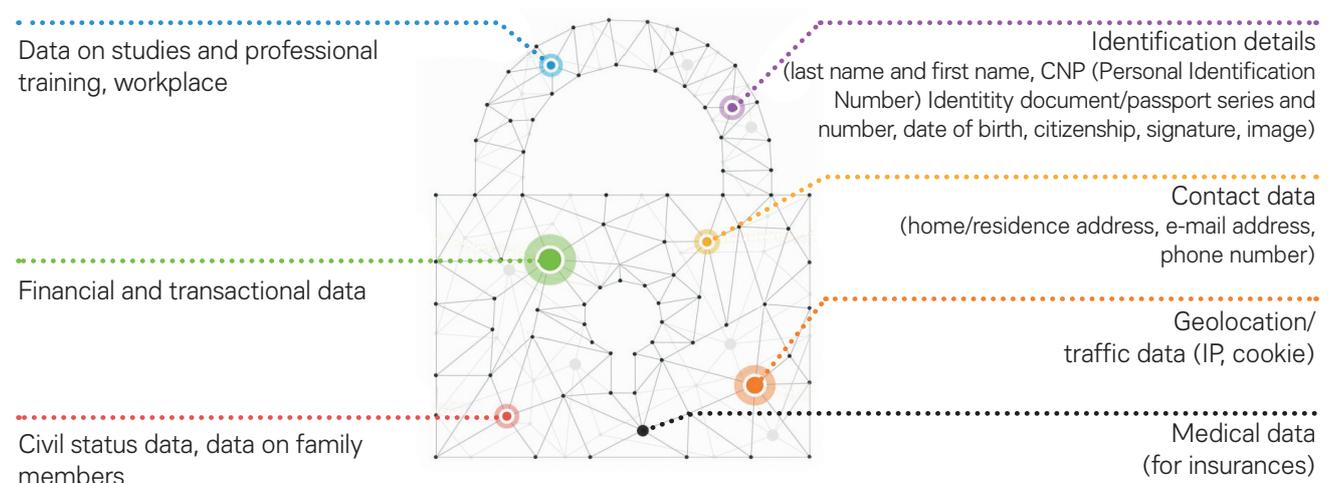
Considering the new regulations on personal data protection and privacy, introduced by EU Regulation 2016/679, which represents the basis of the legislation on the processing of personal data and the protection of such data for EU Member States and which shall apply as of May 25, 2018, we would like to reconfirm our commitment of processing your personal data in a transparent manner and with the observance of all the rights you enjoy under the law. For this purpose, please find hereinafter the main elements that we consider useful for you to know on this topic, in your capacity of "data subject".

### What does data processing mean?

Under the UE Regulation 2016/679, "data processing" means any operation or set of operations performed on personal data or on personal data sets with or without the use of automated tools, such as the collection, organization, structuring, storage, adjustment or amendment, extraction, consultation, use, disclosure by transmission, dissemination or other supply, alignment or combination, restriction, deletion or destruction.

In its capacity of controller, Alpha Bank Romania shall always see that the processing of data is characterized by legality, fairness and transparency, the data requested being adequate, relevant and limited to what is required in relation to the purposes for which are being processed.

### What categories of personal data do we process?



The list of these data may vary depending on the characteristics of the services and products contracted by you or in connection with which you manifest your interest, on the legal provisions applicable to the activities performed by Alpha Bank Romania and on the Bank's prudential policies.

Personal data may be obtained directly from you, from third parties (for example, lead providers) or by querying databases, under the conditions of the law (for example, the database for the Directorate for Persons Record and Databases Management).



## What purpose do we process personal data for?

Data is processed for the following purposes:

- providing financial-banking services;
- operations and transactions related to the Bank's assets and liabilities (such as, but not limited to, assignments of debts or issues of guaranteed bonds);
- processing in Credit Bureau type systems;
- debt collection/recovery;
- transmission to third parties, under the conditions of the law (such as, but not limited to, courier companies/postal services, debt recovery companies or other agents contracted by the Bank for the exercise of its legitimate interests);
- marketing (such as, but not limited to, participation in campaigns and awarding of prizes, loyalty programs and special offers, including the promotion of any products and services of the Bank and its partners, advertising/promotion, specific marketing activities, such as market surveys, profiling, segmentation);
- fulfillment of legal obligations (for example, carrying out audit actions or reporting obligations towards state institutions/authorities, such as ANAF);
- for statistical purposes.

In some situations, your personal data may be processed automatically however, without excluding human intervention. For example, to make sure that we are offering you the most appropriate solutions for your profile, we can use segmentation and marketing profiling which helps us to elaborate relevant offers (offers for students, employees, pensioners etc.).

## What happens if you do not want your personal data to be processed by the Bank?

Initiation and performance of the business relationship and the fulfillment of the obligations set out by the regulations in force may only be carried out based on the processing of personal data. Should you not want to provide us with the necessary information or object to further processing, we will be unable to initiate or continue the business relationship.

Data processing for marketing purposes makes it possible for us to inform you about Alpha Bank Romania's news and offers. The processing for this purpose may be requested to stop, any time, without affecting the Bank – Client relationship

## To whom may personal data be transmitted to?

The categories of potential recipients of data transfers could be:

- partners (e.g. insurance companies contracted by the Bank acting as a subordinate insurance agent, technology and payment companies such as VISA or MASTERCARD, specialized investment management companies, brokerage companies);
- third-party subcontractors (e.g. postal service providers, media/marketing research agencies);
- database organization offices (such as the Credit Bureau and the Credit Risk Center - in the case that you have contracted credit products) or various service agencies (SWIFT/Transfond - for payments in lei/ foreign currency);
- ANAF, in order to comply with FATCA ("Foreign Account Tax Compliance Act") and the CRS ("Common Reporting Standard"), if your personal data or the transactions you perform fall within the reporting criteria set by FATCA and / or CRS;
- shareholders;
- Alpha Bank Group members;
- employers;
- other competent authorities (in order to fulfill legal obligations);
- agents/attorneys-in-fact, in order to fulfil the legitimate interests of the Bank (law firms, debt recovery companies etc);
- third parties, in the event of assignment/transfer of the Bank's rights.



## Can data be transmitted outside the country?

The processing of personal data may involve the transfer abroad, for the purposes mentioned above. Data may be transferred to countries in/outside the European Union, including the United States of America. In all cases, any transfer shall be made with the establishment of necessary safeguards to ensure the protection of personal data against accidental or illegal damage, loss, alteration, disclosure or unauthorized access, as well as against any other type of illegal processing.

## Which are your rights in relation to the protection of personal data?

As of May 25, 2018, EU Regulation 2016/679 has reviewed and extended the scope of the rights of natural persons with regard to their personal data.

Please find below a detailed description of these rights, for a better understanding of their legal content:

- Right to be informed: the right to be informed about the data and the characteristics of their processing in your relationship with Alpha Bank Romania
- Right to rectification: the right to obtain from the Bank, without undue delay, the rectification/completion of inaccurate personal data concerning you
- Right to erasure: you may express the right for your data to be erased from the records of Alpha Bank Romania, in compliance with the applicable legal provisions in the area of personal data protection
- Right to restriction of processing: may be exercised when one of the following cases applies: the data subject challenges the accuracy of the data or the lawfulness of the processing, the data subject objects to the deletion of the data when the Bank no longer requires the personal data for processing but the data subject requires them to establish, exercise or defend a right in court or where the data subject objects to the processing for the period of time during which it is checked that the legitimate interests of the Bank override those of the data subject
- Right to data portability: consists in the possibility to request the Bank to transmit the personal data you provided in a structured format that is currently used and can be readable automatically; the transmission of data may be done directly to another controller only where this operation is feasible in terms of the technical capabilities used by Alpha Bank Romania
- Right to object: the right to object, at any time, based on legitimate and valid grounds relating to your particular situation, to the processing of personal data, except when there are legal provisions stating otherwise. This right may be exercised under the following conditions: a written request is submitted to Alpha Bank Romania, which will include the data that the objection is requested for and the grounded and legitimate reason relating to your particular situation
- Right not to be subject of an automated individual decision-making process: represents your possibility of requesting the Bank not to be subject to a decision based solely on automated processing, including profiling, which produces legal effects concerning the data subject or similarly significantly affecting him or her. With regard to the adoption of a decision based solely on automatic processing, you have the possibility to express your point of view, to request the intervention of a human operator as well as the possibility of challenging such a decision, in the ways described in this information
- Right to lodge a complaint with the National Authority of Surveillance of the Personal Data Processing (ANSPDCP)
- Right to file lawsuits

## For how long are personal data processed by Alpha Bank Romania?

Your personal data will be processed for the duration of the entire business relationship with Alpha Bank Romania, and furthermore, in compliance with the legal provisions on the basis of which the terms of processing of such data are regulated (for example, the legal provisions regulating the archiving of documents).



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For any request, information or notification about the exercise of your rights, including in the event you wish to withdraw your consent for the processing of data for marketing purposes or for making an enquiry in the database of the Directorate for Persons Record and Databases Management, you may contact us using the following means of communication:

- on the web site [www.alphabank.ro](http://www.alphabank.ro), "Contact" section
- by e-mail, at the address: [DPO@alphabank.ro](mailto:DPO@alphabank.ro)
- in Alpha Bank Romania branches by filling in the dedicated form or a written request
- in writing at the Bank's headquarters, located in 237B Calea Dorobantilor, District 1, Bucharest

We mention that the information presented above shall be permanently available to you in an updated format on [www.alphabank.ro](http://www.alphabank.ro).