

Privacy notice regarding the processing of personal data for the update of some know-your-customer information via BT Pay

Banca Transilvania S.A. (the “Bank”, “BT”), in its capacity of credit institution, is legally bound to enforce know-your-customer (KYC) measures, for the purpose of preventing money laundering and terrorist financing, for the performance of a task carried out in the public interest. When you become a **BT individual account holder** or a representative of such client (legal, conventional representative, authorized person) we collect from/about you information such as: last name and first name, alias, date and place of birth, national identification number or another unique identification element, citizenship, domicile, residency, address where the account holder lives and its legal regime, phone number, facsimile number, e-mail address, job, employer’s name or nature of the individual activity, purpose and nature of the business relationship with the bank, source of the funds to be used during the business relationship, classification as publicly exposed persons or the capacity of member of the family of a publicly exposed person or of a person known as close partner of a publicly exposed person (PEP), as well as the details and the copy of the ID document.

We must make sure that this information is **kept up to date** in our records throughout the business relationship. For this reason, whenever there is a change of such data you must update them with the Bank, as well. We shall request you to reconfirm these data, from time to time, even if no changes have occurred, just to make sure that they are the same.

You can update the whole set of data that we need about you for the enforcement of the KYC measures in any BT unit. For the partial update of these data, Banca Transilvania provides you with online solutions, such as BT Pay.

The update of personal data in BT Pay is possible for customers of full age who, at the time of the registration in BT Pay, were identified as BT account holders.

In order to update your data, you will need to upload a copy of your identity card – “ID” - (you will not be able to update your personal data through BT Pay if the expiration date on the ID is older than the date when you are trying to update your data).

To make sure that we only update / reconfirm **your** data and in order to prevent possible fraud attempts, we would like to apply a new technology on your image extracted from the ID you upload in BT Pay. This technology uses the so-called biometric data. We will not use this type of data without your explicit consent. Before deciding freely if you want to express such consent, please read the following information on the use of your biometric data: the software we use will identify in the ID uploaded in BT Pay the section that includes your face, it will select it and compare it with the face from the copy of your ID that is already registered in the bank’s records.

The comparison is made biometrically, based on criteria such as: color, size and inclination of the eyes, position and distance between the main elements of the face such as the eyes, eyebrows, lips and nose. Following the comparison, the solution will issue a reliability score, indicating the probability that the face in the two images belongs to the same person.

If you do not want your biometric data to be processed (facial identification), you can update your data in any BT unit, where your identity will be verified without the use of such data.

Also, if the facial recognition tool emits an unsatisfactory score, you will be able to resume the update process in a BT unit.

If, after completing the above steps, you convince us that it is you, you will be able to update online some of your data that we need for the know your customer (KYC) process. If you have not passed this small test, there is no problem, you can update your complete set of KYC data in any BT unit.

Your e-mail address is one of the data that you must provide. In order to make sure that the address belongs to you, you will be requested to confirm it. For this purpose, you will receive a code at the entered e-mail address and you must enter such code in the dedicated field of BT Pay.

You will then be asked to verify if that the data are correct and you must edit them accordingly, if necessary. If you complete the update in spite of the fact that you notice that the data had been prefill-ed/entered incorrectly, you are guilty of false statements and we are sure this is not your intention. If you cannot correct the errors, abort the online process and visit any BT unit.

Please note that BT Pay does not enable you to update the mailing address. In that regard, if the domicile address that you update/confirm through this channel is different from the mailing address that you had previously communicated to the bank, you will have to update it separately, in any BT unit or through other electronic methods offered by BT.

This notice is supplemented with the provisions of the [General Privacy Notice regarding the processing of personal data belonging to BT Customers](#), which we kindly recommend you to read. It is an integral part of BT's Privacy Policy that is available on the Bank's website www.bancatransilvania.ro.

This privacy policy will provide you with the definition of BT customers, as well as with details about the recipients of the personal data of BT customers, your rights with regard to the processing of personal data, the ways in which you can exercise them or the way in which you can contact BT's appointed data protection officer (BT DPO).