

INFORMATION NOTICE ON THE PROCESSING OF PERSONAL DATA - SUPPLIERS

B.R.D. - Groupe Société Générale S.A., headquartered in Bucharest, 1-7 Blvd. Ion Mihalache, 1st District, registered with the Trade Register Office under number J/40/608/19.02.1991, Tax Identification Number RO 361579, registered with the Banks Register under number RB-PJR-40-007/1999 (hereinafter „**the Bank**” or „**Us/We**”), processes personal data in its capacity of **Data controller**.

As there is a certain connection with the Supplier/the future Supplier, the Bank may process personal data of the following categories of data subjects (collectively referred to as "**Data Subjects**"): representatives of the Supplier (legal or conventional), persons holding management positions, other persons with key/important positions within the Supplier, direct and indirect shareholders of the Supplier, real beneficiaries of the Supplier, contact persons designated by the Supplier, other individuals indicated in the documents provided by the Supplier to the Bank or in a relevant relationship with the Supplier (such as representatives of Supplier's Subcontractors) or other natural persons whose data are processed by the Bank in order to develop the relationship with the Supplier.

I. WHERE DO WE HAVE YOUR DATA FROM?

We process the personal data that:

- the Data Subject provides to us directly, for instance when Data Subject acts in relation to the Bank as:
 - a) the legal representative or, as the case may be, the authorized representative of the Supplier;
 - b) the contact person designed by the Supplier.
- We obtain from the Supplier, through legal or conventional representatives, such as the data provided by the Supplier regarding members of the management, shareholders or real beneficiaries, other natural persons indicated in the documents made available to the Bank by the Supplier.
- We already have in our database, for instance when the Data Subject (e.g. the Supplier's shareholder or legal representative) is a customer of the Bank (for example, as natural person or, as the case may be, as authorized professional or self employed person).

We may also obtain and process the personal data of the data subjects from other sources, such as:

- public institutions and authorities (e.g. ANAF, MFP, RECOM, FNGCIMM, BNR - Central Credit Register (CRC) or Payment Incident Register (CIP));
- electronic registers and databases (e.g. court portal, Credit Bureau, entities ability to manage databases with persons accused of financing acts of terrorism and those politically exposed, RNPM, ANCP, BPI, OCPI, Official Gazette, etc.);
- BRD Group entities and SG Group entities (such as data regarding the Data Subjects with a fraudulent history as customers of other companies in the BRD Group);

The Refusal of Data Subjects to provide Us certain personal data may determine in certain situations, the impossibility of carrying out/continuing the selection process and/or the impossibility of contracting and/ or continue to provide the desired product or service.

II. WHAT CATEGORIES OF DATA DO WE PROCESS?

Where appropriate, the Bank shall process the following categories of data relating to the Data Subjects in connection with the Supplier:

- **identification data and official documents**, such as name, surname, CNP, serie and number of identity card / other document with identification function (e.g. passport, residence permit, etc.), as well as other information contained within (e.g. date and place of birth, citizenship, etc.), signature;
- **contact details** such as: home address, mail address (business), e-mail, phone number;
- **data necessary to assess the eligibility of the Supplier**, such as:
 - public office held, political exposure, special relations with the BRD Group, etc.;
 - information on the economic and financial situation, e.g. income, solvency, credit history, information regarding the contracts with similar object, previously concluded with the Bank;
 - information on fraudulent or, where appropriate, potentially fraudulent activities, e.g. accusations and convictions for (attempted) fraud, committed contraventions or offenses (e.g. for money laundering and / or terrorist financing), international sanctions;
- the position held within the Supplier (company);
- video recordings if the Data Subjects visits one of the Bank's locations;
- **any other data necessary or useful** for the selection process and/or the contractual relations between Bank and Supplier.

III. FOR WHAT PURPOSE DO WE PROCESS THE DATA?

A. ENTERING INTO THE RELATIONSHIP WITH THE BANK.

We process personal data of the Data Subjects in order to verify the eligibility of the Supplier/future Supplier to enter into a relationship with the Bank and to contract the services provided by the Supplier.

When requesting a service, We must carry out a series of checks (if the Data Subject is acting as the legal representative of the Supplier) in order to ensure that the prudential requirements are met for entering into contractual relations with the Supplier.

In the context of concluding and executing the contract with the Supplier, we perform various checks in order to prevent and combating fraud and/or guaranteeing bank secrecy, as well as for identifying potentials conflicts of interest and their proper management.

We also process data of the Data Subjects in order to comply with the legal obligations regarding identification of persons accused of economic and financial crimes, of crimes that may affect security and the integrity of the financial system, regarding the identification of the accused persons/about whom there is information regarding acts of terrorism or money laundering, sanctions, etc. The consequences of such checks may consists in refusing to enter into a relationship with the Bank, thus stopping the selection process or terminating the performance of the services by the Supplier towards the Bank, if a Data Subject in connection with the Supplier finds himself in such a situation.

Also, for the previously mentioned purpose, we can check if the Supplier respects the rules/values of corporate responsibility (Corporate Social Responsibility) of the BRD Group.

We may send information regarding the verification of the eligibility of the Supplier/future Supplier to other entities form BRD Group, who use the respective information in their own processes to verify the eligibility of Suppliers.

We may contact the Data Subjects through various means (e.g. telephone, e-mail, SMS) in order to communicate to you various issues related to the situation of the contract or the services contracted by the Bank.

At the same time, We process personal data for the purpose of archiving, both in hardcopy and electronic format, of the documents regarding the Supplier and the Bank.

Legal basis:

Compliance with the legal obligations of BRD, as well as, the legitimate interest of BRD:

- a) to process the requests for contracting services from legal entities and to verify eligibility of its Suppliers from the perspective of legal regulations, internal policies and standards imposed at BRD Group level;
- b) consisting in the need to process the personal data of the Data Subjects for the conclusion and execution in an optimal and efficient manner of the contracts with the Suppliers who are in legal relations with the Data Subjects.

B. ECONOMIC-FINANCIAL AND ADMINISTRATIVE MANAGEMENT. ANALYSIS AND INVESTIGATIONS FOR INTERNAL USE

We use the personal data of the Data Subjects in order to organize optimally and to streamline Our activity. In this regard, we may use the personal data of the Data Subjects, among others:

- for the organization of internal databases, as support for the activity carried out by the structures and the departments within the Bank;
- to improve the activity and services of BRD, as well as, Our processes;
- for the investigation of possible frauds/suspicious of fraud in banking operations, as well as for identification of potential conflicts of interest and their proper management;
- to support our position in various investigations, administrative and judicial proceedings, litigation, etc. in which the Bank is involved;
- in the context of various analyzes, internal audit procedures and or investigations carried out by the Bank on its own initiative or following the receipt of a notification from a third party (including public authorities);
- management of controls/investigations initiated by public authorities.

Legal basis:

Legitimate interest of BRD in streamlining and optimizing its activity.

C. SUPPORT SERVICES AND COMPLAINTS MANAGEMENT

We process the personal data of the Data Subjects in order to solve their requests or other people requests.

We can record audio conversations with the Data Subject in order to improve the management of Our Suppliers, as well as to prove (a) the Supplier's requests / complaints regarding any requests/complaints regarding the manner in which the contracted services are performed as well as our response, respectively (b) the agreement / option / preferences of the Suppliers, in this respect. If the Data Subject does not consent for the recording of the call according to the above, he can contact us, on behalf of the Supplier, through other available channels, such as by email or writing to our contact address. In the latter case, the solution of the Supplier's request / complaint will not be affected in any way, but it is possible that solving to take longer.

Legal basis:

Compliance with BRD's legal obligations and BRD's legitimate interests (i) to avoid any negative consequences, and (ii) to operate in accordance with internal and established standards at Group level;

The consent of the data subject for voice recording, as well as, the legitimate interest of BRD to keep the voice recording.

D. COMPLIANCE WITH LEGAL REQUIREMENTS AND INTERNAL RULES

We process personal data of the Data Subjects in order to comply with the applicable legal obligations for credit institutions. For example, based on the legal obligations we are bound by, we make various reports to relevant public institutions and authorities, such as: Capital Market Report of the BRD Corporate Finance Directorate (COFI), submitted annually by COFI to the Financial Supervisory Authority (ASF) or reports towards National Bank of Romania.

In addition to legal obligations, we are required to comply with a number of internal requirements established at the level of Société Générale Group concerning internal / external reporting and auditing which, in certain situations, may involve/have as a source of personal data processing.

Legal basis:

Compliance with specific legal obligations, as well as the legitimate interest of BRD and Société Générale Group to carry out activity in accordance with internal / group level standards.

IV. TO WHOM DO WE DISCLOSE YOUR DATA?

We may disclose the personal data of the Ddata Subjects, as the case may be, to the following:

a) Other providers of **main services**, such as:

- payment processing services ;
- valuation services for goods and other assets;

b) Suppliers for **support and / or ancillary services**, such as:

- electronic communications services (e.g. e-mailing, SMS, etc.);
- real estate agencies;
- bailiffs;
- IT services (e.g. maintenance, support, development);
- audit services;
- archiving services in physical and/or electronic format;
- postal and courier services;
- value transport services;
- legal, notarial or other consultancy services;

c) **Public institutions and authorities** in Romania or abroad, such as:

- National Bank of Romania (NBR);
- Financial Supervisory Authority (FSA);
- National Office for Prevention and Combating Money Laundering (ONPCSB);
- National Agency for Fiscal Administration (ANAF);
- Competition Council;
- Courts, other judicial bodies, authorities and applicants such as: police (MAI), Prosecutor's Offices, National Anticorruption Directorate - DNA, Directorate for the Investigation of Organized Crime and Terrorism (DIICOT), the judicial bodies from outside Romania, the National Integrity Agency (ANI), the Department for Combat Antifraud (DLAF) of the Romanian Government, administrators / judicial liquidators / insolvency practitioners, notaries public, mayors, National Employment Agency, Pension Houses, heirs legal and testamentary, etc.;
- OCPI;

d) **Other partners of the Bank**, such as other financial-banking institutions (for example, correspondent banks, financial-banking entities participating in payment schemes/systems and interbank communications such as SWIFT, SEPA, ReGIS, financial-banking institutions to which we confirm or request confirmation signatures and / or certain information that can be found in letters of credit, bank guarantee, other addresses issued by the Bank's Suppliers in favor of their business partners, other entities (such as banks or financial-banking institutions) insurance brokers / damage assessors, external consultants who provide for Us or, as the case may be, for whom We provide various services. Entities from the Société Générale Group and BRD Group, in accordance with the law. To see the complete structure of the Group, access <https://www.brd.ro/despre-brd/despre-noi/despre-brd/societe-generale>.

V. TRANSFER YOUR DATA ABROAD

As a general rule, we transfer personal data only in countries belonging to the European Economic Area (EEA) or to states which have been recognized as having an adequate level by a decision of the Commission of the European Union. The information on the states recognized by the European Commission as providing an adequate level of protection can be accessed here https://ec.europa.eu/info/law/law-topic/data-protection/international-dimensionofdataprotection/adequacy-decisions_en.

However, we may transfer personal data to countries other than the above, such as India, if:

- a) The transfer is made on the basis of appropriate guarantees (such as, through the use of Standard Contractual Clauses adopted by the competent authority, using other clauses - subject to approval them by the competent authority, or of the Binding Corporate Rules applicable at BRD level);
- b) The transfer is necessary for the execution of the contract concluded with the Supplier;
- c) Other cases permitted by law.

VI. FOR HOW LONG DO WE KEEP YOUR DATA?

We retain the personal data of the Data Subjects as long as necessary for the fulfillment of the purposes for which it was collected, in compliance with the applicable legal provisions, as well as of the internal procedures on data retention (including the applicable archiving rules at BRD level). Upon request, the Data Subjects may obtain additional information on the retention periods applicable to their personal data.

VII. WHAT ARE THE RIGHTS THAT YOU BENEFIT FROM?

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

- 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 is 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 have inaccurate personal data rectified or, if the case, to complete 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 contest 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 refuse the erasure of the personal data and

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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 interest of the Bank as data controller prevails over your rights as 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 USING THE CONTACT DATA IN SECTION VIII (CONTACT).

VIII. 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:

Bld. Ion Mihalache, No. 1-7, Sector 1, BRD Tower,
postal code 011171, Bucharest,

E-mail: dataprotection@brd.ro