

PERSONAL DATA PROTECTION INFORMATION NOTE

First Bank S.A. (hereinafter referred to as the "Bank"), a Romanian legal person having its registered office in 29-31 Nicolae Titulescu Road, 1st District, Bucharest, Sole Registration Code 7025592, registered with the Trade Register under no. J40 / 1441 / 27.02.1995 and also registered with the Register of Credit Institutions under no. RB-PJR-40-026 / 18.02.1999, as a Personal Data Controller registered with the National Authority for Personal Data Processing Supervision (ANSPDCP) with the no. 978, processes according to the provisions of (EU) Regulation No. 679 of April 27, 2016 on the protection of individuals with regard to the processing of personal data and on the free movement of such data and repealing Directive 95/46 / EC (General Data Protection Regulation), Law.190/2018 regarding provisions for applying the General Data Protection Regulation and of any other regulations in force on personal data processing and protection your personal data with good faith and for achievement of the goals specified in this **Non-Client Information Note**.

Your personal data is yours as a person interacting with the Bank in order to obtain information about the products and / or services that it can provide to you or to perform operations / purchase of products / services that do not imply initiating a contractual relationship (e.g., cash deposits, foreign exchange, gold purchase, gift card purchase, utility payments etc.). The person whose data is processed is hereinafter referred to as "the data subject".

This information on the personal data processing is regularly updated and whenever we make changes to it, we will display it on the Bank's website, and it may also be requested in any of the Bank's territorial units.

1. Your personal data we process

Your personal data that we process may vary depending on the manner / channel through which you interact with the Bank and / or your interest in certain products and / or services in the Bank's portfolio.

The types of personal data that we can process, as the case may be: name and surname, authorized natural person name, contact details (e.g. fixed / mobile phone, fax, e-mail, etc.), voice, facial image, video image, identity card / passport / civil status document / driving license.

In case you request information on the credit / leasing products offered by the Bank, the Bank may process additional data such as: Personal Identification Number, Tax Identification Number of the authorized person, nationality, citizenship and residence (including tax), address (domicile / residence / mailing address,) personal data (e.g. age, gender, family situation, education, profession, family members, financially dependent persons, health status, etc.), information on the financial and banking products / services held (ex. banking products / services held in other financial-banking institutions), information on the income earned and their source, professional experience (e.g. occupation, position, employers / payers of income, etc.), the locative status and property (movable or immovable), credit or other type of recurring expenses, history of repayment of assumed payment commitments, insurance products owned or to be purchased and the cover provided by them, signature.

If you request information or conclude contracts relating to movable / immovable property in the Bank's portfolio or financial / banking products / services, which do not involve the initiation of a contractual relationship with the Bank, personal data can be processed additionally such as: address (domicile / residence / mailing address), Personal Identification Number, Tax Identification Number of the authorized person, information stating holding funds necessary to conclude such contracts (e.g. bank statement, bank letter) and / or data specific to the operation mode of the products / services purchased, as described in the specific contracts concluded.

Personal data processed were communicated directly by the data subjects (persons concerned) (by filling in the forms - including those on the Bank websites or of its Bank affiliates - or documents provided in order to obtain the requested information / disposal of operations, regardless of the communication channel used), obtained by consulting public sources or from data observed by the Bank.

2. The purposes of processing personal data

a. In order to provide the information / services requested

This category includes, depending on the services and products you require, specific purposes, including: supplying the products and / or services most suited to your particular situation, the subsequent execution of your instructions regarding the functioning of the products / services purchased, providing information on the type and value of credit / leasing facilities that the Bank can provide to you, the analysis of financing requests and credit offerings, the determination of the risk that the Bank would assume by granting the financing, conclusion of the debt to asset (datio in solutum) transaction, sale of gold, rental, presentation and / or sale of movable or immovable assets in the Bank's portfolio, communication of required

information, keeping and archiving of documents, compliance with prudential requirements applicable to the credit institutions.

b. In order to fulfil legal obligations

Specific objectives are included in this category, among which we mention: the analysis of customer knowledge, risk analysis, reporting of suspicious transactions, fraud prevention, according to the NBR Regulation no. 9/2008 regarding the knowledge of the clients in order to prevent the money laundering and terrorist financing and Law no. 656/2002 on the prevention and sanctioning of money laundering, as well as for the establishment of measures to prevent and combat the terrorist financing; performing audit missions; administration of internal registers; physical security by video monitoring (including ATM), access cards and visitors register (reception); making information backups; information and advice to the controller and the provision of the operational support for data protection (DPO).

c. In order to fulfil the legitimate interests of the Bank

Specific objectives are included in this category, of which we mention: performing internal analysis (including statistical analysis) / market studies, regarding products / services, for the continuous improvement and development of products / services / internal processes; advertising, marketing and publicity, performing the current operations for the development of the financial-banking activity, analysing and minimizing the financial, operational, reputational risks to which the Bank is exposed; performing business forecasts on performance indicators, establishing budgets, ensuring a high level of security at both IT systems and within physical locations (e.g., territorial units, regional / business centers, headquarters); developing profiles / segments / typologies to adequately present the most appropriate products / services; recording of interactions through the official communication channels (email / chat / website / call center), in order to improve the quality of services and phone calls, as well as to provide proof of the application / agreement / option regarding certain financial-banking services, as the case may be, design, development, testing and use of existing or new IT systems and IT services, storage of databases in the country / EU, as appropriate); making internal reports to the Bank's governing bodies, preventing operational risk, including fraud.

d. Based on your consent

Personal data processing for direct marketing purposes or automated decision making that produce significant legal effects or similar effects and which are not necessary for the execution of a contract or the fulfilment of a legal obligation as well as the audio recording of the telephone conversations with the Bank shall be made only based on your express consent.

3. The length of personal data processing

In order to achieve the above-mentioned processing purposes, the Bank will process the personal data for a period of 3 years from the date of the provision of the information / service requested, as well as subsequently, when there is a legal or legitimate interest in doing so (ex. to provide the requested information or to comply with our legal, tax or accounting obligations). Where specific contracts are concluded, processing (including storage) is performed over the lifetime of the contracts as well as subsequently, in order to comply with the legal terms of archiving. It is possible that, after fulfilling the legal terms of archiving, the Bank will order anonymity of the data, thus depriving it of its personal character and continuing the processing of anonymous data for statistical purposes.

4. Submitting personal data for the fulfilment of Bank's processing purposes

If applicable, we submit your personal data to:

- the data subject (person concerned) or the legal or contractual representatives of the data subject (person concerned)
- Bank representatives, other natural or legal persons processing personal data on behalf of the Bank, contractual partners of the Bank;
- representatives of the Bank with regard to the processing of personal data held by the confidentiality obligation on data submitted: lawyers, consultants, accountants, assessors, censors and auditors, service providers: IT services, physical and / or electronic archiving; courier services; production and customization of the payment instruments, technical services

for payment facilitation (e.g., Visa and Mastercard); market research, transmission of marketing communications, personalization services of various types of marketing, real estate agents, notary offices;

- the authorities according to their competencies and the applicable legislation, such as: the National Bank of Romania, ANAF, the National Office for Prevention and Control of Money Laundering, the Credit Risk Center, the Competition Council, the Financial Supervisory Authority, etc.

- judicial authority, central public authorities, local public authorities, credit bureaus, insurance and reinsurance companies.

Data transmitted to third parties will be appropriate, pertinent and non-excessive in relation to the purpose for which they were collected and which allows the transmission to a third party.

5. Need to process personal data

In the event you refuse to communicate the above mentioned data, the Bank will be unable to provide you with the required products / services (or any information related thereto) or to complete your other requests.

If you oppose data processing for statistical purposes or other legitimate interests of the affiliate controller (s), we will inform you that this option will be reviewed and, depending on the particular situation of the person concerned, you will receive a response in accordance with General Data Protection Regulation.

6. Rights of the data subject (person concerned)

As the data subject, you have the following rights exclusively to your personal data as provided by the General Data Protection Regulation:

- a. The right to information: the right to be informed about the identity and contact details of the controller and the Data Protection Officer, the purposes of the data processing, the categories of personal data concerned, data recipients or categories of data recipients, existence of the rights provided by the legislation on the protection of personal data for the data subject and the conditions in which they can be exercised;
- b. Right of access to data: the right to obtain from the data controller the confirmation that the personal data that concern you are processed or not by him / her;
- c. The right to rectification: the right to obtain the rectification of the inaccurate data concerning you as well as the completion of incomplete data;
- d. The right to delete data ("the right to be forgotten"): the right to obtain, to the extent that the legal conditions are met, the deletion of personal data concerning you;
- e. The right to restrict the processing: the right to obtain, to the extent that the legal conditions are met, the limitation of further processing of the personal data that concerns you;
- f. The right to data portability: the right to receive personal data in a structured way, commonly used and in a easily readable format, as well as the right for such data to be transmitted by the Bank to another data controller, to the extent that the legal conditions are met;
- g. The Right to Opposition: The right to oppose at any time, for well-founded and legitimate reasons related to its particular situation, that personal data that is intended to be processed, to the extent that the legal conditions are met;
- h. The right not to be subject to an individual decision: the right to request and obtain the retraction, cancellation or reassessment of any decision based exclusively on the processing by automatic means (including the creation of profiles) which produces legal effects as far as you are concerned or similarly affects you to a significant extent;
- h. The right to appeal to the courts of law or ANSPDCP: the right to address with a complaint to ANSPDCP, or to address the courts for the defence of any rights guaranteed by the applicable law in the field of personal data protection that have been infringed upon you.

For the exercise of these rights, you may address with a written, dated and signed application, submitted to the Bank at the address 29-31 Nicolae Titulescu Road, 1st District, Bucharest or by email office@firstbank.ro.

We also communicate the contact details of the Data Protection Officer of the Bank, namely the postal address of 29-31 Nicolae Titulescu Road, 1st District, Bucharest, email address dpo@firstbank.ro.

If you submit a request for the exercise of your data protection rights, the Bank will respond to this request within 30 days under the terms of the General Data Protection Regulation.

The personal data controller processes your data under legitimate conditions, while implementing appropriate technical and organizational measures to ensure the integrity and confidentiality of the data under the General Data Protection Regulation.