

**Information notice concerning the processing of personal data**  
**- management of payment suspension requests -**  
**- GEO 37/2020**

*1. Personal data controller*

First Bank S.A. (hereinafter called "Controller or Bank") hereby informs you of the manner how it processed the personal data in order to manage the payment suspension requests sent according to the Government Emergency Ordinance no. 37/2020 concerning facilities for the loans granted by credit institutions and non-banking financial institutions to certain categories of debtors and the norms to implement this ("GEO 37/2020")

*2. Purpose of data processing*

First Bank processes the personal data in order to manage the payment suspension requests mentioned above, which includes the record of the requests at the bank and contacting you if such requests are incomplete or if the data is not updated, the verification of the compliance with the suspension conditions, the communication of the decision of the bank as concerns the acceptance/rejection of the request, sending the notification related to the amendment of the contract and the new reimbursement schedule, as the case may be. At the same time, the personal data is processed in order to prove the interaction with you and to provide the means required to confirm, exercise or defend the rights of the bank in court, as the case may be.

*3. Personal data and persons concerned*

Thus, the Controller will process the following personal data for the purposes above: your identification data, your contact data, your voice (in the case of telephone calls), data concerning the loan for which the suspension is requested, the manner how your income is affected by the COVID19 pandemics, as well as all the other data included in the payment suspension request or in your correspondence with the Controller for the purpose of managing the suspension requests.

The persons concerned by the processing are you, as client requesting the payment suspension, your representative, guarantor or co-debtor.

*4. Legal grounds for the processing of personal data*

The bank will process your personal data based on the following legal grounds:

- art. 6.1 letter b) in the General Data Protection Regulation no. 679/2016 ("GDPR"), i.e. to take measures in order to execute the contract you are a party of;
- art. 6.1 letter c) in GDPR, i.e. in order to meet the legal obligations of the Bank both from the perspective of the GEO 37/2020, as well as from the perspective of the know-your-client obligations and of the other incidental legal obligations;
- art. 6.1 letter f) in the GDPR, i.e. in order to protect the legitimate interest of First Bank to update your data existing in the First Bank database, as well as in order to prove its interaction with you and to confirm, exercise or defend the rights of the bank in court.

At the same time, the telephone conversations with you held during the process of collecting and managing the suspension requests will be recorded, based on the legal obligation imposed to the Bank in this respect according to the GEO 37/2020 (art. 6.1 letter b) in the GDPR), as well as in order to confirm, exercise or defend the rights of the bank in court (art. 6 letter f) in the GDPR).

Besides, although the Bank tries to avoid the collection and processing the data concerning your health, such as the Covid 19 virus infection, if you send us such information, this shall be used only to manage your payment suspension request, according to the regulations providing for general public interest measures consisting of providing the debtors with facilities during the emergency and extraordinary situation caused by this pandemics (processing ground stipulated under art. 9 paragraph 2 letter g in the GDPR).

### *5. Need for processing*

In the absence of the processing of the personal data, the Bank may not be able to consider the payment suspension requests.

### *6. Recipients of the personal data*

If your payment suspension request is approved, the Bank will record – for all your loans at the Bank, reported to the Credit Bureau and suspended for payment – the comment “Payment suspension”. Then, during the payment suspension, the Bank will send, on each due date, the information referring to the fact that the instalment and the amount paid are zero. Your credit score at the Biroul de Credit SA (Credit Bureau SA) will not be affected by the comment "Payment suspension", as this has no impact on the calculation algorithm. The payment suspension belongs to the “Data concerning events occurring during the credit product execution period” category of information, which is processed in the Credit Bureau System by the participants thereto based on their legitimate interests, as you have already been informed (additional information concerning the processing of data through the Credit Bureau is available at [www.firstbank.ro](http://www.firstbank.ro), Data Protection section). The record of the payment suspension is required in order both to correctly reflect the situation of the loan during the payment suspension and to continue with a responsible credit activity, while protecting, facilitating the access to loans and preventing excessive indebtedness of the persons concerns, complying with the legal framework concerning the assessment of the solvability and the mitigation of the credit risk, as well as preventing the use of the financial-banking system for activities contrary to the law.

### *7. Rights of the person concerned*

As person concerned, you benefit from the following rights under articles 15-22 in the General Data Protection Regulation, i.e. right to rectification of the data, right to erasure of the data (“right to be forgotten”), right of restriction of processing of data, right to portability of the data, right to object the processing of the data, right to be exempted from a decision based exclusively on automated data processing, right to lodge a complaint at the National Supervisory Authority for Personal Data Processing or in court. In order to exercise these rights, you can send a written request to the Bank, dated and signed, to the address Sos. Nicolae Titulescu nr. 29-31, Sector 1, Bucharest, or via e-mail to [office@firstbank.ro](mailto:office@firstbank.ro). The bank shall answer within one month, in the conditions provided by the General Data Protection Regulation. The data protection officer may be contacted at the postal address: Sos. Nicolae Titulescu nr. 29-31, Sector 1, Bucharest or via e-mail at [dpo@firstbank.ro](mailto:dpo@firstbank.ro).

This information notice is completed with the provisions of the following Information Notices concerning the Processing of Data, available at [www.firstbank.ro](http://www.firstbank.ro), Data Protection Section:

- Information Notice concerning the processing of the personal data of the First Bank clients;
- Information Notice concerning the processing of the personal data in the Credit Bureau System;
- Information Notice concerning the processing of the personal data in the Credit Risk Register (CRR).

These notes indicate, without limitation, the categories of personal data receivers, information concerning the international transfer of the data, the period in which the data are kept, details concerning the processing of the data during the execution of the loan agreement, after the approval of the payment suspension.

At the same time, if you provide us personal data concerning the members of your family, please ensure that you have informed them of the supply of information concerning them to First Bank for the purpose of managing the payment suspension request.