

**Information Notice concerning the processing of personal data  
- For the shareholders of First Bank S.A. –**

**First Bank S.A.** (hereinafter referred to as "the Bank" or "First Bank"), the Romanian legal entity with its registered office in Sos. Nicolae Titulescu no. 29-31, sector 1, Bucharest, Unique Registration Code 7025592, registered at the Trade Register under no. J40 / 1441 / 27.02.1995 and at the Register of Credit Institutions under no. RB-PJR-40-026 / 18.02.1999, as data controller, processes your personal data, according to the General Data Protection Regulation (EU) 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 - RGPD), Law no. 190 / 2018 regarding measures for the implementation of the General Data Protection Regulation, and of any other applicable legal regulations regarding the processing and protection of personal data, in good faith and in achieving the purposes specified in this **Information Note**.

The personal data belongs to you, as a person who interacts with the Bank as a shareholder of First Bank S.A., hereinafter referred to as "the data subject".

### **1. Personal data processed by First Bank**

The personal data we process may vary depending on the way / channel through which you interact with the Bank and / or the operations performed through First Bank, as the case may be, as follows:

- identification data - name and surname, data related to the identity document / passport, personal numerical code or another unique element of similar identification, copy of the identity document;
- contact details - telephone number, e-mail address, residence address;
- signature;
- the number of shares held within the bank, as well as the other information included in the Register of shares;
- data concerning participation and voting in general meetings (such as, date of participation, place of participation, voting, debates held during shareholders' meetings)
- data concerning personal financial details (bank account, dividend income);
- information on the location, image and video recordings of individuals (video recordings captured by surveillance cameras installed at First Bank offices), in case you visit these spaces.

### **2. Legal grounds and purposes of personal data processing: in order to fulfill the legal obligations of First Bank (art. 6 paragraph 1 letter c) of the RGPD**

In consideration of this legal basis, your personal data are processed by the Bank for the following **purposes**:

- fulfilling the obligations provided by Law 31/1990 regarding the companies, regarding the keeping of the Register of shareholders;
- fulfilling the legal obligations regarding the reporting to the state authorities such as the exposures to the affiliated persons and other reporting provided by law;
- fulfilling the legal formalities related to the development of the Shareholders' Meeting and adopting the decisions (identifying the shareholders, drawing up the attendance list, drawing up the minutes of the meeting and the decisions);
- communication with shareholders, according to the law;
- fulfilling the legal formalities for implementing the decisions adopted by the General Meeting of Shareholders, such as, but not limited to: registering the decision of the General Meeting at the Trade Register, publishing in the Official Gazette, communication to the National Bank of Romania.
- ensuring physical security through video monitoring (including ATM), access cards and visitor register (reception), according to the legal provisions regarding the protection of objectives, goods, values and protection of persons;

- storage and archiving of information

### **3. Duration of personal data processing**

The processing (including storage) of the personal data is carried out by the Bank for as long as is necessary to fulfill the purposes for which they were collected, in compliance with the applicable legal provisions.

Video recordings will be kept for a maximum period of 30 days, unless there are good reasons to keep them for a longer period.

It is possible that, following the fulfillment of the legal archiving deadlines, the Bank may order the anonymization of the data, thus depriving them of their personal character and to continue the processing of the anonymous data for statistical purposes.

### **4. Transmission of personal data for the fulfillment of the Bank's processing purposes**

If applicable, we transmit your personal data to:

- the data subject or the legal or conventional representatives of the data subject;
- Bank's proxies regarding the processing of personal data held by the obligation of confidentiality regarding the data transmitted: lawyers, consultants, accountants, evaluators, internal or external auditors and auditors, service providers: IT services, archiving in physical format and / or electronic; courier; notary offices;
- to the other shareholders of the bank, within the consultation of the company's registers, or of the documents concluded during the General Meetings, decisions, etc.
- state authorities, according to their competencies and the applicable legislation, such as: Trade Register, National Bank of Romania, ANAF, National Office for Prevention and Combating Money Laundering, etc.

The data transmitted to third parties will be adequate, relevant and not excessive in relation to the purpose for which they were collected and which allows the transmission to a certain third party.

### **5. International Transfer of personal data:**

In order to fulfill the above-mentioned purposes, it is possible for First Bank to transfer certain categories of personal data outside Romania, in EU / EEA countries, as well as outside the EU / EEA, including the United States of America, especially if you are a US citizen.

For transfers outside the EU / EEA, First Bank will base the transfer of personal data on the basis of standard contractual clauses adopted at the level of the European Commission or other guarantees recognized by law.

For the international transfer of data to the United States, we mention that there is the Decision of the European Commission of 12 July 2016, issued under Directive 95/46 / EC of the European Parliament and of the Council, on the adequacy of the protection offered by the EU Privacy Shield. US. Any transfer of data to the United States of America will be made in accordance with the principle of data minimization.

### **6. Necessity to process the personal data**

Your personal data are necessary in order to fulfill the above mentioned purposes. Failure to provide the necessary personal data may cause delays in the availability of certain products and services or may make it impossible for us to provide the services and / or product requested.

If you object to the processing of data for purposes based on legitimate interest, we inform you that this option will be analyzed and, depending on the particular situation of the data subject, you will receive a response according to the General Data Protection Regulation.

### **7. Your rights and manner in which you can exercise these rights.**

As a data subject, you have the rights provided by art. 15-22 in the General Data Protection Regulation, namely:

- a. Right to information: the right to be informed about the identity and contact details of the operator and of the Data Protection Officer, the purposes for which the data are processed, the categories of

personal data concerned, the recipients or categories of recipients of data, the existence of the rights provided by the legislation on personal data protection for the data subject and the conditions under which they can be exercised;

b. The right of access to data: the right to obtain from the data controller the confirmation of the fact that the personal data concerning you are or are not processed by him;

c. The right to rectification: the right to obtain the rectification of 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, insofar as the legal conditions are met, the limitation of the further processing of the personal data concerning you;

f. The right to data portability: the right to receive the personal data in a structured manner, commonly used and in an easy-to-read format, as well as the right for this data to be transmitted by the Bank to another data controller, data, insofar as the legal conditions are met;

g. The right to oppose: the right to oppose at any time, for well-founded and legitimate reasons related to his particular situation, that the personal data aimed at you be processed, insofar as the legal conditions are met;

h. The right not to be subject to an automated individual decision, including profiling: the right to request and obtain the withdrawal, cancellation or re-evaluation of any decision based solely on processing by automatic means (including profiling) which produces legal effects in which concerns you or affects you in a similar way to a significant extent;

i. The right to withdraw your consent at any time, if the data processing operation relies on your consent, in accordance with Article 7 paragraph 3 of the General Data Protection Regulation;

j. Right to lodge a complaint in court or at the ANSPDCP: the right to file a complaint with ANSPDCP, respectively to go to court for the defense of any rights guaranteed by the applicable legislation in the field of personal data protection, which have been violated.

To exercise these rights, you can address a written request, dated and signed, sent to the Bank at Sos. Nicolae Titulescu no. 29-31, sector 1, Bucharest or by email [office@firstbank.ro](mailto:office@firstbank.ro).

Also, we will communicate the contact details of the Data Protection Officer of the Bank, respectively the postal address Sos. Nicolae Titulescu no. 29-31, sector 1, Bucharest, email address [dpo@firstbank.ro](mailto:dpo@firstbank.ro).

If you address a request regarding the exercise of your rights regarding the protection of personal data, the Bank will respond to this request, without delay, within a maximum of one month, under the conditions provided by the General Regulation on data protection.

The Bank, as a personal data controller, processes your data in conditions of legitimacy, implementing at the same time adequate technical and organizational measures to ensure the integrity and confidentiality of data according to art. 25 and art. 32 of the General Regulation on data protection.

## **8. Updating the Information Note**

This General Information Note on the processing of personal data is updated periodically; the updated form of the Information Note is available at any time at [www.firstbank.ro](http://www.firstbank.ro) and in any territorial unit of the Bank.