

Information Notice
concerning the processing of personal data in the database of the Credit Risk Register (CRR)

First Bank S.A. (hereinafter called the “Bank”), a Romanian legal entity with the registered address in Sos. Nicolae Titulescu nr. 29-31 (29-31, Nicolae Titulescu Ave.), sector 1, Bucharest, Unique Registration Code 7025592, registered in the Companies Registry under no. J40/1441/27.02.1995 and in the Credit Institutions Registry under no. RB-PJR-40-026/18.02.1999, as data controller, processes your personal data according to the provisions of the Regulation (EU) no. 679 of 27 April 2016 on the protection of natural persons 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” or “GDPR”), of the Law no. 190/2018 concerning measures for the implementation of the General Data Protection Regulation and of other relevant legal regulations concerning personal data processing and protection, in good faith and for the achievement of the purposes indicated in this **Information Notice**.

This personal data, belonging to you as borrower/co-debtor/guarantor, and respectively representatie, shareholder/associate and/or administrator of a legal entity (hereinafter called “data subject”), is supplied to the Bank both upon submitting a loan request, as well as during the execution of the contract, in compliance with the relevant legal provisions in force.

1. Personal data

- a) identification data: name and surname, personal number/country code;
- b) data concerning the global risk and the situation of outstanding loans;
- c) data and information concerning credit products: negative data (type of product, granting term, date of granting, due date, loans granted, credit status, amounts due, outstanding amounts, due date of the outstanding amount, number of days of delay in reimbursing the loan), positive data (type of product, granting term, date of granting, due date, amounts granted, amounts due, outstanding amount, loan currency, amount paid, type and amount of the guarantee established);
- d) signature.

2. Purposes of processing the personal data

This data is processed by the Bank for the following purposes:

- a) consulting the database of the CRR in order to assess the solvability, minimize the credit risk and establish the level of indebtedness of the data subjects, upon the analysis of the loan application (art. 6 paragraph 1), letter a) in the GDPR), and respectively during the execution of the contract (art. 6 paragraph 1), letter f) in the GDPR);
- b) fulfilment of the legal obligations to report to the CRR, as the case may be, based on art. 6 paragraph 1), letter c) in the GDPR;
- c) settlement of the requests of the data subjects referring to the records made in the database of the CRR, based on art. 6 paragraph 1), letter f) in the GDPR.

3. Duration of processing the personal data

The personal data that First Bank S.A. has the legal obligation to report to the Credit Risk Register (CRR) shall be maintained in the records of the CRR for a period of 7 years after their registration.

4. Data recipients

The personal data can be transferred to the data subject, representatives of the data subject, contractual partners of the Bank (such as: debt collection/receivables recovery agencies, couriers, notaries, lawyers, consultants, accountants, authorized evaluators, censors and auditors, suppliers of IT services, or physical and/or electronic archiving services or to other suppliers of services, bound to comply with the confidentiality obligations as concerns the data transmitted), as the case may be.

At the same time, the personal data can be disclosed to the state authorities in line with their competences and with the legislation in force, such as: the National Bank of Romania, the National Agency for Fiscal Administration, the National Office for Prevention and Fighting Money Laundering, etc.

The data transferred to third parties shall be adequate, pertinent and non-excessive against the purpose for which it has been collected, and which allows for its transfer to a certain third party.

First Bank S.A. sends and receives the personal data mentioned under point 1) to and respectively from the Credit Risk Register, a structure subordinated to the National Bank of Romania, with the registered address in Bucharest, Str. Lipsani, nr. 25 (25, Lipsani Str.), sector 3.

CRR processes this personal data in compliance with the relevant legal provisions in force, i.e. the NBR Regulation no. 2/2012 concerning the organization and functioning of the Central Risk Register at the National Bank of Romania.

First Bank and CRR process the data as associate controllers.

5. International transfer

Your personal data processed for the CRR purpose shall not be transferred outside the EU/EEA.

6. Rights of the data subject

As data subject, you have the following rights concerning your personal data, stipulated in the General Data Protection Regulation: right of access to data, according to art. 15 in the GDPR, right of rectification of data, according to art. 16 in the GDPR, right to erasure of data, according to art. 17 in the GDPR, right of restriction of data processing, according to art. 18 in the GDPR, right to data portability, according to art. 20 in the GDPR, right to object, according to art. 21 in the GDPR, right to be excluded from automated individual decision-making, including profiling, according to art. 22 in the GDPR, right to lodge a complaint at the Authority for the Supervision of Personal Data Processing and in court. At the same time, you have the right to withdraw your consent at any time, if the data processing operation is based on your consent; the withdrawal of the consent will not affect the legality of the processing operations carried out without such withdrawal.

These rights can be exercised by sending a request to the postal address of First Bank or via e-mail at dpo@firstbank.ro.

7. Contact details of the data protection officers

For First Bank – dpo@firstbank.ro

For the Credit Risk Register - datepersonale@bnro.ro

First Bank S.A. guarantees that it processes your data legitimately, implementing at the same time adequate technical and organizational measures to ensure the integrity and confidentiality of the data, according to art.25 and art.32 in the General Data Protection Regulation.