

**INFORMATION NOTICE**  
**concerning the processing of personal data**

**UniCredit Bank S.A.** (The "Bank"), Member of UniCredit Group – registered with the Banking Register under number RB-PJR-40-011/18.02.1999 - paid-up share capital: 589.955.162,70 RON - registered with the Trade Register under number: **J1991007706408, EUID: R00NRC.J1991007706408** - Sole Registration Code: 361536, **fiscal attribute RO**, company administered in a two-tier system, SWIFT Code: BACXROBU, as a Personal Data Operator, processes your personal data ("Personal Data") in good faith and in the achievement of the purposes specified in this Information Notice, in accordance with the provisions of Regulation (EU) No. 679 of 27 April 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 (the Regulation). You have provided/ you will provide the Bank with certain Personal Data belonging to you as client, respectively as data subject, for the purpose of concluding financial instruments transactions with the Bank.

**1. The personal data processed may be the following:**

- a) Identification data: first and last name, personal identification number – CNP - or NIF, as the case may be, the date and place of birth, sex, citizenship, serial and CI / BI / Passport number, other data from the civil status documents, address (domicile / residence), voice, image, signature,
- b) Data on experience and knowledge: the level of professional training, occupation, your experience and knowledge regarding investment products / financial instruments and transactions with such products / instruments, the purpose and duration of the desired investment, risk tolerance and the ability to bear the losses etc.

**2. The personal data are processed by the Bank for the following PURPOSES:**

- a) compliance with the requirements from the MiFID and MiFIR legislation (defined in point 4 below) that the Bank will fulfill towards you (eg verification of the product governance requirements, your classification, according to the legal criteria, in the suitable MiFID category of clients - retail or professional, conducting the opportunity test, providing information according to the legal provisions, confirming the transactions, reporting the transactions, etc.);
- b) the conclusion of transactions with financial instruments between you and the Bank;
- c) reporting to state institutions, including for carrying out the activities related to the controls of the authorities, such as ANAF, BNR, ANSPDCP, etc.;
- d) recording communications by e-mail, fax, digital channels (eg Online Banking, Mobile Banking, email) and telephone calls (if a contract is concluded with the Bank allowing these means of concluding transactions or in case the Bank offers information about investment services or activities via the phone), for the purpose of concluding and executing under optimal conditions contracts / transactions / transactions with financial instruments.

**3. The personal data are processed by the Bank on the basis of the following LEGAL BASIS:**

- a) in order to fulfill a legal obligation of the Bank (eg the fulfillment of the requirements derived from the MiFID and MiFIR legislation - defined in point 4 below), which the Bank will fulfill towards you, such as the verification of the governance requirements of the product, your classification, according to the legal criteria, in the suitable category of MiFID clients - retail or professional, conducting the opportunity test, providing information according to the legal provisions, confirming the transactions, reporting the transactions, recording the electronic communications and telephone calls, etc.), according to art. 6 paragraph (1) lit. c) of the Regulation;
- b) for the purpose of the legitimate interests pursued by the Bank (eg ensuring the security of persons and property, etc.), but taking into account the protection of the fundamental interests, rights and freedoms of the data subject, pursuant to art. 6 paragraph (1) lit. f) of the Regulation.

**4. The personal data are processed for** a period of 5 years, according to the MiFID legislation (respectively Law no. 126/2018 on the markets of financial instruments, through which the EU Directive no. 65/2014 - MiFID II - and the regulations issued in application of this directive) and MiFIR legislation (Regulation (EU) no 600/2014 on the markets of financial instruments and amending Regulation (EU) no 648/2012 and regulations issued in application of the aforementioned regulation).

## 5. Controllers, Processors and Recipients of Personal Data

Personal Data can be transferred to the following categories of recipients: a) Data Subject, representatives of the Data Subject, b) entities within UniCredit Group<sup>1</sup>, c) various service providers (e.g. IT, archiving, printing, couriers, etc.), d) the companies that manage the investment funds whose products and services are distributed by the Bank (ex: Amundi Asset Management SAI SA) and other entities involved in the process of managing the investments (e.g.: depository of funds) e) public authorities in Romania (e.g. National Bank of Romania, ANAF, National Office for Preventing and Combating Money Laundering, etc.) and abroad (e.g. European Commission, tax authorities, etc.).

In the case of transfers of Personal Data to a third party or organization abroad, the information in the *International Transfer* section is applicable.

Personal Data transferred to third parties shall be appropriate, pertinent, and non-excessive compared to the purpose of their collection and which allows the transmission to a particular third party.

## 6. International Transfer

In all situations where international data transfer will be required, this will only be achieved if an adequate level of personal data protection recognized by a decision of the European Commission, such as the member states of the European Economic Union, is ensured in the recipient country (EEA).

In the absence of such a decision of the European Commission, the Bank may transfer personal data to a third country only if the person processing the data has provided adequate guarantees provided by law in order to protect personal data (eg standard contract clauses, binding company rules, codes of conduct, certification mechanisms, etc.).

The bank can be contacted for obtaining additional information regarding the guarantees offered for the protection of personal data in the case of each transfer of data abroad, through a written request for this purpose.

## 7. Necessity of Personal Data Processing

Should you oppose to the processing of your specified Personal Data for the purposes stipulated under sub-par. a) to d) of the above – the Bank will be unable to conclude financial instruments transactions with you or to continue them, as it will not be able to comply with the legal requirements in the financial-banking field (e.g. regarding know your customer requirements, requirements from MiFID Legislation, prudential requirements, etc.), including to analyze the request regarding the provision of services by the Bank, to conclude / run / execute the contractual relationship / transaction / operation.

## 8. As Data Subject, you have the following RIGHTS related exclusively to your Personal Data

- a) the right to access your Data, according to article 15 of the Regulation;
- b) the right to rectification of your Data, according to article 16 of the Regulation;
- c) the right to erasure of your Data, according to article 17 of the Regulation;
- d) the right to restriction the processing of your Data, according to article 18 of the Regulation;
- e) the right to the portability of your Data, according to article 20 of the Regulation;
- f) the right to oppose to processing, according to article 21 of the Regulation;
- g) the right to not be subject to individual automated decision-making, including profiling, according to art. 22 of the Regulation;
- h) the right to contact the National Supervisory Authority for Personal Data Processing and the legal system.

We specify that, according to art. 7 (3) of the Regulation, you are entitled to withdraw your consent for direct marketing and profiling for marketing purposes.

**For the exercise of such rights**, you can file a written application, dated and signed, submitted to UniCredit Bank SA, at the following address: no.1F Expoziției Boulevard, sector 1, Bucharest, postal code 012101, or via e-mail at [infocenter@unicredit.ro](mailto:infocenter@unicredit.ro), respectively by calling +40 21 200 2020 (regular rate number for Telekom Romania fixed network) or \*2020 (regular rate number in Telekom Romania, Orange, RCS&RDS, Vodafone networks). Should you submit a request

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<sup>1</sup> **Group/UniCredit Group** - UniCredit SpA (Italy) and companies controlled directly/ indirectly, including the companies in Romania (UniCredit Bank SA, UniCredit Leasing Corporation IFN SA, Debo Leasing IFN SA, UniCredit Leasing Fleet Management SRL, UniCredit Insurance Broker SA, UniCredit Consumer Financing IFN SA, UCTAM RO SRL, etc.) and the legal successors of such companies.

for the exercise of your rights on data protection, the Bank shall answer such request within one month, term that may be extended with two months, according to the provisions of the Regulation.

In UniCredit Bank S.A, the data protection officer has the following contact details: no.1F Expozitiei Boulevard, sector 1, Bucharest, postal code 012101, e-mail dpo@unicredit.ro.

This Information Notice is done according to art. 13 of the Regulation, respectively for your information, not being transmitted for the purpose of collecting your consent for the aforementioned processing operations. You can permanently consult on the Bank's website, at <https://www.unicredit.ro/en/persoane-fizice/Diverse/protectia-datelor.html>, information on the processing of personal data.

For any other information, we are at your disposal.

Respectfully,  
UniCredit Bank