INFORMATION REGARDING THE PROCESSING OF PERSONAL DATA FOR MANAGING THE RELATIONSHIP WITH REPRESENTATIVES OF THE FINANCIAL AND BANKING SYSTEM

In its capacity as personal data controller, the **National Bank of Romania (NBR)** processes personal data that are either voluntarily provided by or indirectly received from the data subject, according to the applicable provisions of the national legislation in force, to the provisions of **Regulation (EU) 2016/679** 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), hereinafter referred to as GDPR, and of Law No. 506/2004 on the processing of personal data and the protection of privacy in the electronic communications sector, in a secure manner and solely for the purposes described below.

The **National Bank of Romania** is constantly preoccupied with ensuring a high level of protection for the personal data it processes, consistent with the legal framework in place.

In order to observe your right pursuant to the provisions of Regulation (EU) 2016/679 to be informed about the manner in which your personal data are processed by the **National Bank of Romania**, please be advised of the following:

DEFINITIONS

"Personal data" means any information related to an identified or identifiable natural person ("data subject").

In relation to the National Bank of Romania, you are by law the **"data subject"**, meaning an identified or identifiable natural person. An identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.

"Processing" means any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organising, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

LEGAL GROUNDS OF PERSONAL DATA PROCESSING

The legal ground of this data processing is the legitimate interest, under Article 6(1)(f) of the GDPR.

PURPOSE FOR PERSONAL DATA PROCESSING

The National Bank of Romania processes your personal data for the purpose of releasing information of public interest and sending invites to the events organised/held by the NBR, the legitimate interest of the NBR in this processing being the fulfilment of the objective of communication with the public, namely to provide the general public, the domestic and international business environment, the public administration institutions and the academic community, a clear picture of the policies and measures adopted by the NBR in order to perform its tasks and activities. (Article 56(3) of Law 312/2004).

At the same time, mention should be made that, in addition to the above-mentioned purpose, the National Bank of Romania processes personal data for one or several secondary purposes (i. e. archiving purposes in the public interest, scientific or historical research purposes or for statistical purposes, establishing, exercising or defending a right in court, carrying out the audit activity, etc.), which are always compatible with the main purpose for which the data were collected/obtained. The processing of personal data for secondary purposes is carried out in compliance with the applicable law.

CATEGORIES OF PERSONAL DATA PROCESSED AND THEIR SOURCE

Data collected directly from the data subject

The categories of personal data collected by the NBR for this process are submitted directly by you, as follows: name and surname, job title, institution you work for, e-mail address, telephone number.

Data collected indirectly from the data subject

When the request for public information, or for your participation in the events organised/hosted by the NBR is sent by the credit institution or the employee association you work for, the NBR processes, for this purpose your personal data, as follows: name and surname, job title, institution, e-mail address, phone number.

PERSONAL DATA STORAGE PERIOD

Your personal data are stored for the period necessary to achieve the above-mentioned purposes, as required by the applicable legislation and by the rules and regulations on archives, respectively.

PERSONAL DATA TRANSFER

We do not transfer your personal data to non-EU countries, unless expressly laid down by law or when necessary for the purpose of data collection. In case any changes occur, you will be duly informed.

ACCESS TO PERSONAL DATA AND RECIPIENTS OF THESE DATA

Personal data are accessed only by the NBR staff involved in this activity.

These data may be disclosed to persons outside the NBR when necessary for the purpose of processing and/or when required by law.

CONSEQUENCES OF THE FAILURE TO PROVIDE REQUESTED PERSONAL DATA

Any refusal to provide the requested personal data makes it impossible for the National Bank of Romania to take the legal steps to send you public information, to send you invitations to the events organised/hosted by the NBR.

SECURING PERSONAL DATA

In processing personal data, the National Bank of Romania uses technical and organisational measures in order to ensure appropriate security of the personal data, including protection against accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to personal data.

YOUR RIGHTS

Insofar as the conditions stipulated by the applicable legislation are fulfilled, the persons whose personal data are processed have the following rights:

Right of access (Article 15 of the GDPR)

You have the right to obtain from the National Bank of Romania confirmation as to whether or not your personal data are being processed, and the right of access to those personal data.

Right to rectification (Article 16 of the GDPR)

You have the right to obtain from the National Bank of Romania the rectification of inaccurate personal data concerning you. Taking into account the purposes of the processing, you have the right to have incomplete personal data completed.

Right to erasure ("right to be forgotten") (Article 17 of the GDPR)

Where (1) personal data are no longer necessary in relation to the purposes for which they were collected, (2) you withdraw consent on which the processing is based and there is no other legal ground for the processing, (3) you object to the processing and there are no overriding legitimate grounds for the processing or (4) the personal data have been unlawfully processed, you have the right to obtain the erasure of personal data concerning you.

Right to restriction of processing (Article 18 of the GDPR)

You have the right to obtain the restriction of personal data processing by the NBR where one of the following applies:

(a) accuracy of the personal data is contested by you, for a period enabling the controller to verify their accuracy;

(b) the processing is unlawful and you oppose the erasure of the personal data, requesting the restriction of their use instead;

(c) the National Bank of Romania no longer needs your personal data for the purposes of the processing, but they are required by you for the establishment, exercise or defence of legal claims;

(d) you have objected to processing pursuant to Article 21(1) of the GDPR, pending the verification whether the legitimate grounds of the National Bank of Romania override yours.

Right to data portability (Article 20 of the GDPR)

You have the right to receive the personal data concerning you, which you have provided to us, in a structured, commonly used and machine-readable format and have the right to transmit those data to another controller without hindrance from the National Bank of Romania, where:

- the processing is based on consent pursuant to point (a) of Article 6(1) or point (a) of Article 9(2) of the GDPR or based on a contract pursuant to point (b) of Article 6(1) of the GDPR; and
- the processing is carried out by automated means.

Right to object (Article 21 of the GDPR)

You have the right, at any time, to object, on grounds relating to your particular situation, to processing of personal data concerning you, unless the processing is necessary for the performance of a task carried out for reasons of public interest or which results from the exercise of official authority vested in the National Bank of Romania and/or for the purposes of the legitimate interests pursued by the National Bank of Romania or by a third party, including profiling.

In case you exercise your right to object, the National Bank of Romania shall no longer process your personal data unless it demonstrates compelling legitimate grounds for the processing which override your interests, rights and freedoms or for the establishment, exercise or defence of legal claims.

The right not to be subject to a decision based solely on automated processing (Article 22 of the GDPR)

You have the right not to be subject to a decision based solely on automated processing, including profiling, which produces legal effects concerning you or similarly significantly affects you, such as your performance at work.

This right does not apply if the decision:

- is necessary for performance of a contract between you and the National Bank of Romania;
- is authorised by Union or Member State law to which the controller is subject and which also lays down suitable measures to safeguard the data subject's rights and freedoms and legitimate interests; or
- is based on your explicit consent.

Where processing is based on consent, you have the right to withdraw your consent at any time via an express request. If you consider that your rights regarding personal data processing have been infringed, you have:

-the right to lodge a complaint with the National Supervisory Authority for Personal Data Processing;

-the right to bring the matter before a competent court.

HOW TO EXERCISE YOUR RIGHTS

In case you have any questions or doubts about the processing of your personal data or you wish to exercise your legal rights regarding the personal data in our possession, you may contact the NBR's data protection officer.

The legal deadline for replying to these requests is 30 days, with the possibility of extension.

UPDATE

This information may be subject to subsequent changes. All updates and changes hereto take effect starting on the date they are made known.

CONTACT DETAILS OF THE DATA PROTECTION OFFICER

The NBR's data protection officer may be contacted at datepersonale@bnro.ro and/or in writing at: *National Bank of Romania, 25, Lipscani St., sector 3, Bucharest, postal code 030031.*