

Extract

Policy on security of personal data processed within OTP Bank S. A.

1. GENERAL PROVISIONS

- (1) The protection of personal data is one of the priorities of OTP Bank S. A. (hereinafter referred to as – "Bank").
- (2) This Policy on security of personal data processed within OTP Bank S. A. (hereinafter referred to as – "Policy") shall regulate the aspects and processes regarding the processing of personal data within the Bank.
- (3) This Policy has been developed in accordance with:
 - a) The Law no. 202 on the activity of banks as of 06.10.2017(hereinafter referred to as – "law 202/2017");
 - b) The Law no. 133 on personal data protection as of 08.06.2011 (hereinafter referred to as – "Law 133/2011");
 - c) Law no.308 on preventing and combating money laundering and terrorist financing as of 22.12.2017 (hereinafter referred to as – "Law 308/2017");
 - d) other applicable legislation; and
 - e) other internal regulatory documents of the Bank tangential to the field.

2. IDENTITY AND CONTACT DETAILS OF THE OPERATOR

- (4) The Bank is registered on 24.05.2001 in the State Register of Legal Entities with the state identification number-tax code (IDNO) 1002600006089;
- (5) The Bank operate under the license Series A MMII no. 000810 issued on 24.06.2021 for an indefinite term by the National Bank of Moldova, legal address: MD-2012, Republic of Moldova, Chisinau municipality, no. 81 / A Stefan cel Mare și Sfant av., email: datepersonale@otpbank.md, phone: 022812414.
- (6) The Bank is registered at the National Center for Personal Data Protection of the Republic of Moldova as a personal data operator under the number 0000008.

3. DEFINITIONS AND ACRONYMS

- (7) This Policy will use the definitions and acronyms defined in Directive no. 1 Rules of organization and internal functioning of the Bank, which will have the same meaning.
- (8) The meanings of the specific definitions and acronyms used in this policy shall be as follows:
- (9) **Definitions:**
 - a) **controller** - the Bank jointly with its structural subdivisions and branches, determines the purposes and means of the processing of personal data, expressly provided for by the legislation in force, targeting the Bank's customers and employees, as well as the representatives of the Bank's contractual/business partners;
 - b) **personal data subject**- an identified or identifiable natural person;
 - c) **processor** - the natural or legal person governed by public or private law, which processes personal data on behalf of the controller, based on the instructions received from the Bank;
 - d) **recipient** - any natural or legal person governed by public or private law, including the public authority and its territorial subdivisions, to which personal data are disclosed, whether or not it is a third party. The bodies in the field of National Defence, State Security and Public Order, Criminal Investigation Bodies and Courts to which personal data are communicated within the exercise of the powers established by law are not considered recipients;
 - e) **third party** - the natural or legal person governed by public or private law, other than the data subject, the Bank or the processor and the person who, under the direct authority of the Bank or the processor are authorized to process personal data;
 - f) **personal data** - any information relating to the data subject. An identifiable person is a person who can be identified, directly or indirectly, by reference to an identification number or to one or more elements specific to his/her physical, physiological, mental, economic, cultural or social identity;
 - g) **processing of personal data** - any operation or set of operations which is performed on personal data by automated or non-automated means, such as collection, recording, organization, storage, retention, restoration, adaptation or alteration, retrieval, consultation, use, disclosure by

transmission, dissemination or otherwise making available, alignment or combining, restriction, erasure or destruction;

- h) **consent** - manifestation of free, specific, informed and unambiguous wishes of the data subject by which he/she accepts, by an unequivocal statement or action, that personal data relating to him/her be processed;
- i) **data depersonalization** - modifying personal data so that details of personal or material circumstances no longer allow attribution to an identified or identifiable natural person, or allow attribution only under the conditions of an investigation that requires disproportionate expenditure of time, means and manpower.

(10) **Acronyms:**

- a) **NCPDP** - National Center for Personal Data Protection of the Republic Of Moldova;
- b) **OPCML** - Office for Prevention and Combating of Money Laundering;
- c) **COMP** - Compliance Department of the Bank;
- d) **RM** - Republic of Moldova;
- e) **INA** - Internal normative documents;
- f) **ISB** - Information System of the Bank;
- g) **AML** - Provisions of normative acts in the field of preventing and combating money laundering and terrorist financing;
- h) **BB** - Bank Board;
- i) **EXCOM** - Executive Committee of the Bank.

4. PROCESSING OF PERSONAL DATA

- (11) The processing of personal data shall be carried out on the basis and in accordance with the provisions of international and national normative acts.
- (12) The bank shall process personal data only for specified, explicit and notified purposes according to the legislation in force, without seeking to obtain personal data for purposes other than legal ones.
- (13) In order to provide qualitative financial and banking services and to comply with the legal provisions, especially in the field of AML, the bank shall have the right to consult public/private databases and other reliable and independent sources to which it has access under the information services contracts concluded with I. P. "Public Services Agency", I. P. "E-Government Agency" and other public and private authorities (state registers, credit history offices, information resources, etc.), within the limits of the legislation in force.
- (14) Personal data may be processed in order to prepare offers, purchase orders/purchases/provision of services and works or to fulfil other requirements for the conclusion of a contract, at the initiation stage of relations and before its conclusion with the employee, customer, partner, funded person / organization, etc.
- (15) The refusal of the personal data subject to provide the bank with personal data, necessary for the performance of the proposed/requested activity, may lead to the impossibility of applying precautionary measures related to AML, providing banking services and/or fulfilling a legal obligation related to the purposes of data processing by the Bank.

4.1 Legal framework for the processing of personal data

- (16) In the process of processing personal data, the Bank shall be guided by the provisions and principles of international normative acts:
 - a) Universal Declaration of Human Rights as of 10.12.1948;
 - b) Convention for the protection of human rights and fundamental freedoms as of 04.11.1950;
 - c) Convention for the protection of persons on the automated processing of personal data as of 28.01.1981;
 - d) Regulation of the European Union 2016/679 of the European Parliament and of the Council as 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;and national normative acts:
 - a) Constitution of the Republic of Moldova as of July 29, 1994;
 - b) Code of Criminal Procedure of the Republic of Moldova no. 122-XV as of 14.03.2003;
 - c) Code of Civil Procedure of the Republic of Moldova no. 225-XV as of 30.05.2003;
 - d) Labour Code of the Republic of Moldova no. 154-XV as of 28.03.2003;
 - e) Law no. 202/2017
 - f) Law no.133/2011;
 - g) Law no.308/2017;

- h) Regulation on the requirements on preventing and combating money laundering and terrorist financing in banks activity, approved by the Decision of the Executive Board of the National Bank of Moldova no.200 as of 09.08.2018;
- i) Law on access to information no. 982-XIV as of 11.05.2000;
- j) other applicable normative acts involving the processing of personal data.

4.2 Legality relating to processing of personal data

- (17) Personal data, processed within the Bank, shall be treated in accordance with the provisions of the INA, the legislation in force and the international treaties to which the Republic of Moldova is a party, which regulate the protection of personal data.
- (18) The processing of personal data by the Bank is lawful only if and to the extent that at least one of the following conditions shall be met:
 - a) execution of a contract to which the subject of personal data is a party or for taking measures before the conclusion of the contract;
 - b) fulfilment of a legal obligation incumbent on the Bank under the law;
 - c) realization of a legitimate interest of the Bank or of the third party to whom the personal data are disclosed;
 - d) Data Exchange under the current legislation on data exchange and interoperability;
 - e) there is consent of the subject of personal data;
 - f) for statistical and analytical purposes;
 - g) other grounds provided for by the normative acts in force.

4.3 Principles relating to processing of personal data

- (19) The processing of personal data shall be carried out by the bank according to the principles:
 - a) **legality, fairness and transparency** - personal data are processed in a legal, fair and transparent manner towards the subject of personal data, including in good faith and in accordance with the provisions of the normative acts in force;
 - b) **purpose limitation** - personal data are collected for specified, explicit and legitimate purposes and are not further processed in a way incompatible with these purposes;
 - c) **data minimization** - personal data are adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed;
 - d) **accuracy** - the personal data are accurate and, where necessary, up-to-date and ensure that personal data which are inaccurate, in view of the purposes for which they are processed, are deleted or rectified without delay;
 - e) **limitation of storage** - personal data must be stored in a form that allows the identification of the subject of personal data for a period not exceeding the time necessary to achieve the purposes for which they are collected and subsequently processed. The storage of personal data for a longer period, for statistical, historical or scientific research purposes, will be done in compliance with the guarantees regarding the processing of personal data;
 - f) **principle of integrity and confidentiality** - personal data are processed in a way that ensures adequate security of personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, by taking appropriate technical or organisational measures.
- (20) Each employee of the Bank, processor, recipient and third party is responsible, in part, that in the process of processing personal data to be guided by the nominated principles.

4.4 Purposes of processing of personal data

- (21) The bank shall process personal data for the following purposes:
 - a) conclusion, conduct and termination of employment relations with employees, including internships;
 - b) participation in trainings, webinars organized by the Bank and / or other entities/persons contracted by the Bank in this regard;
 - c) Data Exchange under the current legislation on data exchange and interoperability (MConnect interoperability platform);
 - d) application of AML precautionary measures, actions on fraud prevention, with the realization of customer knowledge procedures (KYC), risk analysis, respectively of reporting suspicious transactions;
 - e) conclusion of execution and termination of contractual relations with customers in order to provide the Bank with services and products specific to the Bank's activity;
 - f) offering products / services provided by the Bank, including online, to bank customers and other individuals who occasionally benefit from the services provided;

- g) initiating business relations through electronic identification means in order to provide financial and banking services and products by the Bank;
- h) conclusion, conduct and termination of contractual relations with the Bank for the purpose of the acquisition by the Bank of goods, services and works, including ;
- i) reporting to competent public authorities, private law entities, as well as international authorities (according to international treaties to which the Republic of Moldova is a party) and accessing personal data from databases managed by these institutions;
- j) fulfilment of an obligation incumbent on the bank according to the legislation, including related to the provision of information containing including personal data at the request of the public authorities empowered with this right, private law entities, natural persons, their representatives, as well as other applicants who through the legal provisions have the right to request the bank to provide information (personal data);
- k) providing information / responses and examining requests / complaints / complaints of any nature addressed to the bank by persons(natural/legal) and / or legal representatives, through any channel, including through online chats;
- l) recovery of receivables, forced execution of amounts due to the Bank, administration of garnishments and sequestrations;
- m) monitoring and verification of transactions in order to ensure the security of transactions but also investigation of incidents / frauds, fraud attempts;
- n) monitoring, security and safety of persons, premises, goods, through video cameras located in the bank's offices;
- o) issuance of insurance contract documents and determination of the amount of the payment obligation in case of occurrence of insured risks, if the contracted banking product involves the conclusion of an insurance (life / property);
- p) recording communications via digital/analog channels (e.g. online/mobile banking, e-mail, fax, etc.), means of electronic identification (digital onboarding) and telephone calls and conversations made in order to streamline and improve the services provided to the client, to conclude and execute in optimal conditions the contracts with clients, respectively to carry out online transactions;
- q) conducting direct marketing, marketing and advertising studies through the use of means of communication (e-mail, sms), as well as through automated systems of remote banking service by sending newsletters/other commercial communications, regarding the bank's products, services and activities, current or future, to promote the products / services provided by the Bank, having as legal basis the consent of the subject of personal data, as well as other communications in the legitimate interest of the Bank;
- r) contests and promotional campaigns in order to promote the bank's products, services and image, using information resources such as www.otpbank.md Facebook Instagram, LinkedIn, other social networks;
- s) verification of customer satisfaction and quality of services and products purchased, based on the legitimate interest of the permanent improvement of the Bank's services and products;
- t) for statistical and analytical purposes;
- u) other purposes related to the activity of the Bank in compliance with the applicable legal framework.

4.5 How to process personal data

- (22) The bank shall process personal data in a manual, automated and mixed manner.
- (23) Personal data shall be collected directly from the subjects of personal data.
- (24) Personal data shall be obtained by the bank indirectly from natural/legal persons, within the limits of the legislation in force.
- (25) The bank shall process personal data made public by the subjects of personal data, within the limits of the legislation in force.
- (26) Personal data shall be obtained by consulting public/private databases/information resources (Electronic Services Portal, state registers or other information resources of the Public Services Agency, credit history bureaus, etc.) and other reliable and independent sources to which the bank has access, as well as the data that are subsequently generated based on them.
- (27) The bank shall process personal data in the context of Data Exchange under the current legislation on data exchange and interoperability (MConnect interoperability platform).

4.6 Categories of personal data processed

- (28) Depending on the purpose of the processing of personal data and / or the performance of the contractual relationship with the bank (employee, client, partner, person / funded organization), but

also given the specifics of the activities carried out by the Bank, the following categories of personal data may be processed:

- a) **data assigned by the public authority:** personal identification number (IDNP), serial number and ID number;
 - b) **general identification data:** name, surname, patronymic and pseudonym(if applicable), date and place of birth, citizenship;
 - c) **contact details:** domicile and residence(where applicable), telephone number, e-mail address, including social media accounts in support services, as well as in organizing contests and promotional campaigns, etc.;
 - d) **professional data:** profession, trades, occupation, name of employer or nature of own activity, public office held, in cases provided by law;
 - e) **family status:** (children, spouse, dependents) and relatives of the first and second degree (according to the regulations of the National Bank of Moldova for establishing the affiliation and / or group of related persons);
 - f) **political affiliation:** information related to the status of Politically Exposed Person (PEP), in specific cases, which are processed only in cases provided for by the legislation on AML, according to the recommendations of the OPCML;
 - g) **financial statement data:** salary, income, financial means, virtual assets, funds, income, any category of tangible or intangible values (assets), movable or immovable, tangible or intangible, banking transactions and their history, property owned;
 - h) **bank details:** identification codes, IBAN codes attached to bank accounts, payment card numbers, card expiration date, and other bank card identification data;
 - i) **image:** photo (from the identity document) and video (recorded by electronic identification means(digital onboarding) and video surveillance cameras installed in the Bank's premises);
 - j) **voice:** recorded during telephone conversations with Bank representatives(e.g. Call Center services (in order to support, streamline and improve the services provided to the client), conclusion and execution in optimal conditions of contracts with clients, carrying out online transactions, card support, as well as other subunits engaged in discussions with Bank customers);
 - k) **electronic signature, handwritten signature:** used to initiate (including digital onboarding), conduct and terminate business relationships between the Bank and customers;
 - l) **health data** (*in cases expressly provided by law*);
 - m) **technical data** (*collected at digital onboarding, use of services provided online or when visiting the Bank's website*): IP address, browser type and version, operating system and platform, device type and brand of mobile device, unique access password (Mobias Token) and other information included in cookie files;
 - n) **data needed to prevent fraud:** public information on international sanctions(World Check), charges and convictions related to crimes such as fraud, money laundering and financing of acts of terrorism, etc.;
 - o) **other data** (*necessary to satisfy the purposes and legal obligations related to the Bank's activity*).
- (29) As a rule, the processing of special categories of personal data is prohibited, and the bank avoids processing the data (racial or ethnic origin, political, religious beliefs, health status or intimate life, as well as criminal convictions), except in cases where:
- a) the subject of personal data has given his consent;
 - b) processing is necessary for the purpose of fulfilling obligations and exercising specific rights of the Bank, insofar as this is authorized by the legislation in force;
 - c) the processing is necessary for the protection of the life, physical integrity or health of the personal data subject or of another person;
 - d) processing refers to personal data that is made public;
 - e) processing is necessary for the establishment or exercise of a right in court;
 - f) processing is necessary to provide facilities to the Bank's customers / employees;
 - g) the processing is necessary for the purpose of ensuring state security, reducing the risk of triggering or in case of triggering public health emergencies.

4.7 Term of processing of personal data

- (30) The bank processes personal data within the period established by the legislation, so as to allow the identification of the subjects of personal data for a period that will not exceed the period necessary to achieve the purposes for initiating, carrying out and terminating business relations with customers, contractual relations with employees, partners, funded persons/organizations, etc.
- (31) According to the provisions of the AML legislation, including the recommendations and requests of the OPCML, the Bank shall be obliged:

- a) keep all data related to national and international transactions for a period of 5 years from the termination of the business relationship or from the date of making an occasional transaction. The data retained must be sufficient to allow each transaction to be reconstituted in such a way as to serve, if necessary, as evidence in criminal, contravention and other legal proceedings;
 - b) keep all documents and information necessary for compliance with customer and beneficial ownership precautions, including, where available, information obtained by means of electronic identification, relevant trust services or any other secure, remote or electronic identification process regulated, recognised, approved or accepted by the national authorities empowered by law, and copies of identification documents, archives of accounts and primary documents, business correspondence, results of analyses and research carried out, for a period of 5 years from the termination of the business relationship or from the date of an occasional transaction;
 - c) extend the storage period of the data/documents/information concerned supra, for a period not exceeding 5 additional years.
- (32) The processing (storage) of personal data for a longer period, for statistical and analytical purposes (as the case may be, by depersonalization of data), will be done in compliance with the legislation in force and guarantees regarding the processing of personal data, provided by the rules governing these areas and only for the period necessary to achieve these purposes.
- (33) Upon the expiration of the processing period, personal data are destroyed/deleted depending on the medium on which they were stored, with the maintenance of records about this fact, in accordance with the INA. In the case of the obligations expressly provided by law, these data may remain for storage as an archival document, in accordance with the norms of the National Agency of Archives.

5. DATA SUBJECT

5.1 Categories of data subjects

- (34) The bank processes personal data of the following subjects as follows:
- a) customers (individuals) of the Bank, who benefit from the financial and banking services provided by the Bank;
 - b) potential customers (individuals) of the Bank, who intend to initiate a business relationship with the Bank;
 - c) individuals who occasionally benefit from financial and banking services provided by the Bank;
 - d) bank employees;
 - e) people who apply for a job in the Bank, spend an internship in the bank or participate in training sessions;
 - f) shareholders (natural persons) and / or representatives of shareholders (legal persons) of the Bank;
 - g) natural persons acting on behalf of the legal person: administrators or persons empowered to manage the account and / or founders, associates, beneficial owners, including individual entrepreneurs, members / founders of peasant households, persons mentioned in the specimen sheet for signatures;
 - h) visitors to the bank's premises, in which video surveillance cameras are installed, without the purpose of identifying the person;
 - i) visitors to the Official Web pages of the Bank, including the official pages of the bank on social networks, automated systems of informational remote banking service ,etc.;
 - j) users of technical solutions (means of electronic identification) related to digital on boarding.
- (35) Informing the data subject, about the purpose and conditions of processing personal data, is ensured by presenting to him the necessary notifications in forms (requests/contracts/questionnaires/statements/blanks, etc.) at the initiation, conduct and termination of business relations with the Bank, including through electronic identification means, the Bank's web page and automated remote service systems, as well as through other communication routes established within the Bank and accepted by the subject of personal data.

5.2 Rights of data subjects

- (36) The data subjects, which are processed by the Bank under the legislation in force, shall have (with the exceptions and restrictions provided by the legislation) the following rights:
- a) **right to information** - informing the personal data subject about his personal data processed within the Bank, the identity of the Bank, the processor(as the case may be), the purpose of processing the collected data, the recipients or categories of recipients of personal data, the existence of access, intervention and opposition rights, as well as the conditions under which they can be exercised;

- b) **right of access** - obtaining from the Bank, at request, without delay and free of charge, the confirmation that the personal data concerning it are processed or not by the Bank, information on the purposes and categories of data processed, the recipients or categories of recipients to whom the data are disclosed, available information on the origin of such data, how the automated processing of data is carried out, the legal consequences generated by data processing for the subject of this data and the way to exercise the right to intervene on personal data;;
 - c) **right of intervention** - obtaining from the Bank, the authorized person and the third party (as the case may be), upon request and free of charge, rectification, updating, blocking or deletion of data whose processing contravenes Law 133/2011, especially due to the incomplete or inaccurate nature of the data, notifying third parties to whom the personal data have been disclosed about the operations performed, with the exceptions provided by Law 133/2011;
 - d) **right of opposition** - the right of the subject to object at any time, for good and legitimate reasons related to his particular situation, to the data concerning him being processed for commercial prospecting and / or subject to processing, unless the law establishes otherwise;
 - e) **the right not to be subject to an individual decision** - consists in the possibility of requesting the annulment, in whole or in part, of any individual decision which produces legal effects on his rights and freedoms, being based solely on the automated processing of personal data intended to assess some aspects of his personality;
 - f) **right of defence** - the personal data subject who considers that the processing of his/her data does not comply with the requirements of law 133/2011, can submit to the NCPDP a complaint within 30 days from the moment of detection of the violation;
 - g) **access to justice** - the right to apply to the court for compensation of material and moral damages suffered as a result of a processing of personal data carried out illegally or in violation of the rights and interests of the personal data subject, guaranteed by law 133/2011;
 - h) **withdrawal of consent** - the right to withdraw at any time the previously expressed consent to the processing of personal data, without affecting the legality of the processing carried out before its withdrawal (if the processing was based on legal consent);
 - i) **other rights**, provided for in the legislation of the Republic of Moldova, as well as in the applicable international regulations.
- (37) The personal data subject is aware that the processing of personal data concerning him/her is carried out legitimately and determined purposes.
- (38) The exercise of rights by the personal data subject must be carried out in good faith, conscientiously and without abuse.
- (39) Where requests from a personal data subject are manifestly unfounded or excessive, in particular because of their repetitive nature, the bank may charge a reasonable fee taking into account the administrative costs for providing the information or communication or for taking the measures requested by the personal data subject and/or refuse to comply with the requests.
- (40) The refusal of the personal data subject to provide his/her personal data and / or the request not to process certain categories of personal data, generates the impossibility of providing financial and banking services by the bank, being equated with a statement of unilaterally resolution of the contracts concluded with the Bank and termination of business relations.
- (41) In case of termination of business relations, not seeking the possible requests of the personal data subject not to process certain categories of personal data, the Bank in compliance with the legal provisions, the bank will keep the personal data for a period provided by the legislation in force and/or recommendations/requests of the competent authorities.

6. TRANSFER OF PERSONAL DATA

- (42) According to the legislation on access to information, personal data belongs to the category of information with limited accessibility, and their access and transmission is to be carried out in accordance with the legislation.

6.1 Personal data recipients

- (43) The transfer of personal data to third parties is documented and subjected to a rigorous analysis in advance regarding the purpose and legal basis of the intentions to disclose a certain volume of personal data.
- (44) The bank may transmit personal data to the following recipients:
- a) personal data subject or his/her representative;
 - b) third parties and persons empowered by the Bank;
 - c) the contractual/business partners of the Bank, in the volume and limits of the needs generated by the business relations initiated and the achievement of the purposes for which the data are processed;

- d) OTP Group-OTP Bank Nyrt *majority shareholder of the Bank*) and subsidiaries in different states;
 - e) other natural and legal persons, international authorities in accordance with applicable law and international regulations.
- (45) The bodies in the field of National Defence, State Security and Public Order, Criminal Investigation Bodies and Courts to which personal data are communicated within the exercise of the powers established by law are not considered recipients;
- (46) The processing of such data by the data subject authorities Supra, complies with the applicable data protection rules, in accordance with the purposes of the processing.

6.2 Disclosure of personal data

- (47) Information containing personal data is treated within the Bank as confidential information. This information will not be transmitted to third parties, except in cases where the Bank is legally obliged to provide such information to public authorities, supervisory and tax authorities, criminal investigation bodies and courts or other bodies authorized by law in accordance with the provisions of the legislative acts in force and/or international authorities in the field (according to the international treaties to which the Republic of Moldova is a party).
- (48) Personal data may be disclosed between the Bank, the authorized persons and third parties, including the OTP or Bank Group, the authorized persons and third parties to natural/legal persons, institutions, public authorities and bodies, entities governed by public or private law in accordance with the legislation in force and international authorities in accordance with the applicable international regulations.
- (49) The bank proceeds to the disclosure of personal data only in cases expressly provided for by applicable legislation and/or international regulations, warning the recipients and the authorities receiving this personal data about the need to respect confidentiality and the prohibition to process personal data for purposes other than those specified in the request for the provision of data.
- (50) In the process of cooperation with the suppliers and business partners of the Bank, guarantees regarding the security of the personal data transmitted (contractual clauses, confidentiality agreement, profile certifications, etc.) are requested (if case).

6.3 Cross-border transmission of personal data

- (51) The bank or processor may transfer personal data to another state or international organisation only if the bank or processor has provided adequate safeguards and provided that there are enforceable rights and effective remedies for the personal data subject.
- (52) The cross-border transmission of personal data shall be made on the basis of legal provisions or international agreements, to which the Republic of Moldova is a party. The data may be disclosed to the relevant international authorities within the limits of the legislation in force.
- (53) The bank may carry out cross-border transmission of personal data to other companies or organizations in the same group (OTP Group) with the Bank.
- (54) Cross-border transmission of personal data is permitted and carried out, taking into account the principle of free movement of data:
- a) the member states of the European Economic Area;
 - b) states that ensure an adequate level of protection of personal data.
- (55) The bank may carry out the transmission of personal data to states that do not ensure an adequate level of protection of personal data only in cases expressly provided for by the legislation.

7. DATA PROTECTION OFFICER

- (56) In order to comply with the legislative provisions in the field of personal data protection, the Bank appointed a data protection officer.

8. SECURITY OF PERSONAL DATA

8.1 General aspects regarding the security of personal data

In accordance with the regulations in the field of personal data protection, taking into account the current state of development, the costs of implementation and the nature, scope, context and purposes of the processing, as well as the risk of varying degrees of probability and severity for the rights and freedoms of natural persons. The Bank and the processor implement appropriate technical and organizational measures to ensure an adequate level of protection of personal data.