

INFORMATION NOTICE AND CONSENT DECLARATION REGARDING THE PROCESSING OF PERSONAL DATA, INCLUDING BIOMETRIC DATA AND DATA OBTAINED FROM THE NFC CHIP OF THE IDENTITY DOCUMENT, WITHIN THE ELECTRONIC CUSTOMER IDENTIFICATION PROCESS

*This Information Notice and Consent Declaration (hereinafter the “Notice”) is addressed to you as a customer and data subject and is intended to inform you, clearly and transparently, of how **Non-Bank Credit Organization “IUTECREDIT” S.R.L.** processes your personal data within the process of remote (electronic) customer identification.*

Identifying and verifying your identity constitutes a legal obligation of the operator, as a reporting entity, under Law No. 308/2017 on preventing and combating money laundering and terrorist financing. Carrying this out by electronic means requires the processing of certain personal data, including biometric data, which constitutes a special category of data, as well as data read from the NFC chip of your identity document.

The processing is carried out in compliance with the principles of lawfulness, fairness and transparency, in accordance with the applicable legislation in force on the protection of personal data.

Please read this Notice carefully before expressing your consent. The sections below detail the categories of data collected, the purposes and legal bases for processing, the recipients of the data, the retention period, the security measures applied and the rights you are entitled to.

I. Who processes your data

The controller of personal data is Non-Bank Credit Organization “IUTECREDIT” S.R.L., with its registered office in mun. Chişinău, bd. Ştefan cel Mare şi Sfânt 182, floor 5, MD-2004, IDNO 1008600026223, contact details: 022 800 500. For matters relating to data protection, you may contact us at dpo@iute.md. The technical process of remote identification is carried out using a software solution provided by Europarc S.R.L., which, with respect to your data, acts as a processor on behalf of the controller, under a data processing agreement concluded in accordance with the applicable legislation in force.

II. What data we collect

For the purpose of identifying and verifying your identity remotely, we collect: the data recorded on your identity document, including the data read optically from the machine-readable zone (MRZ); the data stored on the electronic (NFC) chip of the identity document, where this allows for electronic reading, in accordance with the ICAO 9303 standard; the facial image captured in real time (the live “selfie” photograph) and the three-dimensional biometric model generated from it, used exclusively for comparison with the photograph on the identity document and for verifying physical presence; video and photo recordings and screenshots of the identification session; technical data such as the IP address, the electronic fingerprint of the device used and, where applicable, approximate location

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data.

III. Purpose of processing

Your personal data is processed for the following purposes: **(I)** establishing the remote business relationship, as well as identifying and verifying your identity, in accordance with Law No. 308/2017 on preventing and combating money laundering and terrorist financing and with the Regulation on the requirements for the identification and verification of customers' identity by electronic means, approved by Decision of the Executive Committee of the National Bank of Moldova No. 281/2024; and **(II)** fulfilling customer due diligence measures, namely carrying out checks to prevent money laundering and terrorist financing, identifying politically exposed persons and screening against international sanctions, applicable to our business relationship.

IV. Legal basis for processing

The processing of your personal data is carried out on the basis of the legal obligation incumbent upon us under Law No. 308/2017 and the regulatory acts issued for its application. The processing of biometric data, which constitutes a special category of personal data, is additionally carried out on the basis of your explicit consent, given prior to the initiation of the identification session, in accordance with Law No. 133/2011 on the protection of personal data. Consent may be withdrawn at any time in respect of future operations, without affecting the lawfulness of processing carried out prior to withdrawal; however, withdrawal of consent makes it impossible to continue or complete the remote identification process.

V. To whom we disclose your data

The collected data may be accessed, upon request, by the National Bank of Moldova, by the Office for Prevention and Combating of Money Laundering and by law enforcement bodies, under the conditions provided by law. The data is also technically processed by Europarc S.R.L., acting as processor, as well as by its technology sub-processors involved in the physical presence detection and facial recognition component, to the extent strictly necessary for the functioning of the solution and subject to contractual obligations of confidentiality and security.

VI. Data retention

The documents and information obtained in the identification process, including video recordings, photos, screenshots, copies of the identity document, the electronic fingerprint of the device and the IP address, are retained for the active duration of our business relationship and for a period of 5 years after its termination, in accordance with point 46 of Regulation No. 281/2024.

VII. Security measures applied

The data captured on your device is encrypted locally before transmission and is transmitted through secure channels. Verification of physical presence is carried out using technologies certified in accordance with the ISO/IEC 30107 standard on presentation attack detection, while biometric matching follows the ISO/IEC 19795-2 standard. Access to data is restricted and monitored, and upon expiry of the retention period, the data is deleted or destroyed under secure conditions.

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VIII. Your rights

As a data subject, you benefit, under the applicable data protection legislation, from the following rights: **(a)** the right of access to the personal data concerning you; **(b)** the right to rectification of inaccurate data and completion of incomplete data; **(c)** the right to erasure of data (“the right to be forgotten”); **(d)** the right to restriction of processing; **(e)** the right to object to processing, in the cases provided by law; and **(f)** the right not to be subject to a decision based solely on automated processing, including profiling, which would produce legal effects or similarly significantly affect you.

The identification process includes a component of automated processing, namely the biometric matching between the facial image and the photograph on the identity document. To the extent that the result would be based solely on automated processing and would produce legal effects or would similarly significantly affect you, you have the right to obtain human intervention on the part of the controller, to express your point of view and to contest the result. The exercise of the rights to erasure and restriction may be limited by the legal obligation to retain data provided for in Chapter VI, while the withdrawal of consent for the processing of biometric data is carried out under the conditions set out in Chapter IV.

You may exercise your rights through a request addressed to the controller at the contact details indicated in Chapter I, including at dpo@iute.md. We will respond to your request without undue delay and, in any case, within the time limits provided by law, free of charge. You also have the right to lodge a complaint with the National Center for Personal Data Protection of the Republic of Moldova (registered office: MD-2004, Republic of Moldova, mun. Chisinau, str. Serghei Lazo no. 48, email: centru@datepersonale.md; tel: (022) 820 801), as well as to apply to the competent court.

IX. Policy on the prevention of money laundering, terrorist financing and the identification of politically exposed persons

As a reporting entity, we apply customer due diligence measures, including the identification and verification of identity, the identification of politically exposed persons, screening against international sanctions and the ongoing monitoring of the business relationship, in accordance with Law No. 308/2017. Refusal to provide the requested data or reasonable suspicion regarding its accuracy may lead us not to initiate or to terminate the business relationship and, where applicable, to notify the Office for Prevention and Combating of Money Laundering.

X. Consequences of refusing to give consent

Giving consent to the processing of biometric data is voluntary; however, it constitutes a necessary condition for identification through this electronic channel, since remote identity verification cannot be carried out without the processing of biometric data. In the absence of your consent, we will not be able to initiate or complete remote identification and, consequently, will not be able to establish the business relationship through this channel. Refusal to consent does not entail any other negative consequences for you: you may at any time opt for identification through physical presence at our offices, without being disadvantaged. Subsequent withdrawal of consent, under the conditions set out

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in Chapter IV, takes effect for the future and results in the impossibility of continuing remote identification.

XI. Consent declaration

By ticking the corresponding box, prior to the initiation of the identification session, you declare that you have read and understood, in accordance with point 20 of the Regulation approved by Decision of the Executive Committee of the National Bank of Moldova No. 281/2024: (a) the terms of use of the software solution used for identification by electronic means; (b) this Information Notice on the manner of processing and protection of personal data; and (c) the Policy on the prevention of money laundering, terrorist financing and the identification of politically exposed persons, in the summary version set out in Chapter IX.

At the same time, you declare that you understand the categories of data collected, including biometric data and data read from the NFC chip of your identity document, the purposes and legal basis for processing, as well as the rights you are entitled to, and that you give your explicit, free and informed consent to the processing of this data for the purposes described in this Notice.

XII. Technical confirmation of acceptance

Upon completion of the identification session, the software solution automatically generates a digitally signed session report, which records the date, time and exact content of the acceptance expressed by you. The report ensures the integrity and traceability of the consent given, constitutes evidence of it, and is retained by the controller under the conditions provided for in Chapter VI.

